



Delegated Report

Full Planning Application

Planning Application No: 20230584

Location: Parsonage Farm The Barn The Street Cobham

Description: Conversion of barn to provide 2 dwellings consisting of a three bed dwelling and a one bed dwelling.

Applicant: Mr Richard Scripps, Adrian Scripps Ltd

Site Visit Date:

Submitted Documents/Plans

Application Form
Site Location Plan
010 – Existing Plans, Elevations and Sections
P101 Rev A – Proposed Roof and Site Plans
P110 Rev A – Proposed Plans and Elevations
P102 Rev A – Proposed Ground Floor Plans
P103 Rev A – Proposed First Floor Plans
P300 – Proposed Section 1-1 – Details
Cover Letter
Bat Survey Report
3D Visualisations
Planning, Heritage and Design Statement
Environmental Assessment
3D Visualisations
Heritage Statement
Email confirmation of facts

Relevant Planning History

Reference	Description	Decision	Decision Date
20181204	Determination as to whether prior approval is required for the demolition of an existing agricultural building and the erection of a new agricultural building in its place to provide storage for machinery and farm equipment.	Prior Approval Not Required	18.12.2018
20170919	Conversion of the existing barn to provide 1no. three bedroom dwelling and 1no. one bed dwelling.	Permitted	04.05.2018
20170738	Conversion of existing building into a three bedroom dwelling and erection of a single storey rear extension with associated parking and amenity space.	Permitted	02.03.2018
20140557	Conversion of existing barn into one, three bedroomed dwelling and one, one bedroomed dwelling incorporating the erection of a single storey extension on the west elevation and alterations to the existing lean-to on the	Permitted	12.08.2014

	east elevation to provide carport with associated parking and amenity space.		
20130114	Conversion of barn to form two residential dwellings with associated parking, access and amenity space.	Refused	25.04.2013
20090879	Application for renewal of planning permission reference number 20040421 for conversion of barn into one residential unit.	Permitted	11.12.2009
20040421	Conversion of barn into one residential dwelling.	Permitted	24.12.2004

The other planning history is noted but is not relevant to this application.

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

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

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- C11 – Change of use of redundant buildings in the countryside
- C13 – Extensions to dwellings in the countryside
- TC3 – Development affecting conservation areas

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving sustainable development and well-designed places
- Section 13 – Protecting Green Belt Land
- Section 15 – Conserving and enhancing the Natural Environment
- Section 16 – Conserving and enhancing the Historic Environment

Supplementary Planning Guidance

- SPG 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards – nationally described space standard (2015);
- SPG 4 - KCC Parking Standards (2006);
- Householder Extensions/Alterations Design Guide (2021);
- Gravesham Landscape Character Assessment (2009);
- Cobham Rural Conservation Area Appraisal (2017) and

- The Kent Downs AONB Management Plan 2021-2026

Consultations, Publicity and Representations

Consultees

Ward Councillors: No response received.

GBC Conservation Officer: No response received.

Kent Downs AONB Unit: No response received.

GBC Highways Officer

Whilst I have no objections to this proposal, and any traffic generation is liable to be minimal. I would suggest an informative should be added to any approval suggesting that the hedge row to the left of the access on exiting should be set back to improve visibility for vehicles joining the highway. Ideally the hedgerow should align with the hedge to the right of the access.

Suitable provision should be made for cycle storage at the rate of one cycle per bedroom per dwelling.

GBC Environmental Protection

The Phase 1 Environmental (Contamination) Assessment has been reviewed and the findings are acceptable. The risk to both human health and ground waters is low. There is no need for any intrusive sampling on site. It is however recommended that a watching brief is undertaken during the construction in case any contamination not previously discovered is found.

To deal with this and other matters, the following conditions/informatives are recommended:

Watching Brief

The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Drainage/sewerage informative

The foul sewage shall be removed by means of the mains drainage system and not by the use of non-mains sewerage systems, unless connection to the drainage system is not reasonably practicable. If foul sewage is to be removed using non-mains sewerage systems, a sewage treatment plant or septic tank system will be considered in preference to a cesspool. Such a system may require the prior consent of the Environment Agency under the terms of the Water Resources Act 1991. Applicants are therefore advised to discuss their requirements with the Environment Agency at the earliest opportunity. It should be ensured that the septic tank or cesspool is of adequate capacity to serve the proposed development and suitable access and hardstanding area shall be maintained to it on site.

Lighting

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the new properties in order to assist in preventing a nuisance from

occurring (which would be most likely if the bedrooms on neighbouring properties are illuminated).

GBC Waste and Refuse

I have reviewed the attached planning application and have the following comments;

- The bin stores need to be large enough to hold 1x180ltrs, 240ltr recycling bin and a 23ltr food caddy. There is the option to subscribe to a garden waste collection service which includes a 140ltr or 240ltr bin, so space may be required.

Capacity	180ltr Refuse Bin	240ltr Recycling Bin	23ltr Food Caddy
Length	540mm	585mm	380mm
Width	650mm	740mm	290mm
Height	1,060mm	1,100mm	405mm

- The bin stores appear to be in a good location, however the bins which need to be placed in The Street on collection day.

KCC Highways Officer

I note that this application is identical in Highway terms to 20170919, that was considered acceptable by the Local Planning Authority.

Parking spaces for a standard car should measure 2.5m by 5m, there is sufficient room on site to provide this.

An electric vehicle charging point should be provided for each dwelling. The applicant should also be advised that secure, covered cycle storage is required for both dwellings. At least 1 cycle parking space must be provided per bedroom, within the individual curtilage of each dwelling.

I refer to the above planning application and confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:-

- Provision and permanent retention of the vehicle parking spaces and garages shown on the submitted plans prior to the use of the site commencing.
- Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.
- Provision and permanent retention of electrical charging facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.

All Electric Vehicle chargers provided for homeowners in residential developments must be provided to Mode 3 standard (providing a 7kw output) and SMART (enabling Wifi connection). Approved models are shown on the Office for Low Emission Vehicles Homecharge Scheme approved chargepoint model list: <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-approved-chargepoint-model-list>

Informative: It is important to note that planning permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because planning permission has been granted. For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have highway rights over the topsoil.

Works on private land may also affect the public highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process.

Should the development be approved by the Planning Authority, it is the responsibility of the applicant to ensure, before the development is commenced, that all necessary highway approvals and consents have been obtained and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority. The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181

Southern Water

Southern Water requires a formal application for a connection to the public foul sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service:

developerservices.southernwater.co.uk and please read our New Connections Charging Arrangements documents which are available on our website via the following link: southernwater.co.uk/developing-building/connection-charging-arrangements

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

[water.org.uk/sewerage-sector-guidance-approved-documents/](https://www.water.org.uk/sewerage-sector-guidance-approved-documents/)

[ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx](https://www.ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx)

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.

- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

Environment Agency

Thank you for consulting us. Due to the scale, nature and setting of this proposal and the supporting information submitted, we have assessed this proposal as low risk. We therefore do not have any specific comments to add.

Please note that although this proposal is considered as low risk, we would still need to be re-consulted if:

- The proposal is in SPZ1/2 and will include infiltration of surface water other than clean rainwater.
- The proposal is in SPZ1/2 and will include infiltration of surface water that involves deep borehole soakaways.
- During development, contamination not previously identified is found to be present at the site. This will be subject to a remediation strategy.

Advice to applicant

If you would like to receive site specific advice or discuss documents in further details with us, we are able to do so under our charged planning advice. Please contact us on kslplanning@environment-agency.gov.uk for further details.

We would like to refer the applicant/enquirer to our groundwater position statements in 'The Environment Agency's approach to groundwater protection', available from gov.uk. This publication sets out our position for a wide range of activities and developments, including the following:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Ground source heat pumps
- Cemetery developments
- Drainage

Informatives

Contamination

If there is a reason to believe contamination could be an issue, applicants should provide proportionate but sufficient site investigation information (a risk assessment) prepared by a competent person to determine the existence or otherwise of contamination, its nature and extent, the risks it may pose and to whom/what (the 'receptors') so that these risks can be assessed and satisfactorily reduced to an acceptable level. The National Quality Mark Scheme (NQMS) accredits competent persons with regard to assessing and reporting land contamination issues.

Sustainable Surface Water Drainage

Sustainable surface water drainage systems are endorsed and encouraged by the Environment Agency as

the collection and dispersal of clean surface water to ground allows recharge aquifer units. It also can help to prevent localised flooding in heavy rainfall events. Approved Document Part H of the Building Regulations 2000 establishes a hierarchy for surface water disposal. As part of this hierarchy the first option is for the disposal of surface water via SUDS, which encourage infiltration such as soakaways or infiltration trenches. An appraisal of SUD options must be undertaken to ensure feasibility and/or suitability and it must be proven that they can be properly maintained and would not lead to any other environmental problems.

The use of soakaways will always require a site specific investigation and risk assessment to assess suitability. There must be no discharge to land which is impacted by contamination and there must be no direct discharge to groundwater. As a rule of thumb we would accept roof drainage going to soakaway, but other surface drainage may need to go through treatment systems or to foul main, for instance vehicle parking. However discharge into the ground from car parking for less than 20 private cars is normally acceptable, provided there are suitable pollution prevention measures in the system prior to the discharge point and the groundwater is greater than 10 metres below final discharge level. We would not accept any vehicle parking drainage going to ground in an SPZ1.

Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

The detailed design at any site can be negotiated on a site specific basis dependant on environmental setting and drainage design proposals. The following website is helpful in planning drainage design.
<http://www.bgs.ac.uk/products/hydrogeology/infiltrationSuds.html>

Unexpected Contamination

Any unexpected contamination encountered should be reported to the EHO in accordance with Building regulations approved Doc C.

Failing to inform us on any of the above, the development is at risk of contributing to unacceptable levels of water pollution caused by mobilised contaminants. Ensuring the protection of water pollution is in line with paragraph 174 of the National Planning Policy Framework.

Neighbouring properties

5 surrounding properties were consulted as well as a site notice being displayed and an advert on the paper. The overall consultation date expired on 14 July 2023 and no comments were received from members of the public.

Officer's Analysis

Principle of Development

The application site is located in the Green Belt and as such, Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 is relevant. Policy CS02 prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy.

The principle issues in the determination of this application are;

- Is the proposed development appropriate in the Green Belt?
- Effect on the openness of the Green Belt
- Effect on the character and appearance of the area - including landscape character
- Other matters

This proposal is essentially the same as approved under planning reference 20170919, with an updated

Bat Survey. The original permission has since expired. For consistency and where still relevant, this assessment will reflect the previous one. As such, the principle of the development has already been established.

Is the proposed development appropriate in the Green Belt?

Paragraph 149 of the NPPF sets out that the construction of new buildings is inappropriate development in the Green Belt, but lists certain exceptions. One such exception is the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.

Paragraph 150 of the NPPF sets out that the re-use of buildings is not inappropriate in the Green Belt providing the following:

- the buildings are of permanent and substantial construction;
- the re-use preserves the openness of the Green Belt; and
- the re-use does not conflict with the purposes of including land within the Green Belt.

In terms of the purposes of the Green Belt, paragraph 138 of the NPPF sets out the five purposes that the Green Belt serves. Of particular relevance in this case, is that it assists in safeguarding the countryside from encroachment.

Paragraph 79 of the NPPF sets out that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality rural communities. Paragraph 80 of the NPPF also highlights the need to avoid new isolated homes in the countryside unless there are special circumstances, including where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting.

In determining this proposal account will be taken of Saved Policy C11 of the Gravesham Local Plan First Review (November 1994) which relates to the conversion of farm buildings to other uses. It sets out a number of criteria that should be met when considering proposals for such development. As this policy pre-dates the NPPF, the weight attached to it must be considered carefully; with greater weight being given where the approach is consistent with the NPPF.

Policy C11(i) requires that the building should have originally been erected for an agricultural building but is no longer needed for farming and Policy C11(iv) requires the proposed use to diversify the rural economy. However, paragraph 150 of the NPPF makes no reference to the nature of the original building or to its past or proposed functions. Paragraph 80 of the NPPF advises that new isolated homes in the countryside should be avoided unless there are special circumstances, one of which, is where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting. Paragraph 84 of the NPPF sets out that to promote a strong rural economy, development and diversification of agricultural businesses should be enabled. Consequently, some weight should be given to criteria C11(i) and C11(iv).

The submitted details set out with the original application (and confirmed as up to date) detail that the building, which is the subject of this application, is not in use and the previous case officer's photographs illustrate that it is in a relatively poor state of repair and not particularly suitable for modern agricultural purposes. The below image taken in 2022 from Street view software shows the recent stated of the building.



The applicant has confirmed that any agricultural items stored in the building (as shown on the case officer's photographs) would be moved to their Tonbridge site or to another building at the wider Parsonage Farm site. It is noted that the appropriateness of the principle of converting the building to residential use was accepted back in 2004 (when the first such planning permission was granted) and again in 2017 (the most recent application). The applicant has set out that the current farming operations are run entirely from the two concrete buildings and yard (located to the southwest of the application site), which provide adequate accommodation for machinery, maintenance and staff facilities. Therefore, it is considered that the conversion of the building would not be likely to undermine the existing farming operation at Parsonage Farm and would not lead to a requirement for future built development in the surrounding area (i.e. to accommodate alternative agricultural storage).

Policy C11(ii) requires the building to be a substantial one of permanent construction and in an appropriate location in relation to roads and services. The first part of this criterion is entirely in line with paragraph 150 of the NPPF and the second part of this criterion is in line with the overarching objectives set out in paragraph 8 of the NPPF and therefore it should be given significant weight.

Policy C11(iii) requires the building to be 'attractive, in having some architectural, historic or landscape interest or being of a type representative of the Kent Countryside and for the proposed alterations to preserve that interest'. However, paragraphs 80 and 150 of the NPPF do not require any particular historic interest or design quality for rural buildings to be established before they can be considered suitable for re-use. Therefore, it is considered that this criterion is out of date and should only be given limited weight.

The application building is a substantial, timber structure which formed part of the original farmstead at Parsonage Farm. It has historical and architectural merit as a traditional barn. The applicant has set out that it is in a poor state of repair and the previous case officer's photographs evidence this, alongside recent external imagery. The proposed development would involve internal alterations, new windows and doors and the addition of a small side extension and as such, it is not considered that major repair or construction works would be required to facilitate the conversion.

The application site is located on the outskirts of the village of Cobham, some 340 metres from the main built-up area. Cobham has a number of services including a primary school, village hall, shop and place of worship. There are a number of residential properties in the area immediately surrounding the application site. Therefore it is considered that the application site is not located in an isolated location, but due to the distance from the village, any future residents would be reliant upon the private car as their principal means of transport. The proposed development would result in the re-use of an attractive, historical building and ensure that the area surrounding it is maintained into the future.

Policy C11(v) requires the curtilage to be confined to the minimum necessary to operate the use. However paragraphs 80 and 150 of the NPPF do not set out any specific restriction on the extent of external uses where the re-use of a building is proposed. Although paragraph 150 does require that proposals for re-using buildings should preserve the openness of, and not conflict with the purposes of including land in, the Green Belt. Clearly the extent of external uses such as car parking, garden land, hard and soft landscaping would have an impact on openness and could undermine Green Belt purposes. As such, it is considered that this criterion can be given some weight.

The proposed development would provide a garden area, which is of an appropriate size and part of the proposed car parking would be inside an existing garage/car port. New post and rail fences would be provided, which would be agricultural in character and allow views across the site and the south western boundary would be marked by a native hedgerow, which would soften the appearance of the building. The proposed external car parking would be provided in an extended area that is already used for the parking of vehicles (in connection with the farm operation) and as such, the extent of hard standing would only be slightly increased. Therefore, it is considered that the proposed external uses would be appropriate in size and location and would not have any significant adverse impacts on the openness or purposes of the Green Belt.

Policy C11(vi) requires the nature and intensity of the proposed use to not be detrimental to amenity or traffic safety. Whilst there is no requirement in paragraph 150 of the NPPF to consider these issues, this approach is in line with the core overarching objectives set out in paragraph 8 of the NPPF; whereby development should seek to ensure a good standard of amenity for existing and future occupiers. Therefore, it is considered that this criterion should be given some weight. The amenity and highways impact of the proposed development will be considered in detail, later in this report, but in principle, they would be acceptable.

As the proposed development would involve the erection of an extension to the application building, it is necessary to consider paragraph 149 of the NPPF. This sets out that the extension or alteration of a building can be appropriate development in the Green Belt, provided that it does not result in disproportionate additions over and above the size of the original building.

In determining this proposal account will be taken of Saved Policy C13 of the Gravesham Local Plan First Review (November 1994) which relates to extensions to dwellings in the countryside. It sets out a number of criteria that should be met when considering proposals for domestic extensions. Whilst it is acknowledged that the application building is not currently a dwelling, it is considered that the policy provides a useful guide in assessing 'disproportionateness'. As the policy pre-dates the NPPF, the weight attached to the policy must be considered carefully; with greater weight being given where the approach is consistent with paragraph 149 the NPPF.

In particular Policy C13 places an overall limit on extensions of one third of the gross floor area of the original dwelling unless the increased floor space has no overall effect on the existing bulk and appearance of the dwelling (criteria (ii)). It also requires the massing, scale and form of any extension to be appropriate to the existing dwelling and the Green Belt setting (criteria (vi)). It is considered that these factors are relevant in determining whether the size of an extension is proportionate and as such, these aspects of the policy are broadly in line with the NPPF and should be afforded weight.

The original property at the application site is a timber barn, which has a simple rectangular footprint and has a floor area of some 197 square metres. The roof is pitched with barn hipped ends. The proposed extension would be single storey, with a lean-to roof and have a floor area of some 39 metres. The proposed extension would result in an increase in floor area of some 20% above the original building and would add some bulk and mass to the side. However due to the relatively small, subservient nature of the new built form, it is considered that the proposed development would not result in disproportionate additions to the original building.

Overall it is considered that the proposed development would be in line with paragraphs 149 and 150 of the NPPF, Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policies C11

and C13 of the Gravesham Local Plan First Review November 1994 and as such, it would be appropriate development in the Green Belt.

Effect on the openness of the Green Belt

Paragraph 137 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and permanence.

The proposed development would, for the most part be the re-use of an existing building, which as the building already exists, would have no adverse impact on the openness of the Green Belt. However, as the proposal includes the erection of an extension to the existing building and various external uses (including gardens, parking areas and fencing), new built development would occur. By its very nature as an additional form of built development, the proposal would erode the openness of the Green Belt. However, it is noted that the proposed extension would not be widely visible from public vantage points and it would be subservient to the size of the main building. The proposed external uses would be contained within a relatively small garden area to the rear of the building and screened by planting. The area at the front of the building is already hard surfaced and used for parking and there would only be a small increase in the extent of the hard surfacing to provide the required parking.

Therefore overall, it is considered that the proposed development would have no significant adverse impacts on the openness of the Green Belt.

Effect on the character and appearance of the area

The application site is located in the Kent Downs Area of Outstanding Natural Beauty (AONB) and the Ashenbank and Cobham Parkland Landscape Character Area and as such, Policy CS12 of the Local Plan Core Strategy is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the greatest weight will be given to the conservation and enhancement of the Kent Downs AONB and its setting. It also states that the Kent Downs Area of Outstanding Natural Beauty Management Plan and the Gravesham Landscape Character Assessment will be taken into account in determining applications.

In relation to the Kent Downs Area of Outstanding Natural Beauty Management Plan, this document sets out a number of policies which foster the primary purpose of the AONB designation, which is to conserve and enhance the natural beauty of the Kent Downs AONB. Policy SD3 states that development and changes to land use and land management cumulatively conserve and enhance the character and qualities of the Kent Downs AONB rather than detract from it. For farmed landscape, such as the application site, Policy FL5 is most relevant and requires farm diversification activities to be supported if they help achieve the vision, aims and principles of the Kent Downs AONB Management Plan.

In relation to the Ashenbank and Cobham Parkland Landscape Character Area, this document states that the overall condition of the landscape is good and that it has moderate sensitivity. It recommends that the key landscape elements (i.e. parkland and wooded character and historic buildings) should be conserved and reinforced.

The application site is located within an operating farm and would result in the loss of a former agricultural building. The surrounding area is rural in character, with a number of dwellings in sizable plots, located to the north and east. It has a mixed residential/agricultural character. The site itself contains grass and vegetation on the southwestern side, with a hard surfaced parking area to the north east. The land is flat and the site screened from wider view by existing buildings and boundary hedges. The building is currently used for agricultural storage but alternative facilities exist within the wider farm operation.

The proposed development would not significantly alter the existing character of the application site. There would be a small increase in the size and bulk of built form, but this would not be visible from public vantage points and the slightly changed appearance of the building and its curtilage would not be harmful to

overall landscape quality. Therefore it is considered that the proposed development would cause no adverse impact to the landscape character of the Kent Downs AONB or the Ashenbank and Cobham Parkland Landscape Character Area. As such, the proposal would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy September 2014.

The application site is located in the Cobham Conservation Area and as such, Policy CS20 of the Gravesham Local Plan Core Strategy September 2014 and saved Policy TC3 of the Gravesham Local Plan First Review 1994 are relevant. Policy CS20 of the Gravesham Local Plan Core Strategy September 2014 places a high priority on the preservation, protection and enhancement of its heritage and historic environment. Policy TC3 of the Gravesham Local Plan First Review 1994 sets out that development within or affecting conservation areas will be carefully judged for its impact and will be expected to make a positive contribution to the conservation area.

The Cobham Rural Conservation Area Appraisal document (adopted supplementary planning guidance) sets out that the conservation area has three distinct zones of special interest. The application site is located in the lower western zone where sporadic historic development exists among small fields and open spaces, all embowered in trees. The application building is mentioned in the document as one of three buildings at Parsonage Farm that were shown on the 1869 Ordnance Survey map. It is highlighted as a building that contributes positively to the character of the conservation area and the document refers to the fact that it has planning permission for a residential conversion.

The proposed development would result in the re-use of a historical building within the conservation area. There would be alterations to insert windows and doors and an extension to the side of the building which has been designed to mirror an existing projection on the opposite side. It is noted that the residential use would ensure that an important historical building is brought back into use and fully restored. As set out above, there would be no adverse visual impacts associated with the external aspects of the proposed development. It is considered that planning conditions could be attached to any planning permission granted to ensure that any future alterations to the fabric of the building or its curtilage are subject to prior approval. It is noted that the GBC Conservation Officer although not specifically commenting on this proposal, he was very positive about the design when he assessed planning permission reference 20140557.

Therefore, overall, it is considered that the proposed development would have a positive impact on the historical character of the building and on the character and appearance of the Cobham Conservation Area. Therefore, the proposed development would be in line with Policy CS20 of the Gravesham Local Plan Core Strategy September 2014 and Policy TC3 of the Gravesham Local Plan First Review November 1994.

Other matters

Impact on housing land supply

Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period, with the Objectively Assessed Need derived from the Standard Method set out in the NPPF (2021) and PPG (Planning Practice Guidance) advising that this figure is now significantly higher (707 dwellings/year as at April 2022). Evidence now available shows that the Council is not able to demonstrate a five-year housing supply. This engages the first part of footnote 7 of the NPPF (2021) and this means for decision-taking that planning permission for applications involving the provision of housing should be granted in line with the requirements of the NPPF (2021) Para 11(d) unless:

- i. the application of policies in this Framework (the NPPF) that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

In the Gravesham context, the policies referred to in paragraph 11(d)(i) above are those set out in the NPPF (2021) at footnote 7 (rather than those in development plans) relating to any of the following:

- Sites of Special Scientific Interest;
- Green Belt;
- Local Green Space;
- Areas of Outstanding Natural Beauty;
- Irreplaceable habitats;
- Designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 67); and
- Areas at risk of flooding or coastal change.

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 124 of the NPPF (2021)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development would provide a net increase of 2 units which would offer a small contribution towards meeting local housing need and, accordingly, this weighs in support of the application. The NPPF (2021) also encourages the effective use of land in meeting the need for homes. However, this has to be balanced against safeguarding and improving the environment and ensuring safe and healthy living conditions, matters which are sought throughout the NPPF (2021), including in particular the requirement for development to maintain an area's prevailing character and setting; achieve high quality buildings and places; add to the overall quality of the area, be visually attractive and create a high standard of amenity for existing and future users. All of these matters will be considered.

Impacts on the Thames Estuary and Marshes SPA/Ramsar sites

The application site falls within 6km of the Thames Estuary and Marshes Special Protection Area (SPA) classified in accordance with the European Birds Directive which requires Member States to classify sites that are important for bird species listed on Annex 1 of the European Directive, which are rare and/or vulnerable in a European context, and also sites that form a critically important network for birds on migration. It is also listed as a Wetland of International Importance under the Ramsar Convention (Ramsar Site). Studies have shown marked declines in key bird species, particularly in areas that are busiest with recreational activity. Research conducted in 2011 found that additional dwellings were likely to result in additional recreational activity, causing disturbance to protected bird species that over-winter or breed on the SPA and Ramsar Site. The studies found that 75% of recreational visitors to the North Kent coast originate from within 6 km of the SPA boundary and Ramsar Site. The impacts of recreational disturbance can be such that they affect the status and distribution of key bird species and therefore act against the stated conservation objectives of the European Sites.

The Borough Council has mitigated out the impacts of this on each and every planning application for a new residential development of one or more units within the 6km zone since September 2015 by accepting a Strategic Access Mitigation and Monitoring Strategy (SAMMS) (tariff) payment (currently £314.05 per dwelling). This approach is approved by Natural England for all new residential developments.

For every planning application for a new dwelling (including new flats) which does not require any other contributions to be secured through a s106 legal agreement or unilateral undertaking the tariff has been secured through a contribution agreement.

The tariff has been accepted effectively in lieu of an Appropriate Assessment (AA) under the Habitat Regulations and thus avoiding the need to progress into a full AA.

However a more recent Court of Justice European Union (CJEU) ruling means that this approach is now no longer valid and although the mitigation measures (in the form of a tariff payment) will still need to be made the first stage will be a screening assessment as to whether the development either alone or in combination, is likely to have significant effects on a designated site without mitigation. The CJEU sees a distinction between “the plan or project” itself and “measures intended to avoid or reduce the harmful effects of a plan or project on a European site”. This means that mitigation measures, which are intended to avoid or reduce effects, should be assessed within the framework of an AA and cannot be taken into account at the screening stage.

This proposal would result in the net addition of one unit and the applicant has paid the required tariff (£628.10). The Local Planning Authority can therefore be satisfied that the proposal has put in place adequate measures to mitigate potential significant adverse effects on the Thames Estuary and Marshes SPA/Ramsar site. Therefore, in respect of ecology and biodiversity the proposal is compliant with Paragraphs 180 and 181 of the NPPF (2021) and Policy CS12 (LPCS).

Impacts on residential amenity

Nos. 1 and 2 Parsonage Cottages are located at least 24 metres to the north west of the application building. Their rear elevations face the front elevation of the application building. Various windows are proposed to be located in the front elevation of the building and would obliquely face the rear windows of nos. 1 and 2 Parsonage Cottages. Due to the separation between the properties and the design of the development, it is considered that there would be no significant adverse overlooking impacts and no adverse overshadowing or overbearing impacts to the occupiers of Parsonage Cottages.

A brick building that was permitted to be converted to residential use (reference 20170738) is located some 7 metres to the north west of the application building. There are various windows in the front elevation (as well as two proposed new windows) that face the application building. The proposed windows and doors in the front and western side elevation of the proposed dwelling would be in relatively close proximity to the windows in the brick building. However due to the design of the proposed development, their separation and their perpendicular orientation, it is considered that there would be no significant adverse overlooking, overshadowing or overbearing impacts to the occupiers of the brick building.

The proposed room sizes would in line with the National Space standards and the proposed garden areas would meet the Borough Council's Residential Layout Guidelines. The garden depths would be only half the amount that the guidelines require. However in light of the fact that the application site is within the Green Belt (and it is important to restrict the extent of external uses) and because the garden area would be well in excess of the minimum standard, it is considered that the reduced depth would be acceptable. As such, it is considered that the proposed dwelling would provide a good standard of living for future occupiers.

The submitted details show two timber bin stores to be located at either end of the building. It is considered that these refuse arrangements would be sufficient to accommodate the amount of refuse associated with the proposed dwellings. The provision and future retention of the proposed refuse areas could be dealt with through a planning condition.

Overall, it is considered that the proposed development would have no significant adverse impacts to residential amenity and therefore that it would be in line with the provisions of Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Highways issues

The proposed development would result in the creation of two dwellings (a one bedroom and a three bedroom) and according to the Borough Council's adopted Vehicle Parking Standards, a total of three parking spaces would be required. An existing frontage parking area would be widened and used to accommodate two vehicles and the existing side extension would be converted into a car port and used to accommodate two vehicles. As such it is considered that sufficient off-road parking would be available. It

is noted that the existing frontage parking area is currently used for parking by farm workers. However alternative parking exists elsewhere on the wider Parsonage Farm site, which would off-set the loss of this existing farm parking.

The GBC Highways Development Management Officer has not raised concerns with the proposed development. It is noted that the existing grassed area would need to be reduced in size to accommodate the required parking. A planning condition can be used to ensure that proposed parking at the application site is formed, appropriately surfaced and used permanently for parking. Conditions requiring further details of cycle parking provision and EV charging points would be included if approved as per KCC Highways request.

Overall, it is considered that the proposed development would be acceptable in highways terms and be in line with Policy CS11 of the Gravesham Local Plan Core Strategy September 2014 and Saved Policy P3 of the Gravesham Local Plan First Review November 1994.

Design

The proposed facing materials and the architectural design of the proposed extension would match with the existing building. The GBC Conservation Officer has previously welcomed the design approach within the conservation area setting. However, he has sought the submission of materials details and samples prior to the commencement of the development. Overall, it is considered that the proposal is appropriately designed and would be in line with Policies CS19 and CS20 of the Gravesham Local Plan Core Strategy September 2014.

Climate change

Policy CS18 of the Gravesham Local Plan Core Strategy September 2014 sets out the Borough Council's requirements in relation to climate change. For the proposed development, the relevant issue to consider is the impact of run-off on waste water systems. This is because new built development and the hard surfacing of land, leads to increases in the flow of water to the sewer system. The policy seeks to ensure that the run-off from new development has, as a minimum, no greater adverse effect than the existing situation and that, where feasible Sustainable Drainage Systems (SUDS) are used. The details submitted relating to the surfacing of the proposed parking area show that a gravel surface would be utilised. The building already exists and no details of the treatment of run-off for the proposed development have been provided. It is noted that the building regulations process will cover this aspect of the proposal. However, a SUDS condition can be used to ensure that the details do not adversely affect the visual amenities of the building or its surroundings. Overall, it is considered that the proposed development would be in line with Policy CS18 of the Gravesham Local Plan Core Strategy September 2014.

Conclusion & Recommendation

The proposed development would make a modest contribution to housing supply and would be an appropriate development in the Green Belt, which would result in the re-use of an agricultural building, of historical value, which preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. The proposal would have no adverse impacts to landscape character, highway safety, biodiversity or to residential amenity. Therefore, the proposal would be in accordance with the relevant criteria and policies set out above in relation to the National Planning Policy Framework, the Gravesham Local Plan Core Strategy (September 2014) and the saved policies in the Gravesham Local Plan First Review (November 1994).

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

Case Officer:	Ms Lisa Williams	Team Leader:	Miss Faye Hobbs
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Signed:		Signed:	
Dated:	31st July 2023	Dated:	31 July 2023