

(Shorne Parish Council

————— Borough of Gravesham —————

Clerk & Responsible Officer
Mrs S Poole
Shorne Village Hall
The Street
Shorne
Nr Gravesend
Kent DA12 3EA
E-mail: clerk@shorneparishcouncil.org



18th January 2023

Application Ref 20221334

Land At New Green Farm Lower Road Shorne Gravesend Kent

Construction of agricultural worker dwelling, including the provision of all associated landscaping, biodiversity enhancements and drainage infrastructure

This application is effectively a reapplication of previously refused Ref 20210970.

Accordingly the Parish Council submits much the same representations as previously and continues to **OBJECT STRONGLY** to the application as detailed below.

To ensure clarity, “New Green Farm” is merely the name that the applicant has given to open fields that were formerly part of Green Farm.

Changes identified since the previous application:

- The site of the proposed CEO’s house has been moved to near the previously permitted barn, this means that it is now closer to and could adversely impact the ambience of Public Footpath NS156.
- The building will share the previously permitted sewage packet plant serving the proposed seasonal workers mobile accommodation, and other services.
- The proposed house has a smaller ground floor area than the previous proposal, with a basement room added instead. The proposed curtilage is smaller and more appropriate in size.
- An agricultural tie is proposed however the house remains designed and intended for the CEO of the owning company and his family and not for true agricultural or rural workers.
- The applicant states that they will be purchasing additional land but this is not evidenced or presented as definite so has no material effect on the application.
- The applicant also refers repeatedly to their intention to build a large cold storage facility (“proposed cold stores”, note plurality, in point 1.13), and also a packing plant and storage however these do not have planning permission so have no material effect on the application, and permission for this application would not convey permission for those other structures.
- A large area of hardstanding has been installed northwest of the permitted barn.

We also note that:

- The review of local available properties for sale and the agency report have not been updated and do not reflect current availability of properties immediately adjacent to the applicant's present land.
- Several extracts from press articles have been submitted along with the plans and discussed however we do not consider these to be relevant or to provide additional support to the proposal.
- Reference is again made to pre-application discussion with Gravesham Borough Council but we do not know the complete content of the discussion. Appendices 1, 6 and 7 have not been published.
- To date the applicant has made no attempt to discuss any of their plans with the Parish Council.
- 5125 bins of fruit, which is half the anticipated total for the presently owned land, were satisfactorily produced in 2022 despite the prolonged hot and dry weather. This was achieved without any resident managerial staff, and also without any/many resident seasonal workers (there is only one caravan in place) or apparent need for on-site cold storage and packing.
- The cold store stated as intended is shown on plans as being more than three times the floor area of the existing barn, itself 45m x 19m x 8m high, and located within an approximately 60m by 110m red-lined area. The applicant already has a very large cold store and Packing Plant nearby at their headquarters at Flanders Farm on Ratcliffe Highway so we would question the need for any local facilities rather than taking advantage of economies of scale. The proposed store shown is labelled for only 10,529 bins so as such is below the capacity of the anticipated total landholding production leading to concern that a further cold store building would then be wanted (refers back to use of plural in point 1.13). A requirement for additional seasonal worker accommodation is also suggested.
- Any such developments locally would impact very adversely on Public footpath NS156, which is not indicated on the submitted plans, the openness of the Green Belt and the amenity of nearby residential areas.

The Planning Statement has been updated, now extending to 72 pages, so the points we make below have also changed. Our previous representations for refused application Ref 20210970 also still remain valid.

Green Belt location; other designations:

- The proposed site is located in the Green Belt where new dwellings would not normally be permitted. The site is also within the Higham Arable Farmlands Landscape Character Area although that is being sequentially diminished as agricultural land has been sold away from arable farming.
- The proposal would have further adverse effect on openness and lead to further damage to the Green Belt's purpose in this area, which is to preserve openness, prevent urban sprawl and coalescence of discrete communities.
- The proposed site is located centrally in open fields, where it will have maximal landscape impact to the surrounding area when viewed from higher ground. The applicant includes information only about horizontal visual impact, stating incorrectly in point 1.25 that the site "is not readily visible" and in point 1.26 that it will be "well screened within the landscape". The applicant has not considered the issue that land nearby rises steeply to 500ft and over, where many houses are located, so the proposed house and any nocturnal lighting will have visual and landscape impact in addition to that already caused by the barn and proposed seasonal workers accommodation.

- We do not consider that sufficient or robust “very special circumstances” have been evidenced that would outweigh the considerable landscape harm that this proposed additional property, together with the applicant’s other stated intentions, would cause.

Nature of the “Farm”:

- “New Green Farm” is not an existing discrete farm but a parcel of arable fields that were bought by ACGoatham and are being turned into intensive orchards.
- There is no historic farmstead that we are aware of at this location.
- It is not a livestock farm (meaning horses, cattle, pigs)
- It is small being only 67.5 hectares although a further 17.5 hectares may be added.
- ACGoatham appear to be trying to create a farmstead in the Green Belt where none presently exists, as they make reference to “farmyard” in point 1.14 and “farmhouse” in point 8.9.
- It is noted in particular that the land has no direct connection to the A226 so is being accessed via residential areas and unsuitably narrow roads.

Residence for a “farm manager”:

- We note that the applicant is the CEO of the very large, diversified, multi-site Company. As such he is not a mere “farm manager” or an agricultural worker or a rural worker. The planning statement again details that most of the working family member time is (unsustainably) spent offsite including at company headquarters rather than that they will be living “at or near their place of work in the countryside” (point 1.27)
- We consider that the claim that there needs to be a resident farm manager is overall tenuous as the majority of the reasons given do not stand up to close examination or are solveable by automated (and probably offsite) monitoring and proper implementation of safety policies and procedures.
- If such a need was regarded as essential then this should have formed part of the earliest planning applications and been identified from the outset rather than the applicant undertaking piecemeal expansion of the built forms on the site. The same applies to the other mentioned future buildings.
- Locating a family home close to/surrounded by likely chemical spraying causes health concerns.

The “Sight and sound” claim:

- There is no livestock (meaning horses, cattle, pigs) on the site that might require in-person monitoring, which would be the usual attempted justification for a residential need. However we consider that in modern times CCTV and alarm systems are an adequate substitute for on-site presence.
- The usual arrangement in large multi-site Companies is to have a roster of staff on-call to deal with any emergencies, as it is not reasonable for one person to be continuously on-call.
- We do not consider that the level of emergencies likely to occur justifies a resident manager.
- On-site resident managers are not the norm in modern, large scale agricultural endeavours.

The design and plans:

- The house is stated to be being built for the Company CEO and his family and appears over-large and over-specified to be regarded as a genuine and generic farm manager’s house.

- The plans do not show or discuss any boundary treatments (walls, fences, gates etc) and this information must be provided with the application.
- A lower rise building would have less landscape impact.
- The plans do not include details of any exterior lighting, which must be controlled by Condition.
- A long additional driveway is noted.

The Covid-19 pandemic and Brexit:

- Reference is repeatedly made to effects of the Covid-19 pandemic on working practices however the major effects are past, so we do not accept this as any justification.
- Reference is similarly now made to Brexit as justification however this is also rejected.

Opinion of local residents:

- The general view of local residents is that this is again a largely spurious application, manufactured with the intent of circumventing planning rules that are designed to protect communities and the local environment.
- It creates a new house in the Green Belt and on cheaper agricultural land, a measure unavailable to ordinary residents who must pay market prices.
- It seeks to create a farmstead where none presently exists, which might then be used to justify further buildings, as the applicant already indicates.
- A full planning application should have been made at the outset for the totality of what the applicant wants to develop on the site, this would have allowed proper consideration of the applicant's total proposals with attachment of suitable protective Conditions such as for noise and HGV movements.
- The rights and needs of local residents do not seem to be being adequately considered by the applicant as regards both the proposal for a house and the overall direction of development of the agricultural land.

Suggested Conditions if to be permitted:

- A long and strong agricultural tie should be imposed, in line with the stated agricultural need.
- Any permission for this application does not convey permission for any other structures on the entire landholding(s), to include cold stores, packing plants, other storage or additional seasonal worker caravans (over and above what has already been explicitly permitted).
- We request that permitted development rights should be withdrawn for the entire residential site so that extensions, loft conversion, any alteration to the roofline and any other buildings should not be allowed, in order to prevent further landscape impact and erosion of openness.
- No exterior lighting is shown on plans so none is permitted.

The Parish Council considers that the present application is not materially different to that previously refused under Ref 20210970 so hereby requests that, for the reasons stated above and previously, GBC should also **REFUSE** this application.

Should GBC Officers however be minded to permit the application or be undecided then we would also request that the application should be called in for discussion at the Planning Committee.