

PLANNING, DESIGN & ACCESS STATEMENT

Site: Eastfield Farm Stables, Heron Hill Lane, Harvel, Kent, DA13 ODU

Client: Mr & Mrs C Oakes

Prepared by: DHA Planning Ltd (Our Ref 15966)

Date: December 2022

1.1 Introduction

- 1.1.1 This Planning Statement has been prepared on behalf of Mr & Mrs C Oakes in respect of revised proposals for the demolition of an existing ageing stable complex and construction of a modern new equestrian barn at Eastfield Farm Stables, Heron Hill Lane, Harvel, Kent, DA13 ODU.
- 1.1.2 The site is located within the Metropolitan Green Belt where strict restrictions on new buildings apply. Nevertheless, national and local Green Belt policy are clear that buildings for the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and recreation are acceptable forms of development. Accordingly, the amended proposal is wholly compatible with Green Belt policy given the use is well established and this scheme seeks simply to replace old with new without any further intensification.
- 1.1.3 The current stable complex is not fit for purpose and is in disrepair, without enough space to conduct necessary everyday activities safely. This revised scheme therefore represents a smaller scale proposal that seeks to address concerns raised by a previous refusal (ref. 20211294).
- 1.1.4 The resubmission follows pre-application engagement with Gravesham BC and seeks replacement of the existing facilities. No additional horses will be kept on site as a consequence of the proposal.

1.2 Site Context

Application Site

- 1.2.1 The application site is an established stables situated to the south west of Harvel and north east of Culverstone Green. The site is outside of any nearby built village confines, and within the Metropolitan Green Belt as one would expect equestrian facilities to be.
- 1.2.2 The property is located in the administrative area of Gravesham Borough Council.
- 1.2.3 Heron Hill Lane is rural in nature and is characterised by detached houses and agricultural facilities. The application site itself sits adjacent to an area of open countryside to the south and west, with adjoining neighbours to the North and East.

- 1.2.4 The land has covering from the neighbouring properties through extensive tree cover and vegetation. Similarly, these adjoining properties are located in positions within their respective curtilages reasonably far away from the Stables.

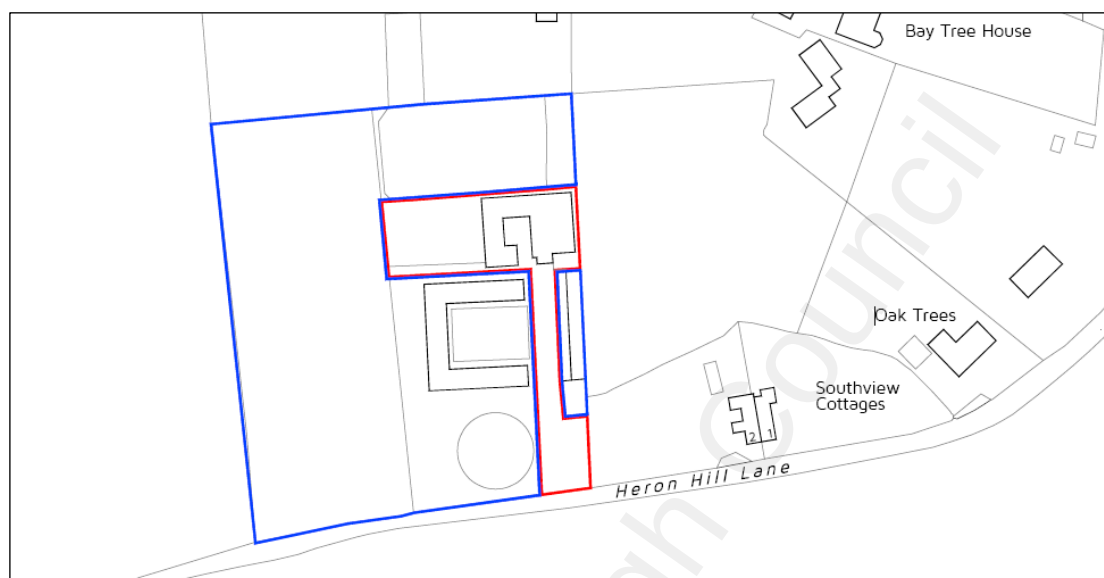


Figure 1 – Site location plan

Planning History

Application reference	Description	Status
20170113	Retention of stable block.	Granted (17/09/2018)
20181292	Application for the approval of condition 3 attached to planning application reference number 20170113 relating to details of the arrangements for the storage and disposal of waste bedding, stable waste and manure (including the means of enclosure where necessary).	Granted (13/02/2019)
20190593	Application for the removal of conditions 5 & 6 attached to planning permission reference no. 20170113 for the retention of stable block; to allow the retention of the existing visibility sight lines and the existing gates.	Refused (15/06/2020)
20210112	Application for variation of conditions 1 and 6 and removal of conditions 5 and 7 to planning permission reference no. 20170113 for the retention of stable block; to allow the relocation of the existing gates and allow retention of the existing visibility sight lines and parking layout.	Permitted (7/09/2021)
20211294	Demolition of an existing stable complex and construction of a new equestrian barn/stables.	Refused (17 December 2022)

1.2.5 The previous application (ref. 20211294) was refused for the following reasons:

- 1. The application site is located within the Green Belt. Proposals were considered to constitute inappropriate development with reference to national policy and would be harmful to the Green Belt. The identified harm to the Green Belt was not viewed as being outweighed by other considerations as to amount to very special circumstances required to justify inappropriate development. So, the proposal was contrary to policy CS02 of the Core Strategy and chapter 13 of the NPPF.*
- 2. The proposed development was also by reason of scale, height and materials considered to fail to preserve the Rural Landscape and Green Belt character of the site and wider area. So, proposals were seen to be contrary to policy C17 (saved policy), policies CS12 and CS19 of the adopted local core strategy and the NPPF.*
- 3. Given the nature of the rural business it was considered the proposed development would increase activities, resulting in increased vehicular movements to and from the site and so was viewed as contrary to Saved Policy T3 of the Gravesham Local Plan First Review (1994) and CS11 of the Gravesham Local Plan Core Strategy (2015 and para 113 of the NPPF.*

1.2.6 We address these concerns within the scope of the sections below.

1.3 Proposed Development

1.3.1 The application seeks planning permission to replace an out of date and declining stable complex and enclosed tack room with a new and more secure barn style stable building.

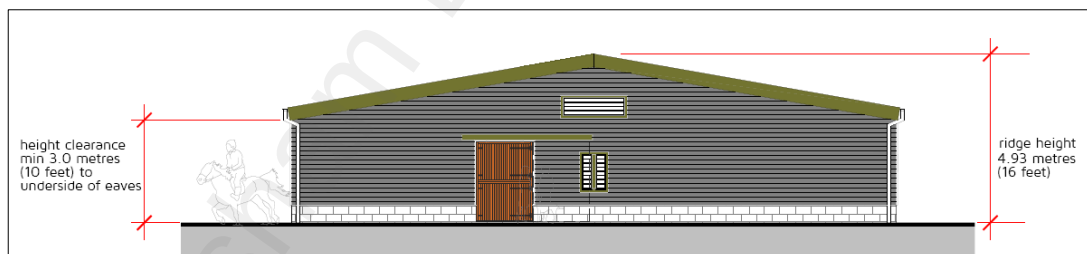


Figure 2 - Proposed elevations

1.3.2 The current stable complex is not fit for purpose and is in disrepair, without enough space to conduct necessary everyday activities safely. For example, outdated stable complex has no crosstie areas, so staff and contractors must walk behind horses when clipping, shoeing, physio, tacking up, untacking, washing off, grooming, inspecting, and treating horses. Also, due to space constraints, the existing concrete yard area on site is used for work, preparation, and inspection of horses. Meanwhile existing overhangs store equipment creating a cluttered working environment. A detailed explanation of the justification for a new stable complex and operational challenges faced by staff, contractors, and the owners will be provided at the meeting.

1.3.3 Given the need for the upgrade, the new equestrian barn is proposed to address previous concerns and comprises of 12no. loose boxes (3.65m x 3.65m), a rug room, 2no. tack rooms (saddle storage, bridles, and riding equipment), a feed room, 3no. wash bays/ individual cross tie areas (3.65m x 2.60m) as well as a

covered 3.0m passage area. This represents a replacement and upgrade of existing facilities rather than an intensification of the use.

- 1.3.4 The previously refused building had a gross external area footprint of 443 square metres. This has now been reduced to 402 square metres, which represents the equivalent of the existing facilities plus enclosed open court yard.
- 1.3.5 The building would have a rural/agricultural appearance with exposed concrete plinth blocks and timber boarding to compliment the surrounding stable materials. This change is a direct result of pre-application feedback.
- 1.3.6 The roof will be a shallow-pitched roof and has been reduced by a total of *m from the previously refused scheme.
- 1.3.7 The land is already in use as stables and therefore this application seeks consent solely for the proposed replacement stable to replace old with new and provide better quality living and security arrangements.
- 1.3.8 The application is submitted with the following documents:

Documents		
Reference	Title	Author
DHA/15966	Planning Statement	DHA Planning
DHA_15967_01A	Site Location Plan	DHA Planning
DHA_15967_02A	Existing Site Layout Plan	DHA Planning
DHA_15967_03A	Existing Stables Layout	DHA Planning
DHA_15967_04A	Existing Stables Elevations	DHA Planning
DHA_15967_05A	Proposed Site Layout Plan	DHA Planning
DHA_15967_06A	Proposed Barn Stabling Floor Plan Layout	DHA Planning
DHA_15967_07A	Proposed Barn Stabling Elevations	DHA Planning

1.4 Planning Policy Framework

- 1.4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 1.4.2 For the purpose of this planning application the development plan includes the Gravesham Core Strategy (2014) and the saved policies of the Local Plan First Review (1994).
- 1.4.3 The National Planning Policy Framework (NPPF) 2021 must also be approached as a material consideration when determining planning applications. This section of the statement therefore highlights the aspects of the NPPF and development plan that are relevant to this application, as a precursor to reviewing the Core Strategy, Local Plan policies and other material considerations.

National Planning Policy Framework (2021)

- 1.4.4 The NPPF is built on the premise that 'sustainable development' should go ahead without delay. In this respect, paragraph 8 of the NPPF states that there are three

dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform several roles:

- a) an economic objective – contributing to building a strong, responsive and competitive economy;
- b) a social objective – supporting strong, vibrant and healthy communities; and
- c) an environmental objective – contributing to protecting and enhancing our natural, built and historic environment.

1.4.5 Paragraph 11 of the NPPF goes on to state that the presumption in favour of sustainable development should be at the heart of both plan-making and decision-taking. For decision-taking this means;

- a) approving development proposals that accord with the up to date development plan without delay; and
- b) where there are no relevant development plan policies or the policies which are most important are out of date, granting permission unless:
 - i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - 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.

1.4.6 Paragraph 137 reinforces that the government attaches great importance to Green Belts, with the fundamental aim being the prevention of urban sprawl by keeping land permanently open. Paragraph 138 clarifies the five purposes of Green Belt:

1. To check the unrestricted sprawl of large built up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and special character of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

1.4.7 Paragraph 143 states that 'inappropriate development' is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

1.4.8 Paragraph 149 explains that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) *buildings for agriculture and forestry;*
- b) *the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries*

and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) 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;*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - not have a greater impact on the openness of the Green Belt than the existing development; or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

1.4.9 Paragraph 150 defines that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

1.4.10 Paragraph 174 sets out how planning policies and decisions should contribute to and enhance the natural and local environment.

1.4.11 When it comes to applications that affect Areas of Outstanding Natural Beauty, paragraph 176 is clear that great weight should be given to conserving and enhancing the landscape and scenic beauty. The scale and extent of development in these areas should be limited and due regard should be given to the conservation and enhancement of wildlife and cultural heritage.

1.4.12 In summary, the keeping and riding of horses is an activity that is an integral part of the character of the countryside, and the provision of buildings and facilities to enable this activity to continue is a common and accepted part of the rural

landscape. The NPPF (2021) specifically allows for 'appropriate' facilities for outdoor sport and recreation, and new buildings that are proposed in connection with these activities are not inappropriate development in the Green Belt (paragraph 149).

Gravesham Local Plan First Review – Saved Policies (2007)

- 1.4.13 The Gravesham Core Strategy is the key component of the Council's Local Plan. It provides the overarching strategic principles for planning and the distribution of development for the period between 2014 and 2028.
- 1.4.14 Policy CS19 (development and design principles) sets an overarching design criterion for new development, to ensure that it will conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area.
- 1.4.15 Policy C17 states that proposals for the recreational use of land in the countryside for horse-riding, riding schools and the erection of stables will only be permitted if they are compatible with the agricultural, landscape and transport policies of this Plan. Where proposals are acceptable in principle, the Borough Council will expect stables and horse shelters to be properly designed and constructed of sound materials appropriate to the countryside and to be in an acceptable location within the site.

Gravesham Local Plan Core Strategy (2014)

- 1.4.16 Policy CS01 indicates the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF and throughout the core strategy. The Council will work proactively with applicants jointly to find solutions where possible and to secure development that improves the economic, social and environmental conditions in the area.
- 1.4.17 Policy CS02 relates to the scale and distribution of development. It states that in the rural area, development will be supported within those rural settlements. Development outside those settlements, including and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan.
- 1.4.18 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, as per Policy CS19. These requirements are met within the proposed scheme.

The Gravesham Landscape Character Assessment

- 1.4.19 The Gravesham Landscape Character Assessment defines and describes the different types and character areas of the landscape in the Gravesham Borough, and evaluates each area in terms of the condition of the landscape and its sensitivity. The Assessment is used in the consideration of planning applications to supplement planning policies.

- 1.4.20 The site is located within the Harvel Wooded Downs, characterised by Ancient Woodland, small paddocks and pastures, traditional farmsteads and small holdings set within the woodland.
- 1.4.21 It is considered that our proposal remains in keeping with the landscape character guidelines. Nonetheless, as the application site is a well-established for equestrian use and will have a minor impact on the setting, the document is of very limited relevance to the current proposal.

1.5 Planning, Design and Access Considerations

- 1.5.1 It is necessary to consider whether the application proposal accords with the statutory Development Plan and, if not, whether any material considerations indicate that planning permission should nevertheless be granted.
- 1.5.2 In considering whether the proposal accords with the development plan, it is necessary to consider the proposed development in the context of the following topics:
- Principle of Development;
 - The amount and scale of development;
 - The proposed layout and siting;
 - Design;
 - Landscaping matters;
 - Access; and
 - Impact on Ecology

1.6 The Principle of the Development

- 1.6.1 The keeping of horses is an activity that is entirely in keeping with the character of the countryside. Indeed, policy C17 of the saved Local Plan states that proposals for the recreational use of land in the countryside for horse-riding, riding schools and the erection of stables will be permitted if they are compatible with the agricultural, landscape and transport policies of the wider Plan.
- 1.6.2 The policy goes on to state that where proposals are acceptable in principle, the Borough Council will expect stables and horse shelters to be properly designed and constructed of sound materials appropriate to the countryside and to be in an acceptable location within the site.
- 1.6.3 In this regard, the site forms part of a well-established equestrian premises and it is wholly apparent that the stables to be removed are in desperate need of repair. Accordingly, the compatibility with its location is already very well established and we understand that the Council accepts the broad principle of development. Previous concerns were primarily in respect of potential intensification.
- 1.6.4 The above being the case, the revised barn style design is responsive to the need to have modern equestrian facilities for animal welfare and security requirements but without increasing the overall scale or intensity of the established use.
- 1.6.5 In respect of material considerations, paragraph 149 of the NPPF allows for 'appropriate' facilities for outdoor sport and recreation and so lend support for the continuation of this rural business enterprise.

- 1.6.6 Taking into consideration the above context, the revised proposal is considered to comply with the development plan and is consistent with national Green Belt policy.

1.7 Design and Access

The Amount and Scale of the Development

- 1.7.1 The existing stables that this application proposes to replace already has capacity of 12 loose boxes and so this is simply a modernisation. The site already has access to a field that provides fenced grazing land and horse menage facility. The space available is more than adequate to cope with the current population of horses.
- 1.7.2 The proposed building contains 12 permanent loose boxes, that are in line with modern stable size requirements.
- 1.7.3 For the reasons outlined in the proposals section, the overall scale has also been reduced and ridge heights lowered.

The Proposed Layout and Siting

- 1.7.4 It is recognised that this site falls within a sensitive location. The character of the countryside is, in part, maintained by the traditional rural activities that take place there. This includes both agriculture and the keeping and riding of horses. It is entirely appropriate therefore, that the proposed stable development on this site should be supported, given its role as an important rural business. Considerable care has been taken with the proposed siting and layout of the building, taking into account a number of relevant criteria, including:
- *The need to ensure that the general openness of the Green Belt is not compromised.*
 - *The need to ensure the security and well-being of the animals; and the*
 - *The need to maintain and utilise the safe and convenient access without the need for a significant new track or other form of more obtrusive building.*
- 1.7.5 Balancing these factors, a direct replacement of the stables is best placed in a similar location to the existing stables, owing to the established existing landscaping and wider topography.

The Design and Appearance of the Buildings

- 1.7.6 The stable building is proposed to have a very simple equestrian/agricultural design. It is also now finished in horizontal timber boarding in line with pre-app advice that this would be more appropriate to its setting.

Landscaping

- 1.7.7 Given the existing mature landscaping surrounding Eastfield Farm stables, the replacement building will benefit from existing mature landscaping. Notwithstanding, if deemed necessary a further landscaping scheme could be conditioned.

Access

- 1.7.8 The stable would continue to be accessed through Eastfield Farm stables access point on Heron Hill Lane.
- 1.7.9 Traffic generation will not change with the new stable complex as this amended scheme now seeks a like for like replacement of existing stabling with focus on better provision rather than intensification.

1.8 Conclusions

- 1.8.1 This statement has been prepared on behalf of Mr & Mrs C Oakes in respect of revised a full planning application for the demolition of existing stable complex and erection of a new facility on land at Eastfield Farm Stables, Heron Hill Lane, Harvel, Kent, DA13 ODU.
- 1.8.2 The applicant owns the stables site and would like to replace the facilities owing to the age, state of repair and a need to ensure modern horse welfare requirements are met.
- 1.8.3 The revised proposal represents appropriate facilities for outdoor sport and recreation, which maintains the open character of the Green Belt. With this in mind, it represents an 'appropriate' form of development within the Metropolitan Green Belt (para 149 of the NPPF).
- 1.8.4 The amended scale and layout of the building has been designed in such a way as to preserve the character and appearance of the countryside setting and there would be no intensification, simply like for like replacement of existing facilities.
- 1.8.5 The above being the case, all three previous reasons for refusal have been overcome and this amended proposal accords with the tests set out with policy C17 of the Local Plan (2007), which regulates equestrian activity and associated buildings. Likewise, it accords with wider design and amenity protection policies.
- 1.8.6 In view of the above considerations the Council is asked to support this proposal.