



Delegated Report

Full Planning Application

Planning Application No:	20231221
Location:	Brimsole Farm, Brimstone Hill, Meopham, Gravesend
Description:	Conversion of two agricultural barns into two 3 bed dwellings, new car ports locations and associated landscaping works.
Applicant:	Mr Adam Thompson
Site Visit Date:	Site visited under previous application

Submitted Documents/Plans

Application form
Barn 1 Existing Elevations
Barn 1 Existing Plans
Barn 2 Existing Elevations
Barn 2 Section, Plan and Photos
Drawing no. E002 (Site Location Plan)
Drawing no. E052 (Existing Car Port Elevations)
Drawing no. P150 (Proposed Site Plan)
Drawing no. P200 (Proposed Floor Plans)
Drawing no. P450 (Proposed Elevations)
Drawing no. P451 (Proposed Car Port Elevations)
Drawing no. C160 (Phasing Plan)
Design and Access Statement
Preliminary Ecological Appraisal
Structural Assessment of Brimsole Farm (Feb 2023)
Structural Assessment of Barn 2 Brimsole Farm, section drawing and photos (Oct 2023)
Planning Statement

Relevant Planning History

Reference	Description	Decision	Decision Date
20230184	Conversion (change of use) of existing barn into new three bedroom dwelling with associated parking.	Permitted	28.04.2023
20150589	Application for a Lawful Development Certificate in respect of the existing self-contained residential use of the outbuilding known as 'The Lodge' and the material change of the land to establish a residential curtilage.	Granted	08.10.2015
19880009	Continued use of part of land for flying of model aircraft and parking of vehicles.	Refused Appeal dismissed	07.03.1988 23.03.1989
19830705	Construction of a cesspool	Permitted	17.10.1983

19590047	Erection of dwellings	Refused Appeal dismissed	03.04.1959 25.08.1959
19550213	Erection of dwellinghouses	Refused	07.09.1955
19520171	Siting of caravan for residential purposes	Permitted	11.03.1953
19520170	Siting of caravan for residential purposes	Temporary	05.09.1952
19490023	Erection of a Dutch Barn and grain store	Permitted	25.01.1949

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development and Design Principles

Gravesham Local Plan: First Review (1994)

- C11 – Change of Use of Redundant Buildings in the Countryside
- T1 – Impact of Development on the Highway Network
- T5 – Access to the identified Highway Network
- P3 – Vehicle Parking Standards

Paragraph 33 of the NPPF (2023) 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 (2023), the Council will also seek to replace these.

Policy CS02 of the Core Strategy 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. Evidence now available shows that the Council is not able to demonstrate a five-year housing supply (a 3.27 year supply has most recently been calculated within the statement published [here](#)), and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Core Strategy Policy CS02 must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF (2023).

This requires that in regard to housing development, planning permission should be granted unless:

“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
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 (2023) at footnote 7 (rather than those in development plans) relating to any of the following:

- Habitats sites (and those sites listed in NPPF (2023) paragraph 187) and/or designated as Sites of Special Scientific Interest;
- Green Belt;
- Local Green Space;
- Areas of Outstanding Natural Beauty;
- A National Park or Heritage Coast;
- Irreplaceable habitats;
- Designated heritage assets (and other heritage assets of archaeological interest, see NPPF footnote 72); 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 129(c)) 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.

As part of this balancing exercise, it should be noted that paragraphs 135 and 139 of the NPPF (2023) requires development to add to the overall quality of the area, be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

Notwithstanding the Council's shortages in housing delivery and the consequent weight to be given in favour of the proposed development it is necessary to assess the proposals against the policies in the National Planning Policy Framework and established local planning policy taken as a whole.

National Planning Policy Framework (2023)

- 2 – Achieving sustainable development
- 5 – Delivering a sufficient supply of homes
- 9 – Promoting sustainable transport
- 11 – Making effective use of land
- 12 – Achieving well-designed and beautiful places
- 13 – Protecting Green Belt land
- 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- SPG4 - KCC Parking Standards (2006)
- Householder Extensions/Alterations Design Guide (2021)
- Gravesham Landscape Character Assessment (2009)
- Technical Housing Standards – Nationally Described Space Standard (2015)

Consultations, Publicity and Representations

External Consultees

Dickens' Country Protection Society

The Society is concerned with the quantum of development on this site which is in wooded countryside in an area within which Green Belt policies apply in the North Downs Area of Outstanding Natural Beauty where new residential development would not normally be permitted.

KCC Archaeology

The site lies within an area of general multi-period archaeological potential and the site itself is a historic farmstead recorded on historic mapping since at least the mid-19th century.

Looking at the photographs in the structural assessment report, the standing building appears to be a relatively modern replacement, possibly on the footprint of two earlier, and smaller, farm buildings which are recorded on historic mapping. On the information presented, I consider it unlikely that the proposed works would have a significant archaeological impact in relation to the standing structures. Any groundworks associated with the proposed development, might impact on archaeological evidence for the earlier history of the farmstead, and site, and I recommend that if planning permission is granted the following condition is applied to any forthcoming consent:

To ensure that features of archaeological interest are properly examined and recorded during development works:

- A) Prior to any development works the applicant (or their agents or successors in title) shall secure an archaeological watching brief so that excavations and other development works are observed and items of interest and finds are recorded. The watching brief shall be undertaken by an archaeologist approved by the Local Planning Authority and in accordance with a Written Scheme of Investigation (WSI), which has been submitted to and approved in writing by the Local Planning Authority.
- B) The archaeological watching brief, recording, post excavation assessment, analysis and reporting shall be carried out in accordance with the agreed specification and timetable.
- C) Within 6 months of the completion of the watching brief a Report shall be submitted to and approved in writing by the local planning authority.

REASON: To ensure that features of archaeological interest are properly examined and recorded

KCC Highways

It would appear that this development proposal does not meet the criteria to warrant involvement from the Highway Authority in accordance with the current consultation protocol arrangements. If there are any material highway safety concerns that you consider should be brought to the attention of the HA, then please contact us again with your specific concerns for our consideration.

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.

Meopham Parish Council

We raise no objection to this application, subject to compliance with local planning policy.

Internal Consultees

GBC Highways

I note that Kent County Council have declined to comment on this application, which whilst below their usual threshold for planning considerations, there are circumstances that require their input at some stage. In this case, the applicant is proposing to fill in an area, understood to be used for highway drainage and replace it with a soakaway. This will require very careful design and any works will have to be agreed with the County Council as Highway Authority before any alterations to the existing surface water drainage system is implemented. The applicant should note that an inadequate drainage provision, could result in the site becoming flooded.

The applicant should provide one secure cycle parking space per bedroom for each property.

It is noted that foul drainage is to be accommodated via a cesspit and whilst its/their size will be determined by Building Regulations. The applicant should demonstrate there is/are suitable location(s) for the chamber(s) which is/are readily accessible by tanker that will need to empty them at intervals. A condition should suffice given the size of the site.

GBC Environmental Protection

Environmental Protection has no objection to this application but would make the following comments.

The barn and site has been in agricultural use and as such, a contamination assessment/investigation is required. Agricultural uses can give rise to contamination through the use and storage of fuels and oils (fuel for machinery and repair/maintenance of machinery/equipment), storage and use of chemicals including pesticides and fertilisers.

To deal with this and other matters, a contaminated land condition and code of construction practice, drainage/sewerage and lighting informatives are recommended.

Neighbouring properties

The application has been advertised by individual neighbour letters to 5 properties, and on site. The overall

consultation period expired on 05 January 2024 respectively.

No letters of representation have been received from neighbouring properties.

The Kent Downs AONB Management Unit, GBC Waste and Local Ward Councillors were also consulted, and no responses were received.

Officer's Analysis

Proposal

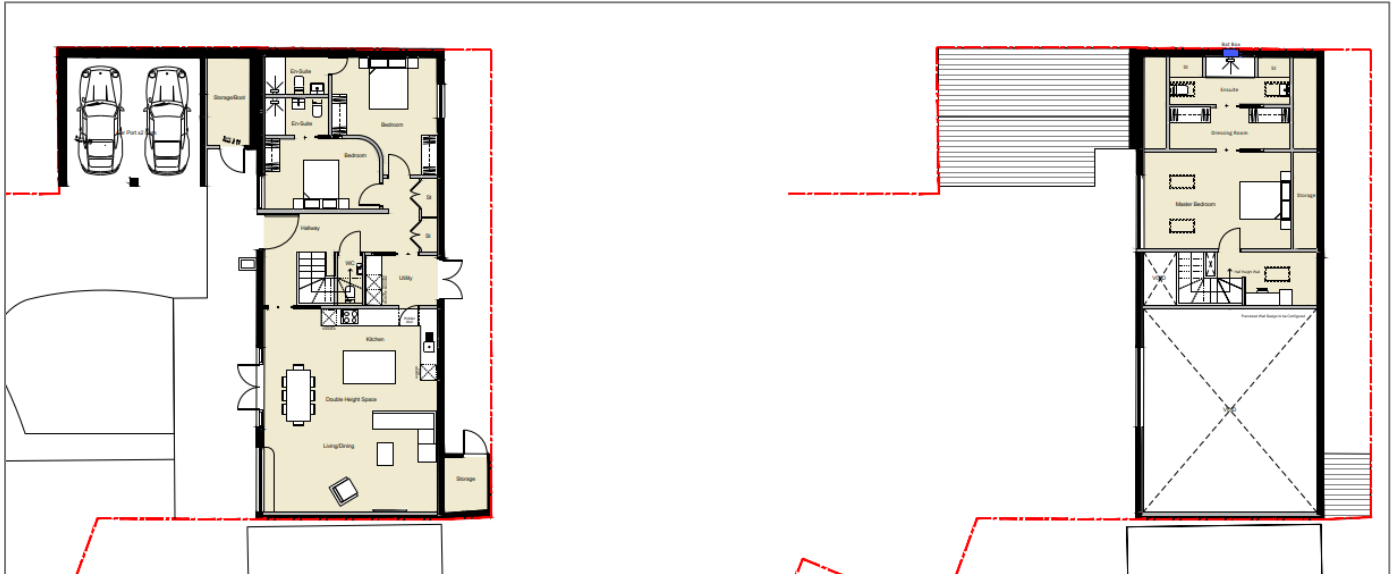
This application seeks full planning permission for the conversion of existing agricultural barns into two 3 bedroom dwellings, with associated car ports, garden and landscaping.

The existing barns include an L-shaped structure comprising a single storey agricultural storage barn with a lower cattle store return (Barn 1 to the north), and a further double height barn clad in corrugated sheet with a detached carport/storage timber building (Barn 2 to the south).

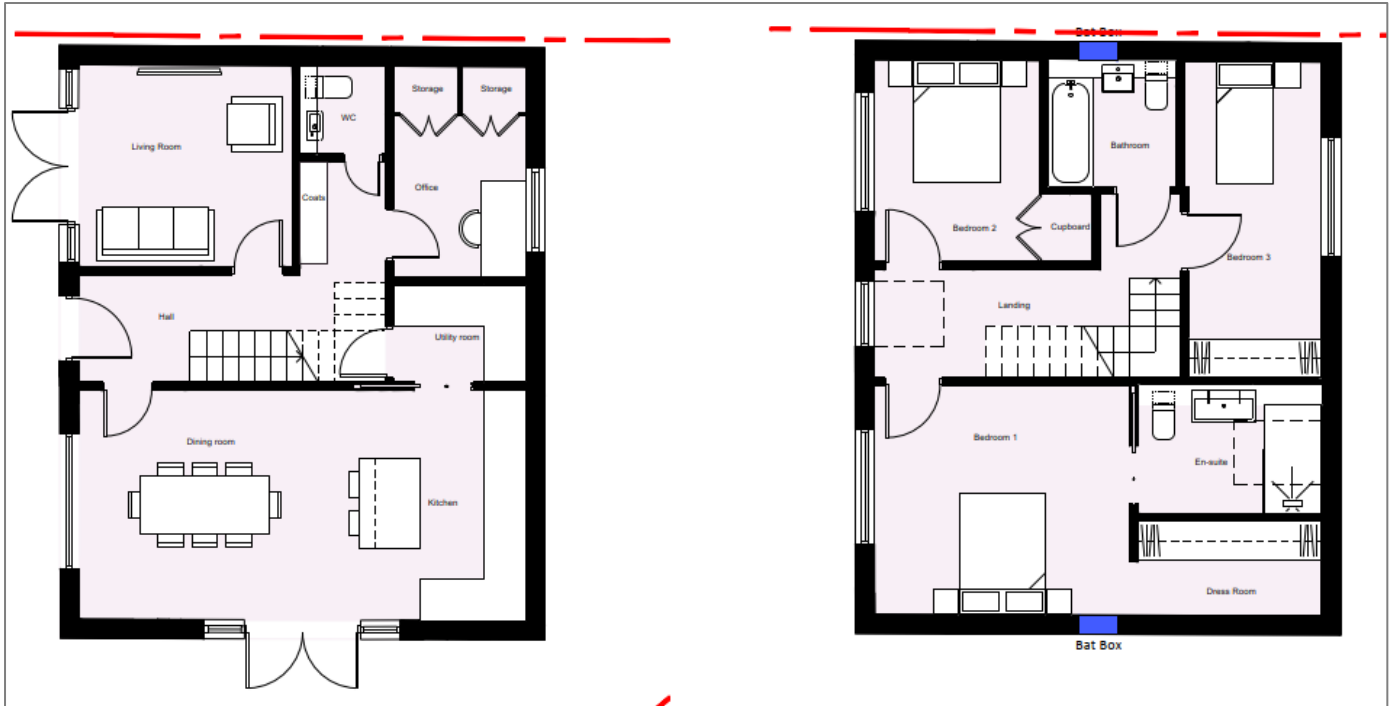
Proposed site plan



Proposed floor plans Barn 1



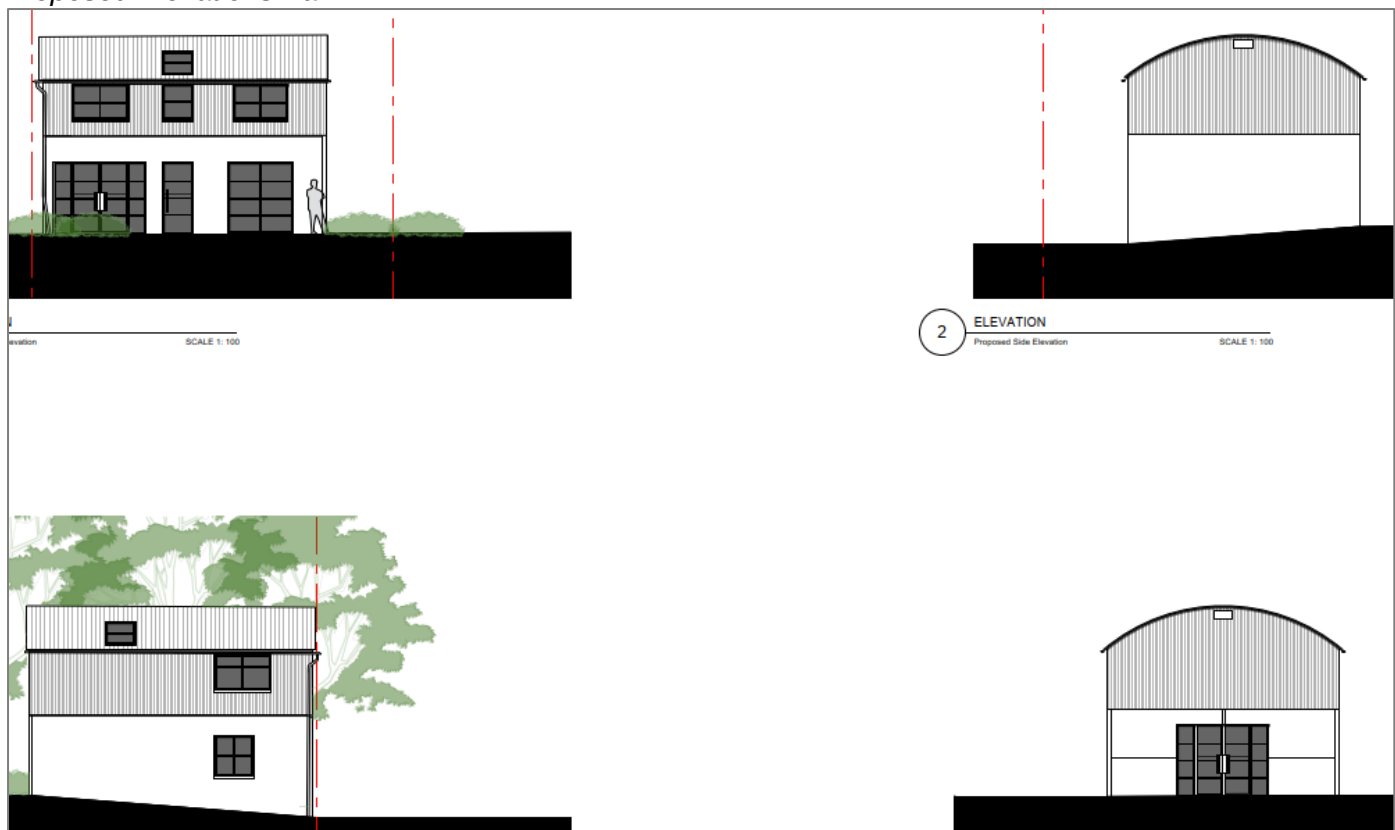
Proposed floor plans Barn 2



Proposed elevations Barn 1



Proposed Elevations Barn 2

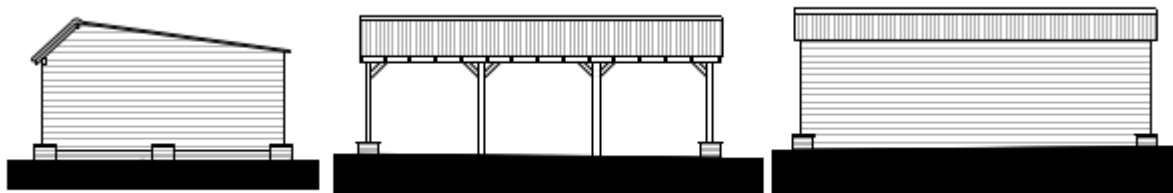


Barn 1 would contain 2 ensuite bedrooms on the ground floor, plus an open plan living/dining and kitchen space, a utility room, WC and hallway with stairs up to a master bedroom on the first floor with an ensuite and dressing room. New window/door openings will be inserted into the roof and front and rear elevations. The building will be reclad with new corrugated metal sheeting and cladding with a brick plinth at the base. Car parking for two cars will be provided within a car port.

Barn 2 would contain a hall, living room, open plan kitchen/dining room, utility room, office and WC on the

ground floor, and 3 bedrooms (the master with an ensuite and dressing room) and a bathroom on the first floor. The building will be updated with new corrugated metal sheeting. The existing car port/storage building will be taken down, reoriented and rebuilt at the front of Barn 2, with the addition of bird boxes.

Car Port Existing Elevations



Car Port Proposed Elevations



The site plan has been submitted showing an attenuation tank and drain runs to help manage surface water drainage. The existing pond will be filled in as part of these works and will be landscaped.

Mature boundary vegetation will be retained, and landscape and biodiversity enhancements will be included (such as a bat boxes on the buildings and bird boxes on new trees). Specific details of these are to be confirmed.

This type of proposal is often dealt with under Part Q of Part 3, Schedule 2, Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (agricultural buildings to dwellinghouses) but cannot be considered under this legislation due to the location of the site within an area of outstanding natural beauty (Article 2(3) land).

Background

Barn 1 was approved for residential conversion under planning application 20230184. The proposals for Barn 1 are the same as were granted under planning application 20230184. Under the current application, the site boundary has been extended to also include Barn 2 and some additional land to the front, side and rear of this building.

Main Considerations

The application site is located in the countryside in the Kent Downs National Landscape (formerly Area of Outstanding Natural Beauty) and in the Green Belt. It is also located on the boundary of the Harvel Wooded Downs and Luddesdown Downs Landscape Character Areas and is in a Biodiversity Opportunity Area.

Taking these designations into account, and as under application 20230184, the main issues for consideration in the determination of this application are as follows:

- Appropriateness of development in the Green Belt, including the effect on the openness of the Green Belt;
- Impact the character and appearance of the surrounding area, including the impact on the Kent Downs National Landscape;
- Residential amenity; and
- Highways and parking.

Principle of development in the Green Belt

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by preserving the open and permanent characteristics of Green Belts (paragraph 142 of the NPPF 2023). Paragraph 152 of the NPPF 2023 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Policy CS02 of the Core Strategy 2014 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 Core Strategy 2014.

Local Planning Authorities should regard the construction of new buildings as inappropriate in the Green Belt (paragraph 154 of the NPPF 2023). However, there are exceptions to this which, as in the case of this proposal, and as set out in paragraph 155 of the NPPF 2023, include:

(d) the re-use of buildings provided that the buildings are of permanent and substantial construction.

Saved Policy C11 of the Local Plan 1994 also permits the conversion of farm buildings to other uses, subject to various criteria, including that it is of permanent construction.

The proposal would re-use the existing barns for residential use, and evidence has been provided to establish that the existing structures are sound. The submitted Structural Assessment for Barn 1 confirms it is a single-storey, timber-framed structure under a pitched, sheeted roof with main frames at approximately 3.3 metre centres. The side walls are clad in metal sheeting beneath which there are brick walls in most locations. To one end there is a single storey attached enclosure formed from block walls with a simple roof installation. The report concludes that 'the proposed conversion is a viable undertaking and that the building is sound and not in need of major reconstruction and can remain standing as existing throughout the construction process. The drawings produced to date, including the existing and proposed layouts can be considered as a logical and sympathetic use of a redundant farm building without involving any major or substantial reconstruction works.'

A Structural Assessment has also been produced for Barn 2, with similar conclusions. The barn is described as 'a single-storey, steel-framed structure under a curved roof. The frames are on a 4.5 metre grid and support the roof and walls. With reference to the geological map of the area, ground conditions should comprise clay with flints which is favourable for foundation support.' The report concludes that 'the proposed conversion is a viable undertaking and that the building is sound and not in need of major reconstruction and can remain standing as existing throughout the construction process. The drawings produced to date, including the existing and proposed layouts can be considered as a logical and sympathetic use of a redundant farm building without involving any major or substantial reconstruction works. As with any scheme of this nature certain elements of the work will be required to meet the building regulation requirements, but these will be primarily concerned with finishes and insulations. The primary structure of the building may be retained without any upgrading.'

On this basis, the proposal would re-use the barn buildings which are of permanent and substantial construction. The existing car port/storage building will also be re-used. These proposals would therefore not be inappropriate development provided they would preserve the openness of the Green Belt and would not conflict with the purposes of including land within it, as also required by paragraph 155. This will be examined further below.

Impact on Openness

Paragraph 142 of the NPPF 2023 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. Paragraph 001 of the Planning Practice Guidance 2019 on Green Belts looks to assess the impact of a proposal on the openness of the Green Belt by taking into account the spatial and visual aspects of a development, its duration and remediability, and the activity levels generated.

As established above, the application proposal would involve an appropriate form of development at the application site. The proposal should also be judged against the second part of paragraph 155 of the NPPF 2023, which seeks to ensure appropriate development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

The existing barns are modestly sized agricultural storage buildings within a modest curtilage. They are sandwiched immediately between residential plots to the north and south, The Cottage and The Farmhouse respectively. To the east is a farm complex which the application site was once part of, and to the west and at a higher level than the application site is Brimstone Hill. Greenacres Farm lies on the opposite side of Brimstone Hill, which has recently had an appeal allowed for an annex to be used as an independent dwellinghouse (appeal ref. APP/K2230/W/22/3297257 attached as Appendix 1).

Current Google Earth Image



Application Site



The Farmhouse



The Cottage (rear of)



Rear of Barns



Existing Car Port/Storage Building



The site is located down from road level and between other residential plots. It is well contained and screened by existing boundary treatment and neighbouring buildings/structures. From looking at historic Google Earth images, it appears that the land to the front of the Barn 1 was originally part of the garden for The Cottage at one stage, and therefore its proposed use as garden area for the proposed barn conversions would not be significantly different to the previous use, albeit for new residential dwellings. The size of the site has been increased to lay out a garden area around Barn 2, and the existing car port/storage building will be re-positioned within this area. The area around Barn 2 and the car port/storage building has been hard standing and used for parking/storage for many years and the inclusion of this part of the site to be used in a similar way within a residential curtilage would have little impact on the openness of this area and would not encroach into the countryside. Boundary treatment details have not been submitted, but providing such details consider the rural nature of the site, such as post and rail fencing, the sense of openness can be maintained.

Google Earth Images
2013



2018



The proposed conversions would not increase the size of the application buildings, and though the appearance of the application buildings would alter to some extent with renewed materials and additional windows/doors (details of which should be conditioned), the conversions themselves would not be considered to adversely impact the openness of the Green Belt. The buildings are already permanent, and the activity levels associated with two additional dwellings would not be excessive and would be in keeping

with the surrounding uses. There may be the addition of residential paraphernalia associated with the residential use of the site but given the previous garden use and hardstanding/parking area across the front of the barns, there would be little difference in terms of openness at the site.

Approved site plan 20230184



Proposed site plan 20231221



Accordingly, the proposal would be unlikely to result in such an intensification of the use of the site that would adversely impact on the openness of the Green Belt either spatially or visually, or encroach into the countryside. Openness would therefore be preserved, and the proposal would not conflict with the purposes of including land within the Green Belt. As such the proposal would not constitute inappropriate development in the Green Belt and would comply with the Green Belt requirements of Policy CS02 of the Core Strategy 2014 and the NPPF 2023.

Design, Character and Appearance

Paragraph 135 of the NPPF 2023 seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well-designed and respects the character and appearance of the surrounding area.

Paragraph 180 of the NPPF 2023 aims for development to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. The site lies within the Kent Downs National Landscape (formerly Area of Outstanding Natural Beauty). Reflective of paragraph 182 of the NPPF 2023, Policy SD2 of the Management Plan 2021-2026 recognises the need to conserve and enhance the local character, qualities, distinctiveness and natural resources of the AONB. Policy SD8 states that proposals which negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the AONB will be opposed unless they can be satisfactorily mitigated.

The application site is also located on the boundary of the Harvel Wooded Downs/Luddesdown Downs Landscape Character Areas (LCAs) and as such, Policy CS12 of the Core Strategy 2014 is also relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications.

The existing application buildings are of an unexceptional, functional appearance, and not out of place in a rural area. They neither make a positive contribution to the area but nor do they detract from it either.

The proposal would change the character of the buildings from agricultural to residential, though the footprint and shape would be the same. If carefully treated, however, the resulting buildings could retain their current agricultural, functional character. Due to the fact that the land to the front of the barns was previously used as garden and as there is already a natural subdivision of the site because of the placement of the buildings around the boundaries, the proposal would have a limited effect on the character and appearance of the site. The application site's position below and set back from road level and behind existing boundary screening also restricts public vantage points and a separate domestic use in this location, contained by neighbouring residential buildings and plots, would not significantly harm the rural character of the area. As such, the proposal would have a limited effect on the special landscape characteristics and qualities of the surrounding landscape, National Landscape and LCAs. The proposal would also be in keeping with the existing pattern of development in the area, including the recently allowed independent dwelling at Greenacres Farm.

Separate dwellings on the site could have the potential to impact additionally on the site with the introduction of further permanent extensions, curtilage buildings and fencing resulting from permitted development rights; however, the Town and Country Planning (General Permitted Development Order) (England) Order 2015 (GDPO) limits the size and type of permitted development within the AONB for such converted buildings, and any further permitted development would therefore only be modest and would appear as part of the existing cluster of development. A restriction on these rights is therefore not considered necessary in this instance. This was also the case with the recently allowed Greenacres Farm development.

Accordingly, the proposal would meet the National Landscape and landscape character conservation aims of Policy CS12 of the Core Strategy 2014, and the NPPF 2023, and whilst it would not necessarily enhance these valued landscapes, it would not result in any harm to them. As the proposal is for conversion, there would not be any significant changes to the existing built form, and as a conversion the opportunity for enhancement is limited. However, planting enhancements are proposed on and around the site. The proposal would be sympathetic to the local character, including the landscape setting, and the quality of the development can be secured by conditioning materials, boundary treatment and landscaping. On this basis, the proposal would comply with the requirements of Policies CS12 and CS19 of the Core Strategy 2014 and paragraphs 135, 180 and 182 of the NPPF 2023.

Residential Amenity

The NPPF 2023 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 130f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

Future Occupiers

The proposed conversion of Barn 1 would result in a floorspace of approximately 178m². There would be three bedrooms. For Barn 2, there would be a floorspace of approximately 120m² with three bedrooms.

In the Nationally Described Space Standard (NDSS) 2015 a 3 bedroom, 6 person dwelling requires a minimum gross internal floor area (GIFA) of 95m². The GIFA area for the conversions therefore exceeds the minimum required space standard. On this basis, the size of accommodation would be acceptable for future occupiers to live in independently on a long-term basis.

The proposed conversions would allow for adequate natural light to all habitable rooms. The outlook for the ground floor bedroom at the rear of Barn 1 and office in Barn 2 may not be ideal given that they will likely face on to a boundary fence, but this would not warrant significant concern. There are no other windows that would be adversely affected in terms of privacy or outlook.

The proposed outside space to the front of the two barns amounts to some 925m², and therefore well exceeds the minimum 60m² garden space required for three bedroom properties under the Council's Residential Layout Guidance.

There are two bedroom windows in The Cottage at the rear facing over what will be the garden area of the proposed converted barn, but according to sales particulars for The Cottage found online ([document-0.pdf \(onthemarket.com\)](#)), these are secondary bedroom windows, and are at high level. The Farmhouse will face over the frontmost part of the gardens of the barns but is set back from the shared boundary by approximately 6.5m and will not have any direct view over the garden area immediately outside the barns. Privacy for the future occupiers of the barns is therefore unlikely to be significantly affected.

The proposal is therefore acceptable in terms of occupier amenity and would comply with the requirements of SPG2 Residential Layout Guidelines (2020), Policy CS19 of the Core Strategy 2014 and paragraph 135 of the NPPF 2023 in respect of providing a high standard of amenity and living conditions for future occupants.

Neighbouring Properties

The Farmhouse is detached, forward of the barns and oriented at a right angle to them. The distance of this property from the barns (approximately 21m at the closest point) will reduce any amenity impact. The barns will not have any direct, harmful impact on The Farmhouse in terms of loss of privacy.

Due to its proximity immediately adjacent the northern site boundary, the main property that would be affected by the proposal would be The Cottage. This property adjoins the proposed car port, which is attached to the eastern side of the property, as seen in the images above and below.

Front view of The Cottage



As the size of the barns will not change, there would be no additions to the buildings that would cause any overbearing or dominant impact on The Cottage. The Cottage and the proposed barn conversions are detached and are at right angles to one another other, which would prevent any direct or mutual overlooking between windows in the properties. The ground floor rear windows at The Cottage are obscured by boundary treatment. The Cottage is not adversely affected by a loss of garden as this land has already been sold off and it has plenty of garden space to the north regardless. A separate residential use of the barns would be unlikely to cause any significantly amenity issues for The Cottage.

Overall, it is considered the proposal would have an acceptable impact on neighbouring properties in terms of outlook, privacy, light, noise and activity levels. As such, the proposal complies with Policy CS19 of the Core Strategy 2014.

Parking and Highways

A 3 bedroom dwelling would require a maximum of 2 car parking spaces, which is easily accommodated on the site. The proposal is therefore considered to comply with parking standards. Cycle spaces would also be able to be adequately accommodated.

The site would accommodate space for turning, including for larger vehicles, such as a tanker to empty the cesspool.

In terms of visibility at the access, it was previously recommended that boundary treatments exceeding 850mm above ground level, or 1m above the carriageway, should not be put within 2m of the highway. This should also apply to this current application.

An issue was also previously raised about possible highway flooding at the access to the application site, due to raised kerbs and gullies on the road that indicated a surface water drainage problem. The previous solution to this concern was the introduction of an attenuation tank on the site and additional drain runs, and this has also been proposed under the current application. This would continue to be acceptable subject to details being submitted, which should be conditioned as previously.

Due to the proposed use for a two dwellings and the low and slow traffic levels, there would not be a significant impact on highway safety from the proposal, which would comply with Saved Policies T1, T5 and P3 of the Local Plan 1994 and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Suitability of Location

This matter was addressed in the appeal for the independent dwelling at Greenacres Farm and the Inspector determined that the proposal would not result in an isolated home in the countryside with regards to paragraph 84 of the NPPF 2023 due to the proximity to other residential properties along Brimstone Hill. Whilst it was recognised that the country lanes serving the property are narrow, with no formal pavements or lighting, as traffic levels are low and slow and there are bus stops, services and facilities all within walking distance on Wrotham Road to the west of the site (less than a mile away), which would provide a reasonable degree of accessibility from the site by means other than the car, and contribute to the rural community in line with paragraph 83 of the NPPF. As the circumstances of the current application are similar to this appeal, the same stance is taken, and the site is deemed to be accessible and not isolated, and therefore a sustainable housing development in this rural area.

Biodiversity

The NPPF 2023 in paragraph 186(a) states that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or as a last resort compensated for, then planning permission should be refused. Policy CS12 of the Core Strategy 2014 reflects this stance and states that sites designated for their biodiversity value will be protected. There will be no net loss of biodiversity in the Borough.

A Preliminary Ecological Appraisal (PEA) was submitted under the previous application. KCC Biodiversity were satisfied that the site/impacted buildings had little protected species/biodiversity interest. However, given the proximity of the site to ancient woodland, it was advised that a native-species only landscape plan should be submitted and sensitive lighting implemented in order to safeguard the ecology of this irreplaceable habitat. This should be secured by condition as previously set out.

Archaeology

The site lies within an area of general multi-period archaeological potential and the site itself is a historic farmstead recorded on historic mapping since at least the mid-19th century.

Looking at the photographs in the structural assessment report, the standing building appears to be a relatively modern replacement, possibly on the footprint of two earlier, smaller, farm buildings which are recorded on historic mapping. On the information presented, it is considered unlikely that the proposed works would have a significant archaeological impact in relation to the standing structures. Any groundworks associated with the proposed development might impact on archaeological evidence for the earlier history of the farmstead, and site, and it is therefore recommended that an archaeological watching brief is conditioned on any forthcoming planning permission. On this basis, the proposal would therefore comply with Policy CS20 of the Core Strategy 2014 and paragraph 203 of the NPPF 2023.

Environmental Protection

The barn and site have historically been in agricultural use and as such, a contamination assessment/investigation is required. Agricultural uses can give rise to contamination through the use and storage of fuels and oils (fuel for machinery and repair/maintenance of machinery/equipment), and storage and use of chemicals including pesticides and fertilisers.

To deal with this, a contaminated land assessment should be conditioned as part of any forthcoming permission, as well as informatives relating to the code of practice on construction and demolition, drainage/sewerage and lighting. On this basis, the proposal would therefore comply with Policy CS19 of the Core Strategy 2014 and paragraph 191 of the NPPF 2023.

Conclusion and Recommendation

The proposed development would provide a net increase of 2 dwellings on the site and would offer a small contribution towards meeting general housing need in the Borough. Accordingly, this weighs in support of the application, particularly where evidence has shown that the Council cannot currently demonstrate a five

year housing supply.

This of course must be balanced against safeguarding and improving the environment and ensuring safe and healthy living conditions, matters which are sought throughout the NPPF 2023. In this case, as discussed above, the proposed barn conversions would be an appropriate development that would not harm the openness of the Green Belt and would conserve the rural landscape context and character of this site within the Kent Downs National Landscape and Harvel Wooded Downs/Luddesdown Downs Landscape Character Areas.

Subject to conditions, the proposal would also be acceptable in terms of design, amenity, parking and highways, environmental protection, biodiversity and archaeology impacts. As such, the proposal would comply with the requirements of Policies CS02, CS11, CS12, CS19 and CS20 of the Gravesham Local Plan Core Strategy 2014, saved Policies C11, T1, T5 and P3 of the Gravesham Local Plan 1994 and paragraphs 83, 84, 115, 131, 135, 142, 143, 152, 153, 154, 155, 186, 191 and 203 of the National Planning Policy Framework 2023.

(For detailed conditions and informatives, see draft Decision.)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Miss Faye Hobbs
Signed:	<i>K. Parkin</i>	Signed:	
Dated:	25 January 2023	Dated:	25 January 2024