

Further Updated PDAS Statement

Meopham Veterinary Hospital,
Wrotham Road, Meopham, Kent,
DA13 0DG

Demolition of detached outbuilding
and erection of first floor infill
extension

September 24

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For: Meopham Veterinary Surgery

Project reference: PR4047



Contents

1	Introduction.....	3
2	Site Context.....	4
3	Relevant History.....	7
4	Proposed Development	10
5	Planning Policy	11
6	Planning Assessment.....	14
7	Conclusions	31

1 Introduction

- 1.1 This Further Updated PDAS Statement has been submitted in support of a planning application for the following development at Meopham Veterinary Hospital, Wrotham Road, Meopham, Kent, DA13 0DG (hereafter referred to as 'the Site'):

Demolition of detached outbuilding and erection of first floor infill extension

- 1.2 The following Land Registry titles are affected by the proposed development, all of which are understood to be under the ownership of the applicant:

Land Registry Title	Description
K279946	'Killarney' and 'Meopham Veterinary Surgery' Wrotham Road, South Street, Meopham, Gravesend, DA13 0DG
K753125	Land on the west side of Wrotham Road, Meopham, Gravesend

- 1.3 The application is accompanied by the following plans and documents:

- 4047-01 Site Location Plan;
- 4047-02 Existing Block Plan;
- 4047-03 Existing Ground Floor Plan;
- 4047-04 Existing First Floor Plan;
- 4047-05 Existing Elevations;
- 4047-06A Proposed Block Plan;
- 4047-07A Proposed First Floor Plan;
- 4047-08A Proposed Elevations;
- Updated Planning, Design and Access Statement (GSP).

2 Site Context

2.1 The subject 0.3 hectare Site is located to the western side of Wrotham Road (A227), close to its junction with Ifield Road some 90m to the north and forms part of the settlement of 'South Street'. On site is an existing detached chalet bungalow with front facing twin gable features, plus multiple side extensions to the extent that the property appears to be twice the width of its original construction at about 30m. There is a single dormer in the north side elevation and a number of rooflights within the pitched roof. Given the multiple extensions the roof form is varied inclusive of one crown roof and two flat roofs, the former to the southern side, the latter including the northern side and within the centre of the building. The depth of the property is relatively consistent at about 16m. It is set back about 10m from the pavement. The Site is in use for veterinary services.

2.2 The ground floor of the main building includes the following:

- Consulting rooms where vets and nurses see clients for appointments to examine and treat their animals
- A reception area for clients to wait for their appointments
- A disabled toilet
- A room to provide hydrotherapy to patients that have had orthopaedic and spinal surgery, along with arthritis
- A pharmacy for spring medicines
- A laboratory for processing blood and tissue samples
- A dental operating theatre
- Two general surgical theatres for operating
- A separate theatre for orthopaedic surgery and laparoscopic surgery
- A preparation room for inducing anaesthesia and preparing patients for sterilization surgery
- A CT room for performing computed tomography scans
- An xray room
- A Cat ward for sick feline patients and patients recovering from operations
- A Dog ward for the same uses
- A small isolation ward for animals with infectious diseases
- A laundry room

2.3 The first floor of the main building is used for the following purposes:

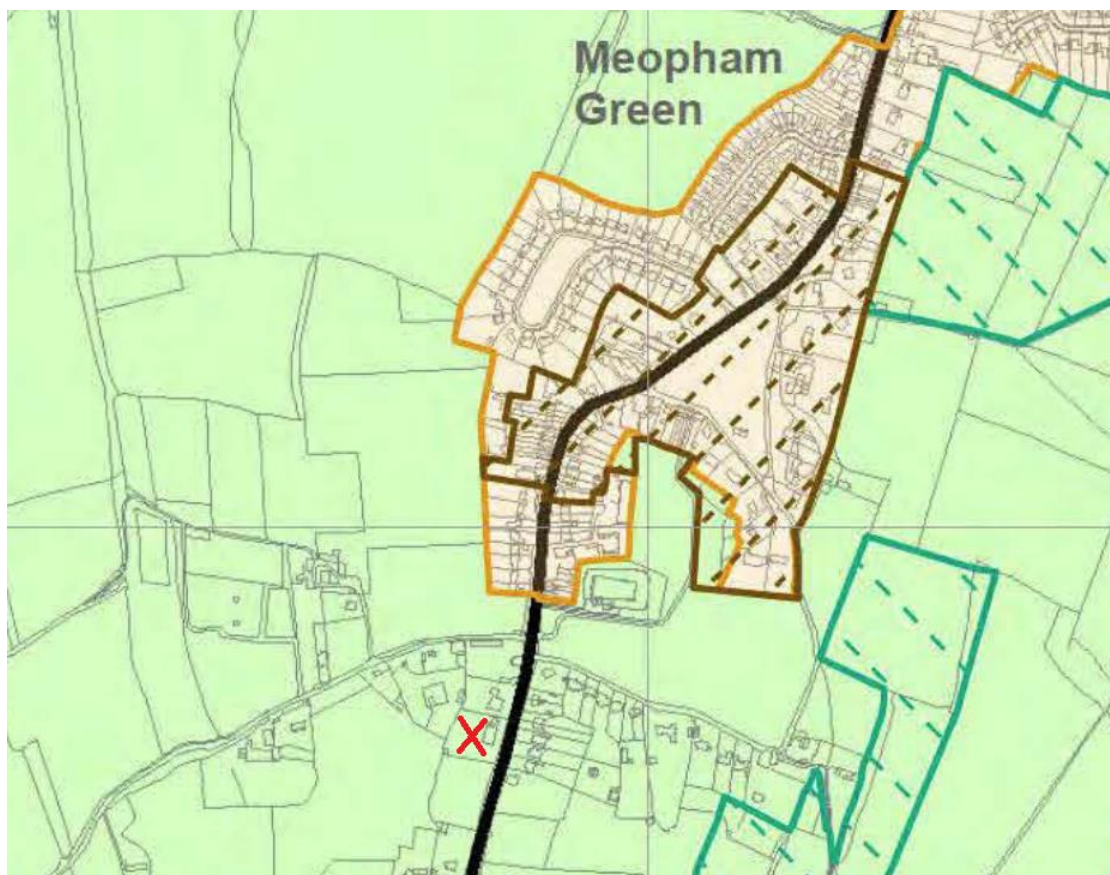
- A general office where the administrative and financial functions of the hospital are carried out. Also includes a desk for the head nurse

- Vets room, for reporting results to owners, reading up on cases, planning procedures, examining CT and Xray in detail on a specialised PACS system. Owing to a lack off space this is also used for staff to eat and relax at the same time as others work and talk to clients
- A meeting room that is used for weekly teaching session of vets and nurses, practice meetings, CPR training. It is also used for night staff to sleep or rest when required and as a rest and lunch facility for staff again owing to a lack of specific welfare facilities
- One staff toilet, where clinical staff also have to change into scrubs
- Corridor, used for storage of clinical clothing and shoes and a comms cupboard
- Small kitchen

- 2.4 The average number of staff on site at any one time is difficult to calculate as they work shifts, however, during a typical patient day this is approximately 25 and during the night between 2 and 4.
- 2.5 The Site benefits from a single vehicular access on to the A227, with a block paved driveway leading to the main car park to the rear and tarmacadam surface between the front elevation and the highway which appears to be used for staff parking. Including the highways verge and pavement, there are sightlines of about 4m forward from the boundary demarcation that exists to the south and north of this vehicular access, whilst the relevant section of the highway is entirely straight in excess of 70m in either direction.
- 2.6 Also within the Site is a single storey outbuilding in the far SW corner and strips of grass around the perimeter of the rear and side car park that appears to accommodate about 33 vehicles (not including the additional informal spaces to the front of the building).
- 2.7 Beyond the Site to the west are open agricultural fields. There is an open parcel of land to the south (referred to as 'land adjoining Kilarney' on Land Registry) whilst on the opposite side of the highway is a cluster of low density, detached residential dwellings. Steele's Lane to the NE is fronted by further linear low density dwellings. The A227 provides links to the A2, Meopham and Gravesend to the north and the M20, Culverstone Green and Wrotham to the south. There is a bus stop just 50m to the north providing hourly, daytime links to Gravesend and Vigo Village, with occasional services continuing to Wrotham and Sevenoaks (excludes Sunday's).
- 2.8 The Site is approximately 135m beyond the southern boundary of Meopham Green (a designated rural settlement inset from the Green Belt – CS02) and is

located within the Green Belt (CS02). The Site forms part of the Parish of Meopham. Leylands Barn and Leylands Orchard are two Grade II listed buildings located just 45m and 65m to the north of the Site (the former is located adjacent to the northbound bus stop). The site is also within Flood Zone 1 which means it has a low probability of flooding from rivers and the sea. The nearest public right of way appears to be NS360 located some 85m away to the north, which follows Steele's Lane.

- 2.9 An extract from GBC's adopted policies map with the Site represented by an 'X' is included below:



3 Relevant History

3.1 The following records are understood to be relevant to the Site:

- [Change of use of dwelling/former nursing home into a veterinary surgery with associated offices, overnight accommodation and the laying out of 18 no. car parking spaces.](#)

Ref. No: 20020159 | Status: Application Permitted

- [Display of an externally illuminated free-standing 'v' shaped signboard in the front garden.](#)

Ref. No: 20030666 | Status: Consent for Advert

- [Application for variation of condition 17 of planning permission reference number GR/2002/159 which prevents horse boxes being kept or parked on the site at any time, to allow horse boxes and trailers to be parked in the car park.](#)

Ref. No: 20050002 | Status: Application Refused

- [Alterations to the rear roof to provide a gable end to south west wing and conversion of additional roof space into overnight veterinary accommodation and an enlarged office.](#)

Ref. No: 20050864 | Status: Application Permitted

- [Erection of storage shed to replace existing greenhouse.](#)

Ref. No: 20060819 | Status: Application Permitted

- [Erection of single storey rear extension to form sterilisation/slucie room, ophthalmic room and surgical instrument store.](#)

Ref. No: 20080195 | Status: Application Permitted

- [Erection of single storey rear extension in substitution to that previously permitted under planning permission reference number 20080195 for revised internal layout of the rooms.](#)

Ref. No: 20080822 | Status: Application Permitted

- [Application for approval of condition 2 of planning permission reference number 20080822 relating to the environmental noise assessment.](#)

Ref. No: 20081080 | Status: Approval of details

- [Application for approval of condition 6 of planning permission reference number 20080822 relating to the landscaping scheme.](#)

Ref. No: 20081093 | Status: Approval of details

- [Application for approval of condition 1 of planning application reference number 20050002 allowed on Appeal reference number APP/K2230/A/05/1177669 relating to the revised details of parking and turning area for horse boxes and trailers.](#)

Ref. No: 20090066 | Status: Approval of details

- [Erection of single storey side and rear extension with enlarged rear gables and two dormer windows to form enlarged veterinary hospital and re-modelling of car park to form additional parking facilities with improved landscaping.](#)

Ref. No: 20140694 | Status: Application Permitted

- [Display of two internally illuminated fascia signs and a double-sided, internally illuminated, projecting box sign on the front elevation, a free-standing, externally illuminated totem sign at the front and two non-illuminated wall signs.](#)

Ref. No: 20150525 | Status: Consent for Advert

- [Erection of a single storey rear extension existing building to provide 14no. additional kennels.](#)

Ref. No: 20181229 | Status: Application Permitted

- [Application for the approval of condition 4 of planning permission reference number 20181229 relating to a noise impact assessment due to animals in veterinary kennels.](#)

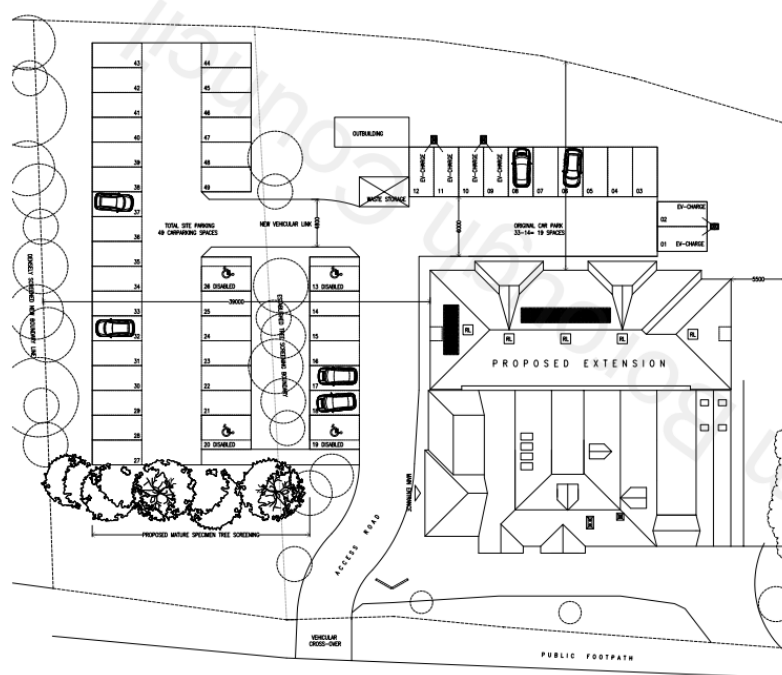
Ref. No: 20190698 | Status: Approval of details

- [Engineering works and change of use of paddock land to create 20 parking spaces including landscaping, access and associated works.](#)

Ref. No: 20200865 | Status: Application Refused

- [Erection of a rear extension and change of use of land to form an extended carpark with EV charging comprising 10no. additional parking spaces on the adjoining parcel of land.](#)

Ref. No: 20220583 | Status: Application Refused on grounds that "the proposed extension and change of use from paddock to car park will result in inappropriate development in the Green Belt without demonstrating that any very special circumstances exist. The proposal, by virtue of its size, appearance and location, will result in a detrimental impact on the openness of the Green Belt, an unattractive development within a wider landscape character area and loss of biodiversity out of character with the area and contrary to policies CS12 and CS19 of the Core Strategy and paras 130, 147 and 149 of the Framework. An appeal decision was later dismissed on 28rd September 2023 on similar grounds (see Appendix GSP1). That site included the open paddock land to the south. The submitted proposed site plan is included below:



4 Proposed Development

- 4.1 The intention of the application is to provide better facilities welfare for the staff of the existing veterinary surgery, who are currently expected to work within cramped offices, insufficient staff welfare rooms and limited toilet facilities, all with limited headroom. There is also a need to provide a more suitably sized meeting room. There is to be no change to the levels of employment. Nor is the application seeking to expand any of the services or training that they already offer.
- 4.2 The Applicant is grateful for the Council's feedback on the design of the plans as originally submitted. In response, the description of the development has been updated as per the front cover and page 1, and the application now entails the following elements:
- Demolition of detached outbuilding along western rear boundary;
 - Removal of centrally located rear dormer window;
 - The central infilling of the U-shaped dual-pitched roof;
 - To include a third and centrally positioned gable end facing the rear using matching roof tiles, white render on the rear wall and a window that matches the two that exist within the existing gable ends;
 - All windows will be white uPVC framed;
 - To also include a flat zinc roof either side of the centrally positioned gable that will be both set down from the ridge by 0.8m and set back from the rear wall by 0.83m;
 - The resultant extensions will add 74 sqm to the first floor accommodation;
 - The additional floor area will enable the Applicant and their staff to benefit from larger offices, a meeting room, toilets and staff welfare room;
 - Three roof lights will also feature to serve the new meeting room and staff welfare room.

5 Planning Policy

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decision-makers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 In terms of the Development Plan for Gravesham, this comprises the following documents that are relevant to this application:

- Adopted Core Strategy 2014 (CS);
- Adopted Saved Policies from Local Plan Review 1994 (LPR).

5.6 In the CS, the following policies are considered relevant:

- CS01 - Sustainable Development;
- CS02 - Scale & Distribution of Development (Green Belt);
- CS07 - Economy, employment and skills;
- CS10 - Physical, and social infrastructure;
- CS11 - Transport;
- CS12 - Green Infrastructure (Landscape Character)
- CS18 - Climate Change
- CS19 - Design & Development Principles

5.7 In the LPR, the following policies are considered relevant:

- T1: Development outside the built-up area
- P3: Vehicle parking standards.

Other Material Considerations

The Framework

5.8 Paragraph 85 notes that planning “decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.” Paragraph 88 adds support for the rural economy. Decisions should enable (amongst others) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings. Paragraph 89 also notes that: “decisions should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

- 5.9 Paragraph 115 notes that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."
- 5.10 Paragraph 123 states that decisions should promote an effective use of land in meeting the need for homes and other uses and making as much use as possible of previously developed land. Paragraph 124 adds that planning decisions should: encourage multiple benefits from rural land; give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and; promote and support the development of under-utilised land and buildings. Paragraph 128 also confirms that decisions should support development that makes efficient use of land.
- 5.11 Paragraph 139 of the Framework notes that "Development that is not well designed should be refused."
- 5.12 Paragraph 154 of the Framework sets out a number of exceptions where new buildings are not to be considered inappropriate in the Green Belt. These exceptions include: (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; (e) limited infilling in villages; whilst (g) refers to the limited infilling of previously developed land (which the site is), 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.
- 5.13 The following are also material considerations:
- Nationally Described Space Standards (NDSS) (March 2015);
 - National Design Guide (NDG) (October 2019);
 - Kent County Council Parking Standards SPG4 (2006);
 - Gravesham Landscape Character Assessment (May 2009) (a technical document which underpins policy CS12).

6 Planning Assessment

Key Issues

6.1 The following are considered to be the key issues in the assessment of this application:

1. Development in the Green Belt;
2. Effect on the rural economy;
3. Character and appearance;
4. Parking, traffic and highway safety;
5. Living conditions;
6. Very special circumstances.

1. Development in the Green Belt

6.2 The Site is already in business use and is therefore considered to be entirely previously developed land that is not located within a built-up area. The following sets out how the proposed extension could be considered a valid Green Belt exception as included within the Framework.

Paragraph 154(c) – proportionate extension

6.3 It is evident from the planning history section above, that the property has already been extended. GBC's planning officer on page 7 of their delegated report in connection with the previous refusal for a doubling of the footprint of the building (20220583) confirms that the original floor area of the building was 210 sqm at the GF and 53 sqm at the FF (263 sqm in total). Between 1982 and 2008 a further 98 sqm was added and in 2014 permission was granted and implemented for an additional 219 sqm, whilst in 2018 a further 36.5 sqm was approved, taking the total additional floor area to 353.5 sqm equating to a 134% increase. The 2023 appeal proposal would have added a further 375 sqm to the building, amounting to a 377% increase.

6.4 That said, the calculations provided by GBC's officers and the previous planning consultants were based on floor area increases. Appeal decision 3298308 in connection with Green Belt extensions (see Appendix GSP2) makes clear that GBC's policies in respect of the extent of acceptable developments in the Green Belt both predate and are not consistent with the Framework. Whilst accepting in paragraph 4 that "numerical restrictions can be helpful as a means to quantify the threshold of harm, in terms of whether a development constitutes disproportionate additions" this is a "crude measure when used in isolation" and

"does not recognise the potential to accommodate additional floors in an existing building."

- 6.5 Regarding the principle of additional upper floor extensions in the Green Belt (akin to the principle of this planning application), the Inspector's positive decision at paragraph 9 confirms that it involved the height of the dwelling "only" being "increased by approximately 2 metres to facilitate accommodation in the roof." The Inspector added that "this increase is minor, even taking account of the small scale of the existing building". Furthermore, the extensions that were the subject of that appeal equated to a 41% increase in footprint.
- 6.6 The following facts of this Green Belt proposal are true:
- No increase in footprint would occur;
 - The extension would act as an infill on 3 sides (as opposed to 2 sides typically);
 - It does not extend beyond any existing side, rear or front wall;
 - There will be no increase in height above the existing ridgeline;
 - Views of the extension will only be possible from the rear;
 - It retains and replicates existing design features to minimise visual impact;
 - The proposal has been updated to include the removal of the existing detached outbuilding along the rear boundary of the Site.
- 6.7 It is also relevant to note that paragraph 154(c) does not require the decision maker to take account of any previous extensions, nor, as the Inspector in paragraph 5 of decision 3298308 notes, does it refer to anything other than "size" (i.e. neither floor area or volume is specifically mentioned). Given the above, this is, therefore, considered to be the type of development that the Inspector envisaged when he was referring to recognising "the potential to accommodate additional floors in an existing building" in paragraph 4 of appeal decision 3298308 (Appendix GSP2).
- 6.8 As such, the proposed upper floor extension is considered to be a proportionate extension taking into account its infill nature and that an exception for the proposed built form exists under paragraph 154(c) of the Framework.
- Paragraph 154(g) – limited infilling of previously developed land*
- 6.9 As noted above, part (g) of paragraph 154 of the Framework permits the limited infilling of previously developed land whether redundant or in continuing use (excluding temporary buildings) subject to that redevelopment not having a greater impact on the openness of the Green Belt than the existing development

(the proposal does not involve affordable housing so part g(ii) of paragraph 154 is not relevant).

- 6.10 The first trigger for part (g) of paragraph 154 is in relation to whether the proposal is for a limited infill or a partial or complete redevelopment. It is the applicant's case that the proposal should be considered as a limited infill, hence this trigger is met.
- 6.11 The second trigger for part (g) of paragraph 154 to be relevant is in regard to whether the land is previously developed. The planning history of the existing site suggests that the entire site is a single plot. The majority of the Site has the appearance of being previously developed in accordance with the definition contained within Annex 2 of the Framework, as it comprises built form and hardstanding. Furthermore, the location of the extension is on top of an existing building. The condition is met.
- 6.12 The third trigger in respect of the application of paragraph 154(g) relates to whether the Site is redundant or in continuing use, but consideration excludes temporary buildings. The Site is certainly in continuing use with all buildings being of permanent construction.
- 6.13 As such, the application could reasonably be considered as an exception under 154(g) as a limited infill involving wholly previously developed land, with the land and buildings in continuing use and all structures being permanent.
- 6.14 Next it is necessary to assess the proposed development against part (g)(i) of paragraph 154 in respect of whether it has a greater impact on the openness of the Green Belt compared with the existing development. It is difficult to see how any reasonable decision maker could perceive an infill of this nature to affect openness, given the built form on 3 sides and the fact that it is not protruding above, nor extending beyond the rear wall of the building. In terms of visual impact, although this is discussed in more detail below, for similar reasons, the applicant considers that there is no issue.
- 6.15 Infilling is not defined in the development plan, nor the Framework. However, a reasonable interpretation could be that it would involve built form between built form. That is what is being proposed here. As 154(g) allows for limited infilling of previously developed land, as this has built form on 3 sides this must be a fine example of what was intended by this exception.

Paragraph 154(e) – limited infilling in villages

- 6.16 The extension can also be examined in relation to exception (e) in paragraph 154 of the Framework. Unlike exception (g), the issue of openness is implicitly included in this exception to new buildings in the Green Belt meaning no further openness tests are requirement. This approach is confirmed in another Green Belt appeal decision in Gravesham (3255704 – see paragraph 9 of Appendix GSP3 where the Inspector confirms that the relevant exception means there is no requirement for him to consider openness). The exception is not limited to residential infills.
- 6.17 The issue of whether this could constitute an infill as part of an exception under paragraph 154(e) has already been explored as part of the assessment under both 154(c) and 154(g). Regarding whether the Site is within a village, a recent High Court decision has clarified that a settlement or village does not have to comprise a minimum number of dwellings, or population, nor does it have to be identified in an adopted or emerging local plan. The decision goes on to comment that a settlement does not have to comprise services and local amenities and that whether a group of dwellings constitutes a settlement, or a village, this will be a matter of fact and planning judgment for the decision maker.
- 6.18 With the above in mind, it is therefore necessary to express a judgement as to whether the Site could reasonably be considered to be within a village taking account of site specific circumstances and the nature and character of the surrounding area.
- 6.19 Firstly, neighbouring development is easily identifiable. The Site forms part of an established linear form of development lining this and the opposite side of South Street. The proposed development would not disrupt this.
- 6.20 Factually, the Site is just 135m away from the defined settlement boundary of Meopham Green. A pavement on at least one side of the road continues well into this settlement from outside the Site. Multiple commercial and employment sites exist nearby, as well as other local amenities, including the following:
- Meopham Dental Care (160m away);
 - Meopham Facial Care (180m away);
 - Meopham Fencing (200m away);
 - NFU Insurance agency (160m away);
 - Minel restaurant (400m away);
 - Cricketers Inn (public house) (450m away);
 - Public green (450m away);
 - Meopham Vineyard (600m away);
 - Meopham Village Hall (900m away);

- Tennis courts (to rear of hall) (950m away);
- Bus stops (50m away).

- 6.21 Given the above accessibility and character merits of the Site and the surrounding area, it can hardly be considered an isolated site that is physically separated or remote from what is a large quantum of development that includes a mix of uses as well as public transport options.
- 6.22 As mentioned above, relevant case law says that a settlement does not have to comprise a minimum number of dwellings, or population, nor comprise services and local amenities. However, it is the case here that the Site forms part of a settlement that does comprise a relatively large population, hundreds of homes, a mix of uses (including commercial and healthcare), public transport options with physical links in place to encourage connectivity and green modes of transport across the area, as well as open spaces.
- 6.23 The applicant accepts the Site is not within a designated village. Following the aforementioned case law, there are now a number of local appeal decisions that support the concept of village infills that do not entail a Site being within a designated village or a development boundary. Two are included as appendices to this statement where no previous built form existed. The first (3255704 – appendix PN3) relates to three dwellings not between existing built form. The second (3230759 – appendix PN4) relates to a single dwelling infill not within a designated village but within previously developed land (akin to the subject proposal).
- 6.24 In consideration of all of the above, it is considered that the proposal involves an infill development and that the Site could and should be considered as falling within a village for the purposes of the exception set out in paragraph 154(e) of the Framework in connection with new buildings in the Green Belt.

Conclusions on the harm to the Green Belt

- 6.25 The very nature of the term 'infilling' suggests that this must result in additional built form. Evidently, there are a number of examples of 154(e) limited infills in villages, which has the added benefit of already having their effect on openness 'built in' to the exception. Alternative exception options are set out above with reference to other appeal decisions including a domestic Green Belt extension in Gravesham that was permitted despite adding height to the built form.
- 6.26 The applicant therefore invites GBC to conclude that either one of the above exceptions apply to the subject development.

2. Effect on the Rural Economy

- 6.27 It is understood that the Site is not a designated employment site either in the development plan. However, there is policy support for the intensification of such sites and no such relevant policy refers to having to comply with other development plan policies, such as Green Belt.
- 6.28 In policy CS07, paragraph 5.1.33 states that the Council will "support the ... expansion of small and medium sized enterprises. The Council will also support the refurbishment and upgrading of existing ... commercial premises." Paragraph 5.1.36 of policy CS07 adds that "The Council will support proposals that promote the appropriate expansion ... of the rural area economy." Paragraph 5.1.38 also says that "the Council will ... enhance opportunities for all local people to access the greater range of higher skilled jobs that will arise as a result of the policies above." This application would assist in achieving the objectives of this policy, and although the aims of the development are not to provide further employment, they are to provide improved facilities to support the existing rural business.
- 6.29 Separately, additional support for rural businesses is also set out in the aforementioned paragraphs of the Framework. Since the 2018 version of the Framework, the 'supporting a prosperous rural economy' now includes reference to decisions having to also support the growth and expansion of all types of businesses in the rural areas, not just planning policies. Paragraph 89 of the latest version of the Framework confirms that in some circumstances the needs of rural businesses may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport (although this Site is served by a daytime bus that operates approximately every hour that serves Orpington). Paragraph 89 adds that "the use of previously developed land ... should be encouraged where suitable opportunities exist." That is considered to be the case here.
- 6.30 Approving this development will result in the safeguarding of rural jobs in the veterinary sector within the authority, as well as improving the working conditions of the staff. The proposed development will therefore assist in positively responding to the aforementioned relevant employment policies from the CS and the Framework. It is therefore hoped that the LPA will support the applicant's preferred choice of securing a limited infill within this long-established and previously developed employment site to the benefit of Gravesham's rural economy.

3. Character and Appearance

- 6.31 Design is a key consideration in the planning process. Good design is an important aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. The Framework states that it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces, and wider area development schemes. Local development plan policies further reinforce the principles of the Framework setting out a clear rationale for high quality design.
- 6.32 Whilst a sensitive site in the Green Belt, as confirmed above, visually, the proposal takes account of that sensitivity by being limited to an infill with existing built form on three sides. Furthermore, it is to the rear, away from view from the public highway. It is highly unlikely that any views of the extension will be possible from South Street.
- 6.33 In design terms, whilst the revised plans feature a zinc flat roof in part, the principle of a flat roof is already characteristic of the existing building, with a total of 3 flat or crown roofs in existence, so a proposal to replace the existing one between the two gable ends does not appear to be a matter that could give rise to a reasonable objection from GBC. The further a flat roof is elevated the less harm it does to the character and appearance of the area because from the ground they are less detectable. The new zinc roofing elements will be both set down from the ridge and set back from the rear wall by 0.8m helping to minimise their presence. The proposed gable end will match the existing two. Furthermore, as an infill the design is in keeping and materials will match the existing where possible. As such, the revised proposal is considered to be in keeping with the character and appearance of the area.

4. Parking, traffic and highway safety

- 6.34 The intention of the proposal entails the provision of improved staff welfare facilities, but no proposal to add to the employment levels of this rural business. As no new consultation rooms are proposed there is expected to be no change to the number of customers visiting the Site. This means that there is no demand for a change to the off-street parking provision, no change to the traffic impacts associated with the Site and no further risk in respect of highway safety.

5. Living conditions

- 6.35 The infill extension will take place 17m from the nearest residential boundary, at Lewin House to the north of the Site. As an infill, there will be no overlooking and no other impacts in respect of overbearing, loss of daylight/sunlight nor any reasonable arguments that the extension could result in any material noise intrusion. As such, the proposal is considered to accord with GBC policy CS19 in regards to amenity impacts.

6. Very Special Circumstances

- 6.36 If GBC finds that on balance of the visual and spatial aspects of Green Belt openness that there is likely to be harm, then paragraph 153 of the Framework becomes relevant. This advises that “‘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.”
- 6.37 Case law states that a number of factors, none of them ‘very special’ when considered in isolation, may when combined together amount to very special circumstances. It is widely regarded that there is no reason why a number of factors ordinary in themselves cannot combine to create something very special.
- 6.38 It is considered that the following make up the applicant's package of very special circumstances (VSCs), if required to justify this development:
1. No other harm could be reasonably associated with such a proposal. To the contrary, the proposal presents an opportunity to improve the appearance of the site, leading to a positive effect on the character of the area generally;
 2. A proposed package of biodiversity enhancements could be secured by condition to assist in adding to the ecological value of the Site;
 3. This is a well-established rural business that has been located within Meopham Green for the past 28 years and now employs almost 50 people, many of whom live within the local community;
 4. The business has expanded steadily over the years and they have found themselves with an urgent need to provide a larger amount accommodation to allow them to continue to offer an acceptable veterinary service that specifically includes adequate staff and meeting room facilities;

5. The business is a RCVS certified hospital (one of only eight in the county);
6. The Site has specialist equipment and facilities essential to meet the needs in the Gravesham area, with one of only three CT scanners used by vets in the county;
7. The veterinary profession is currently listed on the Government's 'Skilled Worker Visa: Shortage occupation (updated February 2022)';
8. The future viability of this business can be secured through the proposed development and avoid the need to relocate;
9. Significant support for rural businesses, such as this, is clearly set out in the Framework;
10. The proposal does not conflict with any of the five purposes of including land in the Green Belt, as: (a) it will not result in the unrestricted sprawl of large built up areas, because it is not adjacent to such an area; (b) it will not result in neighbouring towns merging into one another; (c) it is not open countryside and the applicants are an existing rural business who wish to infill previously developed land in a village; (d) it is not adjacent to an historic town; (e) it will not have any impact on urban regeneration of derelict or other urban land.
11. The applicants have, for some time, been seeking an alternative site to address the future needs of the business, but without success. The preference of the applicants has always been to stay within the Site;
12. Current employee conditions are not ideal. Office, meeting space and staff welfare space is spread out across the existing building. Such a planning application would enable the funding to be provided to reorganise the existing internal layout as well as provide essential additional space;
13. A modern and fit for purpose building and layout is urgently required as is stated in a response to a RCVS inspection. Furthermore, since COVID-19, staff are feeling particularly vulnerable and sensitive about continuing to work within cramped working conditions. The business cannot provide and maintain safe and sufficient working distances for all members of staff across the building. It is not possible for employees of this business to work remotely and new extensions, coupled with internal reorganisations will improve the welfare and safety of the employees, whilst also helping to address an increase in demand for vets, again due to COVID-19;

14. The business provides an essential 'community service' and constitutes 'community infrastructure' necessary to provide sustainable communities;
15. Should the application be successful, following occupation, the business will be able to maximise its role as an incidental training centre for veterinary professionals offering economic and social benefits. The proposed ongoing and improved training facility will help to address the chronic shortage of suitably qualified and skilled veterinary professionals. It will remain the case that due to the Tier 3 RCVS accreditation, a maximum of two students will be on site at any time. Under this accreditation they are not permitted to allow any more students at any one time, so the first floor rear extension will have no impact on the amount of students attending the site over and above the current number – it will simply provide improved facilities for them.

Cramped Conditions

- 6.38 A key driver for this application is, as set out in a number of the points made above, the need to improve the facilities for its staff and students and also provide for a decent sized meeting room for this facility that is open 24 hours per day, 7 days per week. The following photographs are intended to add to this key point of the VSCs:

1. The current meeting room including nurses who are off duty but studying:



2. Corridor & Comms cupboard: This has to accommodate staff surgical scrubs and uniforms and they have to get changed in the wash room behind. There is no formal locker room for changing:



3. Vets Office: The vets office has to duplicate as a nurses office too and the Applicants have nurse practitioners. Everyone hot desks. It's good for communication but it gets hot and overcrowded and is poor for confidentiality:





4. Current staff room: the kettle, microwave, fridge, sink, lockers, bags and shoes all go in here:



5. This is where the clinical staff change. There is a shower behind the door:



6. Other photographs excluding members of staff:





Conclusions on Very Special Circumstances

6.39 These VSCs need to be weighed against any potential harm to the Green Belt (and the likely extent of that harm). There is considered to be a substantial case in favour of these proposals given the lack of any other demonstrable harm and

the extent of positives the development brings in other respects. It is considered that it would be entirely reasonable for these VSCs collectively to be regarded as outweighing any potential harm to the Green Belt, which the applicant is of the view can only reasonably be considered extremely limited (at worst), given the extension's infill nature with built form on three sides.

7 Conclusions

- 7.1 Any Green Belt site presents its challenges to applicants but on this occasion, the Site is previously developed land and benefits from being within close proximity to a designated settlement, which in Green Belt terms means that the proposed development can reasonably constitute 'limited infilling in a village.' Other exceptions could also be reasonably applied either as a proportionate extension to an existing building or as an infill of previously developed without causing a greater impact to the openness of the Green Belt.
- 7.2 The extension will not protrude beyond the height of the existing building, not add to the footprint or spread of built form and would be completely out of sight from the street scene. The assessment above identifies no other harms that are likely to arise from the proposed development.
- 7.3 If the Green Belt exceptions are not considered by GBC to be reasonable then there is a significant package of very special circumstances that should be considered to outweigh any identified harm to the Green Belt (and the applicant states that any such harm can only reasonably be said to be very limited).
- 7.4 In consideration of all relevant development plan policies and material considerations, this application should be viewed positively by the authority and it is respectfully requested that this submission is approved.