

Delegated Report

Full Planning Application

Planning Application No:	20251030
Location:	2 Green Farm Cottages, Lower Road, Shorne, Gravesend
Description:	Change of use of land to the keeping of horses, erection of a stable building and a hay barn and creation of sand-school
Applicant:	Mr S Fisher
Site Visit Date:	Desktop assessment

Submitted Documents/Plans

Application form
Drawing no. 01 (Site Location Plan)
Drawing no. 02 (Existing Block Plan)
Drawing no. 03 (Existing Block Plan with Aerial Image)
Drawing no. 04 (Proposed Block Plan)
Drawing no. 05 (Proposed Block Plan with Aerial Image)
Drawing no. 06 (Proposed Stables Floor Plans and Elevations)
Drawing no. 07 (Proposed Hay Barn Floor Plans and Elevations)
Planning Statement
Heritage Statement
Preliminary Ecological Appraisal (dated 27/06/2025)
Baseline Habitats Plan
BNG Condition Assessment
BNG Metric

Relevant Planning History

There is no history directly relating to the application site.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development and Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- T1 – Impact of Development on the Highway Network
- T5 – Access to the identified Highway Network

- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- 2 – Achieving sustainable development
- 6 – Building a strong, competitive economy
- 9 – Promoting sustainable transport
- 12 – Achieving well-designed places
- 13 – Protecting Green Belt Land
- 15 – Conserving and enhancing the natural environment
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- SPG4 - KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)
- Planning Practice Guidance (PPG) Green Belt (2025)
-

Consultations, Publicity and Representations

External Consultees

Dickens Country Protection Society

The Society has no objection in principle but considers that more information on the nature of the enterprise should be provided in order that appropriate conditions can be attached to any consent.

KCC Biodiversity

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

A summary of our review of the submitted biodiversity net gain information is provided below. Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Table 1: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	+10.34%	N/A	2	N

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should not be treated as significant and so does not require securing for 30-years.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications for development (unless exempt) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information⁴, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 2: To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Y	Is the applicant correct about the BNG requirement and any exemptions? Check application form carefully.
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Y	Date of site survey 22/4/25
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date. The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	N/A	The site is 0.35 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool matches the reported red line boundary site area as per the application form. We are content with the baseline habitat classifications. The planning statement states that a section of arable land under the control of the applicant will be used to achieve BNG. This has been listed under off-site within the metric as it is outside the red line boundary.
A statement whether activities have been	Y	The submitted information supports that

carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value (' degradation '), and where they have: • a statement to the effect that these activities have been carried out; • the date immediately before these activities were carried out; • the pre-development biodiversity value of the onsite habitat on this date; • the completed metric calculation tool showing the calculations, and • any available supporting evidence of this.		no on-site habitat degradation has occurred.
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).	N.A	None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (orY earlier proposed date), including any irreplaceable habitat (if applicable).		

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan. However, it is advisable to seek an indication prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application.

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions should be applied should planning consent be granted.

We consider that the baseline information is correct for the habitats present. The metric states all the other neutral grassland is to be lost, however the post development habitat creation states some will be retained (0.1556Ha) and reduce in condition from moderate to poor. This is realistic due to recreational pressure. This post development poor condition habitat is 0.64 habitat units of medium distinctiveness habitat, and as such due to the condition change rather than creation, we do not consider it significant.

Off-site compensation is required for this development and is proposed within cropland under control of the applicant, and is subject to the general BNG condition.

The suggested conditions below show how on-site biodiversity net gain can be secured by condition; it may be used with a planning obligation securing any monitoring contributions.

OFF-SITE GAINS (NEEDS TO BE REGISTERED)

'Off-site' biodiversity gains are any BNG measures proposed outside of the red line boundary. It can be achieved through habitat creation on land owned by the applicant/developer, a third-party provider or through the purchase of BNG units from a habitat bank operator for a site which is registered on the Biodiversity Gain Site Register.

The statutory Biodiversity Gain Plan (BGP) must contain the biodiversity gain site register reference number for any offsite units if these are used. BNG sites must be registered here: Register a biodiversity gain site - GOV.UK.

Where off-site gains are secured on land owned by the developer (but outside the redline boundary), or on third-party land (but not through a 'habitat bank operator'⁵), the biodiversity net gain needs to be subject to a deed of conservation covenants or Section 106 (as appropriate). Section 106 agreement templates are available on the Planning Advisory Service website. It is generally inappropriate to rely solely on conditions to secure off-site biodiversity net gain. The following needs to be secured as part of the off-site biodiversity net gain:

- The submission of a habitat management and monitoring plan (HMMP);
- Notice of HMMP implementation and completion of the habitat creation and enhancement works;
- Timescales for completion of habitat creation, and the submission of a completion report;
- Submission of monitoring reports;
- A habitat monitoring fee to be paid to the local planning authority on every habitat management monitoring event.

The HMMP shall be submitted when the general BNG condition is discharged and shall contain the following information:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Where off-site gains are to be secured through a 'habitat bank operator' (which has its own legal agreement and HMMP), no additional conditions or section 106 obligations are required, above a condition requiring biodiversity net gain to be delivered as set out in the planning application.

The submission of provisional/draft legal documents outlining the agreement between the applicant and the provider of any off-site gains are advisable prior to determination to confirm that the proposed route to delivering net gain is feasible, but this information is not required until submission of the pre-commencement Biodiversity Gain Plan.

How the BNG is to be achieved will have to be agreed, secured and, where applicable, registered on the Biodiversity Gain Site Register, prior to the submission of the pre-commencement Biodiversity Gain Plan.

BIODIVERSITY GAIN PLAN

Single Phase Development

Suggested Condition Wording:

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Preliminary Ecological Appraisal reference number 2025/02/04, for 2 Green Farm Cottage, Green Farm Lane, Shorne Kent, dated 27th June 2025 and prepared by KB Ecology.

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application, in accordance with [insert relevant policy].

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

PROTECTED SPECIES

A preliminary ecological appraisal was conducted, and the site is predominately grassland with regular grass management. No trees or hedgerows are proposed to be lost. Protected species have been considered, and we are satisfied that impacts will be minimal. To ensure no suitable habitat becomes established we recommend grass management continues.

Therefore, to protect from limited adverse impacts to protected species during clearance and construction we recommend a precautionary work statement is a condition with the suggested wording below.

Suggested condition wording:

From commencement of works (including site clearance), to avoid impacts to protected and priority species, the following precautionary mitigation should be implemented: 1. Any hedgerow and trees to be retained, including its roots, will be protected from damage;
2. All temporarily stored building materials (that might act as temporary resting places) will be isolated within hardstanding areas and raised off the ground, e.g. on pallets.
3. Any work to vegetation that may provide suitable bird nesting habitats should be carried out outside of the bird breeding season (1st March to 31st August inclusive) to avoid destroying or damaging bird nests in use or being built. If within the breeding bird season a survey by a suitably qualified person needs to be conducted to confirm absence, prior to commencing works.
4. If at any time a protected species is discovered within the works area all works must stop while a suitably qualified ecologist and/or Natural England are consulted. Works will not resume until any required surveys and/or mitigation are completed.
5. Practical pollution measures (both physical measures and sensitive working practices) will be in place to avoid noise, dust and run off, or reduce impacts during construction

ENHANCEMENTS

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) 2024, biodiversity should be maintained and enhanced through the planning system. Enhancement refers to providing net benefits for biodiversity over and above requirements for BNG, avoidance, mitigation and compensation. Some actions have been proposed within the PEA. As such, we advise that an enhancement plan is provided that includes responsibilities for future management and a condition wording is suggested below.

Suggested Condition Wording:

Prior to any works above slab level, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The plan shall include full details of biodiversity enhancements and shall include a detailed, scaled soft landscaping plan, planting schedule and habitat management measures. Details may also include (as appropriate) provision of durable and suitably-placed bat/bird boxes, native wildflower sowing (with details of seed mixes/preparation and management measures), tree planting and the creation of hedgehog highways (by creating small 13×13cm gaps in any close board fencing).

The Plan shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187, 192 and 193 of the

National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

KCC Heritage

The site lies within an area of multi-period background archaeological potential.

However, based on existing Historic Environment Record data for the area, I consider it unlikely that these proposals would have a significant below-ground archaeological impact and have no further comments to make in this case.

KCC Highways

I refer to the above planning application and having considered the development proposals and the effect on the highway network, raise no objection on behalf of the local highway authority.

It is important to note that Local Planning Authority (LPA) 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 LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, 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 and near the highway 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 pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>

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. Further details on this are available on our website below:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, 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.

Further 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.

Kent Police

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Perimeter, boundary and divisional treatments including gates. Given the rural and open location of the site, it would be difficult to fully protect the boundary with formal security fencing, which may not be considered Appropriate, Realistic or Cost effective (ARC). Post and rail fencing offers little or no security, thick natural hedging and planting in conjunction with post and rail fencing can provide additional security, but only if the planting is dense and/or a prickly species. We recommend that the access road be fully gated (if not already the case) and secured when the space is unoccupied, in order to prevent/deter unauthorised access, fly tipping, anti-social behaviour etc.
2. Lighting. We appreciate the rural nature of the location, but request lighting be installed at the access to the site and all buildings. Bollard lighting offers little security value and is largely for wayfinding only. Lighting should, however, be installed on the building at all entrances/exits in the interests of site security and safety. Additional lighting may be required for buildings storing high value items, in the interests of site security and safety.
3. CCTV is recommended to cover the main vehicle entrance and all entrances/exits points. Smart CCTV systems are recommended to allow authorised staff to dial in and view images, particularly in the event of any alarm activation. Solar powered and wireless cameras systems are on the market, which may be of interest to the applicant, should long cable runs not be ARC.
4. Doorsets and windows should be certified to PAS24:2022 or LPS1175 SR:1. This includes all entrance/exit doorsets. A door viewer and/or video entry system is also recommended to allow anyone who may stay overnight or lone working to see who is outside the main entrance door. Laminated glazing is recommended for all ground floor or vulnerable windows as an added layer of security. Given the remote location, security grilles are recommended (internal or external) as an added layer of security.
5. We recommend roller shutters to protect the main entrances. Ideally this should be certified to LPS1175 SR1.
6. Alarms. We appreciate the rural nature of the site, an audible only alarm may not be appropriate as it may not be heard and may alarm any horses on site. However, a fully monitored, possibly silent, security alarm system should be installed, ideally monitored by an ARC (Alarm Response Centre). Flashing alarm beacons may also be considered. This is particularly important given the rural location.

7. Additional security measures may be required to protect any storage areas, especially any areas where medical equipment/ medicines are stored. Doorsets and windows for these areas should also be security rated to PAS24:2022 or LPS1175 SR:1 (or higher).
8. Secure mail delivery will need to be considered.
9. Bin storage. Bins should be stored in a secured area away from buildings. Bins can be used as a means to commit crime, be used as a climbing aid or even be an arson hazard.
10. Tack and feed stores should also be fully secured.
11. Site logs and inventories are recommended.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Shorne Parish Council

The Parish Council has no objection in principle to this proposal but additional information is needed.

The proposal is for a livery stable, so an agricultural business/employment use in the Green Belt and rural area.

There will be two very large buildings (12 horse stable with tack and washdown areas, and a feed barn), with a sand school and parking area, located east of existing farm buildings. As the new buildings are near to substantial existing ones, there should not be significant impact on nearby listed buildings although they will add to visual and landscape impact as a whole and particularly when viewed from lower ground. The proposed built forms almost entirely occupy the land defined within the red line boundary, with no blue line area shown on the block and location plans, so it is not clear whether there is other associated land that will be used as paddocks for exercise, and for grazing.

With there not being any bridle paths in the area, there is also a question about what routes will be used for hacking/riding out from the stable as there would be safety concerns on and even crossing Lower Higham Road and Green Farm Lane due to conflicts with traffic.

Further information is also needed about drainage, sewerage, staff and user/visitor facilities, manure storage and management, bin storage and exterior lighting.

Other suggested Conditions:

- The access route, to be only via Green Farm from Green Farm Lane, should be formalised.
- Hours of operation should be defined.
- Conditions are needed preventing residential use/conversion.

Neighbouring properties

The application has been advertised by individual neighbour letters to 2 properties, and on site. The overall consultation period expired on 14 November 2025.

No letters of representation have been received from neighbouring properties

Local Ward Councillors were also consulted, and no responses were received.

Officer's Analysis

Proposal

This application seeks full planning permission for the change of use of the land to the keeping of horses, the erection of a stable building and a hay barn and the creation of sand-school.

The development would be constructed on an existing paddock. The existing boundary treatment would be retained. The stable building would be located along the southern boundary of the site. It will be 30m by 12m, approximately 4.2m high to the ridge, and between 2.3m and 3m to eaves level. It would comprise 12 stables (for 12 horses), a tack room, and a horse wash down area. The building would be set into the ground. It would comprise a corrugated green profiled metal roof with ventilated profiled sheeting for the walls above a brickwork plinth.

The hay barn would be located to the east of the stable building along the site's eastern boundary. It is proposed to be 20m by 10m. The maximum ridge height would be approximately 4.8m and the maximum eaves height 3m. External materials would be a corrugated green profiled metal roof with profiled metal sheeting (green) above a brickwork plinth for the walls.

The sand-school would be located to the north of the stable building and would be 40m by 20m. It would be enclosed with a timber post and rail fence. No lighting is proposed.

There is existing landscaping/hedging site to the north and east of the site, which will be reinforced and enhanced to meet Biodiversity Net Gain requirements. Approximately 1.15ha of the arable field to the north of the site will be sown with species rich herb and grassland mix and maintained to provide the required BNG 10%. The land to the north will be used for grazing.

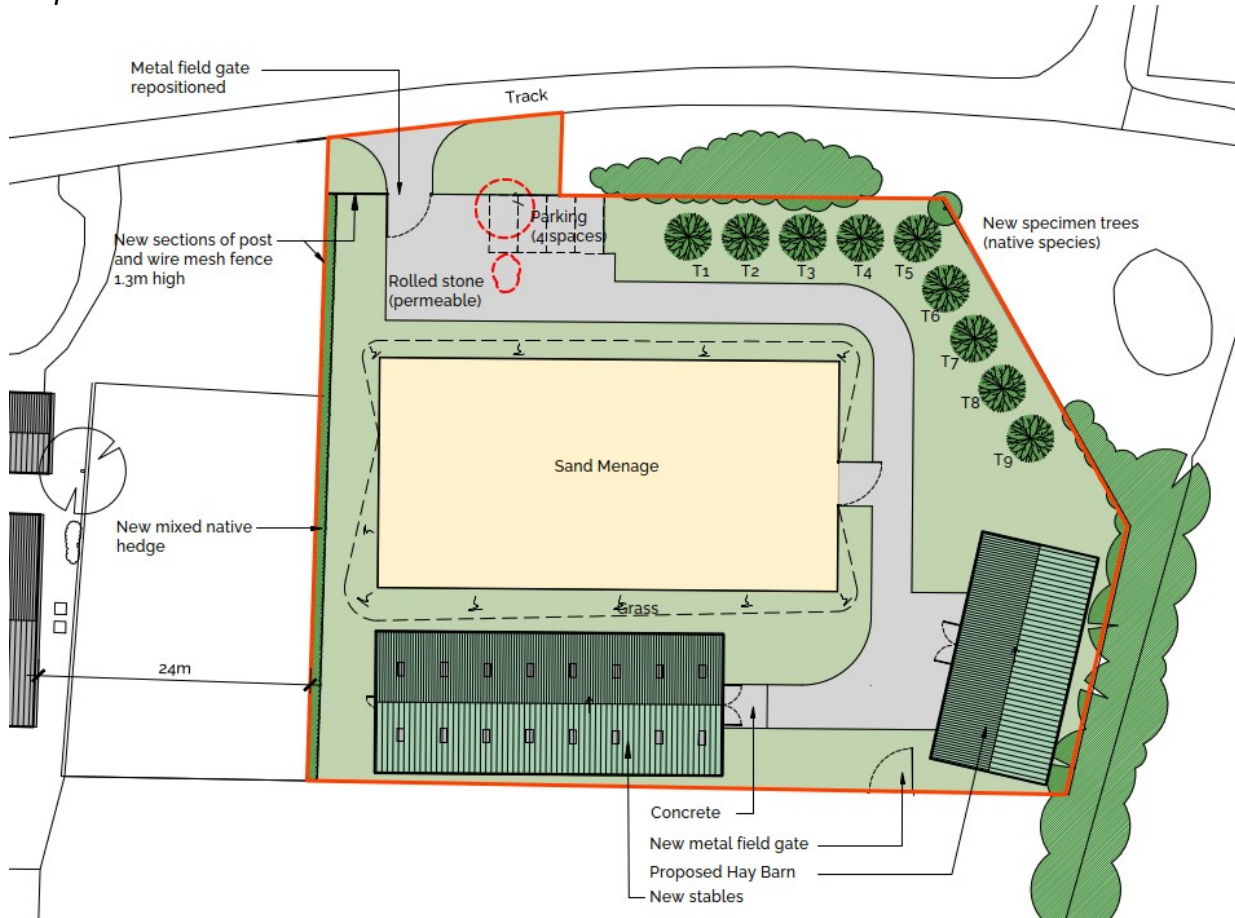
The stables and sand-school will be available for use on a livery basis. The business would be run by the applicant and his immediate family, who reside at 2 Green Farm Cottages to the north of the site. The applicant farms land near to the application site – they have tenancies on land at Queens Farm and land to the north and east of Gravesend Crematorium. They have cattle, sheep, arable and grassland/marshland, some of which is used for hay production. The applicant has stated that as there is no long-term security on any of the land and with the uncertainties facing farming they are looking for a diversification that is their own to provide some stability.

The applicant has suggested a muck heap could be placed between the stables and hay barn. Muck is produced on the farm so will be removed and added to these heaps as and when and spread on the arable land.

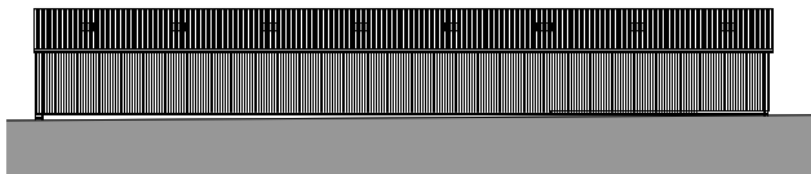
In terms of drainage, most of the areas are permeable. Rainwater would be harvested from the stable to use for drinking etc through filtering. A drain outside the main door would be proposed to catch water from washing etc. into a tank/package treatment plant that would also be connected to the muck heap run off. The sand school would have proper drainage when built to comply with relevant regulations.



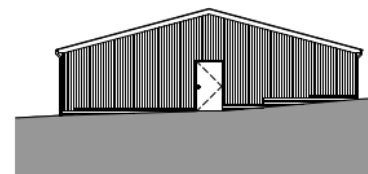
Proposed Site Plan:



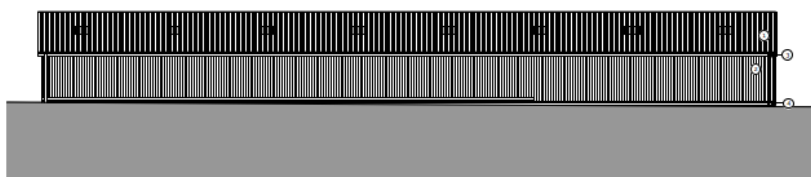
Proposed Stable Building:



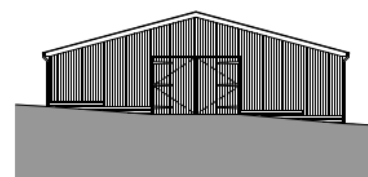
Proposed South Elevation
1:200



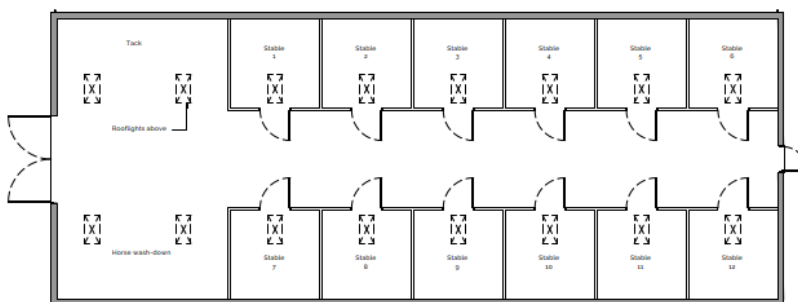
Proposed East Elevation
1:200



Proposed North Elevation
1:200



Proposed West Elevation
1:200



Proposed Floor Plan
1:200

- Legend**
- Roof: Profiled metal roof sheeting (green)
 - Walls: Profiled metal vented wall panels (green)
 - Gutters and downpipes: Black plastic
 - Brickwork path

Area:
Proposed Stables: GFA 300m² GFA 330m²



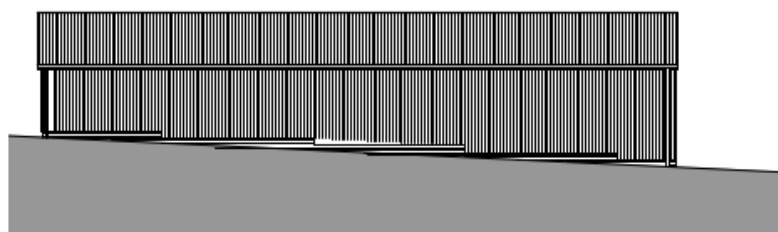
Land at a Green Farm Cottages, 4
Stables, Kent G12 9YT

Proposed Stables
Floor Plans and Elevations

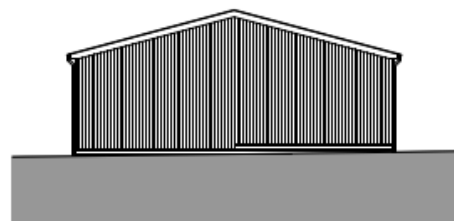
Date: 29.03.2025

Scale: 1:200 A2

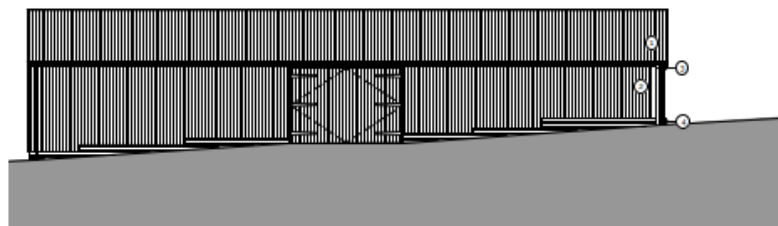
Proposed Hay Barn Building:



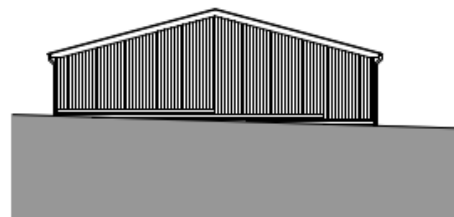
Proposed West (rear) Elevation
1:100



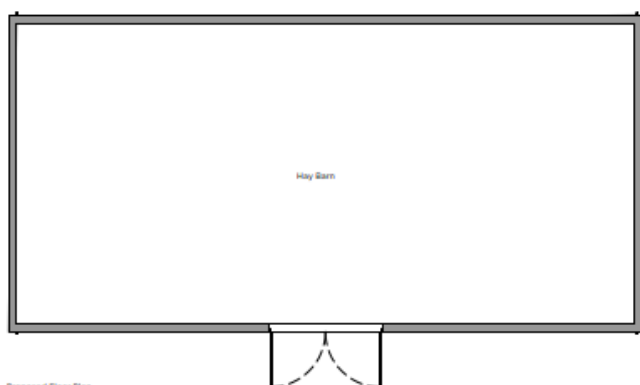
Proposed South (Side) Elevation
1:100



Proposed East (front) Elevation
1:100



Proposed North (Side) Elevation
1:100



Proposed Floor Plan
1:100

Materials

- ① Roof: Profiled metal roof sheeting (green)
- ② Walls: Profiled metal wall panels (green)
- ③ Gutters and downpipes - Black plastic
- ④ Brickwork plinth

Areas	GEA	GFA
Proposed Hay Barn	200m ²	185m ²

Principle Issues

The proposal involves a new commercial livery business on the site. Paragraphs 88 and 89 of the NPPF 2024 relate to supporting a prosperous rural economy. The development and diversification of agricultural rural businesses should be enabled, and it should be recognised that proposals to meet local business needs may be required in such areas, in locations that are not well served by public transport. It will be important, however, 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).

Policy CS07 of the Core Strategy 2014 also supports proposals that promote the appropriate expansion and diversification of the rural area economy. Policy CS02 supports development outside rural settlements, including proposals to diversify and maintain the rural economy, where it is compatible with national policies for protecting the Green Belt and policies in this plan.

National and local policy is generally supportive of rural business development and expansion, subject to compatibility with policies for protecting the Green Belt and other policies in the development plan.

This proposal site is located in the countryside, outside any rural settlement, in the Green Belt and in the Higham Arable Farmlands Landscape Character Area.



The application site is located to the east of Green Farm, which is a historic farm complex accessed from Green Farm Lane to the west, or Lower Road to the north. Green Farm comprises the main original farmhouse (Grade II Listed), a Grade II listed converted Granary, and a range of other agricultural buildings. The application site is owned by the occupiers of 2 Green Farm Cottages, which lies to the north-east of Green Farm:



The site itself is approximately 0.35ha in size and comprises a paddock currently used for horse grazing. It is bounded by hedgerow. There are open arable fields around the site to the north and south and there is a commercial orchard to the east, known as New Green Farm.

The Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar sites and South Thames Estuary and Marshes Site of Special Scientific Interest (SSSI) lie approximately 1km beyond the north of the site.

Given the designations of the site, the main issues for consideration in the determination of this application are as follows:

- Appropriateness of development in the Green Belt
- Landscape impacts
- Residential amenity matters
- Parking and highways issues

- Biodiversity impacts
- Heritage matters.

Principle of Development in the Green Belt

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.

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 2024). Paragraph 153 of the NPPF 2024 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

Any harm to the Green Belt should be given substantial weight. Development in the Green Belt is inappropriate unless either one of the exceptions in paragraph 154 applies.

The submitted Planning Statement considers the development is potentially not inappropriate under paragraph 154 (b) of the NPPF 2024, which relates to the following:

- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, 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*

The proposal can be considered under this exemption, as it involves facilities for outdoor recreation (horse riding). The main consideration in relation to whether this exemption applies relates to whether the facilities preserve the openness of the Green Belt and do not conflict with Green Belt purposes.

A further exemption could also apply under paragraph 154 (h) of the NPPF 2024:

- v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds);*

The same provisos apply to this exemption, in that openness must be preserved and there must be no conflict with the Green Belt purposes. These matters will be considered further below.

Green Belt Purposes

Paragraph 143 of the NPPF 2024 sets out the five purposes of the Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Whilst the proposal would not conflict with the majority of these points (it would not cause an expansion of a large built-up area; it would not cause towns to merge; it does not affect a historic town; and is not related to urban regeneration), there is a conflict with point c). The proposal will involve a large proportion of this currently open, undeveloped countryside site being developed with large buildings and surfacing, which would result in an encroachment into the countryside. There is therefore a conflict with this Green Belt

purpose.

Preservation of Openness

Paragraph 142 of the NPPF 2024 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 013 of the Planning Practice Guidance 2025 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. These matters must be considered in relation to the proposal.

As previously stated, the application site is currently open agricultural land, void of development.

In terms of the spatial impact of the proposal, the proposed stable building, hay barn and sand school will cover a large portion of the site in terms of the proposed built footprint and building height and will therefore have a significant impact on its openness. Whilst the site is some distance away from the closest roads, there is a Public Right of Way running through Green Farm past the application site, and therefore the visual impact of the proposals would be discernible from a close public vantage point. Whilst the proposed development would be sited close to other rural buildings associated with Green Farm, it would result in a fairly significant spread of development to the east, and given the fairly open countryside surroundings, this will have a clear visual impact.

Whilst given the nature of the proposed development, there would be the potential for remediation were the development not to be permanent, the activity levels generated from a commercial livery with at least 12 horses and their associated people and paraphernalia would have a significantly higher impact than the current undeveloped nature of the site.

On the basis of the spatial, visual and activity impacts, it is considered that the proposal would have a significant impact on the openness of the site.

Conclusion on Green Belt

Paragraph 154 of the NPPF 2024 states that development in the Green Belt is inappropriate unless one of the listed exceptions apply. In this case, due to the fact that the proposal would fail to preserve the openness of the site and would conflict with one of the Green Belt purposes to safeguard against countryside encroachment, the proposal would not meet the exception criteria and as a result the Green Belt would be harmed. Any such harm is given substantial weight.

Despite the policy support set out for a prosperous rural economy, as set out in the submitted Planning Statement, this is not considered to provide the special circumstances necessary to outweigh the harm to the Green Belt. The proposed development is therefore inappropriate and should be refused on this basis.

The exemption under paragraph 155 would not apply, as the land is not considered to be grey belt land given that it undermines one of the purposes of the Green Belt; there is no demonstrable need for the type of development proposed; and it is not in a sustainable location.

Landscape Impact

Paragraph 135 of the NPPF 2024 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 187 of the NPPF 2024 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 application site is located in the Higham Arable Farmlands Landscape Character Area within the Gravesham Landscape Character Assessment (GLCA) 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 LCA will be taken into account in determining applications.

In relation to the Higham Arable Farmlands Landscape Character Area, one of the key characteristics of the area is the open, gently undulating farmland, which provides high visibility across the area. The overall condition of the landscape is poor and has moderate sensitivity. It is recommended that key landscape elements should be restored and created. Proposals that introduce extensive or obtrusive elements within visually sensitive areas of the open landscape should be resisted.

The scale and extent of the proposal will result in a fairly significant spread of development across open countryside, with two large buildings and a change in surfacing from the sand school and internal parking and access areas. The site is well contained by existing boundary planting and fencing which will exacerbate the change in character and function. Whilst the proposed use may be appropriate for the rural area, given the open farmland surroundings, the built development will have a clear visual impact that will introduce large obtrusive features into the landscape where there are currently none. This would be contrary to the landscape guidelines for the area and would therefore have an unacceptable impact on the landscape.

On this basis, the proposal would fail to comply with the requirements of Paragraphs 135 and 187 of the NPPF 2024, Policy CS12 of the Core Strategy 2014 and the GLCA (2009).

Residential Amenity

The NPPF 2024 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 135f). 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, and avoid adverse environmental impacts from pollution.

Due to its location some distance away from residential properties (approximately 50m at the nearest site boundaries), the proposed development is considered to safeguard the amenity of residential properties. There may be more comings and goings related to the change in the use of the site, but its distance from neighbouring properties would mean that the impact would be minimal. Having said that, were permission to be forthcoming, it would be appropriate to include conditions relating to hours of use and restricting the extent of stabling and horses. A waste management plan would also be necessary. On the basis of such conditions, the proposal would be in compliance with Policy CS19 of the Core Strategy 2014 and relevant NPPF paragraphs.

Parking and Highways

There are 4 parking spaces shown within the site on the proposed Block Plan, accessed by a repositioned field gate, and there will be an internal access comprised of rolled stone. There will be no new access to the field; this will continue to be accessed via the track leading from Lower Road to the north and Green Farm Lane to the west.

There are no objections to the proposal from KCC Highways. There would therefore be no adverse parking or highway issues resulting from the proposal, which would comply with Saved Policies T1 of the Local Plan First Review (1994) and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Biodiversity

Paragraph 187 of the NPPF 2024 states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and sites of biodiversity. Policy CS12 of the Core Strategy seeks to protect sites designated for their biodiversity value based on their level of importance and enhance, restore, recreate and maintain habitats.

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications for development (unless exempt 59,60) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

KCC Biodiversity reviewed the proposal and advised that sufficient ecological and biodiversity net gain information has been provided. Using the national and local guidance regarding significance, they consider that the on-site biodiversity net gain should not be treated as significant and so does not require securing for 30-years. A Biodiversity Gain Plan condition is recommended.

A preliminary ecological appraisal (PEA) was conducted, and the site is predominately grassland with regular grass management. No trees or hedgerows are proposed to be lost. Protected species have been considered, and KCC Biodiversity are satisfied that impacts will be minimal. To ensure no suitable habitat becomes established it is recommended that grass management continues.

Therefore, to protect from limited adverse impacts to protected species during clearance and construction a precautionary work statement condition is recommended. A biodiversity enhancement plan condition is also recommended, further to the actions proposed in the submitted PEA.

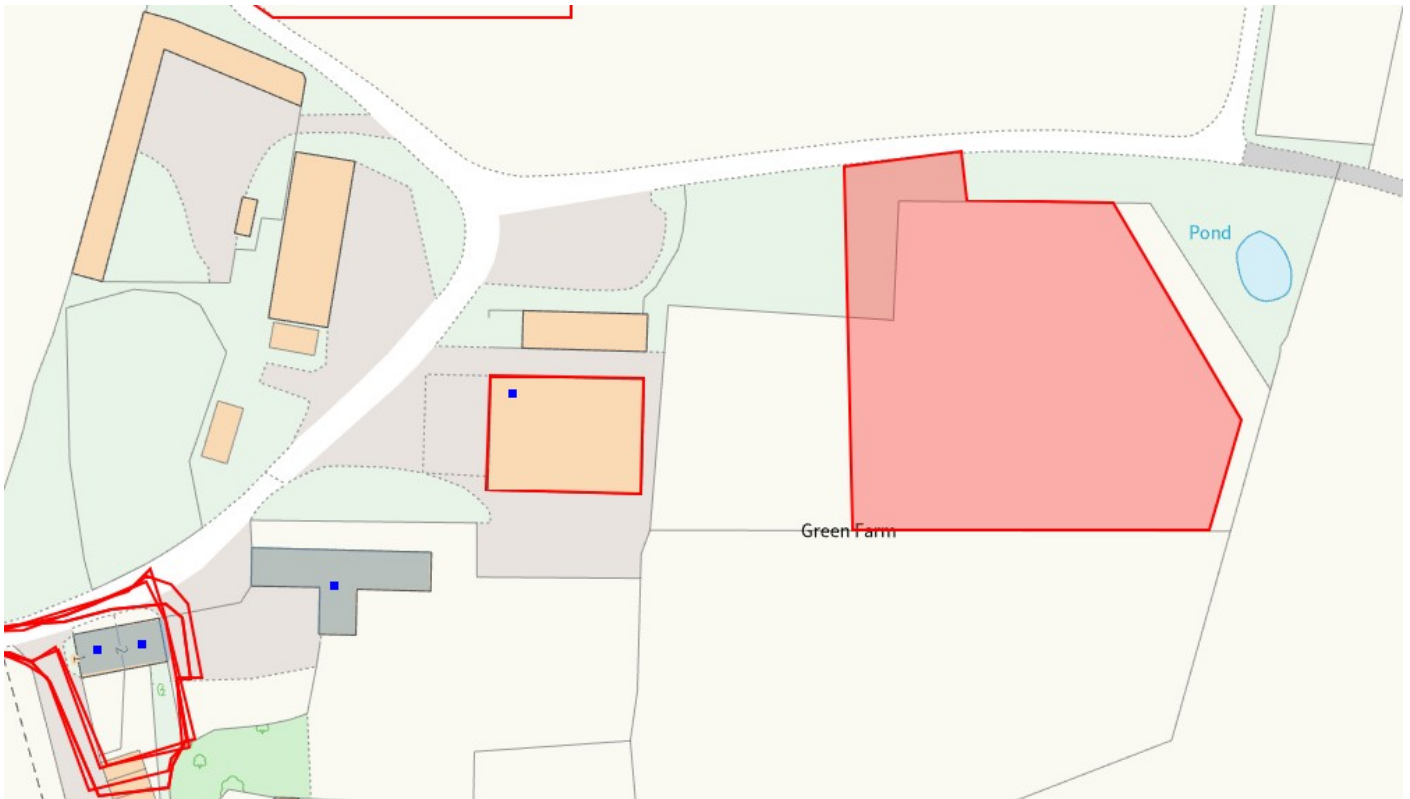
On the basis of the recommended conditions, the proposal is considered to comply with the requirements of paragraphs 187 and 193 of the NPPF 2024 and CS12 of the Gravesham Core Strategy 2014.

Heritage

The NPPF 2024 places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraph 203). This is echoed in Policy CS20 of the Core Strategy 2014, which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC2 of the Local Plan 1994 sets out that for development involving alterations to listed buildings or affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building. Proposals must be sympathetic in terms of their appearance and materials. Saved Policy TC7 states that development on important archaeological sites will not normally be permitted.

The site is within an Area of Archaeological Potential and there are two listed buildings nearby: Green Farm House and Green Farm Granary:

Uniform Map Extract (Listed buildings in grey):



KCC Heritage has confirmed that it is unlikely the proposal would have a significant below-ground archaeological impact.

A Heritage Statement has been submitted with the application. It concludes that there will be a less than substantial harm to the significance of the Heritage Assets (i.e. listed buildings) as the principal element of their significance lies in the historic relationship between the two buildings as the main buildings around the farmyard. The presence of existing more modern and large outbuildings around the listed buildings already impacts their setting to the east, and as the proposed development would lie beyond these, it would not be considered to have any significant impact on the listed buildings' setting.

In this respect the proposal complies with the relevant requirements of saved Policies TC2 and TC7 of the Local Plan 1994, Policy CS20 of the Core Strategy 2014 and Section 16 of the NPPF 2024.

Conclusion

The proposal would fail to preserve the openness of the site and would conflict with one of the Green Belt purposes to safeguard against countryside encroachment. As a result, the proposal would not meet the paragraph 154 exception criteria set out in the National Planning Policy Framework 2024, and the Green Belt would be harmed. Any such harm to the Green Belt is given substantial weight. There are no special circumstances that would outweigh this harm to the Green Belt by reason of inappropriateness. The proposal would therefore be contrary to the relevant requirements of Section 13 of the National Planning Policy Framework 2024, including paragraphs 142, 143, 153 and 154, and Policy CS02 of the Gravesham Local Plan Core Strategy 2014.

The scale and extent of the proposal will result in a significant spread of development across this open and undeveloped countryside site, and given the open farmland surroundings, will have a clear visual impact that will introduce obtrusive features into the rural landscape. This would be contrary to the landscape guidelines for the Higham Arable Farmlands Landscape Character Area set out in the Gravesham Landscape Character Assessment 2009 and would therefore have an unacceptable impact on the landscape. The proposal would therefore be contrary to the requirements of Paragraphs 135 and 187 of the National Planning Policy Framework 2024 and Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

Recommendation

Refuse.

(For reasons for refusal, see draft Decision.)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Mrs Faye Walsh
Signed:	<i>K. Parkin</i>	Signed:	<i>F Walsh</i>
Dated:	10 December 2025	Dated:	11 December 2025