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Planning Statement for Lomer Farm, Meopham

March 2022



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1 Introduction

1.1 Purpose of this Report

- 1.1.1 This document has been prepared by DHA Planning in support of a detailed application for full planning permission submitted by our client Hawkspare Ltd.
- 1.1.2 The application seeks planning permission for the redevelopment of land at Lomer Farm, Meopham, comprising the creation of 6 no. commercial units in a flexible E(g)/B8 use (formally B1/B8 uses) and 3 no. residential units with associated access and parking, following the demolition of existing commercial, agricultural and stable buildings.
- 1.1.1 This statement provides an overview of the application site, its context and planning history; and a review of all applicable development plan documents and emerging policies.
- 1.1.2 The merits of the proposed development are discussed having regards to its context and policy framework and subsequently concludes the proposal is acceptable in planning terms. Accordingly, we request that planning permission is granted.

1.2 Application Documents

- 1.2.1 This statement should be read in conjunction with the following plans and documents which are submitted as part of this application.

Ref.	Description	Author
Documents		
	Application Form	
15203/EAH	Planning Statement	DHA
21505 P001	Design and Access Statement	Open Architecture
21050	Preliminary Ecological Appraisal	Corylus Ecology
21050	Bat Emergence Report	Corylus Ecology
4087\GH\11-2021	Contamination Report	Lustre Consulting
BLA104	Landscape and Visual Appraisal	Briarwood Landscape Architecture
Drawings		
21505-E001	Site Location Plan	Open Architecture
21505-E010	Existing Site Layout	Open Architecture
21505-E011	Existing Stables Plans	Open Architecture
21505-E012	Existing Plans and Elevations Unit D4	Open Architecture

21505-E013	Existing Workshop Ground Floor Plan	Open Architecture
21505-E014	Existing Workshop First Floor Plan	Open Architecture
21505-E015	Existing Stables Elevations	Open Architecture
21505-E016	Existing Workshop Elevations	Open Architecture
21505-P150	Proposed Site Layout	Open Architecture
21505-P200	Proposed Plans	Open Architecture
21505-P210	House Type A Proposed Plans and Elevations	Open Architecture
21505-P211	House Type B Proposed Plans and Elevations	Open Architecture
21505-P450	Proposed Elevations	Open Architecture
21505-P451	Proposed Elevations	Open Architecture
15470-S1	Topographical Survey	Evans & Langford

Table 1.1: Submitted Documents and Drawings

2 Site and Surrounding Area

2.1 Site Location

- 2.1.1 The Lomer Farm Estate is located within the village of Meopham near Gravesend, Kent. The site is located just outside of the settlement confines as defined on Gravesend's Core Strategy Proposals Maps and is therefore within the countryside in planning policy terms. The site is also located within the Metropolitan Green Belt.
- 2.1.2 The site is situated immediately to the south of the Meopham Secondary School and served via an access fronting Wrotham Road (A227) opposite the Meopham Village Hall. The estate is surrounded by open fields.
- 2.1.3 The site benefits from being located within close proximity to a number of local services and facilities which include, but are not limited to a village hall, country club, Meopham Secondary School, Fitness Centre, a veterinary surgery and a number of public houses, restaurants and local convenience stores.
- 2.1.4 Furthermore the site benefits from being directly opposite the nearest bus stop, which provides services 223, 304, 305, 306, 308 and 418 which offer daily routes into Gravesend, Sevenoaks, Stansted, Tonbridge, New Ash Green as well as other surrounding areas. Meopham railway station is within close proximity to the application site, and is on the Chatham Main Line. The typical Monday to Saturday off-peak service is 3 trains per hour to London Victoria, 1 train per hour to Gillingham and 2 trains per hour to Ramsgate and Dover Priory dividing at Faversham.



Figure 2.1: Aerial view of Lomer Farm Site

2.2 Site Description

- 2.2.1 The site comprises approximately 0.84 hectares and comprises a mix of former agricultural and stable buildings, which are now in a commercial use and thus constitute brownfield land. The site is currently divided into 11 units for a mixture of office and small workshop uses. The units vary in size from approximately 17 sq.m to 150 sq.m, let on a flexible basis.
- 2.2.2 The existing buildings are of early 20th Century construction; the commercial buildings being of solid brick construction with concrete sheet roofing, (Figures 2.2 and 2.3) whilst the stable buildings are of solid brick and flint construction with a slate roof and painted wooden doors and windows (figure 2.5).
- 2.2.3 The buildings are of varying roof heights with ad-hoc extensions having been added to the site overtime. There is a central large opening for courtyard access and gated access to the rear. The overall buildings are tired and are showing signs of disrepair.
- 2.2.4 Parking for the units is provided within the front courtyard. The estate does not benefit from security lighting or a central refuse point and tenants are currently responsible for the disposal of their own waste.



Figure 2.2: Existing industrial buildings



Figure 2.3: Existing industrial buildings



Figure 2.4: Existing courtyard area used for parking



Figure 2.5: Disused stable building

2.3 Planning History

2.3.1 The Lomer Farm Estate has a relatively extensive planning history. The most relevant planning applications are set out below:

Ref.	Description	Decision
19950564	Demolition of semi-derelict farm buildings and change of use of part of group of existing farm buildings to 6 no. workshops for class B1 use. Laying out of van & car parking spaces and alteration to existing vehicular access onto Wrotham Road.	Permitted
19960760	Application for the approval of alterations to buildings, refuse storage area, treatment and drainage of parking and circulation areas and landscaping as required by conditions (viii), (xii), (xvi) and (xix) of planning permission ref no. GR/95/564W.	Permitted
20020433	Conversion of redundant farm building into part live/work unit and part industrial unit involving external alterations and refurbishment.	Permitted
20040681	Conversion of existing two storey building into eight live/work units.	Refused
20110352	Erection of infill extension and conversion of existing light industrial and agricultural units to form 978sq.m B1 commercial space with ancillary B8; three live/work units and one residential unit; conversion of stables into two residential units; internal and external alterations to Lomer Farm Barn and alterations to parking and access arrangements	Permitted
20150843	Prior Notification for the proposed change of use of units D1 (upper and lower), D2 and B2 (lower) to form 3 no. residential dwellings under Class O, Part 3 of the Town and Country Planning (General Permitted Development) Order 2015	Refused
20160884	Conversion of existing stables to 2 no. residential dwellings with associated parking	Withdraw
20170999	Conversion of existing commercial buildings and other existing buildings and stables to 10 no. commercial units in a flexible B1/B8 use and 4 no. residential dwellings with associated access and parking arrangements.	Permitted
20211295	Application for the variation of conditions 4, 5 and 14 attached to planning permission reference number 20170999 to allow the existing consent to be protected, so the triggers for a material start can be made on site without excessive or abortive works.	Permitted

20211296	Application for approval of condition 3 and 18 attached to planning permission reference number 20170999 relating to materials (3) and updated bat survey (18)	Permitted
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Table 2.1: Site Planning History (Courtesy of GBC)

3 Development Proposal

3.1 Background

- 3.1.1 Although the redevelopment of the site under application 20110352 to create a mix of B1 and B8 uses with 3 no. live work units and 3 no. residential units was permitted in October 2013, this permission was never implemented due to it being financially unviable and the landowner was unable to secure finance for it due to banks resistance to lend on live work units.
- 3.1.2 A further application 20160884 was submitted in September 2016 to secure the residential aspect of the previous scheme and this comprised the proposed conversion of the existing stable buildings to form 2 no. residential dwellings. This scheme was discussed with Council Officers at several pre-application meetings, during which a number of enforcement issues were raised relating to the wider site and concerns regarding the longevity of the site as a valued commercial enterprise in the Borough given the documented viability issues.
- 3.1.3 In order to keep the site functioning as a commercial enterprise, the redevelopment of the wider site was discussed and as such the application for the conversion of the stable building was withdrawn.
- 3.1.4 Application 20170999 was instead submitted to provide a rationale and strategy for the redevelopment of the wider site as a more viable alternative. The application was accompanied by a comprehensive viability statement which demonstrated why it was so essential for residential uses to come forward to cross-subsidise the significant upgrades that the rural business site required. This was permitted in February 2019 and provided additional B1/B8 floorspace above that currently existing on site, as well as 4 no. residential units. A material start was made in February 2022 prior to the consent expiring.
- 3.1.5 The following tables set out the existing uses on site and their respective floor areas and those which have been consented under application 20170999.

Existing Situation	
Units	GIA (sq.m)
Unit B1 (workshop)	117.3
Unit B2 Lower (offices)	75.8
Unit B2 Upper (offices)	76.5
Unit C1 (Store/workshop)	150.8
Unit C2 (Store/workshop)	120.4
Unit C3 (Store/workshop)	47.1
Unit C4 (Store/workshop)	74.8
Unit D1 Lower (Offices/workshop)	40.7
Unit D1 Upper (Offices/workshop)	54.1

Unit D2 (Offices)	17.3
Unit D4 (Offices)	23
Unit D3 (Redundant Agricultural Store)	202.9
Stables (Livery)	174.3
Total area	1,175 sq.m

Consented Scheme 20170999	
Commercial Units	GIA (sq.m)
Unit C1	62.1
Unit C2	113.8
Unit C3	67.3
Unit C4	75.3
Unit C5 (Upper and Lower)	173.2
Unit C6 (Upper and Lower)	169.4
Unit C7	40.5
Unit C8 (Upper and Lower)	118.8
Unit C9	148.9
Total commercial area	969.3 sq.m
Residential Units	
Unit R1	99.4
Unit R2	123.3
Unit R3	116.0
Unit R4	120.7
Total residential area	459.4
Total commercial and residential area	1,428.7 sq.m

Table 3.1: Existing uses and areas on site

Table 3.2: Consented scheme areas (ref. 20170999)

3.2 Pre-application Advice

- 3.2.1 Following receipt of the decision notice for application 20170999, our client had meetings with property consultants, Salisbury & Co. to discuss the future marketing potential of the site. Their professional opinion was that the existing buildings on site were of such poor quality and utility value that it would be uneconomic to refurbish them to an acceptable standard and that it would be more beneficial to demolish them and build new purpose built, modern business units.

- 3.2.2 Pre-application advice was sought from Gravesham Borough Council on this basis in May 2021, to discuss the potential to demolish the existing commercial buildings and stables on site and replace them with a mixed use scheme, comprising a new-build commercial unit and 3 no. new single storey dwellings (see figure 3.1 below).

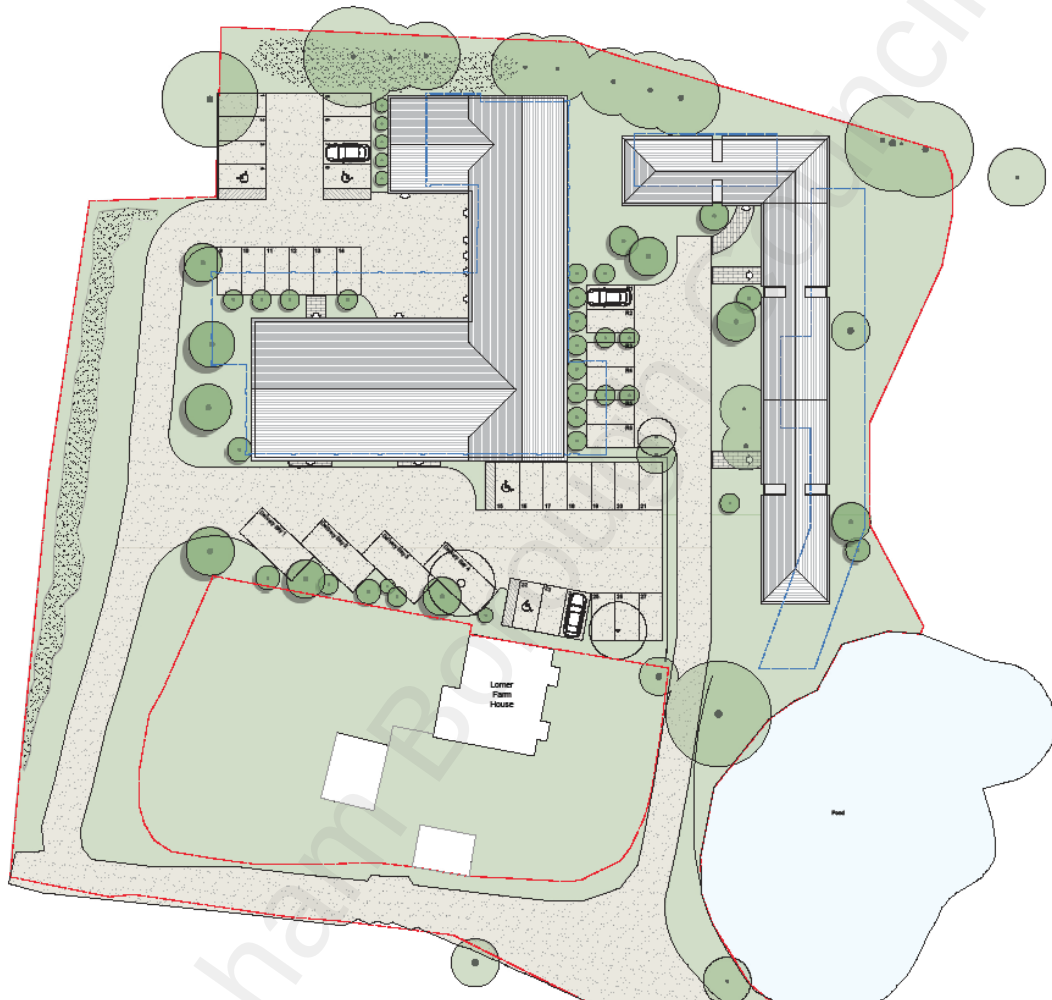


Figure 3.1: Pre-application scheme (Open Architecture)

- 3.2.3 Despite requesting a meeting, the pre-application advice was delayed some 20 weeks with the formal advice received on 1 October 2021. The comments received are summarised below:

- The broad principle of residential and commercial development finds support in the NPPF.
- The existing buildings on site are considered to comprise previously developed land and therefore paragraph 149 of the NPPF could apply in allowing for the '*limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or –*

not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority'.

- Whilst the overall footprint of development would be reduced, the proposals constitute a significant increase in volume and therefore would have a '*greater impact on the openness of the Green Belt than the existing development*' and would fail to meet the requirements of NPPF paragraph 149.
- The increase in soft landscaping, although welcomed, would not offset the impacts that the increase in volume would have on the openness of the Green Belt.
- No case of very special circumstances has been put forward to outweigh the harm identified.
- 35% affordable housing would be required.
- In terms of appearance, the general design is acceptable and materials appropriate given the sensitive location of the site. The development would not have a harmful impact upon the visual amenity of the wider locality, nor would there be any material harm to the local landscape.
- It is unlikely that there would be any significant impacts on residential amenity in terms of loss of privacy, loss of daylight/sunlight or loss of outlook.
- Noise and disturbance issues between Lomer House and the proposed commercial units will need to be addressed as part of any future planning application.

3.2.4 Having taken this advice on board, the scheme has been reduced in height and scale, such that the volume of built form on site is now comparable to what was consented under application 20170999.

3.2.5 The following sections of this Statement set out in detail the revised proposals and consider the proposed development (as revised) in light of the adopted planning policies.

3.3 The Proposal Scheme

3.3.1 The proposal involves the demolition of the existing buildings on site and their replacement with a new build, mixed use scheme.

3.3.2 The site has been split into two distinct elements. A new-build, high quality courtyard Business Park is located to the rear of the site, making use of the existing rear access and a traditional residential courtyard scheme is located to the front of the site to relate to the existing residential uses. This is demonstrated in figure 3.2 overleaf.

- 3.3.3 The proposal scheme effectively tidies up the current appearance of the site, through the demolition of the deteriorating buildings and their replacement with high quality commercial buildings and dwellings and the incorporation of appropriate amenity space and a high quality landscape scheme.



Figure 3.2: Proposed Site Layout Plan (Open Architecture)

Commercial Units

- 3.3.4 The accompanying Design and Access Statement details the design of these units further, but in summary the commercial units are envisioned to be modern, adaptable and flexible in design to enable response to tenants' requirements as businesses grow.
- 3.3.5 Property Consultants Salisbury & Co. advise that there is increased demand for light industrial units within the borough with circa 15-20% of this as office space. The design of the units therefore allow for flexibility in future such that the units could be used for uses within the E(g) use class, as well as B8 storage, allowing both the tenant and landlord to fully utilise the space and hopefully reduce vacancy rates.

3.3.6 In terms of accommodation, the commercial unit is comprised of 6 units within 2 blocks, all with mezzanine levels at first floor and with pedestrian and roller shutter entrances to allow for flexibility.

3.3.7 The proposed schedule of accommodation is set out below.

Unit	Size (sq.m)
C1	90.6
C2	90.6
C3	125.6
C4	109.5
C5	172
C6	172
TOTAL	760.3 sq.m

Table 3.3: Proposed schedule of accommodation for the commercial units

3.3.8 A traditional palette of distressed brick and black timber with glazing is proposed for the commercial building. There are a number of windows set out within modules which allow views out towards the fields beyond and to ensure maximum natural lighting and airflow into the units.

3.3.9 Parking has been provided in accordance with Gravesham Borough Council and Kent County Council vehicle parking standards: 24 car parking spaces have been provided (including 2 disabled car spaces) and 3 no. large van spaces. Further space is available for HGV's and deliveries as well as overflow parking space within the courtyard if ever necessary. Dedicated bicycle storage is also provided.

Residential Dwellings

3.3.10 The dwellings are all single storey units, arranged around a central forecourt. They are proposed to be open plan with three double bedrooms. Access to the gardens are via sliding doors and a feature glass door.

3.3.11 The proposed schedule of accommodation is set out below.

Unit	Type	Size (sq.m)
R1	3 bedroom	121.3
R2	3 bedroom	121.3
R3	3 bedroom	121.3
	TOTAL	363.9 sq.m

Table 3.4: Residential schedule of accommodation

3.3.12 In terms of materials, black timber and a flint plinth is proposed for the dwellings, taking inspiration from the existing stable block. A series of windows are on the

two main facades to allow an abundance of natural light and airflow. A central up and over rooflight creates a dynamic addition to the facade and breaks up the length of the materials.

- 3.3.13 Parking has been provided in accordance with Gravesham Borough Council and Kent County Council vehicle parking standards: 2 car parking spaces have been provided per dwelling with an additional 3 visitor parking spaces. Dedicated bicycle storage is also provided for 3 bicycles.

4 Planning Policy Framework

4.1 Statutory Development Plan

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.1.2 Set out in this section are the policies of the statutory Development Plan and other material considerations that should be taken into account in determining this application.

4.2 Development Plan

Saved policies of the Gravesham Borough Local Plan First Review (1994)

- 4.2.1 The following saved policies in the Gravesham Local Plan 1st Review (1994) are considered relevant to the determination of this application.
- 4.2.2 **Policy P3** relates to parking provision and states that the Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site.

The Gravesham Local Plan Core Strategy 2014

- 4.2.3 The Council's Core Strategy was adopted in 2014 and is accompanied by saved policies from the Local Plan First Review (1994).
- 4.2.4 **Strategic Objective SO1** seeks to make the most efficient use of land by concentrating development on underused, derelict and previously developed land.
- 4.2.5 **Strategic Objective SO2** seeks to provide sufficient new homes to meet the future objectively assessed needs of the Borough's population, to include provision of affordable homes, homes for smaller households and older people, and sites for travellers within the urban area and rural settlements inset from the Green Belt.
- 4.2.6 **Policy Strategic Objective SO8** seeks to preserve the openness of the Green Belt, maintain its national and local planning purposes and protect it from inappropriate development.
- 4.2.7 **Strategic Objective SO9** seeks to conserve and enhance the diverse rural landscape of Gravesham.
- 4.2.8 **Strategic Objective SO10** seeks to retain and where possible improve existing employment sites.
- 4.2.9 **Strategic Objective SO16** seeks to safeguard and enhance the biodiversity of the Borough.

- 4.2.10 **Policy CS01** relates to Sustainable Development and seeks to ensure that Planning applications that accord with the policies in the development plan for Gravesham. Where they do, they will be approved without delay, unless material considerations indicate otherwise.
- 4.2.11 When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 4.2.12 **Paragraph 4.1.8** states that where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
 - Specific policies in that Framework indicate that development should be restricted.
- 4.2.13 Paragraph 4.2.8 states that the Core Strategy acknowledges that as development opportunities within the existing urban area and settlements inset from the Green Belt become more limited, some development may be required on land in the rural area before the end of the plan period to meet the Borough's housing needs and sustain rural communities. The Green Belt has therefore been identified as a broad location for future growth and its boundaries will be subject to a review.
- 4.2.14 **Policy CS02** sets out the Borough's scale and distribution of development. It states that a strategic Green Belt review will be undertaken to identify additional land to meet the housing needs up to 2028, while maintaining the national and local planning purposes of the Green Belt.
- 4.2.15 **Policy CS07** states that particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises. The Council will also support the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and communications technology to facilitate more flexible working practices and the changing economic needs of the Borough. It also states that the Council will support proposals that promote the appropriate expansion and diversification of the rural area economy.
- 4.2.16 **Policy CS11** states that sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

- 4.2.17 **Policy CS14** states that the Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.
- 4.2.18 **Policy CS15** Sites will be developed at a variety of densities, depending on their location and accessibility to public transport. All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. In the rural area, new residential development will be expected to achieve a minimum density of 30dpa. Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused planning permission.
- 4.2.19 **Policy CS16** The provision of affordable housing will be required on all new housing developments of: 15 dwellings or more or on sites of 0.5 hectares or more in the urban area; and 3 units or more or on sites of 0.1 hectares or more in the rural area. Development will be subject to site viability and a tenure mix necessary to meet local needs and achieve a successful sustainable and socially inclusive development.
- 4.2.20 **Policy CS19** Development and Design Principles states that new development should be visually attractive, fit for purpose and locally distinctive. It requires that it will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through criteria as set out,
- 4.2.21 New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;
- New development will be located, designed and constructed to:
 - safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
 - avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and
 - not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
 - The design and layout of new residential development, will accord with the adopted Residential Layout Guidelines;

- New development will be designed in an inclusive way to be accessible to all members of the community;
- New development will provide appropriate levels of private and public amenity space;
- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
- Car parking will be well related to the development it serves;
- New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- New development will incorporate appropriate facilities for the storage and recycling of waste; and
- The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

4.3 Other Material Considerations

The National Planning Policy Framework 'NPPF' (2021)

- 4.3.1 The replacement NPPF was published on 24th July 2018 and updated in February 2019 before the most recent revision in July 2021. Paragraph 2 of the NPPF states that it is a material consideration in planning decisions and Appendix 1 states that the policies in the Framework should be taken into account in dealing with applications from the day of its publication.
- 4.3.2 Annex 1 confirms that the policies in the NPPF apply with immediate effect and reinforces the importance of up-to-date plans. Whilst policies should not be considered out of date simply because they pre-date the NPPF, "*due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan are to the policies in the Framework, the greater the weight that may be given)*" (Para 219).

Achieving Sustainable Development

- 4.3.3 **Paragraph 7** - The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.3.4 **Paragraph 8** - Achieving sustainable development means that the planning system has three overarching objectives, economic, social and environmental which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Presumption in Favour of Sustainable Development

- 4.3.5 **Paragraph 11** - Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
- i. the application of policies in the Framework that protect areas or assets of importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Decision Making

- 4.3.6 **Paragraph 38** - Local planning authorities should approach decisions on proposed development in a positive and creative way.
- 4.3.7 **Paragraph 39** - Emphasises that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.

Delivering a Sufficient Supply of Homes

- 4.3.8 **Paragraph 60** - To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 4.3.9 **Paragraph 61** - To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need

figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.

- 4.3.10 In terms of affordable housing **paragraph 63** - states provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

Identifying Land for Homes

- 4.3.11 To this end, **paragraph 68** - states that strategic plan-making authorities should have a clear understanding of the land available in their areas through the predation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) Specific, deliverable housing sites for years one to five of the plan period, and
- b) Specific deliverable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan.

- 4.3.12 **Paragraph 69** - then goes onto stress that small and medium sized sites can make an important contribution to meeting housing requirements of an area, and are often built out relatively quickly. Therefore, to promote the development of a good mix of sites local planning authorities should support the development of windfall sites through their policies and decisions- giving great weight to the benefits of using suitable windfall sites within existing settlements.

Rural Housing

- 4.3.13 **Paragraph 79** - states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

Building a Strong, Competitive Economy

Paragraph 81 - is clear that planning policies and 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.

Supporting a Prosperous Rural Economy

- 4.3.14 **Paragraph 84** - confirms that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, the development and diversification of agricultural and other land-based rural businesses and sustainable rural tourism and leisure development which respect the character of the countryside.
- 4.3.15 **Paragraph 85** - goes on to state that planning policies and decisions should recognise that sites to meet local business and community 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.

Promoting Sustainable Transport

- 4.3.16 **Paragraph 105** - emphasises that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 4.3.17 **Paragraph 111** - goes onto states the development should only be prevented or refused on highways ground if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Making Effective Use of Land

- 4.3.18 Section 11 sets out how planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.3.19 **Paragraph 119** - emphasises the clear desire to make as much as use as possible of previously-developed or 'brownfield' land.
- 4.3.20 **Paragraph 120** - of the NPPF states that planning policies and decisions should (amongst other things):
- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate

opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

- d) promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

4.3.21 Furthermore, and as set out in **paragraph 123**, local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to use employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites and would be compatible with other policies in the Framework.

4.3.22 **Paragraph 124** - goes on to state that planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places.

Achieving Well-Designed Places

4.3.23 **Paragraph 126** - states the creation of high-quality buildings and places are fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

4.3.24 **Paragraph 130** - states planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 4.3.25 **Paragraph 132** - states design quality should be considered throughout the evolution and assessment of individual proposals.
- 4.3.26 **Paragraph 134** - is clear that permission should be refused for development that is not well-designed, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents.
- 4.3.27 **Paragraph 135** - confirms that local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).

Protecting Green Belt Land

- 4.3.28 **Paragraph 137** - reinforces that the government attaches great importance to Green Belts, with the fundamental aim being the prevention of urban sprawl by keeping land permanently open. Paragraph 138 clarifies the five purposes of Green Belt:
- 1. To check the unrestricted sprawl of large built up areas;
 - 2. To prevent neighbouring towns from merging into one another;
 - 3. To assist in safeguarding the countryside from encroachment;
 - 4. To preserve the setting and special character of historic towns; and
 - 5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Proposals Affecting the Green Belt

- 4.3.29 **Paragraph 147** - states that 'inappropriate development' is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 4.3.30 **Paragraph 149** - explains that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:
- a) buildings for agriculture and forestry;

- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Conserving and Enhancing the Natural Environment

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

Habitats and Biodiversity

- 4.3.32 With respect to habitats and biodiversity, **paragraph 180** - says that when determining applications, local planning authorities should apply the principles that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 4.3.33 Equally proposals that conserve or enhance biodiversity to seeking net gains should be supported and encouraged.

4.4 Wider Material Considerations

Emerging Local Plan Partial Review & ADMP Document

- 4.4.1 Gravesham Borough Council are in the process of preparing both a partial review of the Local Plan Core Strategy and an Allocations and Development Management Policies 'ADMP' document to meet the latest development needs of the borough and to bring the development plan in-line with the updated NPPF.
- 4.4.2 Following the close of the Regulation 18 (Stage 2) consultation in December 2021, the Submission version of the Plan is anticipated to be published later this year although is currently subject to an indefinite delay and nonetheless will then be required to progress through Examination and potential Main Modification stages.

- 4.4.3 Consequently, it is clear that the adoption of an up-to-date Development Plan in Gravesham remains a significant way off and accordingly the draft plan can carry only limited weight in decision making. In policy terms this leaves the Council with an increasingly out of date Development Plan which is inconsistent with the latest NPPF and does not identify land to meet the current needs of the borough.
- 4.4.4 For reference, the adopted development plan sets a housing requirement of 363 dwellings per annum. In contrast, the emerging Plan review will be required to plan for 655 dwellings per annum, an uplift of 292 dwellings per annum (+80%). Nonetheless the most recent housing delivery test (published January 2022) confirms that just 57% of the adopted Plan requirement was delivered in the preceding three years. Moreover, the Council's published 5-year housing land supply position against the adopted requirement is 3.2 years.
- 4.4.5 The Economy and Employment Background Paper which forms part of the Emerging Plan Evidence Base identifies positive economic growth in the Borough, using Experian 'business as usual' forecasts including within B Use Classes and notes that it will be necessary to take into consideration the possible direct effects of both the development of Ebbsfleet Central and/or London Resort on the need/demand for B Use Class employment land in Gravesham. The consequences of the loss of existing employment floorspace within the area due to redevelopment will also need to be understood.
- 4.4.6 Considering the borough's economic needs, the Part 1: Local Plan Core Strategy Partial Review and Site Allocations Document for consultation confirms that the scale of employment land needed in the Borough over the plan period needs to be reviewed to take into account the workforce likely to be created over the plan period; it will also need to be flexible enough to take into account changing working practices and changing economic realities. However, using presently available evidence, it is stated that 15ha of employment land will be required over the plan period, distributed relatively evenly across office, industrial and warehouse space at approximately 5ha, 5ha and 4ha respectively.
- 4.4.7 Given the above context, prior to the adoption of the new Development Plan, there is no benefit to delaying the much-needed supply of new housing and employment land coming forward through the Development Management system.
- 4.4.8 Further, the out-of-date development plan policies, the 5-year housing land supply position and the 2021 Housing Delivery Test measurement are all independently capable of engaging Paragraph 11 of the Framework, through footnote 8, which applies a presumption in favour of sustainable development.
- 4.4.9 Therefore, in the absence of a robust supply of housing land and uncertainty regarding the likely adoption date of the plan, it is pivotal that the Development Management system continues to intervene and take a permissive stance to development to meet the borough's housing and economic needs.

5 Planning Merits of the Proposal

5.1 Introduction

- 5.1.1 The proposed development comprises the redevelopment of land at Lomer Farm, Meopham, comprising the creation of 6 no. commercial units in a flexible E(g)/B8 use and 3 no. residential units with associated access and parking, following the demolition of existing commercial, agricultural and stable buildings at Lomer Farm, Wrotham Road, Meopham.
- 5.1.2 In this case it is important to note that planning permission has previously been granted to change the use of the majority of the original farm buildings to commercial and live-work purposes, such that the principle of commercial and residential uses are already established on the site.
- 5.1.3 However, experience over a significant period of time demonstrates that the current uses are not financially viable and the applicant is failing to attract prospective tenants to the site. In discussing the marketing potential of the site, independent property consultants, Salisbury & Co. advised that the existing buildings on site were of such poor quality and utility value that it would be uneconomic to refurbish them to an acceptable standard and that it would be more beneficial to demolish them and build new purpose built, modern business units.
- 5.1.4 Therefore the proposed scheme has been formulated following careful analysis of existing operations and lettings on the site to date and realistically analysing what mix of uses will be viable going forward to secure the long term viability of the site and delivery of associated benefits.
- 5.1.5 It is also necessary to consider whether the application proposal accords with the statutory Development Plan and if not, whether any material considerations indicate that planning permission should nevertheless be granted.
- 5.1.6 In considering whether the proposal accords with the development plan, it is necessary to consider the following issues on a topic by topic basis.

5.2 Appropriate Development in the Green Belt

- 5.2.1 As set out in Chapter 4 of this statement, policy CS02 of the Gravesham Borough Core Strategy sets out that development outside settlements, including proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt. Accordingly the NPPF must be applied to determine whether there would be a materially greater impact on the openness of the Green Belt.
- 5.2.2 To this end, paragraph 147 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 5.2.3 Nonetheless, there are a number of exceptions, including (paragraph 149(g):

limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- *not have a greater impact on the openness of the Green Belt than the existing development; or*
- *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.'*

5.2.4 Previously developed land is specifically defined within Annex 2 of the NPPF as being 'land which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings...'

5.2.5 The proposals are for the redevelopment of the commercial enterprise at Lomer Farm. The site falls within the definition of 'previously developed land' as defined in the NPPF, being occupied by permanent structures in a mix of former B class uses (now E class), with fixed surface hardstanding which extends throughout the site.

5.2.6 On the basis that the site is previously-developed and benefits from an implemented consent, we consider the proposal falls to be considered in the context of the first limb of paragraph 149(g). Namely, that new development of a similar impact on the openness of the Green Belt as the existing development can occur and still result in an 'appropriate' form of development.

5.2.7 From a local perspective, the adopted development plan is absent of an up-to-date policy that direct the decision maker how to interpret the provisions of paragraph 145(g). However, it is considered a pragmatic approach to apply an assessment of both floorspace and volume.

5.2.8 A straight comparison between the implemented consent and the proposed scheme is outlined below:

	Floorspace (Sq.m GIA)
Cumulative Consented Scheme	1428.7
Cumulative Proposed Scheme	1124.2
Change	-304.5
Percentage Change	-21%

Table 5.: Direct Comparison of extant vs proposed floorspace

5.2.9 Alternatively, if one were to adopt an entirely differing approach and compare consented and proposed volumes the following table would be of relevance.

	Volume (Cubic M)
Cumulative Consented Scheme	5472.4
Cumulative Proposed Scheme	5451.2
Change	-21.2
Percentage Change	-0.4%

Table 5.3: Direct Comparison of extant vs proposed volume

- 5.2.10 In applying either of these approaches, it is clear that the proposal would deliver a significant net reduction in floorspace and a modest reduction in volume and that the proposed development would plainly not have a materially greater impact upon Green Belt openness.
- 5.2.11 Furthermore, in considering the visual element of Green Belt openness, the site is already well-contained, and forms a compact layout surrounded by mature boundary vegetation which delineates the site from the open countryside west of Meopham. In its current form the site is one which impacts negatively on the openness of the Green Belt, given the presence and bulk of the existing deteriorating buildings and wide expanse of hardstanding.
- 5.2.12 The proposals, by virtue of their siting predominantly utilising the existing built footprint, would not result in any significant incursion into open Green Belt countryside and would not affect the site's contribution to the anti-coalescence or urban sprawl purposes of including land within the Green Belt. Moreover, the demolition of the tired and underutilised commercial buildings and their replacement with new build units would serve to improve the aesthetics of the site in general and its current contribution to the openness of the Green Belt. In addition, apart from the buildings, the site is laid almost entirely to hardstanding. This will be removed in favour of an increased amount of soft landscaping within private gardens and landscaped areas, which is considered to have a positive impact on the openness of the Green Belt compared to the existing.
- 5.2.13 Finally, whilst the site is outside of defined settlement confines, the site is well-related to the general built area of Meopham and is appreciated in the context of surrounding development in residential, commercial and education uses, evidencing the proximity to the settlement area, which defines the character of the application site. The appearance and character of the proposal is therefore in keeping with the adjacent uses and surrounding rural area.
- 5.2.14 With all of the above in mind, the proposal passes the test set out within relevant limb of paragraph 145(g).

5.3 Sustainability

Rural Economic Development

- 5.3.1 The issue of promoting jobs in the rural economy is noted within a report by DEFRA, 'Barriers to Farm Diversification' (May 2007). This report sets out at paragraph 17 that: 'The rural economy is an important source of small businesses and new start-ups'. In addition, paragraph 50 states that:

'It is a widespread concern that planning policy has an overriding imperative towards urban development. This is both to improve prospects for lagging urban areas and steer major economic development towards areas with the appropriate existing infrastructure as well as preserving the character of the countryside.

However, this policy can be interpreted to mean that economic development in rural areas should be avoided, and once these interpretations become incorporated into Regional Spatial Strategies and local planning policy, they can become an insuperable barrier to small scale rural economic development such as farm diversification schemes. The urban centric nature of planning can also mean that there is a lack of skills, experience and appreciation amongst planning officers of the need and nature of farm based diversification or wider rural economy issues. The bias towards development in and around urban areas is also encouraged by the principle of sustainable development'.

- 5.3.2 In relation to sustainable development, paragraph 52 of the DEFRA report also sets out that planning authorities should not impose disproportionate costs, in terms of environmental and social impacts, or unnecessarily constrain otherwise beneficial economic or social development. Indeed, at paragraph 53 it is stated that the Working Group felt that there was: *'a strong bias against rural development on sustainability grounds that did not take into account appropriately the needs of rural economies and the value of economic development to rural communities in supporting local infrastructure and helping rural communities thrive'*. It is therefore imperative to give significant weight to the benefits that the proposal will have to the rural economy.
- 5.3.3 The Taylor Review (published in July 2008) at Paragraph 37, page 128 sets out challenges that need to be overcome to support rural economies, including:
- (1) To promote all business in rural areas subject to local impacts;
 - (2) To ensure and maintain good supply of sites and premises including a flexible approach to the conversion of farm buildings and farm diversification; and
 - (3) To better support small and home-based business.
- 5.3.4 Paragraph 84 of the NPPF outlines the support for sustainable growth and expansions of all types of business and enterprise in rural areas, including through the provision well-designed new building, therefore significant weight can be given to the case at Lomer Farm.
- 5.3.5 There is clear high-level support therefore for the provision of new commercial buildings within the rural area especially where this will create the conditions for existing rural businesses to invest, expand and adapt and will be supported by the combined economic and social benefits associated with the provision of much-needed high quality new housing. It is considered that such development can improve sustainability, as well as underpin rural economic regeneration and vitality.

Three Overarching Objectives of Sustainability

- 5.3.6 In accordance with paragraph 8 of the NPPF, the proposal seeks to pursue sustainable development by seeking positive improvements to the quality of the built environment as well as people's quality of life; by creating jobs and commercial space, replacing old design with better design, widening the choice of high quality homes and commercial space and improving the conditions in which people live, work and travel.
- 5.3.7 There are three dimensions of sustainability outlined in the NPPF which are interdependent and need to be pursued in mutually supportive ways.
- 5.3.8 Outlined below are the benefits the proposed scheme will have on each of the three overarching objectives of sustainability.

Economic

"to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure."

- 5.3.9 The proposed scheme provides the following economic benefits:
- The proposal will contribute to the local economy by providing local employment opportunities in the building industry;
 - Support local building materials suppliers;
 - The proposed mix of units will continue to provide commercial floor space for local businesses but with the benefit of modernised spaces to create the conditions for businesses to invest, expand and adapt;
 - Continuing to provide business floor space will provide some guarantee to those who currently rely on the existing businesses e.g. local suppliers, cleaners etc. of their continued viability;
 - Investment to the local area - future employees will be attracted to Meopham, which will in turn improve the viability of the local facilities and services;
 - The development will have a knock on benefit to local shops, services and businesses through additional expenditure to boost the local economy, as well as diversify the service available to the local community;
 - The proposed residential units will provide economic benefits to the site, which can then be used to enhance the employment areas of the site;
 - Development within this location could also assist in maintaining existing public services.

Social

"to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and."

5.2.4 The proposed scheme provides the following social benefits:

- New job opportunities for local people in the building industry;
- The proposed residential use will improve natural surveillance and security at the site. In turn, improved security may help to attract new businesses to the site;
- The application site is in close proximity to Meopham train station and bus stops, therefore reducing reliance on the use of the private car;
- Mix of uses will reduce risk of isolated residents in rural areas, and the proximity of residential to commercial spaces can reduce commuting and private car usage;
- The proposed residential units will provide social benefits to the site, which can then be used to enhance the employment areas of the site; and
- The introduction of more residents in the local area will help to support the vitality of the rural community and the viability of existing businesses.

Environment

"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

5.2.4 The proposed scheme provides the following environment benefits:

- The proposed scheme will ensure that there is a viable future for the existing buildings and assist with other uses by allowing for reinvestment in the site to keep it viable and in good order;
- NPPF paragraph 119 encourages the accommodation of objectively assessed needs to be met in a way that makes as much use as possible of previously developed land. Paragraph 120 goes on to encourage multiple benefits from both urban and rural land, including through mixed use schemes and promotes and supports the development of under-utilised land and buildings;
- The conversion will contribute to protecting and enhancing the natural and built environment by reusing an underutilised previously-developed site. Development on previously developed land providing the site is not of high environmental value and the density of new development reflects the

character and appearance of the locality should be permitted and reduces the need to develop into greenfield location of greater environmental and landscape quality to meet the needs of the borough;

- The proposal will improve the aesthetics of the site in terms of both design and landscaping. The presence of residents and landscaping will also help to maintain the aesthetics of the site;
- The added landscaping and planting of hedgerows will add to the appearance of the site, and will not only soften the appearance of the site but add to its ecological value;
- The re-development of the site through the demolition and creation of new similarly scaled structures will have no materially greater impact upon the openness of the Green Belt; and
- The scheme does not propose any greater built footprint on site and minimal increased volume compared to the existing and less than that previously consented and therefore there will not have a materially greater impact than the present use.

5.3.10 The proposed scheme will therefore accord with the aims of the NPPF, and the Government's plan to bring economic stability.

Sustainable construction standards and techniques

5.3.11 Currently there are no adopted planning policies within Gravesham Borough which require a particular BREEAM level to be sought. However it is anticipated that the demolition and creation of new buildings will enable a greater standard of building quality and efficiency to be achieved over the conversion of the existing buildings.

5.3.12 It is anticipated that the scheme will use energy, water and resources efficiently and that it will ensure continued sustainable management and operation and provide an appropriate level of health and wellbeing for its occupants and users.

5.4 Mixed-Use Re-development of the Site

5.4.1 The principle of flexible B1/B8 use commercial units and residential dwellings has already been accepted numerous times by the Council, namely permissions 1995/0564, 2002/0433 and 2011/0352. Most recently this was accepted by the Council under application reference 20170999 (since demonstrated to have been implemented) where permission was granted for the following:

'Conversion of existing commercial buildings and other existing buildings and stables to 10 no. commercial units in a flexible B1/B8 use and 4 no. residential dwellings with associated access and parking arrangements.'

5.4.2 It is acknowledged that the most recent permission proposed the conversion of the existing rural buildings in order to deliver the scheme, however it is stressed that national policy does not exclude the development of new buildings in the countryside. In supporting a prosperous rural economy, nationally policy seeks to

enable 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 85 of the NPPF also recognises that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements and emphasises the use of previously-developed land and sites that are physical well-related to settlements should be encouraged where suitable opportunities exist.

- 5.4.3 Furthermore, policy CS07 of the Gravesham Local Plan Core Strategy expresses particular support for schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises and recognises the need to facilitate more flexible working practices in the borough. The policy goes on to state the Council's support for proposals that promote the appropriate expansion and diversification of the rural area economy.
- 5.4.4 On this basis, there is clear national and local policy support for the development of new buildings capable of facilitating the growth and expansion of business with particular support directed to small and medium flexible industrial/office uses. Policy also recognises the need to offer particular support to the rural economy to facilitate its appropriate expansion and diversification and offer business and commercial development the flexibility that is needed in order to remain competitive in the modern market. Moreover, in the context of otherwise heavily urban area-centric policy, national policy encourages the use of previously-developed sites, well-related to existing settlements to meet local business needs.
- 5.4.5 The construction of new buildings will enable commercial units that are modern, adaptable and flexible in design to facilitate response to tenants' requirements as businesses grow and will permit a greater contribution of businesses to the rural economy in the long term, without the need for businesses to re-locate in order to succeed.
- 5.4.6 With respect to the residential elements of the proposals, we acknowledged that policy generally seeks to restrict new residential development in the countryside. However, the site is not isolated and is well-related to the residential area of Meopham and associated day-to-day facilities within the settlement itself as well as public transport links to Meopham station and neighbouring settlements from which a wider array of services, facilities and employment opportunities are easily accessible.
- 5.4.7 In the context of the site's comparatively rural area, national policy acknowledges that opportunities to maximise sustainable transport solutions will vary between urban and rural areas (NPPF paragraph 105), however given the proximity to services and public transport connections, residential development at Lomer Farm is not considered to result in an unacceptable reliance on the private car.
- 5.4.8 Nonetheless, locational sustainability is but just one element of sustainable development which encompasses wider social, environmental and economic aims and should not serve to prevent genuine opportunities for positive and beneficial growth.

- 5.4.9 Equally, it would be both unreasonable and impractical to suggest that all new residential development should be focused solely to the most accessible locations within the borough. To the contrary a distributed growth pattern should be sought, where small scales of proportionate growth are permitted in rural locations, to support the vitality of rural communities, facilitate rural business growth and take advantage of opportunities for the sustainable re-use of underutilised previously developed land.
- 5.4.10 As set out, the provision of a residential element is necessary in order to facilitate the provision of the commercial development on viability grounds. The mixed, residential use of the site has already been established as acceptable by virtue of previous permissions albeit via conversion. It is however submitted that the proposed demolition and creation of new dwellings are conducive to a higher quality of design, construction and energy/water efficiency and will ensure the proposed buildings are conducive to modern living needs. Further, the proposals will facilitate the creation of new, modern, flexible and adaptable business space that better suit current commercial needs.
- 5.4.11 Moreover, the proposed demolition and creation of new buildings retains the benefits associated with the re-development of previously developed land which is strongly encouraged by both local and national planning policy. The provision of much-needed modern rural commercial space and high-quality housing on brownfield land will make effective use of a presently under-utilised site, plagued by high vacancy rates due to its present condition. The use of underutilised land, well-related to the existing settlement of Meopham is a significant benefit which will simultaneously reduce the need to develop into more ecological sensitive and higher landscape value greenfield land to deliver the commercial and residential development that is so urgently needed.
- 5.4.12 Given all of the above, it is considered that circumstances justify this sensitive and well-planned development and the demolition and creation of new buildings equally offer significant benefits which justify grant of permission.
- 5.4.13 Also of material consideration is the fact that the Council cannot demonstrate a 5 Year Housing Land Supply. Consequently, the current adopted housing policies are 'out-of-date' for the purpose of decision making and the presumption in favour is engaged. It is clear that the borough's development needs are not being met and inevitably, there is significant pressure to develop into greenfield locations to meet the shortfall.
- 5.4.14 Consequently, where there are opportunities to make use of previously-developed sites, that are well-related to existing settlements, services and public transport links and that have previously been established as acceptable for residential development, these represent the most suitable locations for the growth that is needed and should be considered positively, particularly where it is clear that development will bring significant associated benefits to the rural economy through the creation of high-quality modern commercial space. Given this context, there is no benefit to delaying the much-needed supply of new housing and commercial space coming forward through the development management system

5.5 Permitted Development

5.5.1 Notwithstanding the relevance of the implemented consent for mixed commercial and residential use of the site, for additional context, the development scope afforded by the General Permitted Development Order is considered in the following section. As set out briefly in section 3, at present the uses at Lomer Farm are generally based on a number of planning permissions. Much of what is now in commercial use was granted under reference GR/95/564 and this is set out in detail in table 5.2 below.

Unit	Current Use	Size GIA sq.m (measured)	Permitted under GR/95/564W)
B1	Workshop	117.3	Yes
B2 LOWER	Offices	75.8	Yes
B2 UPPER	Offices	76.5	No
C1	Store/workshop	150.8	No
C2	Store/workshop	120.4	Yes
C3	Office/workshop	47.1	No
C4	Store/workshop	74.8	Yes
D1 LOWER	Office/workshop	40.7	Yes
D1 UPPER	Office/workshop	54.1	No
D2	Office	17.3	Yes
D4	Office	23	Yes
(Redundant Agricultural Store) D3	Store	202.9	No
Stables	Livery	174.3	No

Table 5.4: Existing Use of Commercial Buildings at Lomer Farm

5.5.2 As illustrated, 469.3 sq.m of commercial floorspace has been granted permission. Other areas, whilst not benefiting from a planning permission have been used for commercial use for a extended period of time in excess of 10 years and this application therefore seeks to amend and regularise matters relating to enforcement issues raised by the Council.

Units C1 and D3

5.5.3 Units C1 and the agricultural store D3 listed above in table 5.2 (and illustrated on figure 5.1 overleaf) have been used in a B8 storage use for a period of time now exceeding 10 years. It is considered therefore, in our opinion that these units have a lawful B8 use.

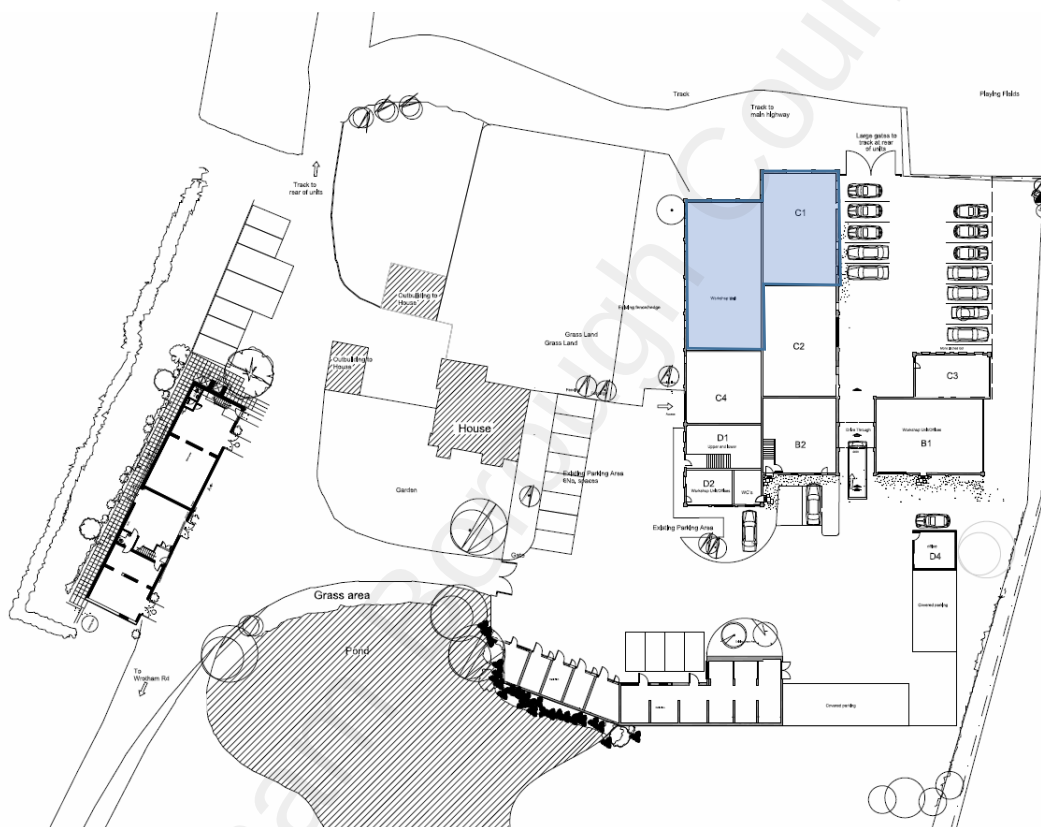


Figure 5.1: Layout plan depicting Units C1 and D3 (redundant agricultural store)

5.5.6 Likewise Units C3, B2 Upper and D1 Upper listed above in table 5.2 (and illustrated on figure 5.2 overleaf) have been used in a B1 office or workshop use for a period of time now exceeding 10 years. It is considered therefore, in our opinion that these units have a lawful B1 use.

5.5.7 As such, through the provisions of the General Permitted Development Order there is a justification for the change of use from an office/workshop use to a residential use.

- 5.5.8 Part 3, Class PA and O of this Order allows for the change of a building and any land within its curtilage from a use falling within Class B1(c) and B1(a) respectively to a use falling within C3 (dwellinghouse), subject to certain criteria.

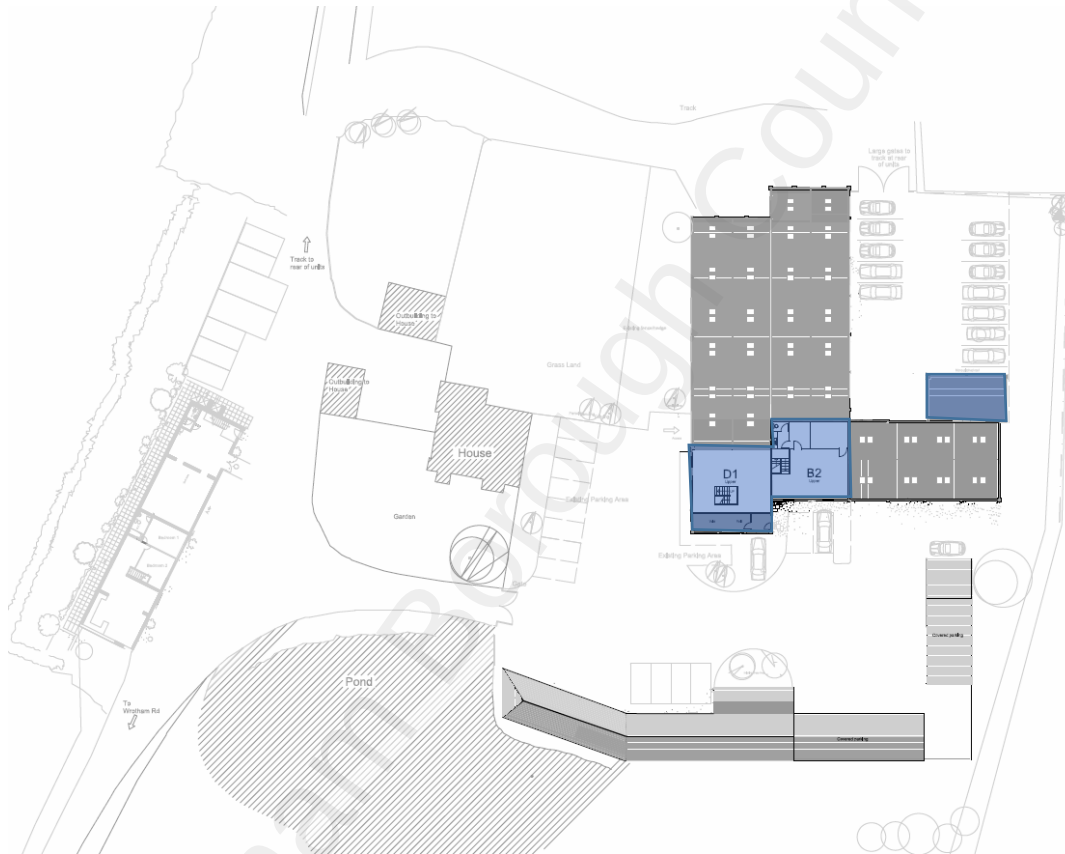


Figure 5.2: Layout plan depicting Units C3, B2 Upper and D1 Upper)

- 5.5.9 Although not all of the physical floorspace contained within these units is proposed to be changed to a residential use, (as this would result in a fragmented layout design), this position can be used as a fall-back position in demonstrating how much permitted development can be achieved. As illustrated in table 5.3 below, the provisions contained within the GPDO allow for the conversion of 531.4 sq.m of B1/B8 use to residential use. This is clearly in excess of the 459.4 sq.m of residential use on the proposal scheme.

Unit	Current Use	Lawful Use	Size sq.m
C1	Store/Workshop	B8	150.8
D3	Store/Workshop	B8	202.9
C3	Office/Workshop	B1	47.1

B2 Upper	Office/Workshop	B1	76.5
D1 Upper	Office/Workshop	B1	54.1
TOTAL RESIDENTIAL FLOORSACE AS PERMITTED DEVELOPMENT			531.4
PROPOSED RESIDENTIAL FLOORPSACE			459.4

Table 5.5: Summary of permitted development provisions

5.6 General Issues

Design and Appearance

- 5.6.1 As the NPPF supports the re-development of previously-developed land and does not serve to exclude such re-development for residential uses, it must be recognised that some amenity space must be provided. The provision of 'curtilage' is therefore not inappropriate development per se, albeit measures should be taken to incorporate the curtilage into the landscape and to minimise impact.

- 5.6.2 The design of the proposal is set out in full in the following design and access section.

Affordable Housing Contribution

- 5.6.3 The proposed development comprises 3no. residential dwellings.
- 5.6.4 National Planning Practice Guidance sets out that planning obligations for affordable housing should only be sought for residential developments that are major developments (10 homes or more, or the site has an area of 0.5 hectares or more). Designated rural areas may choose to set a lower threshold, providing that the designation fits the description under section 157(1) of the Housing Act 1985, which refers to National Parks, Areas of Outstanding Natural Beauty or areas the Secretary of State has ordered be designated a rural area.
- 5.6.5 We acknowledge the requirement of Policy CS16 of the Core Strategy which states that affordable housing will be required on sites of 3 units or more, or on sites of 0.1 hectares or more, in the rural area. However, this is a legacy policy and is superseded by the national policy and guidance.
- 5.6.6 This assessment of policy CS16 has been endorsed by recent appeal decision (APP/K2230/W/20/3255704) against the decision of Gravesham Borough Council to reduce the erection of 3no. self-building houses citing failure to make provision of affordable housing as one of the reasons for refusal. Within the appeal decision, the Inspector confirmed that:

'there is no national or statutory support for seeking a lower threshold for affordable housing contributions in this case. For this reason, policy CS16 is considered to be inconsistent with the national guidance and the weight of conflict with the policy is reduced.'

Consequently, the Inspector considered that:

'In the absence of affordable housing contributions, I therefore conclude that the proposal would be in conflict, albeit limited, with policy CS16 of the Core Strategy, which seeks the provision of affordable housing.'

- 5.6.7 The appeal decision is a significant material consideration in the determination of this application, in which the conflict of policy CS16 with national guidance is established and the weight afforded to policy CS16 must be reduced accordingly.
- 5.6.8 On this basis, in the absence of affordable housing contributions, this proposal would be in conflict, albeit limited, with policy CS16 of the Core Strategy, which seeks the provision of affordable housing.

5.7 Ecology

- 5.7.1 This application is supported by an updated Extended Phase 1 Habitat Survey and Bat Building Assessment, prepared by Corylus Ecology. No rare or nationally scarce botanical species or habitats were identified on Site.
- 5.7.2 In terms of the bat building assessment, twelve buildings have been assessed for bat roost potential. B4, B5 and B6 are excluded from the proposals and no further surveys are required. B3, B9, B11 and B12 support low roost potential and a single emergence survey during May-August was confirmed to be required. B1, B2, B7 and B8 support moderate roost potential and two emergence surveys during May-September were recommended. If bat roosts are identified, an EPS licence application will be required to permit the work.
- 5.7.3 An updated bat emergence survey in July and August 2021 was therefore carried out which concluded that B1, B2, B7 and B8 have been found to support non-breeding day roosts for common pipistrelle bats, with a peak of three bats across the Site on both survey occasions. A European Protected Species licence is required to undertake the works to demolish B1, B2, B7 and B8. A bat mitigation strategy has been outlined, which includes recommendations for timing of work and compensation measures.
- 5.7.4 A habitat suitability assessment (HSI) and eDNA survey of one pond has been undertaken and the result was negative. There are no predicted impacts on great crested newts although the measures outlined for reptiles will help to avoid harm to other amphibian species such as common toad that may be present.
- 5.7.5 Precautions have been made in regard to reptiles and the vegetated habitats in the west of the Site. The impacts on any reptiles present are considered to be minimal if these precautionary measures can be implemented and no further surveys for protected species such as reptiles, dormice or badger have been recommended.
- 5.7.6 Regarding breeding birds, recommendations have been made in relation to the timing of the demolition of buildings; this should be undertaken outside of the breeding bird season, limiting this work to 1st September – 1st March.

- 5.7.7 Recommendations for enhancing the ecological value of the proposed site under the NPPF have been suggested and include provision of nesting boxes for birds and native planting.

5.8 Landscape Impact

- 5.8.1 This application is supported by a Landscape and Visual Appraisal prepared by Briarwood Landscape Architecture included within the submission pack. The appraisal confirms that the proposals would remove the current existing commercial and storage buildings which, though not uncharacteristic of the local area, make no appreciable contribution to the landscape. The proposed development would positively contribute to the character of the local landscape. The proposals would introduce a style of residential and commercial development, in the form of new buildings which would represent high quality contemporary design. Through the use of appropriate materials and landscaping the proposed development would help to both conserve and enhance the site and its surroundings in accordance with national and local policy.
- 5.8.2 In general, the proposed development, even from publicly accessible locations would typically be screened from view by the presence of existing built form and/or vegetation in the intervening landscape between the observer and the site boundary. From more distant locations, changes in topography would also be a factor in screening views of the proposals. Where it is evident, the proposed development would typically be seen only as discrete elements rather than in its entirety.
- 5.8.3 The proposals represent a replacement of an existing built rather than the introduction of a completely new feature into the landscape. It is considered that the nature of any visual effect would be neutral rather than adverse. In balance, though there would be a visual effect with the proposed development in place, the quality, understanding and integrity of the features in the particular view would be maintained.
- 5.8.4 Overall, the appraisal concludes that it is considered that the proposed development would have a limited visual effect within a confined visual envelope in the landscape surrounding the site. It is considered that the proposals would not give rise to an unacceptable harm to the visual amenity of the wider landscape beyond the site boundary. With all things considered, the proposed development would result in acceptable effects on the character of the local landscape with the proposed mitigation measures in place. The character of the local landscape and its underlying rural and settled character would prevail and would not be materially changed.
- 5.8.5 Given the above findings, there are not considered to be any identified adverse landscape impacts associated with the proposed development that would warrant refusal.

5.9 Contamination

- 5.9.1 This application is supported by an updated Phase 1 Contamination Desk Study prepared by Lustre Consulting Ltd. It concludes that the anticipated contaminative status of the site is not considered to be prohibitive to the proposed redevelopment scheme, but recommends that further investigations are carried out as conditioned by any planning consent.

Gravesham Borough Council

6 Design

6.1 Use and Amount of Development

- 6.1.1 The scheme proposes the conversion of the existing commercial, agricultural and stable buildings to provide 6 no. commercial units in a flexible B1/B8 use and 3 no. residential units with associated access and parking arrangements at Lomer Farm.
- 6.1.2 The new proposal has been developed to provide a viable scheme that will not only provide 760.3 sq.m of modern B1/B8 space on the site but also 3no. residential units required to cross subsidise the scheme. The proposed schedule of accommodation is set out below:

Residential element

Unit	Type	Size (sq.m)
R1	3 bedroom	121.3
R2	3 bedroom	121.3
R3	3 bedroom	121.3
	TOTAL	363.9 sq.m

Table 6.1: Residential schedule of accommodation

Commercial element

Unit	Size (sq.m)
C1	90.6
C2	90.6
C3	125.6
C4	109.5
C5	172.0
C6	172.0
TOTAL	760.3 sq.m

Table 6.2: Proposed schedule of accommodation for the commercial units

- 6.1.3 The principle of change of use at Lomer Farm has already been accepted by the Council under permissions 1995/0564, 2002/0433, 2011/0352 and more recently where permission was granted (and since implemented) under 2017/0999 for the 'Conversion of existing commercial buildings and other existing buildings and stables to 10 no. commercial units in a flexible B1/B8 use and 4 no. residential dwellings with associated access and parking arrangements.'
- 6.1.4 The proposal will not introduce any greater built form on the site and to the contrary, represent a net reduction in both floorspace and volume compared to

the implemented consent. There will therefore be no detrimental impact upon the surrounding countryside or Special Landscape Area.

- 6.1.5 The re-development of the site preserves the openness of the Green Belt by containing the external residential elements to areas either in use as curtilage or to areas that are enclosed and already physically separated from the surrounding countryside. In any event additional screening can be provided.
- 6.1.6 The use and amount of development proposed therefore is considered to be entirely appropriate in this context.

6.2 Layout

Site Layout

- 6.2.1 The proposed layout can be seen on drawings 21505-P150 and 21505-P200 and illustrated in figure 6.1 below. For clarity, the commercial elements is proposed to be contained with the west building and residential to the east.



Figure 6.1: Proposed Site Layout

- 6.2.2 Notwithstanding the demolition and new build nature of the proposals, the layout broadly utilises the footprints of the existing buildings and therefore the layout of

the site remains largely unchanged albeit the creation of additional parking spaces and residential gardens for the residential units.

Internal Layout

- 6.2.3 The internal layout of both the commercial and residential elements have taken full advantage of the benefits afforded by the demolition and construction of new buildings to create modern, adaptable and lettable commercial spaces suitable for current commercial needs. Similarly, the proposed residential units have been carefully designed to create high-quality, spacious and usable family accommodation to suit modern living.
- 6.2.4 The layouts have been designed in accordance with Building Regulations relating in particular to Part M Access to and use of buildings, Part L Protection from falling, collision and impact and Part B Fire Safety.
- 6.2.5 The design of all the commercial units allow for flexibility in future such that the units could be used for all uses within the B1 and B8 class. All commercial units have been designed with pedestrian as well as roller shutter entrances to allow flexibility for incoming users to utilise the space for light industrial or office units with mezzanine floors conducive to mixed uses within the units themselves as illustrated in figure 6.2 below.

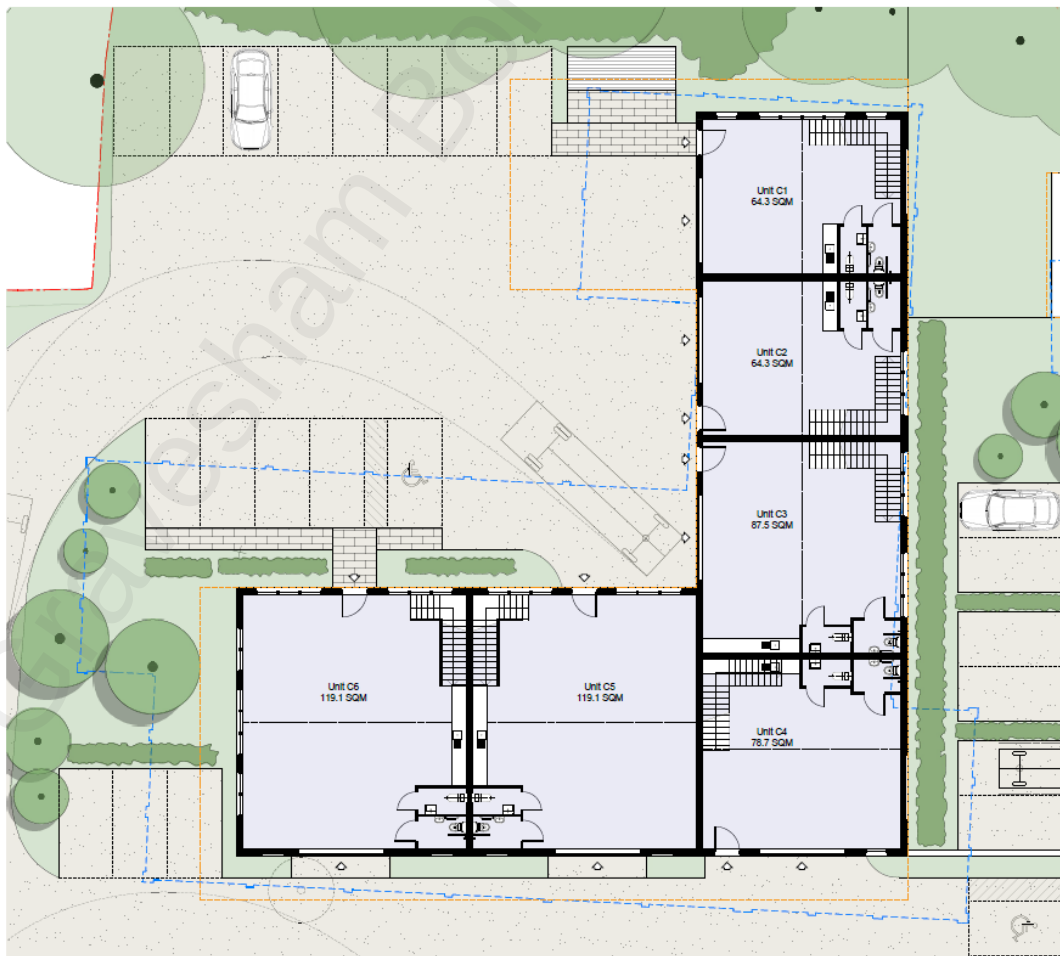


Figure 6.2: Proposed Commercial Layout

- 6.2.6 In terms of the residential element of the site, 3no. three-bedroom dwellings are proposed. The dwellings all comprise an open-plan living/dining room with kitchen, a family bathroom, W/C, a master bedroom, two further bedrooms and utility/storage area, with access out to a private garden to the rear as illustrated in figure 6.3 below.

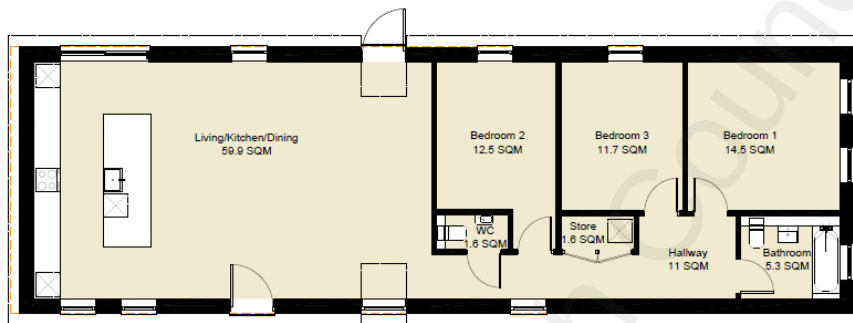


Figure 6.3: Proposed Residential Layout

- 6.2.7 The internal layout have been designed in accordance with the Government's Nationally Described Space Standards to ensure that adequate levels of residential amenity have been provided.
- 6.2.8 Parking is to take place on areas already either permitted or committed to parking. Further, the proposals will not result in an increase in scale which would compromise the open nature of the surrounding land.
- 6.2.9 Areas of private amenity space have been provided for each of the residential units, along with further landscaping around the remainder of the site.
- 6.2.10 Part of the existing large areas of tarmac will be removed and replaced with gravel and grass and concrete parking spaces.

6.3 Scale

- 6.3.1 As demonstrated in Section 5.5 , there are no works that would result in a greater impact upon the Green Belt than the consented development which has been implemented.
- 6.3.2 The proposals have been carefully designed in order to provide a high-quality development that meets modern commercial and domestic needs without resulting in unnecessary bulk, scale or massing in order to ensure compatibility within the sensitive context.
- 6.3.3 The scale of the proposal is therefore considered acceptable and represents an appropriate form of development within the Green Belt.

6.4 Appearance

- 6.4.1 The proposed scheme effectively tidies up the current appearance of the site, through development of high-quality new buildings, and the incorporation of an appropriate landscape scheme.
- 6.4.2 The overall character and appearance of the existing brick buildings has been retained through a sensitive pallet of materials that reflect the predominantly rural context and the former uses of the site.

Commercial Buildings

- 6.4.3 The commercial buildings comprise a facade of primarily 'distressed effect' brickwork with touches of black timber detailing and a black metal roof.
- 6.4.4 There are a number of windows set out within modules which allow views out towards the fields beyond and to ensure maximum natural lighting and airflow into the units. At ground floor, where windows are not suitable, there are recessed brick details instead of glazing to allow for a balanced facade.
- 6.4.5 Black roller shutters are located for ease of access for all units and feature signage is located on the focal elevations as shown below:



Figure 6.4: Proposed West Elevation



Figure 6.5: Proposed East Elevation

Residential Buildings

- 6.4.6 The residential buildings elevations are a combination of black timber with a flint plinth. A series of windows are on the two main facades to allow an abundance of natural light and airflow. A central up and over rooflight creates a dynamic addition to the facade and breaks up the length of the materials. This is illustrated in figure 6.5.

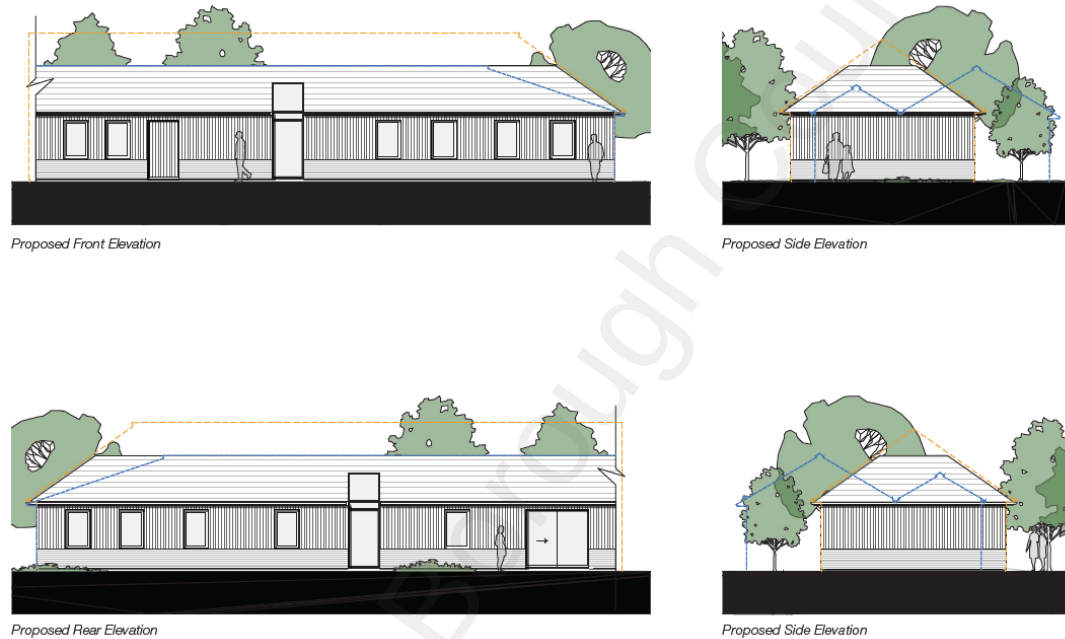


Figure 6.6: Proposed Stable West Elevation

6.5 Landscaping

- 6.5.1 The scheme proposes new landscape planting around the application site, including the planting of new native species and soft landscaping to the boundaries of the site in accordance with the recommendations of the Extended Phase 1 Habitat Survey prepared by Corylus Ecology.
- 6.5.2 The existing trees around the site will be retained where possible. The proposals will further green the environment and soften the built form and will add visual interest, give seasonal variety, structure and form to the public space, and will be useful markers to improve the legibility of the site.
- 6.5.3 The site layout ensures that the entrance to the site is kept clear and visible.



Figure 6.7: Proposed Site Layout Plan

6.5.4 The private garden areas around the site are already enclosed and appear as part of the Lomer farmyard, rather than as part of the open countryside. This ensures that the domestic gardens do not impact on the character or appearance of the Green Belt.

6.5.5 All boundaries can be subject to extensive screening and will be heavily landscaped with native grass, trees and shrubs. These features are designed to maintain privacy between the proposed dwellings. They also help provide visual breaks within the development and add to the sense of place and attractive appearance of the site. Further details can nonetheless be secured via an appropriately worded condition if required.

6.6 Access and Parking

6.6.1 The site is accessed directly from Wrotham Road, with a wide entrance leading into the farm. This access will remain as existing.

6.6.2 The proposed uses of the buildings will not significantly affect the traffic conditions at the site.

6.6.3 A total of 24 car parking spaces (including 2 disabled spaces), 3 goods vehicles spaces and cycle store have been provided for the commercial units in accordance with Kent Vehicle Parking Standards.

- 6.6.4 The Kent Vehicle Parking Standards stipulate that for B1 Business use, 1 car parking space per 25 sq.m is required with adequate facilities to enable delivery drivers to park and 1 cycle space per 200 sq.m. For B8 Storage use, 1 car parking space per 110 sq.m is required, 1 goods vehicle space per 300 sq.m and 1 cycle space per 200 sq.m.
- 6.6.5 Given the proposal is for 760.3 sq.m in a flexible B1/B8 use and taking the average in this respect, there is a requirement for approximately 19 car parking spaces, 2 goods vehicle spaces and 3 cycle spaces.
- 6.6.6 The level of parking provision proposed at Lomer farm as part of the redevelopment of this site is therefore considered to be in clear excess of the requirements.
- 6.6.7 In addition, 2no. car parking spaces and 1no. visitor space have been provided per residential unit in accordance with Kent County Council's Interim Guidance Note 3. Access to these spaces will be maintained via the existing access tracks. Other areas are available for deliveries and additional parking if required.

7 Conclusion

- 7.1.1 This document has been prepared by DHA Planning in support of a detailed application for full planning permission on behalf of our client Hawkspare Ltd.
- 7.1.2 The application seeks planning permission for the redevelopment of land at Lomer Farm, Meopham, comprising the creation of 6 no. commercial units in a flexible E(g)/B8 use (formally B1/B8 uses) and 3 no. residential units with associated access and parking, following the demolition of existing commercial, agricultural and stable buildings.
- 7.1.3 The proposal includes the sensitive redevelopment of the site to provide upgraded, high-quality commercial space, capable of adaptation to suit the flexible needs of modern businesses and is supported by the addition of three well-designed residential dwellings to support the delivery of the scheme financially and assist in making a modest contribution to the much-needed new housing and commercial space in Gravesham Borough.
- 7.1.4 It should be noted that previous applications were permitted on the site, the most recent of which has been demonstrated to have been implemented. This scheme effectively tidies up the previous application site and the design provides an opportunity to ensure long term viable use for the buildings, while increasing the quantum of high-quality commercial floorspace at the site.
- 7.1.5 The application site provides an ideal opportunity to re-develop land on a suitable, available and developed site to help provide high quality housing in the area whilst maintaining and diversifying the local economy to better suit modern business needs.
- 7.1.6 Importantly, the scheme does not propose any greater built form on site than that consented and therefore there will be no materially greater impact than the present use on the character or appearance of the area, respecting the openness of the Green Belt.
- 7.1.7 The conversion to a mix of building usage will provide for the needs, health and well-being of present and future generations, by creating new high quality housing, B1 and B8 work spaces in the context of the Council's present lack of 5YHLS and indefinitely delayed emerging development plan.
- 7.1.8 The residential units will provide the appropriate level of cross subsidy which can then be invested into the employment areas on the site and is the minimum amount of residential required to make the scheme economically viable.
- 7.1.9 It is concluded that the proposed re-development of the existing site at Lomer Farm accords with planning policy and it is requested that the Local Planning Authority support the proposal, subject to any conditions considered to be appropriate.
- 7.1.10 This statement demonstrates that the proposed development is in accordance with the relevant policies of the development plan, as well as national government

guidance. Furthermore the proposal remains entirely acceptable in design and access terms.

- 7.1.11 Given the above, it is formally requested that planning permission be granted, subject to appropriate conditions.

Gravesham Borough Council