



OUR REF: 3877.SC

PLANNING STATEMENT

**LITTLE MOCKBEGGAR FARM
LAND SOUTH OF TWO GATES ROAD
HIGHAM KENT ME3 8EU**

1 INTRODUCTION

- 1.1** This statement is prepared in support of a planning application submitted on behalf of WB Chambers Farms Ltd. seeking permission for the following development:

Use of land for the stationing of 20 caravans for occupation by seasonal agricultural workers.

2 SITE CONTEXT

- 2.1** The application site is located within Little Mockbeggar Farm to the west of the B2000 Town Road some 170m south of its junction with Two Gates Hill. The land falls generally towards the south towards Lower Rochester Road which forms the southern boundary of the site. The site is located at the very eastern boundary of the Metropolitan Green Belt, but has no other designation. The site's boundary with Town Road is also the boundary of Gravesham District with Medway Council's area.
- 2.2** WB Chambers Farms Ltd have leased 28.4ha of land at Mockbeggar, Higham on a 15 year long-lease and in 2014 they purchased some additional 16ha of land on the west side of Town Road which includes the current application site, giving a total of 44.4ha of land. The applicants have also leased and currently farm, land at Southfleet and land at Sutton at Hone all of which is serviced from this site. In addition, the applicants have significant areas of owned and rented land in the Maidstone area. The applicant's holdings and business are managed from their base at Oakdene Farm in Langley near Maidstone.
- 2.3** The land at Little Mockbeggar Farm and nearby at Mockbeggar, which is located to the north-east of the junction with Town Road/Two Gates Hill/Bunters Hill Road, are farmed intensively for strawberry, raspberry, blackberry and rhubarb production. Little Mockbeggar Farm is now exclusively strawberry production grown using polytunnels for cultivation.
- 2.4** On the southern side of the complex some 47 mobile homes, some occupied on a seasonal basis and some occupied all year round, housing workers are sited along with laundry and other facilities and associated parking and amenity space.

3 PROPOSALS

- 3.1** It is proposed to use a further area of land immediately to the west of the existing caravans to house a further 20 caravans. The caravans would replace the existing polytunnels currently sited on the land. An area is available for additional car parking, if required, to the north of the proposed caravans.
- 3.2** The application is in part required due to the impending need to relocate units from Mockbeggar Farm to the east of Town Road is now required in connection with the owners' farming operations and is subject to planning application recently deposited with Medway Council (MC/23/1118).
- 3.3** The caravans will typically be occupied by 2-4 persons and will have all facilities including cooking toilet and washing facilities in each caravan. A floorplan and elevation drawing of a typical static caravan are included as part of this application
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but it should be noted that caravans may have a different detail. Freezers and laundry equipment will be available in two portable cabins for shared use as on the site opposite. Existing Calor Gas tanks will supply gas to the proposed additional caravans

- 3.4** This standard of accommodation is now sought by the best seasonal agricultural workers who are considered to be a valuable and reliable source of labour, essential for the operation of the farm business. The majority of the workers come from Europe on part-time contracts, either by direct employment or through reputable agencies such as Concordia YSV. Good quality on-site accommodation will help the farm business to secure high quality labour and it should be noted that there is now a shortage of labour so this business needs to compete with other farms looking for labour.
- 3.5** The Applicant confirms that there will be a break in the residential use of each caravan per calendar year. Occupation of 8 of the caravans over the winter months would be in rotation, which would have benefits because this would ensure heating, ventilation and maintenance of the caravans all year round. Accommodating less than 4 workers in each of the occupied caravans in the winter will give workers more space when weather conditions are poor and they need to wear all weather clothing etc. There will be an on-going turnover in the identity of the individual workers as well as rotation in the use of the individual caravans so that the occupation of the caravans will be “seasonal” and not in the nature of a residential mobile home which would be occupied by the same resident all year.
- 3.6** Retaining the caravans on the land all year will avoid the need to move them to another farm in the vicinity, or further afield, at the end of October, and then to bring them back again to Little Mockbeggar at the end of February. This would be problematical because it would need to be done on wet ground after harvest finishes in November and there would be a need to take the caravans out on a low loader which would have to negotiate Town Road and the local road network, depending on their destination. There are potential difficulties associated with lifting the units which could be subject to damage and in wet weather there could be damage to surfaces on the farm and road verges etc. There could also be delay and possibly harm to highway safety in connection with an operation to move them.

4 PLANNING HISTORY

- 4.1** Relevant recent history relating to the Little Mockbeggar Farm site is as follows.

Ref. No: 20181125 Application Withdrawn NO DECISION: [Use of the land for the storage of x20 seasonal agricultural workers caravans during the winter months \(October-March in any one calendar year\).](#)

Ref. No: 20181130 Application Withdrawn NO DECISION: [Application for Lawful Development Certificate for the proposed use of land for the stationing of x20 seasonal agricultural workers caravans.](#)

Ref. No: 20200143 Granted Temporary Permission (06 04 2020 to 06 04 2025): [Use of the land for the stationing of 4 x caravans for occupation by seasonal agricultural workers all year round; the stationing of 15 x caravans for occupation by seasonal agricultural workers from 01 March to 31 October and the unoccupied storage of the 15 caravans over winter \(part retrospective\)](#)

Ref. No: 20201290 Granted Temporary Permission (08 03 2021 to 08/03/2026): [Use of land for the stationing of x28 caravans for occupation by seasonal agricultural workers, 8 caravans to be occupied all year round with 20 occupied in main season.](#)

5 PLANNING POLICY

- 5.1** Policies in the NPPF set out the Government's commitment to securing economic growth, creating jobs and prosperity and these issues are at the heart of this application because without the accommodation for seasonal workers and the ability to retain the caravans on the land over winter then the efficient and effective operation of this agricultural business would be harmed possibly threatening viability.
- 5.2** At paragraph 84 the Government stress their aim to ensure a prosperous rural economy and particularly sustainable growth and expansion of all types of business and enterprise in rural areas including the development and diversification of agricultural and other land-based rural businesses. These proposals clearly support this approach put forward by the Government.
- 5.3** At paragraphs 79 and 80, the Government seeks to promote sustainable development in rural areas and in this context, it is apparent that seasonal workers are needed to support the operations at the farm. The Government recognises the need for essential workers to live at or near their place of work in the countryside.
- 5.4** In terms of decision taking, the advice from Government is set out at paragraph 38. This encourages Local Planning Authorities to approach decisions in a positive way to foster the presumption in favour of the delivery of sustainable development. In this case, the development proposed is entirely sustainable.
- 5.5** The advice goes on to encourage Local Planning Authorities to look for solutions rather than problems and to approve applications for sustainable development wherever possible. They are encouraged to work proactively with applicants to secure developments that improve the economic, social and environmental conditions of an area.
- 5.6** It is therefore apparent that the proposals in this application when considered against the relevant policies should be regarded as a sustainable form of development for which planning permission should be granted.
- 5.7** None of the Saved Policies of the Gravesham Local Plan First Review are relevant to this proposal.

- 5.8** Strategic Objective SO8 from the Gravesham Core Strategy 2014 is relevant because the site is located within the Metropolitan Green Belt. Objective SO8 seeks to preserve the openness of the Green Belt, maintain its national and local planning purposes and protect it from inappropriate development which is harmful to openness. Core Strategy Policy CS02 sets out that, in the rural area, development will be supported within rural settlements inset from the Green Belt and defined on the Policies Map. Development outside of these settlements will be supported when it is compatible with national policies for protecting the Green Belt and other policies in the plan. This is the case with the application proposals.

PLANNING ISSUES

Need for the development

- 6.1** The site at Little Mockbeggar Farm which is under the applicant's ownership and therefore their full control, now serves as the storage/packing and distribution base for all the production from the land in North Kent that they own and lease. With this and the cultivation on the site within the polytunnels, the site provides employment for around 200 workers. It is, however, still necessary to transport workers onto the site despite the presence of the existing caravans which currently accommodate around 160 workers.
- 6.2** The siting of the 20 additional caravans on the land, albeit moving the accommodation from one side of Town Road to the other, will provide space to enable approximately 60-80 further workers to be accommodated on-site. This will represent a significant proportion of the total Little Mockbeggar workforce and will enable the operations on the holding to be more efficient.

Green Belt

- 6.3** The proposed development is required to support agriculture and should therefore be regarded as an appropriate form of development that accords with Paragraph 149 of NPPF and policy CS02 of the Core Strategy.
- 6.4** The development would have only a limited additional impact on the openness of the Green Belt, given the context of the existing caravans and the surrounding polytunnels.
- 6.5** In terms of the impact of the development on the purposes of the Green Belt, it is apparent that:
- It will not add to the sprawl of a large built up area.
 - It will not result in neighbouring towns merging into one another.
 - It will have a very limited impact on the countryside in terms of encroachment due to the existing activity and nearby structures (existing and approved).
 - It will not have any impact on the setting and special character of a historic town.
 - It will not have any impact on urban regeneration because this development needs to be located in the countryside.

- 6.6** It is not therefore considered that there will be any undue impact on the purposes of the Green Belt.

Visual impact

- 6.7** Topography in this area is of gentle slope from west to east with a fall from north to south. Fields at Little Mockbeggar are generally enclosed by substantial hedgerows and there are a number of windbreaks within the farm with high hedgerows and mature trees which divide the land giving an enclosed character. The outer boundaries of the farm also benefit from substantial green screening comprising high hedgerows and trees. The trees extend along the northern, south western and south eastern boundaries of the farm, including along Lower Rochester Road adjacent to the existing and proposed caravans.

- 6.8** It is noted that there is a Public Right of Way (Path NS149) which crosses the triangular area of land between Town Road, Two Gates Hill and Lower Rochester Road from northeast to southwest, ie. from close to the junction of Two Gates Hill and Town Road to Lower Rochester Road just to the west of its junction with Hermitage Lane. The footpath runs to the west of the site for the seasonal workers caravans and through the Polytunnels which will screen the caravans from view.

- 6.9** The Council are asked to bear in mind the fact that caravans are mobile structures and they will only be kept on the land so long as they are needed by the farm and when they are no longer necessary they can be removed from the land. The laundry and freezer containers on the adjacent land can also be removed if no longer required as they are portable equipment. This is not an application for permanent built development.

Other issues

- 6.10** The proposed additional caravans or the activity associated with them will have no impact on residential amenity, the nearest dwellings are in excess of 200m to the south-east and separated from the current site by existing caravans, polytunnels and existing tree screening.

7.0 CONCLUSIONS

- 7.1** The site for the stationing and storage of caravans is enclosed and screened and is not immediately adjacent to any neighbouring residential property. The use of the caravans in the main season and the proposed over-winter storage alongside limited residential occupation over the winter period will not have an adverse impact on the landscape or visual amenity.

- 7.2** Impact on openness of the Green Belt will also be limited, and the Council are asked to bear in mind the fact that the caravans would be able to be stationed on the land lawfully for the main season as Permitted Development if they were then removed in the winter, as the Applicant's fall-back position. It is hoped that the Council will be mindful of the significant advantages of keeping them in situ rather than moving them away and then back onto the site every year.

- 7.3** The Appellant does not consider that there is a policy conflict and it is clear that the proposal accords with the objectives of the NPPF in terms of maintaining and increasing the contribution of this successful rural business to the local economy.
- 7.4** In these circumstances we request that permission is granted for the development without delay as advised in paragraph 11(c) of the NPPF.

APPENDIX ONE

DEVELOPMENT PLAN POLICIES

GRAVESHAM CORE STRATEGY 2014

Policy CS02: Scale and Distribution of Development

4.2.24 The development strategy for the Borough is to retain and improve the existing stock of housing and suitable employment land and to make provision for the Borough's objectively assessed need for at least 6,170 new dwellings delivered at a variable rate as follows; at least 325 dwellings per year for 2011/2012 – 2018/2019, at least 363 dwellings per year for 2019/2020 – 2023/2024, at least 438 dwellings per year 2024/2025 – 2027/2028, and at least 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) during the plan period.

4.2.25 Development will be distributed throughout the Borough as follows: around 3,890 new dwellings and around 186,490 sq m gross employment floorspace (within use classes B1, B2 and B8) will be provided in the Opportunity Areas at Northfleet Embankment and Swanscombe Peninsula East; Gravesend Riverside East and North East Gravesend; Ebbsfleet (Gravesham) and Gravesend Town Centre and on land at the Coldharbour Road Key Site; around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt.

4.2.26 The strategy prioritises development in the urban area as a sustainable location for development. This will be achieved by:

- Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas;
- The continued development of a new sustainable mixed use community in the Ebbsfleet (Gravesham) Opportunity Area, which will include the provision of high quality employment floorspace;
- Revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town; and
- Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development, including Land at Coldharbour Road Key Site.

4.2.27 In the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.

Policy CS19: Development and Design Principles

5.15.14 New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. 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 the criteria set out below:

- Using the collaborative approach advocated in Building for Life 12 and in line with the guidance set out in Kent Design, the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Account will also be taken of the wider site context, including strategic views, site topography, the significance of heritage assets and features of townscape and landscape value which contribute to local character and sense of place;
- 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, including conversions, 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.