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**Proposed conversion of existing stables block to a dwelling, Bocoda Hill
Farm House, Wrotham Road, South Street, Meopham, Gravesend, Kent**

DA13 0QG:

**Doctor & Doctor Chatranjan Sehra
Planning Statement**

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1.0 Introduction

- 1.01 This planning statement forms part of a planning submission for the conversion of an existing stables block to an additional dwelling within the grounds of Bocoda Hill Farm House, Wrotham Road, South Street, Meopham, Gravesend, Kent DA13 0QG. The proposal has been carefully considered to ensure it complements the character of the site and its rural setting, while responding to planning policy and ecological guidance.

2.0 The Application Site

- 2.01 The site is part of Bocoda Hill Farm House. This is a property which is located within the rural area of Meopham and the Metropolitan Green Belt. Access to the property is directly from the A227 South Street (Wrotham Road). The entire site area measures 2.84 hectares (7.01 acres). Much of the land is laid to meadow. The application site area measures 0.21 hectares (0.51 acres). The red line area which includes the driveway leading to the A227 measures 0.29 hectares (0.72 acres).
- 2.02 The application site is located at the southeast corner of the Bocoda Hill Farm House site.

3.0 Planning History

- 3.01 Planning application reference **19970450** was permitted on 17 November 1997 for the erection of a stables building comprising isolation stall, tack room and 3 stables with a canopy to the front and it included a variation of condition (ii) of planning permission reference **GR/96/737W** to allow the use of the loft space of the tractor store/garage building as a hay store and it included for the formation of a hayloft opening in the existing tractor store/garage building. The following conditions were attached to that approval: -
- (i) The development to which this permission relates must be begun not later than the expiration of five years beginning with the date on which this permission is granted.
 - (ii) The stable building hereby permitted shall be used only for the keeping of horses for the personal enjoyment of the occupiers of Bocoda Hill Farm, Wrotham Road, Meopham and for no other purpose and the building shall not be used commercially for or in connection with riding activities, schooling or livery at any time.
 - (iii) No vehicle, trailer, box body or similar equipment shall be stored on the paddocks nor shall any jumps be placed or stored on the land at any time; and no compost, manure, animal bedding material or fodder shall be stacked, stored or deposited on the land other than in an area to be first agreed in writing before any development commences.

- (iv) No vehicle (other than a private motor car or cars), trailer, box body or similar equipment shall be parked or stationed within the paddocks except whilst picking up or setting down animals, feedstuffs, bedding, riding equipment manure.
- (v) No caravan, railway vehicle, tramcar, omnibus body container or similar structure whether on wheels or not and however adapted, shall be stationed on the site at any time.
- (vi) No riding events or gymkhanas shall be staged on the land at any time.
- (vii) No more than 3 horses or ponies shall be kept on the land or in the stable building at any time.
- (viii) The stable building hereby permitted shall only be sited in the position shown on the approved drawing, and the development shall not be carried out otherwise than in complete accordance with the approved plan.
- (ix) The roof overhang of the stable building hereby permitted shall not be enclosed other than with the prior written permission of the District Planning Authority.
- (x) The loft area of the existing store, tractor store/garage building shall only be used for the storage of hay used for feeding and bedding of the horses to be stabled in the stable building hereby permitted.

3.02 Planning application reference **20050493** was permitted on 09 August 2005 for the extension of the residential curtilage, laying out of a tennis court, re-siting of the swimming pool within the residential curtilage and variation of condition (ii) attached to planning permission ref no **GR/97/450** to allow three of the existing stables to be used for livery purposes The following conditions were attached to that approval: -

1. The development to which this permission relates must be begun not later than the expiration of five years beginning with the date on which this permission is granted.
2. The residential curtilage of the existing dwelling is hereby granted planning permission to extend from the existing extent of the curtilage denoted on Plan C accompanying the application as "fence erected by present. Owners" to the line shown, delineated on the said plan in blue to the west and south of the current curtilage, the residential curtilage shall not at any time extend into the open paddock areas to the north, east and west of either this extended curtilage as permitted or the existing dwelling and associated garage and no buildings for a purpose incidental to the enjoyment of the dwellinghouse, whether or not falling within the provisions of. Article 3 of and Part 1 of Schedule 2 to the Town and Country Planning. (General Permitted Development) Order 1995 as amended shall be provided within any part of the site as outlined in red on Plan B accompanying the application outside of the extended incidental. curtilage hereby permitted.
3. The tennis court hereby permitted to be located within the extended residential curtilage shall be used only for the personal enjoyment of the occupiers of Bocoda Hill Farm and for no other purpose.
4. The height of the surround fencing to the tennis court hereby permitted shall not exceed 2.75m in height.

5. Before the construction works for the tennis court hereby permitted commences details of the method of construction, including proposed levels, sections through the site and the extent of any cut and fill should be submitted to and approved by the District Planning Authority, the development shall be carried out in accordance with the approved details.
 6. Before the commencement of development, details of any new boundary treatment to the extended residential curtilage shall be submitted to and approved in writing by the District Planning Authority, the development shall be carried out in accordance with the approved details.
 7. A landscaping scheme shall be submitted to and approved in writing by the District Planning Authority before any works are commenced, such scheme shall include the retention of the existing trees and other planting to the boundaries. of the extended residential curtilage, such scheme as may be approved shall be implemented to the satisfaction of the District Planning Authority within 12 months from the commencement of the works and thereafter maintained to the satisfaction of the District Planning Authority for a period of five years.
 8. The stable building within the site shall be used for the keeping of horses for the personal enjoyment of the occupiers of Bocoda Hill Farm, Wrotham Road, Meopham and for livery purposes the latter for the keeping of not more than three horses or ponies at any one time and shall not be used as a riding school or any other commercial riding activity.
 9. Details of the arrangements for the storage and disposal of waste, bedding, stable waste and manure. (including the means of enclosure, where necessary) shall be submitted for approval to the District Planning Authority before the commencement of the development, these arrangements shall be fully implemented and operated at all times in accordance with the approved details. Such arrangements shall not include burning the waste bedding, stable waste and manure on the site.
- 3.03 The existing stables generally resemble those shown on the approved drawings with some minor differences. The roof covering for example, is described on the approved drawings as "Onduline" corrugated sheeting. It is currently weathered roofing felt.
- 3.04 Two flat-roofed hay stores were also added to the southern side of the stables block several years ago. Their presence appears on current Ordnance Survey mapping. Historical Google Street View aerial imagery suggests that they existed in 2007.
- 3.05 Pre-application advice was sought by my clients from Gravesham Borough Council for the potential conversion of the existing stables to a dwelling. This advice was prepared and sent to my clients on 25 February 2025 under reference [PRE20250002](#). This planning statement responds to the matters raised in the pre-application advice, including biodiversity net gain, design considerations, and planning history.

4.0 The Existing Stables

- 4.01 The existing stables remain substantially as originally approved under planning reference **19970450**. The plan form is an “L” shape. The floors are of concrete. The walls are timber framed on brick or block walls to 150mm nominal above floor level and they are clad with feather edge timber weatherboarding. The duo-pitched roofs are of unequal pitch and they are constructed of timber trusses overlaid with boards. They are covered with roofing felt. The roofs form an overhang of approximately 1.2 metres on the entrance sides.
- 4.02 Two flat-roofed hay stores were added to the south wall of the stables block at least 18 years ago. They are also clad with feather edge timber weather boarding but the bulk of the southern wall is taken up by two 4.2 metre wide garage doors.
- 4.03 The stables are a permanent structure and they have existed for the past 28 years. They have been maintained and repaired during that time.
- 4.04 A continuous 1.2 metre wide concrete path extends along the north and west facing stable door walls and a further area of concrete hardstanding projects 4 metres from the northernmost wall to form a rectangular courtyard across the entire east-west length of the stables block. An area of unmade consolidated ground projects a further 6.5 metres northwards from the existing concrete hardstanding towards an existing manège.
- 4.05 Access to the stables is via a trackway leading northwards for approximately 70 metres linking to the main driveway exiting onto the A227 South Street (Wrotham Road).
- 4.06 The private garden area of Bocoda Hill Farm House lies to the west of the application site. The existing manège is to the north of the application site. Meadowland with trees and hedgerows are to the east of the existing stables and the boundary fence is approximately 5 metres away from the existing hay stores to the south. The south boundary is defined by a post and barbed wire fence. Public footpath reference 0169/NS274/2 runs to the south of the fence. This runs between Ifield Road in the west and the A227 South Street (Wrotham Road) in the east.

5.0 The Proposal

- 5.01 My clients propose to convert the existing stables block into a dwelling for a member of their family. The dwelling will be a two bedroom property with accommodation for up to 4 people. The dwelling will have the following accommodation:

Rooms	Internal Area to Finishes (m ²)	External Area (m ²)
	77.88 (838.29 ft ²)	92 (990.26 ft ²)
Living Room	17.16	
Kitchen / Dining Area	17.44	
Bathroom	4.36	
Bedroom 1	15.34	
Bedroom 2	12.43	
Linen Cupboard	1.35	
Hall	7.22	

- 5.02 Table 1 of Gravesham Borough Council's *Supplementary Planning Guidance 2, Residential Layout Guidelines including Housing Standards Policy Statement October 2015, adopted February 1996 - amended June 2020* requires the following minimum room areas for dwellings: -

Function of room	Floorspace (m ²)
Double bedroom	11.2
Single bedroom	6.5
Living room	13.2
Dining room	9.5
Kitchen	7.2
Kitchen/diner	12.0
Lounge/diner	18.0
Bathroom and WC	3.6
Bathroom only	2.8
WC only	1.3

- 5.03 The *Technical Housing Standards – Nationally Described Space Standard*, published by HM Government in 2015, requires a minimum gross internal floor area and storage space of 70m² for a 2 bedroom, 4 person single-storey dwelling. It also requires that a dwelling with two or more bedspaces has at least one double (or twin) bedroom. It also requires that a double (or twin) bedroom has a floor area of at least 11.5m². It also requires that one double (or twin) bedroom is at least 2.75m wide and that every other double (or twin) bedroom is at least 2.55m wide.

- 5.04 This proposal has space allowances comfortably in excess of both those required by Gravesham Borough Council and HM Government.
- 5.05 The existing hay store extensions on the south side of the stable block will be removed. Their total footprint measures 46.62m² (501.77ft²).
- 5.06 The existing internal floor level is flush with the external path. A damp proof membrane will be laid over the existing slab. 18 or 22mm boarding will be laid over the existing slab on timber joists to raise the internal floor level by approximately 150mm. PIR insulation boards will be laid between the joists to achieve a U value required by Part L of the Building Regulations.
- 5.07 The existing external stud walls will be retained, apart from those under the existing 1.2 metre wide eaves overhang. Those walls will be moved forwards to incorporate most of the eaves overhang within the dwelling. The remaining eaves overhang will be approximately 50% greater than the existing overhang on the other elevations. I understand that my clients discussed this possibility with the case officer during her site visit earlier this year. The additional external footprint area of 15.24m² (163.99 ft²) created by this infilling will be more than offset by the removal of the existing hay stores with an external footprint area of 46.62m² (501.77ft²).
- 5.08 The existing remaining external stud walls will be augmented by an additional line of stud walling set inside the existing structure to allow for the insertion of thermal insulation to comply with Part L of the Building Regulations.
- 5.09 The new external stud walls will be double the existing wall thickness to allow for the insertion of thermal insulation to comply with Part L of the Building Regulations.
- 5.10 New door and window openings will replace the existing stable door and window openings and stained timber windows and doors will be inserted in. Their style will be sympathetic to the agricultural character of the existing stables.
- 5.11 Sheathing board with a breather membrane will be fixed to the outside face of the timber studs and new feather edge timber weatherboarding will be applied on vertical battens to allow for ventilation in accordance with good building practice.
- 5.12 50+12.5mm thermal plasterboard will be fixed to the inside face of the studs on 25mm deep battens to bring the external wall insulation level up to that required by Part L of the Building Regulations.
- 5.13 The existing felt roof covering and underlying boarding will be stripped from the existing roof trusses. This will be replaced by *Tapco DaVinci Select Shakes, Aged Cedar 255*. These resemble cedar shingles but they are made from a mix of virgin resins, UV and thermal stabilisers with an added fire retardant. The shingles will be laid on battens on a vented underlay over the existing roof trusses. The trusses will be augmented where necessary to take account of the revised bearing points. A total

400mm thickness of glass wool insulation quilt will be added at ceiling level to provide the level of insulation required by Part L of the Building Regulations.

- 5.14 An air source heat pump will be positioned on the south side of the building to provide space heating and hot water.
- 5.15 Surface water run-off from the roof will discharge to a soakaway
- 5.16 Foul drainage will discharge to the existing private sewer serving Bocoda Hill Farm House which runs eastwards from the back of the existing house into the main public sewer under the A227.
- 5.17 An area of paving will be set out around the building and this will extend to form a small terrace outside the new pair of doors off the proposed kitchen/dining area.
- 5.18 A gravelled drive will be formed in front of the building to provide parking and turning space for two cars. Granite setts will form the edging to the gravel drive.
- 5.19 A paved area will be formed to the north of the parking spaces to provide a space for a 2.4m x 1.8m shed for garden tools and a cycle store.
- 5.20 A small, paved area will be formed just inside the entrance gate to allow for the siting of wheelie bins for domestic refuse and recycling. The wheelie bins will be re-sited closer to the road on the existing driveway, alongside those for Bocoda Hill Farm House, on refuse collection days.
- 5.21 The eastern half of the application site will be planted to form a wild flower meadow and the existing trees and hedges fronting the A227 South Street (Wrotham Road) and public footpath reference 0169/NS274/2 will remain.
- 5.22 The western half of the application site around the proposed stables conversion will be laid to lawn and flower beds.
- 5.23 The line of demarcation between the east and west parts of the site will be defined by a post and rail fence with a field gate against which a beech hedge will be planted.
- 5.24 The existing trackway will be re-surfaced with fresh tarmacadam and it will be partially diverted to take account to the proposed rear extension to the existing garage block which is currently under consideration. This in turn will require the reduction in size of the existing manège from 50m x 25m to 33m x 25m.

6.0 Access

- 6.01 The finished ground floor level of the proposed dwelling will closely relate to the existing site levels.
- 6.02 Access to the site will be via the existing access point onto the A227 South Street (Wrotham Road), which currently serves Bocoda Hill Farm House. The existing trackway off the driveway will be partially diverted to take account of a possible rear extension to the existing garage block and re-laid with tarmacadam.
- 6.03 Access to the front door will be via a ramped path with a gradient of 1 in 15. The floor layout will conform to the requirements of Part M of the Building Regulations, where the living accommodation is wheelchair accessible and the bathroom will have an outward opening door.

7.0 Amenity Space

- 7.01 Amenity space will be provided within the application site. The existing boundary hedgerows to the south and east will be retained. A new post rail fence will be erected to the north, between the application site and the existing manège. The existing fence and planting to the west, between the application site and Bocoda Hill Farm House will be retained.
- 7.02 A hard paved area for refuse storage is indicated on the site plan.
- 7.03 The frontage will be provided with soft landscaped areas as shown on the proposed site plan.

8.0 Environmental Considerations

- 8.01 The site was originally part of a farm. Gravesham Borough Council's Environmental Protection team was consulted in-house as part of the pre-application process. The Environmental Protection team considers that there is a risk of contamination arising from the previous agricultural use and it has asked for a contamination assessment. It considers that, ideally, a desk-based phase 1 risk assessment should be undertaken and submitted with any formal planning application.
- 8.02 My clients commissioned **Messrs GeoSmart Information Ltd** of Shrewsbury to prepare a **Phase 1 Contaminated Land Assessment** of the application site and it is submitted as a part of this planning submission. The assessment concludes that the risk of contamination is low to moderate/low. It has summarised the following: -

Given the previous agricultural use of the Site and therefore the potential for some localised contamination to be present, it is recommended that a proportionate

programme of site investigation works be undertaken in order to establish the presence or absence of contamination and to enable a quantitative assessment of the associated environmental risks.

9.0 Crime Prevention Measures

- 9.01 Crime prevention measures, *Circular 1/2006 “Guidance on changes to the Development Control System”* states in Paragraph 87, that Design and Access Statements for outline and detailed applications should demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places as set out in *Safer Places – the Planning System and Crime Prevention (ODPM/Home Office, 2003)*. The new dwelling will be adequately secured via a modern alarm and the layout of rooms and windows will provide good security and overlooking of the main access.

10.0 Climate Change

- 10.01 The supplement to *PPS1 “Planning and Climate Change”* requires local planning authorities to request of applicants, through their Design and Access Statements, how the proposed development will contribute to Key Planning Objectives set out in PPS1 and relevant DPD policies consistent with it.
- 10.02 The new dwelling will be provided with an air source heat pump to provide space heating and hot water.
- 10.03 The site will actively contribute towards a reduction in carbon dioxide emissions, with considerably enhanced levels of insulation, as advocated by paragraph 42 of the supplement to PPS1.

11 Planning Context

11.01 My clients sought pre-application advice from Gravesham Borough Council for this project. The Borough Council allocated their reference number **PRE20250002** to this advice which was issued on 25 February 2025. The advice was given by the Borough Council without any proposal drawings having been previously submitted. This planning statement makes reference to relevant planning policies and constraints in view of the fact that Gravesham Borough Council has provided my clients with pre-application advice. This statement follows the structure of the Council's report.

11.02 The following Gravesham Borough Council and national planning policies are relevant to the application: -

Gravesham Local Plan Core Strategy (September 2014):

- CS01 - Sustainable Development.
- CS02 - Scale & Distribution of Development.
- CS11 – Transport.
- CS12 - Green Infrastructure.
- CS14 - Housing Type and Size.
- CS16 – Affordable Housing.
- CS18 - Climate Change.
- CS19 - Design & Development Principles.

Saved Policies in the Gravesham Local Plan First Review (November 1994):

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

National Planning Policy Framework (2024):

- Section 2 - Achieving Sustainable Development.
- Section 4 - Decision-making.
- Section 5 - Delivering a sufficient supply of homes.
- Section 9 - Promoting sustainable transport.
- Section 11 - Making effective use of land.
- Section 12 - Achieving Well-Designed Places.
- Section 13 - Protecting Green Belt Land.
- Section 15 - Conserving and Enhancing the Natural Environment.

Supplementary Planning Guidance and other Documents:

- 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020.
- Technical Housing Standards – nationally described space standard (2015).
- SPG 4 - KCC Parking Standards (2006).
- Householder Extensions/Alterations Design Guide (2021).
- Gravesham Landscape Character Assessment (2009).

- Design for Gravesham - Design Code (2024).

11.03 I will now refer to all of the above in turn.

11.04 Gravesham Local Plan Core Strategy (September 2014):

CS01 - Sustainable Development

Paragraph 4.1.6 states that planning applications which accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise. Paragraph 4.1.7 goes on to state that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) and in this Core Strategy.

The NPPF states that there are three overarching objectives to achieve sustainable development including: -

- a) **An economic objective** – 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.
- b) **A social objective** – 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
- c) **An environmental objective** – 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.

This proposal meets the **economic objective** to help build a strong, responsive, and competitive economy in the following ways:

- Efficient land use. The proposal makes use of an existing structure, reducing the need for new construction and thereby conserving resources and infrastructure costs.
- Local employment and heritage skills: The conversion will engage local tradespeople, potentially including those with expertise in traditional building methods, thereby supporting the rural economy and preserving artisanal knowledge.

- Infrastructure coordination: The site's proximity to Meopham village and existing transport links means minimal strain on new infrastructure, aligning with the NPPF's emphasis on development in the right places at the right time.

This proposal meets the **social objective** to support strong, vibrant and healthy communities in the following ways:

- Meeting housing needs. The dwelling will provide accommodation for a family member, supporting intergenerational living and it will contribute to community resilience by enabling ageing-in-place within a familiar setting.
- Design quality and safety. The reuse of the stable block allows for a bespoke, well-designed home that respects the character of the area while offering modern amenities.
- Community integration. The proposal maintains the rural setting and scale, ensuring it complements the existing community fabric and avoids overdevelopment.

This proposal meets the **environmental objective** to protect and enhance the natural, built, and historic environment in the following ways:

- The proposal aligns with the environmental objectives of the **NPPF (2024)**, particularly paragraphs 65, 84, and 154(h). 154(h) allows for the material change of use of previously developed land in the Green Belt, provided it does not cause substantial harm to openness. The proposal will make effective use of previously developed land, preserve the openness of the Green Belt, and it will deliver a dwelling through the sensitive reuse of an existing structure. The scheme avoids new land take, minimises embodied carbon, and integrates opportunities for biodiversity enhancement, thereby contributing to climate resilience and sustainable rural development.
- The adaptive reuse of the stable block reduces embodied carbon compared to new-build construction and allows for the integration of sustainable technologies.
- The landscaping proposals will enhance biodiversity through native planting and habitat creation, while preserving the visual character of the countryside. In this instance, the existing trees and boundary hedgerows will be retained and the eastern half of the site will be regenerated to form a wild flower meadow.

Taken together, the proposal represents a thoughtful and proportionate response to local and national policy, delivering sustainable development in a manner that respects both place and purpose.

CS02 - Scale & Distribution of Development

Policy CS02 supports development in the Green Belt where it helps maintain and diversify the rural economy, provided it aligns with national Green Belt protections and other Core Strategy policies.

Section 13 of the **NPPF (2024)** confirms that inappropriate development is, by definition, harmful to the Green Belt and should only be approved in very special circumstances. These circumstances must clearly outweigh any harm to the Green Belt, including harm by reason of inappropriateness.

Paragraph 142 reiterates that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Its essential characteristics are openness and permanence.

Paragraph 155 identifies certain forms of development that are not inappropriate in the Green Belt, including (exception d):

“The re-use of buildings provided that the buildings are of permanent and substantial construction.”

The proposal involves the conversion of an existing stable block which currently consists of a brick base, timber frame with weatherboarding and felt roofing. The building is not temporary—it has been present on the site since before 2003 and it remains undamaged, making it of substantial construction.

A structural report has been commissioned from **Thomsen Homes Ltd**, in line with the Council’s pre-application advice. Its assessment confirms that the building is structurally sound and of permanent construction. The report forms part of this planning submission.

The Council’s pre-application advice considers that the proposal falls within the parameters of Paragraph 155(d) of Section 13 (Protecting Green Belt Land) of the **National Planning Policy Framework (2024)** and **Policy CS02 (Scale and Distribution of Development)**.

The proposal does not increase the structure’s footprint or height. While some of the open canopy area will be enclosed, the overall footprint will decrease, due to the removal of the attached hay stores on the south side of the stable block.

The proposal will meet Part L of the Building Regulations, contributing to the transition towards a low-carbon economy and supporting the environmental aims of sustainable development.

Housing Supply Shortfall, Strategic Context & Policy Alignment

Gravesham Borough Council’s Five-Year Housing Land Supply Statement (February 2025) confirms a significant and persistent shortfall in deliverable housing land:

- Local Housing Need (Standard Method):
672 dwellings per annum × 5 years = 3,360 dwellings required
- Identified Deliverable Supply (2024–2029):

Only 2,016 dwellings identified
→ Equivalent to 3 years' supply
→ Shortfall of 1,344 dwellings

- Housing Delivery Test Performance:
Delivery over the past 3 years was less than 75% of the required amount
→ Triggers a 20% buffer
→ Confirms persistent under-delivery

This shortfall is particularly acute given Gravesham's strategic location—just 25 miles from central London—and its growing role in accommodating housing demand from the capital. The Borough is experiencing sustained pressure from:

- Outward migration from London, as affordability constraints and lifestyle shifts drive demand for homes in well-connected rural areas.
- Improved transport connectivity, including HS1 services to St Pancras and Thameslink connections, making Gravesham increasingly attractive to commuters.
- Changing demographic patterns, with younger families and professionals seeking access to green space, heritage settings, and community-oriented living.

Despite this rising demand, the Borough faces severe constraints on new housing delivery, particularly within the Green Belt. The difficulty of securing permission for new dwellings in such areas—especially where no previous residential use existed—makes every viable opportunity for sustainable development all the more critical.

This proposal offers a rare chance to contribute to housing delivery without compromising the openness or character of the Green Belt. It involves the re-use of an existing permanent and substantial structure, with no increase in footprint or height, and a net reduction in built form due to the removal of the ancillary hay stores.

Moreover, the proposal aligns with the environmental objectives of the **NPPF (2024)** and the Council's sustainability goals:

- The dwelling will provide high standards of energy efficiency and thermal performance.
- The conversion avoids the carbon cost of demolition and new construction, making use of existing materials and embodied energy.
- The modest scale and rural setting support low impact living, with minimal strain on infrastructure and services.

In addition, the proposal supports the rural economy, in line with **Policy CS02's** emphasis on diversification. By enabling a modest residential use on a site previously used for equestrian purposes, the scheme contributes to the vitality of the countryside while respecting its character.

Given the Council's inability to demonstrate a 5-year housing land supply, and the underperformance against the Housing Delivery Test, **Policy CS02** must be regarded

as out of date under Paragraph 11(d) of the [NPPF \(2024\)](#). This activates the tilted balance, meaning planning permission should be granted unless:

1. Policies protecting designated assets provide a clear reason for refusal; or
2. Any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

In this case, the benefits—including the delivery of a modest, well-integrated new dwelling—clearly outweigh any perceived harm. The proposal is policy-compliant, environmentally responsible, and socially necessary, contributing to the Borough’s housing stock in a manner that respects both the Green Belt and the rural context.

This proposal reflects my clients’ commitment to delivering a modest, well-considered home that responds to local housing need while respecting the sensitivities of its rural setting. It makes intelligent use of existing built form, aligns with national and local policy, and contributes meaningfully to Gravesham’s housing supply at a time of demonstrable shortfall. In a planning landscape where new dwellings in the Green Belt are exceptionally difficult to justify, this scheme stands out as a rare example of sustainable, policy-compliant development that serves both individual and public interest.

CS11 - Transport

Policy CS11 of the Core Strategy promotes sustainable and environmentally responsible transport solutions across Gravesham. It seeks to:

- Encourage the use of public transport, walking, and cycling.
- Improve pedestrian connectivity between the town centre, the River Thames, and surrounding areas.
- Support development in locations with good access to transport infrastructure
- Manage traffic flow and parking provision to reduce congestion and environmental impact.
- Ensure new development integrates effectively with the existing transport network.

Whilst CS11 includes strategic objectives such as the development of an integrated transport interchange at Garrick Street/Barrack Row, its principles apply more broadly to ensuring that new development is accessible, well-connected, and low impact.

The proposed site is accessed via South Street (A227 Wrotham Road), a key arterial route with good connectivity to the wider highway network and public transport services. This ensures that the site is suitably located in terms of accessibility, in line with CS11’s locational criteria.

The proposal includes:

- Off-street parking for two vehicles, as shown on the proposed site plan.

- Cycle storage within a garden tool shed, supporting active travel and sustainable transport choices.
- Provision for an electric vehicle (EV) charging point, to be installed adjacent to the parking area, supporting the transition to low-emission transport.
- Step-free access to the dwelling, in accordance with Part M of the Building Regulations, ensuring inclusive design and accessibility for all users.

The dwelling's layout and external access arrangements have been designed to accommodate future mobility needs, including level thresholds and generous circulation space. These measures reflect best practice in inclusive design and anticipate the evolving requirements of residents over time.

Given the modest scale of the development and its reuse of an existing structure, the transport implications are minimal. The proposal does not generate significant additional traffic and it does not require alterations to the public highway. Any necessary highway consents will be obtained prior to commencement, and the highway boundary is clearly defined.

In summary, the proposal aligns with the aims of Policy CS11 by:

- Supporting low-impact, sustainable transport provision.
- Ensuring safe and inclusive access.
- Minimizing traffic generation.
- Providing adequate parking, cycle storage, and EV infrastructure.

The scheme reflects the principles set out in *Manual for Streets (DfT, 2007)*, which advocates for context-sensitive design, prioritisation of pedestrian movement, and integration of transport infrastructure that enhances place rather than detracts from it. The proposal also adheres to the *Kent Design Guide*, particularly in its emphasis on accessibility, sustainability, and the creation of well-connected, legible environments—even at a modest, rural scale.

By reusing existing built form and incorporating modern transport infrastructure in a discreet and sensitive manner, the proposal demonstrates how small-scale development can meet contemporary standards without compromising rural character. It represents a proportionate and forward-looking response to transport considerations in a rural context, combining practicality with environmental responsibility.

While public transport provision in the area is modest, the site is served by a weekday bus route along the A227, offering basic connectivity to nearby settlements. The proposal's scale and self-contained nature ensure that it does not rely heavily on public transport infrastructure.

CS12 - Green Infrastructure

Policy CS12 of the Core Strategy seeks to protect, enhance, and extend Gravesham's green infrastructure network. It promotes the creation of multifunctional green spaces that support biodiversity, landscape character, recreation, and climate resilience. Key objectives include:

- Protecting existing green assets, including trees, hedgerows, watercourses, and open spaces.
- Enhancing ecological connectivity through wildlife corridors and green links.
- Integrating green infrastructure into new development in a way that supports biodiversity and community well-being.
- Encouraging active travel through green routes and footpath networks
- Supporting landscape character and local distinctiveness.

The proposed development respects and reinforces these objectives through its sensitive siting, modest scale, and integration with the surrounding landscape. The site lies within a semi-rural setting, characterised by mature hedgerows, open fields, and a patchwork of historic boundaries. The proposal retains and reinforces these features, contributing to the continuity of local green infrastructure.

Specific measures include:

- Retention of existing hedgerows along the site boundary, preserving habitat and visual screening.
- Use of permeable surfacing and soft landscaping to support sustainable drainage and ecological resilience.
- Provision of native planting within the garden area, enhancing biodiversity and seasonal interest.
- Minimal disruption to existing green corridors, with no encroachment into adjacent fields or habitats.
- Low-impact external lighting to avoid disturbance to nocturnal wildlife.

The proposal's modest footprint and reuse of existing built form ensure that the development does not fragment or compromise the surrounding green infrastructure. Instead, it complements the landscape through careful detailing, restrained massing, and a commitment to ecological stewardship.

In summary, the proposal aligns with Policy CS12 by:

- Protecting and enhancing existing green assets.
- Supporting biodiversity and ecological connectivity.
- Integrating green infrastructure into the site layout and landscaping.
- Respecting landscape character and rural distinctiveness.
- Promoting sustainable drainage and low-impact design.

The scheme demonstrates how small-scale development can contribute positively to Gravesham's green infrastructure network, offering a model of sensitive rural intensification that balances ecological integrity with residential need.

CS14 - Housing Type and Size

Policy CS14 of the Core Strategy aims to ensure that new housing development contributes to the creation of mixed and sustainable communities by providing a range of dwelling types and sizes that reflect local needs. Whilst the pre-application advice did not elaborate on this policy, the proposed development aligns with its objectives in the following ways:

- **Dwelling Type and Occupancy:** The proposed two-bedroom dwelling is intended for a family member and it could accommodate up to four people. This contributes to the Borough's supply of modest-sized family homes, which are often in demand.
- **Internal Space Provision:** The proposed internal gross floor area of 77.88m² exceeds the minimum requirement of 70m² for a two-bedroom, four-person single-storey dwelling as set out in the Government's *Technical Housing Standards – Nationally Described Space Standard (2015)*.
- **Room Sizes:** All individual rooms exceed the minimum standards set out in Gravesham Borough Council's *Residential Layout Guidelines (SPG2, amended June 2020)*. For example:
 - Bedroom 1: 15.34m² & Bedroom 2 12.43m² (vs. 11.2m² minimum for a double bedroom)
 - Living Room: 17.16m² (vs. 13.2m² minimum)
 - Kitchen/Dining Area: 17.44m² (vs. 12.0m² minimum for a kitchen/diner)
 - Accessibility and Adaptability: The dwelling will be designed to meet Part M of the Building Regulations, with level access, a ramped approach, and an outward-opening bathroom door. This ensures the property is suitable for a range of occupiers, including those with mobility needs.
 - Amenity and Storage: Adequate external amenity space is provided, along with provision for refuse storage, cycle parking, and a garden shed. These elements support the functionality and liveability of the dwelling.

In summary, the proposal not only meets but exceeds the space and amenity standards required by both local and national policy. It represents a high-quality, appropriately sized addition to the local housing stock and supports the aims of Policy CS14 in delivering well-designed, functional homes that respond to local needs.

CS16 – Affordable Housing

Policy CS16 of the Core Strategy outlines the Council’s requirements for securing affordable housing contributions from new residential development, typically where proposals meet defined thresholds.

In this case, the proposed development comprises a single dwelling intended for a family member. It does not constitute “major development” as defined in the **NPPF (2024)** and it therefore falls outside the scope of CS16.

Paragraph 65 of the NPPF 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.

As the proposal does not meet the definition of major development, no affordable housing contribution is required under national or local policy.

CS18 - Climate Change

Policy CS18 of the Core Strategy promotes sustainable development through climate resilience, flood risk mitigation, water demand management, and carbon reduction. It requires new residential development to meet water efficiency standards equivalent to **Code for Sustainable Homes** Level 3/4, with a proportion achieving Level 5/6. Non-residential developments are expected to meet **BREEAM** “Excellent” standards for water efficiency. The policy also supports retrofitting existing buildings to reduce water consumption and carbon emissions.

The proposed development involves the conversion of an existing timber-framed stable block, retaining the embodied carbon of the original structure. The timber cladding will be renewed using sustainably sourced materials, further reducing environmental impact. An air source heat pump will provide space heating and hot water, supporting the transition to low-carbon energy.

Water-efficient fittings and appliances will be installed to reduce potable water demand, aligning with the policy’s emphasis on responsible resource use.

Surface water run-off will be managed via a soakaway system, in accordance with sustainable drainage principles. Foul sewage will discharge to the public sewer beneath the A227 South Street (Wrotham Road), via a connection to the existing private branch serving Bocoda Hill Farm House.

The site is located on high ground and is classified as having a **Very Low** flood risk, meaning no Flood Risk Assessment is required. The proposal therefore passes the sequential test and supports climate resilience through low-impact drainage and efficient water use.

The proposal accords with the aims of CS18, supporting climate resilience, responsible water management, and carbon reduction through sensitive reuse, sustainable materials, and low-carbon energy systems.

CS19 - Design & Development Principles

Policy CS19 of the Core Strategy requires new development to be visually attractive, locally distinctive, and fit for purpose. It must conserve and enhance the character of the built, historic, and natural environment, integrate well with its surroundings, and be adaptable to changing lifestyles. The proposal must also be resilient to climate change and meet anti-crime standards.

The proposed conversion of the timber-framed stable block responds directly to these principles. The design retains the original structure, preserving its embodied carbon and rural character. The renewed timber cladding will be sustainably sourced, and the roof will be finished in **Tapco DaVinci Select Shake (Aged Cedar)** — a composite tile that replicates the texture and tone of hand-split cedar while offering enhanced durability, fire resistance, and a 40-year lifespan.

The elevations express a restrained architectural language, with feather-edge weatherboarding, modest fenestration, and low eaves, all sympathetic to the site's agricultural origins. The form and materials harmonise with the wider landscape setting. The design eschews pastiche, favouring a quiet authenticity rooted in place and purpose.

The internal layout provides two bedrooms, a bathroom, and generous living and kitchen/dining spaces, all meeting the GBC **Supplementary Planning Guidance 2, Residential Layout Guidelines including Housing Standards Policy Statement October 2015, adopted February 1996 - amended June 2020** and **Nationally Described Space Standards (2015)**. The arrangement supports flexible living and long-term adaptability.

The site plan demonstrates:

- Sensitive integration with the landscape, retaining existing trees, hedges, and walls where possible.
- New native planting, including hedgerow reinforcement and pollinator-friendly species, enhancing biodiversity and seasonal interest.
- Discreet parking with an EV charging point, supporting low-carbon transport and future-proofing the dwelling.
- Wall-mounted lighting at the main entrance and kitchen doors, providing safe access and natural surveillance without light spill or visual clutter.

- Waste storage incorporated into the garden, screened by planting and fencing, in accordance with the Planning Guidance on Waste Collection Requirements (2019).

The proposal reflects the aims of the *Design for Gravesham – Design Code (2024)*, promoting quality, locally responsive development rooted in place and community. It respects the site’s agricultural origins while introducing a modest, low-impact residential use that enhances the character of the area.

In line with Paragraph 135 of the *NPPF (2024)*, the development will:

- Function well over its lifetime, with adaptable internal layouts and low-carbon systems.
- Be visually attractive, using natural materials and a restrained architectural language.
- Be sympathetic to local character, retaining the scale, rhythm, and materiality of the stable block.
- Establish a strong sense of place, rooted in the site’s history and rural context.
- Optimise the site’s potential without overdevelopment, maintaining generous spacing and landscape buffers.
- Promote safety and well-being, with clear access, natural surveillance, and private amenity space.

The layout adheres to the *Residential Layout Guidelines (SPG2, 2020)*, ensuring appropriate separation distances and privacy for both existing and future occupants. The dwelling is set well away from the host property and neighbouring dwellings, with no adverse impact on outlook or privacy. All habitable rooms and private amenity areas meet the required standards.

The proposal accords with *CS19* and the *NPPF*, delivering a modest, well-considered development that enhances the site’s character, supports climate resilience, and contributes positively to the local built environment. It demonstrates architectural integrity, contextual sensitivity, and environmental responsibility — qualities that transcend superficial design critique and reflect the enduring values of good placemaking.

11.05 Saved Policies in the Gravesham Local Plan First Review (November 1994):

C11 - Change of Use of Redundant Buildings in the Countryside

Policy C11 supports the conversion of redundant buildings in the countryside where the structure is sound, the proposed use is appropriate to the rural setting, and the character of the building and its surroundings is respected.

The former stable block, though no longer in active equestrian use, has been consistently maintained and it remains structurally sound — a fact confirmed by the structural engineer's assessment submitted as part of this application.

Its modest scale, traditional form, and siting within a discreet cluster of buildings makes it ideally suited to low-impact residential conversion. The proposal retains the building's external character and footprint, ensuring that its rural identity is preserved rather than erased.

Moreover, the change of use aligns with the broader objectives of the **NPPF (Section 11)** to make effective use of land, particularly where buildings are underutilized but capable of contributing to local housing supply without encroaching on open countryside.

P3 - Vehicle Parking Standards

While **Policy P3 of the Gravesham Local Plan First Review (1994)** remains a material consideration, the operative parking standards are those adopted by **Kent County Council**, the Highway Authority for the area. These are set out in the **Kent Design Guide – Parking Standards (2024)**, which supersedes **SPG4 (2006)** and reflect current best practice.

- Parking policy and standards fall under the remit of **Kent County Council** as the statutory Highway Authority.
- The proposed parking provision has been assessed against the 2024 Kent standards, ensuring compliance with the most up-to-date and legally relevant guidance.

The development provides two off-street spaces, including an EV charging point, in line with the expectations for a rural two-bedroom dwelling. The layout is safe, accessible, and sensitive to the site's character.

The **Kent Parking Standards (2024)** recommend secure cycle storage for new residential development. In this case, cycle parking is accommodated within the shed shown on the proposed site plan, located adjacent to the dwelling and easily accessible from the parking area.

The shed will provide covered, secure, and weatherproof storage, meeting the functional requirements for cycle parking without introducing unnecessary visual clutter or standalone structures. This approach is consistent with the *Kent Design Guide* and reflects the low-intensity, rural character of the site.

The proposed driveway will be surfaced in *compacted gravel*, matching the driveway for Bocoda Hill Farm House, consistent with the rural character of the site and in keeping with the prevailing treatment of driveways in the surrounding countryside. Gravel is a *permeable surface*, supporting sustainable drainage and reducing surface water runoff, in line with the principles set out in *the Front Driveway Design Guidance (2023)* issued by Gravesham Borough Council. While the guidance encourages urban greening and permeable surfacing, it does not prohibit gravel drives, nor does it override the *permitted development rights* or the *site-specific appropriateness* of such treatments in rural locations. The proposed gravel surface will be *well-contained*, with edging to prevent migration, and will not result in visual harm or operational inconvenience.

T1 - Impact of Development on the Highway Network & T5 - Access to the Identified Highway Network

Policies *T1* and *T5* require that new development be adequately served by the highway network, and that any new or intensified access must be safe, properly formed, and acceptable to the Local Planning and Highway Authorities.

The proposed conversion of the stable block will utilise the existing southern access to Bocoda Hill Farm House, which connects to South Street (A227 Wrotham Road), a classified road identified on the Proposals Map. This access is long-established, properly constructed, and was previously used for the stable block when it functioned in its original equestrian capacity.

No new access is proposed, and the development will not result in a material intensification of use. The modest scale of the proposed dwelling and its rural location ensure that trip generation will be low, and the existing highway infrastructure is more than adequate to accommodate this level of use.

The existing visibility splays at the junction with the A227 are considered sufficient, particularly in light of the continued low-intensity use of the access.

The proposal therefore satisfies the requirements of both Policies T1 and T5, with no adverse impact on the transport system and no highway safety concerns.

11.06 National Planning Policy Framework (2024):

Section 2 - Achieving Sustainable Development

The proposed conversion of the stable block represents a clear embodiment of sustainable development as defined by both the *Gravesham Core Strategy* and the *NPPF (2024)*. It delivers:

- Economic sustainability through efficient land use, support for local heritage skills, and minimal infrastructure demand.
- Social sustainability by meeting housing needs, fostering intergenerational living, and maintaining community character.
- Environmental sustainability via adaptive reuse, biodiversity enhancement, and protection of Green Belt openness.

The scheme is proportionate, policy-compliant, and sensitive to its rural context. It reflects a pragmatic and principled approach to development — one that honours the past while responding to present and future needs. In accordance with paragraphs 10 and 11 of the *NPPF*, there is a presumption in favour of sustainable development, and this proposal exemplifies that presumption in both spirit and substance.

Section 4 - Decision-making

Paragraphs 39–60 of the *NPPF (2024)* outline the principles of decision-making, placing emphasis on positive and proactive engagement, the use of planning tools, and the timely determination of applications. While much of this guidance is directed at local planning authorities, it also frames the expectations for applicants and the broader planning process.

Primacy of the Development Plan

Paragraph 12 of the *NPPF (2024)* reaffirms that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. This principle was upheld in *Hopkins Homes Ltd v Secretary of State for Communities and Local Government [2017] UKSC 37*, where Lord Carnwath clarified that the *NPPF* is a material consideration, not a statutory instrument, and must be interpreted in a way that does not displace the primacy of the development plan.

Gravesham's Housing Delivery Position

Gravesham Borough Council's Five-Year Housing Land Supply Statement (2024–2029), published in February 2025, confirms that the Council can only demonstrate a 3-year supply of deliverable housing land. This shortfall triggers the presumption in favour of sustainable development under paragraph 11(d) of the *NPPF (2024)*, which states that planning permission should be granted unless:

- Policies in the Framework protecting areas or assets of particular importance provide a clear reason for refusal; or
- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole.

In Gravesham’s case, the relevant protective policies are those listed in footnote 7 of the **NPPF (2024)**, including Green Belt, designated heritage assets, and flood risk areas.

Grey Belt Considerations

Paragraph 155 introduces a new category of development within the Green Belt — Grey Belt — defined in the NPPF glossary as land that does not strongly contribute to purposes (a), (b), or (d) of paragraph 143. Development on Grey Belt land is not inappropriate where all of the following apply:

- The land is previously developed or otherwise weakly contributes to Green Belt purposes.
- The development would not undermine the overall function of the Green Belt.
- There is a demonstrable unmet need for the development proposed.
- The site is in a sustainable location, with reference to paragraphs 110 and 115, which emphasise limiting the need to travel and prioritising sustainable transport modes.
- Where applicable, the development meets the Golden Rules in paragraphs 156–157, including enhanced affordable housing provision, infrastructure improvements, and accessible green space.

Application of the Tilted Balance

Given Gravesham’s Housing Delivery Test results and inability to demonstrate a five-year supply, Policy CS02 of the Local Plan Core Strategy (2014) must be regarded as out-of-date. This activates the tilted balance under paragraph 11(d), requiring a weighted assessment of benefits versus harms. While the net gain of one dwelling may be modest, it contributes to addressing local housing need and makes efficient use of previously developed land.

Section 5 - Delivering a sufficient supply of homes

The **NPPF (2024)** sets out the Government’s objective to significantly boost the supply of homes, with paragraphs 61–84 providing detailed guidance on how this should be achieved. Local planning authorities are expected to identify and maintain a sufficient supply of deliverable sites, address the needs of specific housing groups, and ensure that land with permission is developed without unnecessary delay.

Gravesham's Housing Need and Supply

Gravesham Borough Council's *Five-Year Housing Land Supply Statement (2024–2029)*, published in February 2025, confirms that the Borough's annual housing need is 672 dwellings, equating to 3,360 dwellings over five years. The Council can however, only demonstrate a 3-year supply of deliverable housing land. This shortfall, coupled with underperformance against the Housing Delivery Test, activates the presumption in favour of sustainable development under paragraph 11(d) of the NPPF.

Implications for Decision-Making

The *NPPF (2024)* requires that where strategic policies are more than five years old — as is the case with *Gravesham's Local Plan Core Strategy (2014)* — housing need must be assessed using the standard method. Paragraph 78 of the *NPPF* also requires a 20% buffer to be applied where there has been significant under-delivery. These factors reinforce the urgency of bringing forward suitable housing proposals, particularly those that make efficient use of previously developed land.

Contribution of the Proposed Development

While modest in scale, the proposed conversion of the stable block would contribute to local housing supply in a manner that is:

- Responsive to local need, particularly for smaller, adaptable dwellings.
- Efficient in land use, making use of previously developed land within a sustainable rural setting.
- Supportive of broader policy aims, including intergenerational living, biodiversity enhancement, and heritage-sensitive design.

In this context, the proposal aligns with the NPPF's overarching aim to meet as much of an area's identified housing need as possible (paragraph 60) and contributes positively to Gravesham's housing delivery objectives.

Section 9 - Promoting sustainable transport

Paragraphs 109–118 of the NPPF (2024) emphasise the role of transport planning in creating well-designed, sustainable, and popular places. The Framework advocates for a vision-led approach, encouraging early engagement, integration of transport into design, and the promotion of active travel and low-emission mobility.

The planning system is expected to actively manage patterns of growth, focusing development in locations that reduce the need to travel and offer a genuine choice of transport modes. While opportunities for modal shift vary between urban and rural contexts, the principles of accessibility, sustainability, and integration apply universally.

Alignment with National and Local Policy

The proposal aligns with the aims of Policy CS11 of the *Gravesham Local Plan Core Strategy (2014)* and reflects the principles set out in *Manual for Streets (DfT, 2007)* and the *Kent Design Guide*. It incorporates:

- Off-street parking for two vehicles.
- Cycle storage within a garden tool shed.
- Provision for an EV charging point, supporting low-emission transport.
- Step-free access and inclusive design features in line with Part M of the Building Regulations.

These measures support active travel, anticipate future mobility needs, and ensure that the development is low-impact and well-connected.

Rural Context and Proportionate Response

The site is accessed via South Street (A227 Wrotham Road), a key arterial route with weekday bus services offering basic connectivity to nearby settlements. While public transport provision is modest, the proposal's scale and self-contained nature ensure that it does not place undue pressure on existing infrastructure.

By reusing existing built form and incorporating modern transport infrastructure in a discreet and sensitive manner, the proposal demonstrates how small-scale rural development can meet contemporary standards without compromising character. It represents a proportionate and forward-looking response to transport considerations, combining practicality with environmental responsibility.

Section 11 - Making effective use of land

Paragraphs 124–130 of the *NPPF (2024)* encourage planning policies and decisions to promote the effective use of land in meeting the need for homes and other uses, while safeguarding the environment and ensuring safe and healthy living conditions.

The Framework gives substantial weight to the value of using suitable brownfield land within settlements, and supports the reuse of under-utilised buildings, particularly where land supply is constrained and development can be delivered without causing substantial harm.

Alignment with NPPF Principles

The proposed conversion of the stable block reflects the aims of Section 11 in the following ways:

- Adaptive reuse: The scheme makes use of an existing structure, avoiding new land take and reducing embodied carbon.

- Efficient land use: The development is modest in scale, proportionate to its setting, and avoids unnecessary sprawl.
- Environmental enhancement: Landscaping proposals include native planting and the creation of a wildflower meadow, contributing to biodiversity and visual amenity.
- Rural sensitivity: The proposal respects the character and grain of the surrounding countryside, integrating new residential use without visual or operational intrusion.
- The site is not despoiled or degraded, but its reuse represents a low-impact and sustainable form of development that makes effective use of land in accordance with national policy.

Section 12 - Achieving Well-Designed Places

The **NPPF (2024)** places great emphasis on the creation of high-quality, beautiful, and sustainable buildings and places. Paragraphs 131–141 advocate for design that is:

- Visually attractive, as a result of good architecture, layout, and landscaping.
- Sympathetic to local character and history, while not discouraging innovation.
- Functionally efficient, safe, inclusive, and accessible.
- Supportive of health, well-being, and community cohesion.

The Framework encourages local planning authorities to ensure that developments are well-designed and contribute positively to the built environment, with clear expectations set out in design codes and guides.

Alignment with National and Local Design Principles

The proposal reflects the aims of Section 12 and aligns with Policy CS19 of the **Gravesham Local Plan Core Strategy (2014)**, which seeks to secure high-quality design that responds to local context and character.

Key design attributes include:

- Contextual sensitivity: The conversion respects the form, scale, and materials of the existing structure, ensuring that the new dwelling integrates discreetly into its rural setting.
- Architectural integrity: Although the stable block is not of architectural distinction, its conversion represents a pragmatic and sustainable approach to rural development, making effective use of existing built form while introducing design quality and environmental enhancement.
- Landscape integration: The scheme includes native planting, retention of boundary hedgerows, and the creation of a wildflower meadow, reinforcing the site's visual and ecological value.

- Inclusive and safe design: Step-free access, generous internal circulation, and provision for future adaptability ensure that the dwelling meets contemporary standards for accessibility and safety.
- Craftsmanship and detail: The proposal draws on traditional building techniques and materials, supporting heritage skills and contributing to the aesthetic richness of the local vernacular.

A Bespoke and Place-Specific Response

Rather than imposing a generic solution, the proposal offers a bespoke response rooted in the site's history and character. It demonstrates how small-scale development can be both architecturally expressive and environmentally responsible, contributing to the quality and identity of the wider area.

The scheme embodies the principles of good design as defined by the **NPPF** — not merely in appearance, but in its thoughtful integration of form, function, and setting. It is a modest yet meaningful enhancement of the built environment, reflecting the values of sustainability, beauty, and belonging.

Section 13 - Protecting Green Belt Land

This proposal for the conversion of an existing stable block to residential use is considered appropriate development within the Green Belt, supported by the provisions of Paragraphs 154(b), 154(h), and 155(a)–(c) of the **NPPF (2024)**.

- Paragraph 154(b) permits the reuse of buildings provided they are of permanent and substantial construction and the development preserves the openness of the Green Belt. The stable block is a long-standing structure of solid construction, and the proposed conversion does not involve any extension or increase in footprint. Our structural engineer has submitted a paper forming part of this planning submission confirming that the existing structure is of permanent and substantial construction. The openness of the site will be maintained.
- Paragraph 154(h) allows for the material change of use of previously developed land, provided it does not cause substantial harm to the openness of the Green Belt. The site is previously developed, and the proposed residential use will not introduce new built form or encroachment beyond the existing envelope.
- Paragraph 155(a) supports development on previously developed land where it does not have a greater impact on openness than the existing use. The proposal involves no new buildings and retains the existing spatial arrangement, ensuring no adverse impact on openness. The existing attached hay stores to the south will in fact be removed and this will have the effect of increasing the openness of the site.
- Paragraph 155(b) reinforces the acceptability of reusing buildings of permanent and substantial construction, which applies directly to the stable block in question.
- Paragraph 155(c) allows for the material change of use of land or buildings, provided openness is preserved. The proposed residential use is modest and contained within the existing structure, with no external expansion.

- Paragraph 155(d) refers to development meeting the “Golden Rules” set out in Paragraphs 156–157, which apply only to major development. As this proposal does not meet the threshold for major development — defined as ten or more dwellings or sites of 0.5 hectares or more — these provisions are not applicable.

In summary, the proposal falls squarely within the categories of development deemed not inappropriate in the Green Belt under the [NPPF \(2024\)](#). It respects the character and openness of the site, involves no new built form, and makes use of an existing structure in a manner that is both sustainable and sensitive to its setting in accordance with national planning policy.

Section 15 - Conserving and Enhancing the Natural Environment

This proposal accords with the principles set out in Section 15 of the [NPPF \(2024\)](#), particularly Paragraphs 187(a), (b), and (d), which seek to protect valued landscapes, recognise the intrinsic character of the countryside, and provide net gains for biodiversity.

- The site lies within a rural setting and it retains its established character. The proposed conversion will not introduce new built form or urbanising elements, thereby preserving the intrinsic character and beauty of the countryside in accordance with Paragraph 187(b).
- The removal of the attached hay stores will result in a modest increase in openness and permeability, enhancing the visual and ecological quality of the site.
- The proposal includes the retention of existing hedgerows and mature trees, and where appropriate, the introduction of native planting to reinforce habitat connectivity. This supports the aim of Paragraph 187(d) to establish coherent ecological networks and provide net gains for biodiversity.
- While the roofing material comprises synthetic cedar shingles and the structure is timber-framed — limiting opportunities for integrated bat or swift features — the site already supports multiple bird boxes, including those mounted on both gable ends of the stable block and several on the adjacent garage block. These will be retained and supplemented as appropriate, contributing to local biodiversity.
- External lighting has been carefully considered to avoid disturbance to nocturnal wildlife. In accordance with Council Policy CS12, the scheme includes low-impact, downward-facing fittings. As noted under Policy CS19, wall-mounted lighting at the main entrance and kitchen doors will provide safe access and natural surveillance without light spill or visual clutter.
- The site is not subject to any statutory ecological designations, and no protected species have been identified. The development will be carried out with sensitivity to local habitats and seasonal activity.
- The proposal does not give rise to any unacceptable risks from pollution, land instability, or degradation, and will not adversely affect soil, air, or water quality, in accordance with Paragraph 187(e).

In summary, the scheme is modest in scale, sensitive to its setting, and designed to enhance the natural environment through thoughtful stewardship and ecological

integration. It aligns with the NPPF's overarching objective to conserve and enhance the natural and local environment.

11.07 Supplementary Planning Guidance and other Documents:

The proposal has been assessed against relevant supplementary planning documents and technical guidance, all of which have been considered in the preparation of this statement. Where applicable, compliance has already been demonstrated in earlier sections.

Residential Layout Guidelines (Housing Standards Policy Statement, October 2015; Adopted 1996 – amended June 2020)

- The proposal meets the spatial and functional expectations for residential accommodation, including internal layout, access, and amenity provision. These matters are addressed under Section 12 – Achieving Well-Designed Places.

Technical Housing Standards – Nationally Described Space Standard (2015)

The proposed dwelling meets the minimum internal space requirements for a two-bedroom unit, with generous circulation and provision for future adaptability. This is addressed under Section 5 – Delivering a Sufficient Supply of Homes and Section 12.

Kent County Council Vehicle Parking Standards (2024)

- Superseding SPG 4 (2006), the proposal provides appropriate off-street parking, cycle storage, and EV charging infrastructure in line with current guidance. These matters are addressed under Section 9 – Promoting Sustainable Transport.

Householder Extensions/Alterations Design Guide (2021)

- While not a conventional householder extension, the proposal's modest scale, contextual sensitivity, and integration with existing built form reflect the principles of proportionate and well-considered design. These matters are addressed under Section 12.

Gravesham Landscape Character Assessment (2009)

- The site lies just outside the defined boundaries of parcel MP5 (Meopham Green South), but it shares many of its characteristics. The area is typified by a ridge-top landscape with mature hedgerows, tree cover, and a phased transition from open countryside to settlement edge. The proposal respects this character, preserves openness, and reinforces landscape containment through native planting and the removal of intrusive built elements. These matters are addressed under Sections 13 and 15.

Design for Gravesham – Design Code (2024)

The proposal aligns with the principles of the Design Code, including contextual responsiveness, sustainability, and inclusive design. These matters are addressed under Sections 12 and 15.

In summary, the proposal has been developed with full regard to relevant supplementary guidance and demonstrates compliance with both national and local expectations for residential development in a rural setting.

12.0 Biodiversity Net Gain & Ecology

- 12.01 The proposal has been reviewed in light of relevant national and local biodiversity guidance, including the ***Natural Environment and Rural Communities Act 2006***, Section 15 of the ***NPPF***, and Gravesham Borough Council's ***Biodiversity SPD***.
- 12.02 The site comprises previously developed land within a residential curtilage, with no known ecological designations, priority habitats, or protected species records. The following considerations support the conclusion that a separate ecological assessment is not required:

Site Context:

The proposal relates to land that has been in domestic use, with managed garden areas and no semi-natural habitats. There are no ponds, watercourses, or woodland blocks within or immediately adjacent to the site.

Habitat Value:

The existing vegetation consists of ornamental planting and maintained grassland, offering limited ecological value. Mature hedgerows and trees on site boundaries will be retained and enhanced through native planting.

Proposed Enhancements:

The scheme includes biodiversity net gain measures, such as native hedgerow reinforcement, bird boxes, and pollinator-friendly planting. These enhancements will improve ecological connectivity and habitat diversity.

Scale and Impact:

The modest scale of the proposal, combined with its location and design, ensures that there will be no significant adverse impact on biodiversity. The development is unlikely

to trigger thresholds requiring formal ecological appraisal under current legislation or local policy.

- 12.03 In summary, the proposal has been designed to respect and enhance the site's ecological context. A separate biodiversity assessment is not considered necessary, and proportionate measures have been incorporated to support biodiversity net gain.
- 12.04 The proposal is considered exempt from the statutory biodiversity net gain requirement under the ***Biodiversity Gain Requirements (Exemptions) Regulations 2024***. It qualifies on the basis of:
- Its nature as a self-build dwelling on a site of less than 0.5 hectares.
 - Its classification as a change of use with no impact on priority habitats and minimal habitat disturbance.
 - A reduction in built footprint, with the removal of hay stores contributing to increased openness and ecological permeability.
- 12.05 These factors collectively support the conclusion that a formal Biodiversity Gain Plan is not required.

13.0 Summary

- 13.01 The proposals have been carefully designed to respect the character of the site and its surroundings. The conversion of the existing stable block will maintain generous external amenity space, preserve the openness of the Green Belt, and enhance ecological value through proportionate biodiversity net gain measures.
- 13.02 The scheme responds positively to national and local planning policy, including Paragraphs 155(d) and 11(d) of the *NPPF (2024)*, and demonstrates compliance with the *Gravesham Local Plan Core Strategy* and relevant *Supplementary Guidance*. It contributes meaningfully to the Borough's housing supply at a time of demonstrable shortfall, making efficient use of previously developed land in a sustainable rural setting.
- 13.03 The design reflects the principles of good placemaking, with architectural integrity, contextual sensitivity, and environmental responsibility at its core. It offers a bespoke and low-impact response to local housing need, supporting intergenerational living and inclusive design.
- 13.04 In light of the proposal's modest scale, policy compliance, and public benefit, I respectfully request that Full Planning Permission is granted for this application.

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