

**Coachfields, Northfleet Green Road,
Northfleet, Gravesend, Kent, DA13
9PN**

**Planning, Design and Access
Statement**

36629

October 2025



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CONTENTS

1	INTRODUCTION.....	3
1.1	SUMMARY CONTEXT	3
1.2	DOCUMENT STRUCTURE	4
1.3	SUPPORTING INFORMATION	4
2	APPLICATION SITE	5
2.1	SITE OVERVIEW	5
2.2	PLANNING DESIGNATIONS	6
2.3	PLANNING HISTORY	7
3	PROPOSED DEVELOPMENT.....	9
3.1	OVERVIEW	9
3.2	DESIGN AND ACCESS	9
4	PLANNING POLICY	12
4.1	OVERVIEW	12
4.2	NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (DECEMBER 2024)	12
4.3	GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)	15
4.4	GRAVESHAM LOCAL PLAN FIRST REVIEW – SAVED AND DELETED POLICIES (2014)	16
4.5	SUPPLEMENTARY PLANNING DOCUMENTS	16
5	PLANNING CONSIDERATIONS.....	17
5.1	THE PRINCIPLE OF DEVELOPMENT	17
5.2	HOUSING NEED	18
5.3	DESIGN, CHARACTER AND APPEARANCE	19
5.4	LANDSCAPE.....	19
5.5	RESIDENTIAL AMENITY	20
5.6	ECOLOGY	21
5.7	HIGHWAYS AND PARKING	21
5.8	FLOOD RISK	22
6	CONCLUSION	23

1 INTRODUCTION

1.1 SUMMARY CONTEXT

- 1.1.1 This statement has been prepared on behalf of Mrs R Arnold in respect of a full planning application for the conversion of an equestrian feed barn to a residential dwelling and associated works at Coachfields, Northfleet Green Road, Gravesend, DA13 9NP, hereinafter referred to as 'the site' or 'the barn'.
- 1.1.2 The feed barn is an existing building of a modern construction set within a wider piece of land owned by the applicant, which comprises stables, menage, horse walker and grazing land. The site lies directly to the southwest of Gravesend, outside of the settlement boundary and consequently falls within the Metropolitan Green Belt.
- 1.1.3 This application follows the submission of planning application ref. 20250141, for the '*Change of use of an existing equestrian feed barn and equipment store to a residential dwelling and associated works*', which was refused in August 2025. Within this new application, the issues relating to the previous reason for approval have been addressed.
- 1.1.4 The Gravesham Core Strategy Local Plan (2014) sets out that the main focus for growth will be in sustainable urban areas however, development outside these areas will be supported where it complies with relevant development policies. The development is located within the Green Belt and so national Green Belt policies apply.
- 1.1.5 In this regard, paragraph 153 of the National Planning Policy Framework ('NPPF' or 'the Framework') is clear that local planning authorities should regard the construction of new buildings as 'inappropriate' in Green Belt, however paragraph 154 does allow for some exemptions including the reuse of buildings which are of permanent and substantial construction provided that the development would preserve the openness of the Green Belt or conflict with the purposes of including land within it.
- 1.1.6 In terms of design, the proposal has been prepared with regard to the character and context of the open countryside. Following the recent refusal at the site, the amended scheme has been revised to address the case officer's previous concerns by incorporating a larger residential curtilage, whilst still maintaining the open appearance of the countryside.
- 1.1.7 Turning to wider material considerations, the ability to deliver new homes is extremely important given the extent of the housing land supply shortage within the borough of Gravesham. the Council's 5 Year Housing Land Supply Statement 2024-2029, published February 2025, sets out the annual dwelling need of 672, resulting in 4032 dwellings over the 5-year period, including a 20% buffer.
- 1.1.8 At the time of the published report, the borough can only deliver 2429 homes, resulting in a housing land supply of **3 years**.
- 1.1.9 The importance of housing need and supply is reflected in national planning policy, which requires local authorities to provide a five-year supply of housing land.

Where authorities are unable to do so, circumstances radically tilt decision-making in favour of the grant of permission.

- 1.1.10 The opportunity to deliver an additional dwelling which has the capability of being delivered quickly should be afforded significant weight.
- 1.1.11 This statement considers the proposed development in relation to the context of the site, and the relevant local and national planning policies and sets out that there are no adverse impacts which would significantly and demonstrably outweigh the benefits of the proposed development in accordance with the National Planning Policy Framework (the "NPPF") and National Planning Practice Guidance (the "NPPG").

1.2 DOCUMENT STRUCTURE

- 1.2.1 This Statement provides an overview of the application site and proposals. It assesses the planning merits of the scheme, having regard to the relevant planning history and the applicable planning policy framework. It concludes that the proposal is appropriate in planning terms and accordingly requests that planning permission be granted.
- 1.2.2 Section 2 of this statement sets out the context of the site and the immediate surroundings. Sections 3 and 4 have regard to the proposal and the planning policy context by which the application will be considered respectively.
- 1.2.3 Section 5 sets out a comprehensive assessment of the proposal in the context of Gravesham Borough Council policy and wider planning considerations.
- 1.2.4 Section 6 draws conclusions to justify the suitability of the development.

1.3 SUPPORTING INFORMATION

- 1.3.1 This application is supported by the following plans and documents:

DOCUMENTS	PREPARED BY
Application Form	DHA Planning
Planning Statement	DHA Planning
Wider Site Locality	The Duncan and Graham Partnership
DRAWINGS	DRAWING NO.
Proposed Scheme Floor Plan	25.001 10
Proposed Scheme Elevations	25.001 11
Location Plan	25.001 12
Existing and Proposed Block Plans	25.001 13
BNG Calculation Proposed Block Plan	25.001 15

TABLE 1.1: DHA REFERENCE

2 APPLICATION SITE

2.1 SITE OVERVIEW

- 2.1.1 The application site comprises an agricultural feed and storage barn located on the north side of Northfleet Green Road, within the administrative boundaries of Gravesham Borough Council (GBC).



Figure 1. Google Earth aerial view of the site (red boundary)

- 2.1.2 The barn is of a traditional agricultural appearance with a metal and timber frame with elevations clad in dark brown horizontal timber. The barn has a hipped roof comprising dark grey tiles and dark grey tiles and features a central gable design on the building's front elevation as well as a large corrugated metal entrance door.



Figure 2. Image of the existing barn

- 2.1.3 The barn lies at the south-western corner of a wider plot of land owned by the client, which consists of a stable block, menage, horse walker and grazing land.
- 2.1.4 The site is accessed via a hardstanding driveway which adjoins directly onto Northfleet Green Road to the south of the site.
- 2.1.5 A large area of polytunnels is located to the northwest of the site. A residential property and pockets of agricultural land sit to the south of the property. Residential properties are also located to the east of the site, running along Northfleet Green Road. In the wider area, the settlement of Southfleet is located to the west, with Gravesend to the northeast.

2.2 PLANNING DESIGNATIONS

- 2.2.1 The site lies to the southwest of the urban settlement of Gravesend, outside of the settlement boundary and consequently falls within the Metropolitan Green Belt. The site is also located within the Istead Arable Farmlands Landscape Character Area and Thames and Estuary Marshes Strategic Access Management and Monitoring Strategy (SAMMS) 6km buffer zone.
- 2.2.2 There are otherwise no landscape or strategic constraints affecting the site. The application site is not identified to be at risk of flooding and lies within Flood Zone 1 (least likely zone to flood). From a heritage perspective, the property is not listed, and it is not within a Conservation Area.



Figure 3. Excerpt from the Gravesham Local Plan Core Strategy Policies Map

2.3 PLANNING HISTORY

2.3.1 Online records held by GBC set out the following applications relating to the site:

Application Reference	Description	Decision
20181154	Erection of a detached feed barn and equipment store.	Approved (January 2019)
20250141	Change of use of an existing equestrian feed barn and equipment store to a residential dwelling and associated works.	Refused (August 2025)

Application ref. 20250141

2.3.2 Planning application ref. 20250141 was previously submitted for the change of use of the barn to a single residential dwelling but was refused for the following reasons.

2.3.3 **Green Belt** – The development does not fall within the exceptions to inappropriate development in the Green Belt in the National Planning Policy Framework (2024)

and would result in a form of encroachment in the countryside and be harmful to the openness of the Green Belt.

- 2.3.4 **Design** – The size and design of the private amenity space would undermine the spatial layout or character of the area and therefore fail to respect the rural characteristics and value within the Kent countryside and landscape.
- 2.3.5 **Amenity** – The size of the private amenity space is not of a sufficient size and so would result in a detrimental impact on the amenities of future occupiers.
- 2.3.6 **SPA Contributions** – The proposal failed to secure a contribution towards strategic mitigation measures within the Thames Estuary and Marshes SPA/Ramsar Sites.
- 2.3.7 We address all these reasons within the subsequent sections of this statement.

3 PROPOSED DEVELOPMENT

3.1 OVERVIEW

- 3.1.1 Full planning permission is sought for the conversion of the barn into a single residential dwelling. For avoidance of doubt, the description of development is as follows:

"Conversion of an equestrian barn to a single dwelling with associated parking."

3.2 DESIGN AND ACCESS

Amount and scale

- 3.2.1 This application will result in the conversion of a barn into a single detached dwelling.
- 3.2.2 The barn will maintain its existing structure and no additional massing will be added. The barn has a length of 20.8 metres at its longest, a width of 11.2 metres, an eaves height of 4.4 metres and a ridge height of 8.8 metres.

Design and appearance

- 3.2.3 The barn's structure will be maintained, which incorporates a 2-storey form with a hipped roof featuring a central gable.
- 3.2.4 On the southern (front) elevation, the new entrance way will incorporate a modern appearance, acting as the focal design element of the dwelling. The existing barn door will be replaced with glass double doors and floor-to-ceiling windows, which extend up the gable feature.



Figure 4. Proposed south elevation

- 3.2.5 A number of additional windows will also be placed on the ground and first floor on the barn's north, east and west elevations. 2 sets of glass double doors will be

located on the barn's rear elevation and an additional door will be located on the eastern elevation.

- 3.2.6 Whilst modern features have been added, the remainder of the dwelling's design retains the barn's existing rural appearance, incorporating a border of red brick at the ground floor level, black horizontal cladding and black metal roof sheeting.
- 3.2.7 The design remains unaltered from the previous submission and no design concerns were advanced.

Layout

- 3.2.8 The dwelling's ground floor incorporates an open plan design with a large centred entrance way, featuring a bifurcated staircase, living room, kitchen and dining room. A separate utility room and shower room will also be located on the bottom floor.



Figure 5. Proposed ground (bottom) and first (top) floor elevations

- 3.2.9 The extension adjoining the barns' eastern elevation will be used as a cycle store, which adjoins a new area of hardstanding to be used as a bin store.
- 3.2.10 The first floor will accommodate 4 double bedrooms, all of which are fitted with an ensuite.
- 3.2.11 The internal layout remains unaltered from the previous submission and no concerns were advanced regarding the format.
- 3.2.12 To address the reasons for the refusal of the planning application ref. 20250141, the size of the garden has been increased, providing more amenity space and better reflecting the open nature of the wider countryside.

Access

- 3.2.13 The dwelling will be accessed via the barn's existing hardstanding driveway, which leads directly onto Northfleet Green Road. There are no proposed changes to this.
- 3.2.14 In accordance with Kent County Council Parking Standards, 3 parking spaces will be provided, located to the south east of the property.
- 3.2.15 The access and parking arrangement remains unaltered from the previous submission and no transport concerns were advanced.

4 PLANNING POLICY

4.1 OVERVIEW

- 4.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications for planning permission are required to be determined in accordance with the provisions of the development plan in force unless material considerations indicate otherwise.
- 4.1.2 The proposed development has been considered in accordance with the Gravesham Local Plan Core Strategy (2014) and the Gravesham Local Plan First Review Saved and Deleted Policies.
- 4.1.3 In addition to the Local Plan, the Government's National Planning Policy Framework ('NPPF') was updated by the newly elected Labour administration in December 2024. The NPPF sets out the Government's requirements and policies for planning in England and must be treated as a material consideration.

4.2 NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (DECEMBER 2024)

- 4.2.1 **Paragraphs 7 and 8** of the NPPF outline that the purpose of the planning system is to contribute to the achievement of sustainable development through three overarching objectives:
- 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 and vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of the 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 wellbeing, and*
 - c) An environmental objective- to protect and enhance our natural, built and historic environment, including making effective use of and, improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 4.2.2 **Paragraph 10** states, so that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. **Paragraph 11** confirms that in respect of decision-taking, the presumption in favour should be applied as follows:
- c) Approving development proposals that accord with an up-to-date development plan without delay; or*

d) Where there are no relevant development plan policies or the policies which are most important for determining the application are out of date, granting permission unless:

- i) The application of policies in this framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed or*
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.*

4.2.3 **Paragraph 39** provides guidance in relation to decision-making and outlines that local planning authorities should approach decisions on proposed development in a positive and creative way, seeking to approve applications for sustainable development where possible.

4.2.4 **Paragraph 61** sets out the need to meet housing requirements. To meet this, it is important that a sufficient amount and variety of land can come forward. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.

4.2.5 **Paragraph 73** outlines that small and medium-sized sites can make an important contribution to meeting the housing contributions of an area. To ensure a good range of development sites are brought forward, Local Planning Authorities should support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using suitable sites within existing settlements for homes.

4.2.6 **Paragraph 83** states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

4.2.7 **Paragraph 110** sets out that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

4.2.8 **Paragraph 115** requires appropriate opportunities to promote sustainable transport modes to be undertaken and safe and suitable access to a site to be achieved for all users.

4.2.9 **Paragraph 116** outlines that *development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.*

- 4.2.10 **Section 11** sets out how planning policies and decisions should promote an effective use of land in meeting the needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.2.11 **Paragraph 124** states that decisions should promote the effective use of land meeting the need for homes and other uses.
- 4.2.12 **Paragraph 125** states that planning policies and decisions should (amongst other things) encourage multiple benefits from urban and rural land, taking opportunities to achieve net environmental gains and promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.
- 4.2.13 **Section 12** of the NPPF sets out a guide to creating well-designed, high-quality and sustainable development. **Paragraph 131** in particular states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.
- 4.2.14 **Paragraph 135** outlines that decisions should ensure developments:
- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development*
 - b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping*
 - c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.*
 - f) Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users*
- 4.2.15 **Paragraph 153** sets out that *when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*
- 4.2.16 **Paragraph 154(h)** states that development within the Green Belt is inappropriate unless for the re-use of buildings, provided that the buildings are of permanent and substantial construction, provided that they preserve the openness of the Green Belt and does not conflict with the purposes of including land within it.
- 4.2.17 **Section 14** states that plans should contribute to the mitigation and adaptation of climate change, taking into account the long-term implications of flood risk. In particular, **paragraph 170** outlines that inappropriate development in areas at risk of flooding should be avoided by directing areas away from areas at highest risk.
- 4.2.18 **Paragraph 187** outlines that planning policies and decisions should contribute to an enhancement of the natural and local environment by protecting and enhancing

valued landscapes and recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services. Proposals should also aim to minimise impacts on and provide net gains for biodiversity.

- 4.2.19 **Paragraph 192** requires proposals to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

4.3 GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 4.3.1 **Policy CS02 Scale and Distribution of Development** sets out that the plan strategy focuses development within sustainable urban locations. In rural areas, outside of rural settlements, development will be supported where it is compatible with national policies for protecting the Green Belt and policies in the plan.
- 4.3.2 **Policy CS11 Transport** states that development should mitigate its impact on the highway and public transport network. Additionally, sufficient parking should be provided in accordance with adopted parking standards.
- 4.3.3 **Policy CS12 Green Infrastructure** requires the overall landscape character to be conserved and enhanced. Where relevant, proposals should take account of the Gravesham Landscape Character Assessment. The policy also sets out that there will be no net loss of biodiversity in the borough and opportunities to enhance and restore habitats should be sought.
- 4.3.4 **Policy CS14 Housing Type and Size** requires housing development to provide a range of dwelling types and sizes taking into account the existing character of the area.
- 4.3.5 **Policy CS15 Housing Density** states that new housing should be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused planning permission.
- 4.3.6 **Policy CS19 Development and Design Principles** states that new development should be visually attractive and locally distinctive which conserves and enhances the character of the local built and natural environment. This will be achieved through the following criteria:
- 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.
 - 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

- The design and layout of new residential development, including conversions will accord with the adopted Residential Layout Guidelines;
- New development will provide appropriate levels of private and public amenity space.

4.4 GRAVESHAM LOCAL PLAN FIRST REVIEW – SAVED AND DELETED POLICIES (2014)

- 4.4.1 **Policy T1 Impact of Development on the Highway Network** states that the council will consider the impact of the development on transport systems and the traffic environment and will wish to ensure that all proposals are adequately served by the highway network.
- 4.4.2 **Policy T4 - Development outside the Built-Up Area** sets out that development outside of the confines of a built-up area will not normally be approved where significant vehicular traffic is generated.
- 4.4.3 **Policy P3 Vehicle Parking Standards** requires development to make provision of vehicle parking in accordance with Kent County Council Vehicle Parking Standards.

4.5 SUPPLEMENTARY PLANNING DOCUMENTS

- 4.5.1 The following supplementary planning documents have been included as part of this application:
- Gravesham Residential Layout Guidelines 2020
 - Gravesham Landscape Character Assessment 2009
 - Kent County Council Parking Standards 2025
 - Planning Policy Guidance (PPG)

5 PLANNING CONSIDERATIONS

5.1 THE PRINCIPLE OF DEVELOPMENT

- 5.1.1 The site is an existing equestrian building located outside any designated settlement boundaries and within the Metropolitan Green Belt.
- 5.1.2 Policy CS02 of the Local Plan sets out that in rural areas, outside of rural settlements, development will be supported where it is compatible with national policies for protecting the Green Belt and policies in the plan.

Inappropriate development in the Green Belt

- 5.1.3 The previous planning application (ref. 20250141) was refused partly on the basis that the “*development does not, in the opinion of the Local Planning Authority, fall within the exceptions to inappropriate development in the Green Belt in the National Planning Policy Framework (2024)*”.
- 5.1.4 Paragraph 153 of the NPPF is clear that local planning authorities should regard new development as ‘inappropriate’ in the Green Belt however, paragraph 154 does allow for some exemptions. Paragraph 154(h) of the NPPF states that development within the Green Belt is inappropriate unless for the re-use of buildings, provided that the buildings are of permanent and substantial construction and provided that they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 5.1.5 This development is for the conversion of an existing barn, and so constitutes the re-use of a building. The barn is a relatively new addition to the wider site at Coachfields, approved in 2019 and as seen in Figure 6, is constructed with metal framing. The building is therefore of a permanent and sound construction, which has the capacity for future use as a residential dwelling. This development is therefore in accordance with paragraph 154(h) of the NPPF.



Figure 6. Photos of the barns internal structure

- 5.1.6 Contrary to the decision of planning application 20250141, it is clear that the application does meet the exemption criteria for development in the Green Belt as set out in the NPPF, and so development is not inappropriate in the Green Belt. Considering the above, this development is also in accordance with Local Plan Policy CS02, which requires national Green Belt policy to be applied where

relevant. This application should therefore not be refused on the grounds that the development would constitute inappropriate development within the Green Belt.

Openness to the Green Belt

- 5.1.7 The previous refusal further sets out that *"the building of a dwelling, whether as conversion or otherwise would still by definition result in a form of encroachment in the countryside and harmful to the openness"*.
- 5.1.8 The site comprises an existing equestrian barn and so within the committee report of refused planning application ref. 20250141, it was *"agreed that the site meets the definition of previously developed land based on the lawful use of the site."*
- 5.1.9 PPG - Green Belt, paragraph 14, confirms that development which is not considered to be inappropriate development on previously developed land is excluded from policy requirements to give substantial weight to any harm to the Green Belt, including to its openness.
- 5.1.10 As set out, the development does not constitute inappropriate development in the Green Belt and due to its location on a brownfield site, and contrary to the decision of planning application ref. 20250141, this application should not be assessed or refused due to the development's harm to the openness of the Green Belt.
- 5.1.11 Nevertheless, it is worth noting that there will be no material change in the structure or size of the barn, or introduction of additional built form at the site and so there will be no change in the openness of the Green Belt.

5.2 HOUSING NEED

- 5.2.1 Gravesham's 5 Year Housing Land Supply Statement 2024-2029, published February 2025, sets out the annual dwelling need of 672, resulting in 4032 dwellings over the 5-year period, including a 20% buffer. At the time of the published report, the borough could only deliver 2429 homes, resulting in a housing land supply of 3 years and so the borough is unable to demonstrate a 5-year housing land supply.
- 5.2.2 Paragraph 61 of the NPPF sets out the need to meet housing requirements. To meet this, it is important that a sufficient amount and variety of land can come forward. The overall aim should be to meet as much of an area's identified housing need as possible, including an appropriate mix of housing types for the local community.
- 5.2.3 Whilst only a single unit is proposed, paragraph 73 of the NPPF outlines that small windfall sites can make an important contribution to meeting the housing contributions of an area, as they can be delivered quickly. In a time of a housing deficit, the opportunity to deliver a new home, capable of being delivered quickly, to address the shortfall should be afforded significant weight to help ensure that the borough's housing requirements are met.

5.3 DESIGN, CHARACTER AND APPEARANCE

- 5.3.1 Policy CS19 of the Local Plan states that new development should be visually attractive and locally distinctive, which conserves and enhances the character of the local built and natural environment. Development should take into account scale, layout, materials and height.
- 5.3.2 Policy CS14 and CS15 specifically relate to the design of residential development and require proposals to consider the existing character of the area.
- 5.3.3 Section 12 of the NPPF further establishes that development should be of high quality, producing visually attractive designs which are sympathetic and add to the character of the local area.
- 5.3.4 The dwelling will retain the barn style existing appearance in terms of mass, silhouette and materials used, which maintains the rural character of the building and will not alter the appearance of the wider countryside. The fully glazed central entrance lobby serves as an attractive modern addition to the barn however, overall design respects the original character and appearance of the barn.
- 5.3.5 Northfield Green Road hosts a number of 2-storey detached residential properties and so the development of a large 2-storey dwelling would not be out of character regarding the prevailing land use and scales. No additional massing will be added to the barn and so the density of the existing built form will not be altered.
- 5.3.6 This proposal seeks to address the design concerns relating to the refused planning application ref. 20250141. The residential properties along Northfield Green Road comprise large garden plots. As part of the old scheme, the dwelling's garden was considered to be small, which did not “*respond to the spatial layout or character of the surrounding area*”. This new application sites the barn on a much larger plot, increasing the amount of private amenity space, which will be more consistent with local density levels and maintain the open character of the countryside.
- 5.3.7 Overall, it is considered that the proposed development would comply with relevant local and national policies that seek to promote high-quality and inclusive design to create beautiful places, which aim to protect existing landscapes. In this instance, it is considered that there would be no demonstrable harm to the character and appearance of the locality as a result of this proposal.

5.4 LANDSCAPE

- 5.4.1 The site is located within the Istead Arable Farmlands Landscape Character Area, which has been considered as part of this application.
- 5.4.2 Policy CS12 of the Local Plan requires the overall landscape character to be conserved and enhanced. Where relevant, proposals should take account of the Gravesham Landscape Character Assessment.
- 5.4.3 Paragraph 187 of the NPPF outlines that planning policies and decisions should contribute to an enhancement of the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and

beauty of the countryside and the wider benefits from natural capital and ecosystem services.

- 5.4.4 This conversion will not impact the setting of the Istead Arable Farmlands Landscape Character Area. The development will retain the barn's existing built form and materials, preserving the rural character of the barn and wider Landscape Character Area. Additionally, the immediate setting consists of existing residential properties and so the conversion to residential use will not alter the land use within the Character Area.
- 5.4.5 The development therefore conserves the character of the Istead Arable Farmlands Landscape Character Area in accordance with Policy CS12 of the Local Plan and paragraph 187.

5.5 RESIDENTIAL AMENITY

- 5.5.1 Policy CS19 of the Local Plan states that 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.
- 5.5.2 Paragraph 135 of the NPPF further states that developments should provide a high standard of amenity for existing and future users.
- 5.5.3 2 residential properties sit in immediate proximity to the site, namely Elm Tree Cottage (52 metres) and Abbotsview (57 metres). There is a sufficient distance between these properties and the site to not cause any impact upon neighbouring amenity in terms of loss of privacy and sunlight, or overshadowing. The proposal therefore safeguards the amenity of neighbouring properties in accordance with Policy CS19.
- 5.5.4 Policy CS19 further states that the design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines and development will provide appropriate levels of private amenity space.
- 5.5.5 All space within the dwelling has been designed in accordance with the Gravesham Residential Layout Guide 2020. In total, the barn is of a sufficient size to provide a high-quality living environment which exceeds National Described Space Standards. Externally, the proposed garden space has been increased as a response to the previous refusal at the site, complying with requirements in the Gravesham Residential Layout Guide 2020, and providing a spacious private amenity. The development can accommodate a high level of internal and external amenity space, as in accordance with Local Plan Policy CS19.
- 5.5.6 Overall, the proposed development can be well accommodated on the site in a manner that is compatible with neighbouring buildings and would not result in any unacceptable loss of amenity for existing residents, as well as ensuring future residents enjoy a good standard of amenity and quality of life. The proposal is considered to comply with relevant local and national planning policies in this regard.

5.6 ECOLOGY

- 5.6.1 Local Plan Policy CS12 sets out that there will be no net loss of biodiversity in the borough and opportunities to enhance and restore habitats should be sought.
- 5.6.2 Planning application ref. 20250141 was partly refused on the basis that the *"proposal fails to secure a contribution towards strategic mitigation measures within the Thames Estuary and Marshes SPA/Ramsar Sites"*.
- 5.6.3 The site is located within the SAMMS 6-kilometre buffer zone and as such a tariff is required for development, which will result in a net increase of dwellings, to mitigate potential impacts on the Thames Estuary and Marshes Special Protection Area and Ramsar site. The payment of this fee will be made upon registration and assignment of a suitable planning reference and so planning permission should not be refused on the basis that no contributions will be made.
- 5.6.4 No external works are required as part of this application and so the development has no basis to cause harm to any protected species. The previous application did not submit a Preliminary Ecological Appraisal, however reasons for refusal did not include concern due to harm to protected species. The design of the scheme has only changed by way of increasing the size of the dwellings' rear garden. There will be no increased harm to protected species and so in accordance with the previous application, this re-submission should not be refused on ecological grounds.
- 5.6.5 Paragraph 187 outlines that planning decisions should contribute to an enhancement of the natural environment by aiming to minimise impacts on and provide net gains for biodiversity.
- 5.6.6 This application will impact less than 25 square metres of priority habitat and so is exempt from Biodiversity Net Gain requirements. De minimis exemptions were also applied for and accepted as part of planning permission ref. 20250141 and as there have been no changes to the size of the barn or area of proposed hardstanding, this proposal should still be considered as exempt from BNG requirements.

5.7 HIGHWAYS AND PARKING

- 5.7.1 Policy CS11 of the Local Plan and Policies T1 and T4 of the Saved Policies Local Plan require development to mitigate its impact on the highway and public transport network, ensuring that significant vehicular traffic is not generated outside of the built-up confines.
- 5.7.2 Paragraph 116 of the NPPF further outlines that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety.
- 5.7.3 This application is for a single dwelling which is not likely to generate a significant number of additional vehicle movements and consequently is not likely to result in 'severe' impacts on the local highway network as set out in paragraph 116 of the NPPF.

- 5.7.4 The site will make use of the existing access to the land at Coachfields, consisting of a gated concrete track with wide visibility splays. The access is sufficient in its construction to accommodate additional trips associated with the 4-bed dwelling and so no proposed changes are required to facilitate safe entry and exit to the site.
- 5.7.5 Policies CC11 and P3 of the Local Plan and Saved Policies Local Plan require development to make provision of vehicle parking in accordance with Kent County Council Vehicle Parking Standards.
- 5.7.6 The development will provide 3 parking spaces, in accordance with Kent County Council Parking Standards and policy CS11.

5.8 FLOOD RISK

- 5.8.1 Paragraph 170 outlines that inappropriate development in areas at risk of flooding should be avoided by directing areas away from areas at the highest risk. As shown in Figure 7, the site is located within Flood Zone 1, therefore, it is at a low risk from flooding. It is considered that the proposal would not have a detrimental impact on flooding to the site or the surrounding area and should not be refused on flood risk grounds.

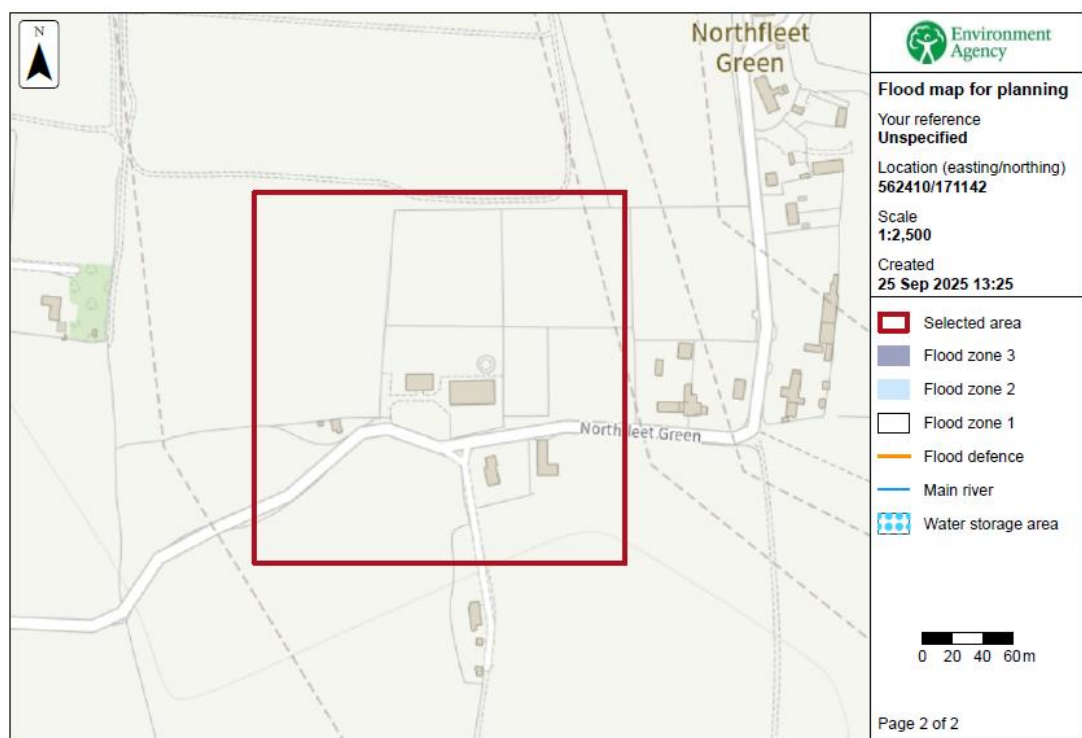


Figure 7. The site in relation to flood zones

6 CONCLUSION

- 6.1.1 This application is for the conversion of an existing equestrian feed and storage barn into a single dwelling, acting as a resubmission, addressing the reasons for refusal of planning application 20250141.
- 6.1.2 The site is located to the southwest of the settlement of Gravesend, outside the settlement boundary and so is considered to be located within the Green Belt. Policies within the NPPF restrict development within the Green Belt, unless it meets one of the development exemptions. Under paragraph 154(h)(iv), developments within the Green Belt will not be considered as inappropriate where they involve the re-use of a building which is of permanent and substantial construction.
- 6.1.3 The previous application was refused partly on the basis that the development would not meet one of the NPPF Green Belt exemptions for inappropriate development. This statement has clearly set out that development will re-purpose the existing barn into a dwelling and therefore complies with exemption h(iv) of paragraph 154, and so constitutes appropriate development in the Green Belt.
- 6.1.4 Comprising a form of appropriate development on previously developed land, contrary to the previous refusal, this development should not be assessed due to its harm to the openness of the Green Belt. Nevertheless, this development will not introduce additional massing to the site and so the openness of the Green Belt will not be harmed.
- 6.1.5 In terms of design, the development incorporates an attractive modern centre entrance way whilst maintaining the existing rural nature of the site in terms of its silhouette and materials. The development addresses design issues of the old refused application, with the amended scheme presenting a larger, more open plot. The development, therefore, increases private amenity space and maintains the rural character and openness of the countryside and Istead Arable Farmlands Landscape Character Area and so should not be refused due to reasons regarding insufficient outdoor amenity space or failure to respect the rural characteristics of the Kent countryside.
- 6.1.6 In response to the fourth and final reason for refusal, payment of mitigation towards the Thames Estuary and Marshes Special Protection Area and Ramsar site will be made upon registration and assignment of a suitable planning reference.
- 6.1.7 Turning to wider planning considerations, the Borough is currently unable to demonstrate a 5-year housing land supply. As set out within the NPPF, small sites can make important contributions to an authority's housing supply and so the opportunity to provide a dwelling which can address the housing shortfall should be given significant weight.
- 6.1.8 Overall, this application complies with local and national policies and has addressed the 4 reasons for refusal of planning application 20250141. There should be no further reasons for refusal and so it is requested that this application be considered favourably.