

Brimsole Farm Barns, Brimstone Hill,
Meopham, DA13 0BN

Planning Statement

Mr A Thompson

DHA/35241

MAY 2025



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1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Planning Statement has been prepared on behalf of Mr. A. Thompson in respect of a full planning application for the demolition of two disused agricultural barns to create two new 3-bedroom dwellings.
- 1.1.2 Through planning application reference numbers 20231221 (granted in January 2024) and 20230184 (granted in April 2023), planning permission has previously been obtained for the Site allowing for the residential conversion of the existing buildings on Site. In this regard, redevelopment of this Site for residential use has already been established.
- 1.1.3 The applicant is therefore seeking to obtain planning permission for two new build dwellings, which are considered architecturally to be of higher quality. The proposals will also allow for the dwellings to be constructed to a higher energy efficiency compared to the conversion scheme.
- 1.1.4 The description of development is as follows:
- "Demolition of existing barns and provision of two new three bedroom dwellings with associated parking, amenity garden, and landscaping"*
- 1.1.5 This Statement provides a detailed overview of the Site and proposals, it assesses the planning merits of the scheme with regard to any relevant planning history, and the applicable planning policy framework, and subsequently concludes that the proposal is acceptable in planning terms and therefore planning permission should be granted.

1.2 APPLICATION DOCUMENTS AND PLANS

- 1.2.1 This Statement summarises the proposed development and appraises it in the context of the relevant planning policy requirements. It should be read together with the following documents and plans:

Documents:

DOCUMENT	REFERENCE	AUTHOR
Application Forms and Ownership Certificate	n/a	DHA Planning
Planning Statement	DHA/35241	DHA Planning
Environmental Report	19458	HESI
Geotechnical Report	19458	HESI

Desktop Study	19458	HESI
Drainage Hydraulic Calculations	25-0040	BdR Civil & Structural Engineers
Design and Access Statement	24130-P001	OPEN Architecture
Drainage Specification Notes	25-0040, C10500 Rev A	BdR Civil & Structural Engineering Consultants
Preliminary Ecological Appraisal	23_1714_ReportX02_MF_AT	GreenLink Ecology
Landscape & Ecological Management Plan	2506-800	Christina Odell
BNG Assessment and Metric	10 th April 2025	Christina Odell

TABLE 1.1: SUBMITTED DOCUMENTS

Plans:

PLANS	REFERENCE	AUTHOR
Proposed Elevations	24130-P450	OPEN Architecture
Proposed Floor Plans	24130-P200-Proposed Floor Plans	OPEN Architecture
Proposed Site Plan	24130 P150 -P1	OPEN Architecture
Structural Assessment Plan and Photographs	3068	TSC Consulting Engineers
Drainage Layout	25-0040, C10501 Rev A	BdR Civil & Structural Engineering Consultants
Post Development Area Plan	25-0040, C10525 Rev A	BdR Civil & Structural Engineering Consultants
Drainage Construction Details	25-0040, C10551 Rev A	BdR Civil & Structural Engineering Consultants
Alarm Unit for Septic, Cesspool and Silage Tanks	590003P Rev 01	Kingspan

TABLE 1.2: SUBMITTED PLANS

2 SITE AND SURROUNDINGS

2.1 THE APPLICATION SITE

- 2.1.1 The Site comprises an L-shaped structure that comprises a large agricultural storage barn and features a cattle store, in addition to this a Dutch barn and open sided storage bay are present on the Site, alongside associated hardstanding, scrubland, and vegetation. The Site is accessed via Brimstone Hill.
- 2.1.2 The Site is approximately 0.12 hectares in size and falls within the administrative boundaries of Gravesham Borough Council (hereafter 'the Council').
- 2.1.3 The Site is bound by Brimstone Hill to the west with agricultural fields beyond this. To the north lies a detached residential dwelling, with residential development associated with Foxendown Lane beyond this. To the south lies a residential dwelling with agricultural land and woodland beyond this. To the east lies an equestrian complex with woodland and agricultural land beyond this. Established hedgerows line the western Site boundary, the Site topography is set at a lower gradient than Brimstone Hill, which naturally contains and compartmentalises the Site.

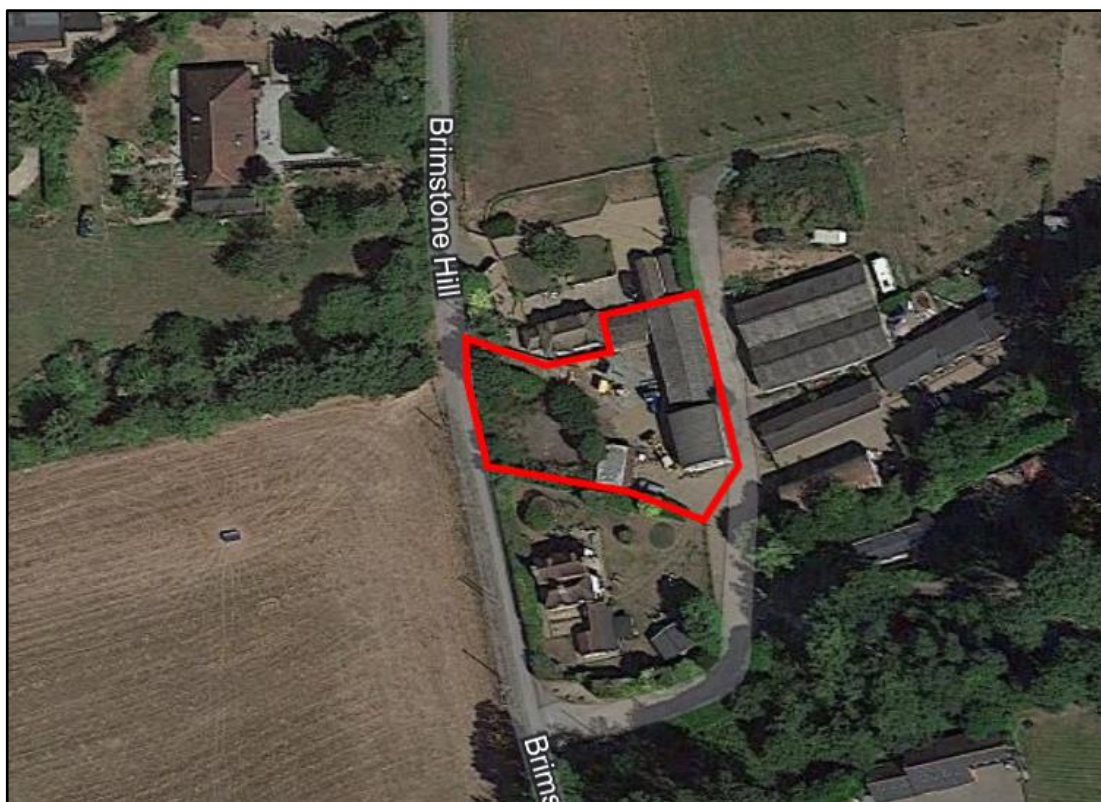


FIGURE 2.1: APPROXIMATE SITE LOCATION EDGED IN RED (GOOGLE EARTH).

- 2.1.4 The Site historically formed part of a wider complex of former farm buildings, however, the ownership of which has since been disaggregated.

2.2 PLANNING DESIGNATIONS

- 2.2.1 According to the Gravesham Borough Council ('GBC', 'the Council', or 'Gravesham Council') online planning proposals map, the Site is outside any defined settlement boundaries and is therefore considered as being within the Countryside. The Site is designated as falling within the Metropolitan Green Belt and the Kent Downs National Landscape (formerly AONB land).
- 2.2.2 The closest Public Rights of Way (PRoW) are located to the north (Footpath NS259) and south (Footpath NS258) of the Site, as demonstrated by Figure 2.2 below.



FIGURE 2.2: PUBLIC RIGHTS OF WAY MAP (KENT COUNTY COUNCIL).

- 2.2.3 The Site is also identified in the Environment Agency's flood risk maps as being located entirely within Flood Zone 1 and is therefore at the lowest level risk of flooding.
- 2.2.4 According to Historic England's Listed Building Map Search, there are no nearby Listed Buildings or heritage assets that are within the setting of the development.

2.3 ACCESSIBILITY

- 2.3.1 In terms of accessibility, it is noted that Brimstone Hill provides a connection to Meopham via Foxendown Lane, which provides a connection to Wrotham Road (the A227) which connects to Gravesend in the north and Wrotham in the south.
- 2.3.2 From Meopham, a number of bus services are accessible, including '223', '305', '306', '308', '311', and the '418', which provide a connection to Gravesend, Sevenoaks, Tonbridge, Vigo Village, and Cobham. Meopham is served by a Train Station which provides services to Gillingham, London Victoria, Dover Priory, and Ramsgate.
- 2.3.3 Several services and facilities are located within close proximity to a number of local services and facilities which include, but are not limited to a village hall, Post Office, church, restaurants, bars, post office, convenience stores, fitness centre, Secondary Schools, Nursery, and Community Academy.

2.4 PREVIOUS PLANNING HISTORY

- 2.4.1 As previously noted, the Site has been the subject of an extant planning permission, which is detailed below. However, it is noted that the Site, according to the Gravesham Borough Council Planning Application database has not otherwise been the subject of any relevant previous applications.

REFERENCE	PROPOSAL	DECISION
20231221	Conversion of existing agricultural barns into two 3 bedroom dwellings, with associated car ports, garden and landscaping	Granted Permissin June 2024
20230184	Conversion (change of use) of existing barn into new three bedroom dwelling with associated parking.	Granted Permission April 2023.

TABLE 2.1: SITE PLANNING HISTORY (COURTESY OF GRAVESHAM BOROUGH COUNCIL)

3 PROPOSED DEVELOPMENT

3.1.1 The full description of the development is as follows:

"Demolition of existing barns and provision of two new three bedroom dwellings with associated parking, amenity garden, and landscaping".

3.1.2 This section summarises the development proposed. Full details are contained within the Design and Access Statement prepared by Open Architecture, which is submitted with this application.



FIGURE 3.2: RED LINE BOUNDARY OF PROPOSED DEVELOPMENT

3.2 PROPOSE USE, LAYOUT AND APPEARANCE

3.2.1 The proposals consist of the demolition of the existing disused barns to create two new detached three bed properties with private amenity space to the rear. The proposed units will be two storeys in height and will each contain a pitched roof design with dormers added to the roofspace to provide sufficient headspace internally whilst not creating too much bulk.

- 3.2.2 Internally, the proposed units will be accessed from the parking area to the west, which provides access to a welcoming internal hallway space. The ground floor has been designed to provide for a generous kitchen and dining space to the rear with large windows to allow for views into the neighbouring field to the east. The upper floors will contain three generous bedrooms.
- 3.2.3 In terms of the elevational treatment, the proposed units will be clad in zinc and timber in order to reflect local built design whilst providing a more contemporary approach for the development.
- 3.2.4 Future residents of the Site can access the Site from the west where private parking forecourts will be provided for up to two spaces per unit in accordance with Kent parking standards. Access to the garden areas are provided from within the proposed units internally with side access being provided via a gate.
- 3.2.5 In terms of the provision of hard and soft landscaping, an attenuation basis will be provided for drainage purposes and additional grassland will be provided across the Site. Low level amenity planting will be provided at the entrance of the proposed units providing an attractive frontage. Additional tree planting will be incorporated across the Site.

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Under the provisions of 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 This section sets out the relevant policies of the statutory Development Plan and refers to any other material considerations that should be taken into account in determining this application.
- 4.1.3 Rather than rehearsing policies, this section highlights relevant policies applicable to the application at hand. Policies are then explored in further detail within the below section.
- 4.1.4 In this case, the following documents are relevant to the application:
- The Gravesham Local Plan Core Strategy (2014);
 - The Saves Policies in the Gravesham Local Plan First Review (1994); and
 - The National Planning Policy Framework (December 2024).
- 4.1.5 The Local Plan and Core Strategy has not been reviewed within five years as required by the Framework and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Both policy documents are fundamentally out of date, setting out a strategy that does not in any way reflect current identified development requirements. Due consideration will be given to the consistency of these policies with those in the Framework.
- 4.1.6 The Council undertook a Regulation 18 Stage 1 consultation on the Site Allocations: Issues and Options and Development Management Policies between April and July 2018. This, alongside additional technical work, informed the Regulation 18 Stage 2 help between October and December 2020.
- 4.1.7 The LPA are at early stages of reviewing their Draft Local Plan. The LPA anticipate submitting the draft Local Plan for examination in December 2025 with adoption anticipated in December 2026. No recent updates have been published with regards to the next stages for consultation.

4.2 GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 4.2.1 The following Policies within the Gravesham Local Plan Core Strategy are deemed relevant to the proposed development:

- **Policy CS01:** Sustainable Development;
- **Policy CS02:** Scale and Distribution of Development;
- **Policy CS11:** Transport;
- **Policy CS12:** Green Infrastructure;
- **Policy CS14:** Housing Type and Size;
- **Policy CS15:** Housing Density;
- **Policy CS18:** Climate Change;
- **Policy CS19:** Development and Design Principles; and

4.3 GRAVESHAM LOCAL PLAN FIRST REVIEW SAVED POLICIES (ORIGINALLY ADOPTED 1994, SAVED AND DELETED POLICIES 2014)

4.3.1 The following policies within the Gravesham Local Plan First Review Saved Policies are deemed relevant to the proposed development:

- **Policy H5:** Increasing the Housing Stock by Conversion;
- **Policy C11:** Change of Use of Redundant Buildings in the Countryside;
- **Policy T1:** Impact of Development on the Highway Network;
- **Policy T4:** Development outside the Built-Up Area;
- **Policy P3:** Vehicle Parking Standards; and
- **Policy P5:** Change of Use of Buildings and Vehicle Parking Standards.

4.4 NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF), Updated December 2024

4.4.1 The NPPF sets out the Government's planning policies for England and puts "the presumption in favour of sustainable development" at the heart of the planning system. Those sections of the NPPF which are relevant to the determination of this application include:

- **Section 2:** Achieving Sustainable Development;
- **Section 4:** Decision Making;
- **Section 5:** Delivering a Sufficient Supply of Homes;
- **Section 11:** Making Effective Use of Land;
- **Section 12:** Achieving Well-Designed Places;
- **Section 13:** Protecting Green Belt Land; and
- **Section 15:** Conserving and Enhancing the Natural Environment; and
- **Section 16:** Conserving and Enhancing the Historic Environment.

4.4.2 Section 13 of the Framework is most pertinent to the delivery of the Site. This section sets out the Government's measures to protecting the Green Belt, where new development is considered to be inappropriate, other than certain exceptions under Paragraphs 154 and 155.

4.4.3 The updated Framework introduces 'grey belt' which is defined as, 'For the purposes of plan-making and decisionmaking, 'grey belt' is defined as land in the

Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development'.

Planning Practice Guidance

- 4.4.4 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance. The PPG is a 'living document' and is constantly being updated / reviewed.
- 4.4.5 As well as providing technical guidance the PPG sets out the importance of good design. It advocates the need for quality of design which it considers is an integral part of achieving the fundamental objective of sustainable development. The relevant sections of the PPG are listed below:
- Design: Process and Tools;
 - Effective Use of Land;
 - Green Belt;
 - Historic Environment;
 - Housing: Optional Technical Standards;
 - Housing Supply and Delivery; and
 - Natural Environment.

4.5 OTHER MATERIAL CONSIDERATIONS

Residential Layout Guidelines (Adopted 1996 – Amended 2020) SPG2

- 4.5.1 All planning applications for new dwellings, extensions to existing dwellings, flats, maisonettes, and bedsitters (new build or conversion), must comply with the Borough Council's adopted Residential Layout Guidelines.

Housing Land Supply

- 4.5.2 National Planning Policy Framework (NPPF) Paragraph 78 is clear that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.
- 4.5.3 In the absence of an up-to-date plan, the Council's housing supply target should be based on the Government's standard methodology.

- 4.5.4 In recent decisions, the Council has stated that it accepts that it does not have a 5YHLS. This reflects the recently published Housing Land Supply Position for the Council as of 2025, which is 3 years' supply of housing against the Borough's local housing need figure with a 20% buffer applied for the period of 2024 - 2029.
- 4.5.5 The NPPF states, in paragraph 78b, footnote 40, that under-delivery will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement. The latest published Housing Delivery Test for Gravesham shows that against a need of 1,789 dwellings, 1,056 dwellings were delivered in the Borough which results in a Housing Delivery Test 2023 measurement of 59%. As a result, a 20% buffer needs to be applied to Gravesham's housing need figure.
- 4.5.6 In view of the Council's 5YHLS and HDT figures, the Council cannot demonstrate a deliverable five-year supply of housing land as required by NPPF Paragraph 78 and therefore the presumption in favour of sustainable development is engaged on the basis of the housing policies being out of date.
- 4.5.7 The significance of this shortfall is also material and should be considered in the determination of this application, and this is further compounded by the fact that there appears to be little prospect that housing needs (as identified by the standard method) will be met soon.

5 PLANNING CONSIDERATIONS

5.1 INTRODUCTION

- 5.1.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is necessary to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.
- 5.1.2 In determining whether the proposal accords with the development plan, the following planning policy considerations are assessed in this section in relation to the proposal:
- The Principle of Development;
 - Design;
 - Residential Amenity;
 - Ecology; and
 - Highways, Access, and Parking.
- 5.1.3 This section identifies the key issues that are material to the planning balance required in respect of this scheme and presents the case in favour of granting planning permission.

5.2 THE PRINCIPLE OF DEVELOPMENT

- 5.2.1 Local Plan Policy CS01 is clear that when considering proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as contained within the NPPF, therefore they will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development improves the economic, social, and environmental conditions in the area.
- 5.2.2 Local Plan Policy CS02 sets out the development strategy for the Borough in which the LPA are seeking to retain and improve the existing stock of housing and to make provision for the Borough's objectively assessed need for at least 6,170 new dwellings to be delivered across a stepped trajectory up until 2028. In the rural area, development outside defined settlements will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan.
- 5.2.3 The Site is currently situated outside of a defined settlement boundary and located within the Greenbelt. Notwithstanding this, the Site obtained planning permission

in previous years for the residential conversion of the existing buildings on Site to provide two additional dwellings. The Site is also considered a sustainable location as the Site is located within walking and cycling distances of the services and facilities within Meopham Green itself, including schools, village hall, pubs and restaurants, and local supermarkets. This was confirmed by the planning officer within their officers report for planning permission 20231221:

"There are bus stops, services and facilities all within walking distance on Wrotham Road to the west of the site (less than a mile away), which would provide a reasonable degree of accessibility from the site by means other than the car, and contribute to the rural community in line with paragraph 83 of the NPPF".

- 5.2.4 Overall, it has been demonstrated that the principle for residential development has been established on the Site. It is also clear that NPPF Paragraph 11d applies and the policies most important for determining the application are out-of-date, as a result of both GBC being unable to demonstrate a fiveyear supply of deliverable housing Sites and having delivered a level of housing that is substantially below the housing requirement over the previous three years.
- 5.2.5 Notwithstanding the above, as the Site is currently designated as Green Belt in the adopted Development Plan, the proposed development needs to be assessed against the Green Belt policy in the NPPF (2024) on the basis that the LPA's development plan is out of date. In this context the following sections assesses the proposals against the relevant paragraphs in the NPPF.

5.3 THE GREEN BELT

- 5.3.1 Paragraph 143 confirms that the fundamental aim of green belt policy is to prevent urban sprawl, with the essential characteristics of green belt being openness and permanence. Paragraph 143 sets out the five purposes of the Green Belt as:
- a. To check the unrestricted sprawl of large built-up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and
 - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 5.3.2 The recently revised NPPF (2024) has introduced the concept of 'grey belt' land within the green belt which the following paragraphs considers.
- 5.3.3 Paragraph 153 states that when considering applications, local planning authorities should ensure that substantial weight is given to any harm to the green belt,

including harm to its openness, subject to footnote 55 which states 'other than in the case of development on previously developed land or grey belt land, where development is not inappropriate'.

5.4 GREY BELT DEFINITION

- 5.4.1 Noting the above, the Framework now provides further opportunities for development within the Green Belt, if the land would fall within the new definition of 'grey belt' and meet certain other tests. For clarity, grey belt is defined in the Framework as:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development".

- 5.4.2 Footnote 7 includes the following type of designated land: habitat sites, SSSI's, Local Green Space, National Landscape, National Parks or Heritage Coast, irreplaceable habitats, designated heritage assets, and areas at risk of flooding. The Site does not fall within any of these defined areas.
- 5.4.3 The site is existing agricultural land and therefore in accordance with the NPPF does not constitute previously development land. Notwithstanding this, the site is underused existing built form and does not positively contribute to the purposes of the Green Belt. The site has therefore been assessed against purposes a, b and d below.
- 5.4.4 Purpose A – Check unrestricted sprawl of large built-up areas
- 5.4.5 The Site is well-contained by development to the south, west and north. On this basis, the development of the Site would be contained and enclosed by built form as well as sufficient boundary treatment to the east. It would not result in an expansion of a settlement boundary and therefore would not meet the definition of sprawl.
- 5.4.6 The Site is also located adjacent to existing residential dwellings. Views of the Site are partially restricted by a combination of built form and mature tree cover and, therefore, the Site provides a little contribution to the separation between neighbouring built-up areas.
- 5.4.7 There is also an absence of significant development within the Site, it is overlooked by adjacent/nearby development/wooded/treed areas. Consideration therefore moves to Purpose B below.

Purpose B - To prevent neighbouring towns merging into one another

5.4.8 The Site does not contribute to separation between any significant areas of settlement. The Site is contained in existing built form, and will not encroach into the surrounding countryside.

5.4.9 The Site does not therefore contribute strongly to Purpose B.

Purpose D – To preserve the setting and special character of historic towns.

5.4.10 The Site is located away from any historic towns and therefore this purpose is not applicable.

5.5 GREY BELT REQUIREMENTS

5.5.1 Following the above assessment of the definition, the supporting paragraphs in the Framework must be assessed. Firstly, paragraph 155 states that, 'the development of homes, commercial, and other development in the Green Belt should also not be regarded as inappropriate where:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b) There is a demonstrable unmet need for the type of development proposed;
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and
- d) Where applicable the development meets the 'Golden Rules requirements set out in paragraphs 156-157'

5.5.2 In respect of Part A, it has been demonstrated that the Site constitutes grey belt land and would not undermine the purposes of the remaining Green Belt as set out above.

5.5.3 Part B is subject to the provisions of footnote 56, which confirms that demonstrable unmet need means the lack of a five-year supply of deliverable housing sites, including the relevant buffer where applicable or where the Housing Delivery Tests was below 75% of the housing requirement over the previous three years.

5.5.4 In respect of housing need, it is well documented that the Council are unable to demonstrate a five-year housing land supply. The Council's latest position statement (January 2025) identifies a 3-year supply of housing for the period 2024-2029 (including a 20% buffer). The latest 2023 Housing Delivery Test (December 2024) also confirms that GBC only delivered 59% of its housing delivery

during the period 2020/21-2022/23 against the housing requirement of 1,789 homes. There is therefore a clear need for high quality homes within the Borough.

- 5.5.5 In terms of Part C within Paragraph 155, the development clearly constitutes sustainable development. This has been confirmed by the LPA during previous planning permissions for the Site. The proposals therefore satisfy the requirements of Part C.
- 5.5.6 Finally, Part D requires developments to meet the Golden Rules set out by paragraphs 156-157. The Site constitutes minor development and therefore the golden rules should not apply.
- 5.5.7 Overall, it has been demonstrated that the Site is classified as grey belt land in accordance with the Framework. Accordingly, the proposed development comprises an exception to inappropriate development.

5.6 OTHER RELEVANT CONSIDERATIONS

- 5.6.1 It is necessary to recognise that the extant permission obtained in June 2024 for this Site, as allowed under application reference 20231221 is a material consideration of substantial weight. There are numerous case law examples including The Court of Appeal judgment in Michael Mansell v Tonbridge and Malling Borough Council [2017], which clarifies the principle that, in considering proposals for new development, decision-makers should have regard to the fallback position of lawful development, which has a real prospect of taking place in the alternative. In this case, the previous consent remains extant and presents a viable opportunity for development of the Site if planning permission is not obtained for this scheme.
- 5.6.2 On the basis of the above, this scheme offers clear benefits over and above the existing permissions. It not only represents high quality development but also enhances energy efficiency. Therefore, the existing permission should be given considerable weight in the planning balance.

5.7 DESIGN, CHARACTER AND APPEARANCE

- 5.7.1 NPPF Paragraph 131 is clear that 'good design is a key aspect of sustainable development, creates *better places in which to live and work and helps make development acceptable to communities*'.
- 5.7.2 The proposals are design-led to ensure that the new dwellings reflect the rural village aesthetic found in and around Meopham village. The village primarily consists of low to mid density housing of 1 and 2 storeys that contain private gardens to the rear and vehicle parking to the front. The proposed development will consist of two storeys and the proposed ridge height of the detached properties will not exceed the roof line of surrounding properties and has a clear

connection to the existing buildings in terms of both scale and mass as well as aesthetics.

- 5.7.3 The proposed scheme would also result in a reduction in built form [floor space/volume] (approximately 188 sqm less GEA) compared to the already permitted scheme. There would also be a 10% biodiversity Net Gain with the removal of additional hardstanding and the replanting of grassland and soft landscaping. The proposed boundary treatment is in keeping with the character of the area.
- 5.7.4 The proposed dwellings will primarily consist of zinc and timber in which these features reflect key design styles found in rural villages as highlighted in the Design and Access Statement.
- 5.7.5 Internally, the dwellings have all been designed to ensure that the internal spaces are appropriate and fit for purpose. The proposals also exceed the requirements set out under the Nationally Described Space Standards and contain adequate internal storage, recycling storage space and access to useable private amenity space.

5.8 RESIDENTIAL AMENITY

- 5.8.1 Paragraph 135 of the NPPF is clear that planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible and which offer a high standard of amenity for existing and future users.
- 5.8.2 The proposals are designed to allow for ample natural light to all habitable rooms. For instance, a generous kitchen and dining space is positioned to the rear of the units, which contain windows and openings that face onto the garden and land associated with the farm. Although this elevation will allow for striking views out of the property for proposed occupiers to enjoy, it is not envisaged that this elevation would give rise to any amenity concerns.
- 5.8.3 Windows proposed within the side elevations of units have been limited to non-habitable rooms with the proposed units also being staggered to offset any overlooking between properties. In terms of the front elevation, there are no amenity concerns given that the proposed units will face onto Brimstone Hill where there is sufficient distance between the proposals and existing properties to the west.
- 5.8.4 In view of this, it is considered that there is no likely harm to neighbouring amenity as a result of the proposed development and will indeed provide a high standard of amenity for future occupiers. Additionally, it is noted that the Council did not highlight any amenity concerns associated with a residential development in this location under the extant scheme by virtue of this, the proposal development is considered to be the subject of the same conclusion.

- 5.8.5 Overall, it is considered the proposal would have an acceptable impact on neighbouring properties in terms of outlook, privacy, light, noise and activity levels. As such, the proposal complies with Policy CS19 of the Core Strategy 2014.

5.9 ECOLOGY

- 5.9.1 To accompany the application, a Walkover Survey has been produced by Green Link to support the application.
- 5.9.2 A BNG Metric Assessment has also been produced by Chistina Odell. It is concluded that the proposals can provide a 104.04% net gain based on the metric 4.0 calculations.
- 5.9.3 In conclusion, developing this parcel of under-utilised previous agricultural land to a residential Site with managed communal space generates a substantial biodiversity gain in terms of mixed native hedgerow, informal green walls, native trees and a revamped bioswale. A Landscape and Environmental Management Plan has also been submitted to support the proposals.

5.10 CONTAMINATION

- 5.10.1 To accompany the application, a Phase I and Phase II Geo-environmental and Geotechnical Investigation Report has been produced by Hesi.
- 5.10.2 On the basis of the above, it is considered that the accompanying report is acceptable if all recommendations are followed.

5.11 HIGHWAYS AND INFRASTRUCTURE

- 5.11.1 Vehicular access to the Site exists via the established access track on Brimstone Hill, the development will make use of the shared access track as existing.
- 5.11.2 By virtue of the scale of the development, it is not expected that the proposals would generate significant additional vehicle trips and therefore would not demonstrably impact on Local Highway capacity, amenity, or operation, nor would it have any severe impact on the Local Highway Network in line with NPPF Paragraph 111.
- 5.11.3 Two car parking spaces will be provided per plot in accordance with the KCC Interim Guidance Note 3 (IGN3). These will be provided within a private court to the front of each dwelling to allow easy access. The parking and access of the extant permission were considered acceptable.
- 5.11.4 Under the extant permission an attenuation tank on the Site was proposed in addition to further drain runs to address surface water flooding. This was

considered an acceptable solution by both KCC and GBC Highways. It is noted that the proposed development will benefit from these improvements.

6 SUMMARY AND CONCLUSION

6.1 SUMMARY

- 6.1.1 This Statement has been prepared on behalf of Mr. A. Thompson in respect of a full planning application for the demolition of two disused agricultural barns to create two new 3-bedroom dwellings. The Site already benefits from two extant planning consents for the buildings conversion (most recent planning application granted in January 2025 under application reference: 20230184) and in this regard these changes seek only to upgrade the dwellings through the provision of two new detached properties of the same quantum at Brimsole Farm, Brimstone Hill, Meopham, Gravesend, Kent.
- 6.1.2 The extant permission is clearly positive evidence of the development credentials for the Site irrespective of the proposal. The recent conversion permission will certainly be implemented in the alternative.
- 6.1.3 It has been outlined that the most important policies for determining the application are out of date through a demonstrable housing land supply shortfall, meaning paragraph 11d of the Framework is engaged. As set out, the proposal would utilise grey belt land, there is a demonstrable unmet need for housing, and the development would be in a sustainable location. The Golden Rules are not applicable. The proposal would therefore satisfy criteria (a)-(d) of paragraph 155 of the Framework. Consequently, the proposed development would not be inappropriate development within the Green Belt.
- 6.1.4 The importance of the ability to deliver a small but valuable contribution for new family homes in the short-term is reiterated given the extent of the housing land supply shortage in the Borough. National Planning Policy reflects the importance of housing need and supply, which requires Local Authorities to provide a five-year housing land supply, where Authorities unable to do so, circumstances significantly tilt decision making in favour of the grant of permission.

6.2 CONCLUSION

- 6.2.1 In considering the above context, the development comprises a well-informed, high-quality, sensitive, and well-planned re-development proposal.
- 6.2.2 It is considered that the proposal entirely accords with the development plan, additionally, wider material considerations support the provision of new built form and therefore it is respectfully requested that Planning Permission be granted.