

Planning Validation
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU

October 2023

Dear Planning team

Re: Land Off Copthall Road, Cobham, Gravesend, DA13 9AU Renewal Application, further to temporary planning permission granted on 3rd December 2021 under reference 20211081. Continued use of mobile home.

I am instructed by Fiona Hunter to advise and to an application for the following development:

Continued use of mobile home.

Note that the site office has been removed.

Please find enclosed an application together with the following drawings and documents:

- Site Location Plan as created on the portal.
- Site Layout Plan showing the site layout including the site of the mobile home.
- Photos of the mobile home
- Farm business plan dated November 2023, including accounts and projected farm cash flow – confidential.
- List of incidents and crimes – confidential.

The following statement includes details of the proposal and sets out the relevant planning considerations:

PLANNING STATEMENT

This application relates to land at Copthall Road and to an established farm enterprise., a site located within the Green Belt but outside the Kent Downs Area of Outstanding Natural Beauty.

The application site is located within the Meopham Downs Landscape Character Area, an area characterised by gently undulating topography with a mix of arable and pasture farmland, three large settlements located along the A227 and traditional architecture surrounding village greens providing local vernacular.

Below is the planning history for the site as taken from the Council's website:

- [Retention of existing mobile home and site office/store.](#)

Ref. No: 20151015 | Status: Granted Temporary Permission

- [Continued use of mobile home and site office.](#)

Ref. No: 20190310 | Status: Granted Temporary Permission

- [Continued use of mobile home and site office.](#)

Ref. No: 20211081 | Status: Granted Temporary Permission

The farming enterprise is operating successfully with an on-site residential presence allowing security. Before a mobile home was stationed on the farm, the farmers experienced serious security problems due to walkers, motorbikes, quad bikes, and shooting. Gates were left open, and sheep were frightened by trespassing walkers and vehicles. Numerous incidents resulted in escaped sheep. During lambing the

applicants had to sleep in their car and, realising this was not sustainable, safe, or practical, moved a mobile home onto the site to ensure safety and surveillance of their animals. Detail of incidents is provided as part of this application. Please note that there have been 2 sheep worrying incidents during the time the mobile home has been on site/ during the applicant's residency – the last one in 2022 which would have been much more serious if they had not been on site and chased off the dogs within a few minutes of the dogs appearing (police crime reference number is on the list of reported incidents/crimes).

The residential presence remains essential to the successful and safe operation of the farm business.

Planning permission is required to retain the mobile home permanently or for a further temporary period, as the Council sees fit.

The business is continuing to develop, as detailed in the Farm Business Plan. The farm now benefits from a further fifty acres of land. The Farm Business Plan concludes as follows:

- The livestock system at Bluebell Barn is currently at approximately 159 animals annually. In addition to this there are a number of additional income streams, the most notable of which are the sale of chickens at the 'point-of-lay' and the educational open farm days which are especially popular around lambing.
- It is the intention of the landowners to increase the size of the herd as they have recently taken on a tenancy of an additional fifty acres which can be both grazed and used for the production of forage in order to support an increased number of livestock.
- There exists an irrefutable need for a constant on-site presence during the lambing period to provide appropriate supervision. By checking the animals at regular intervals throughout the day and night, the farmer can intervene if required in the lambing process and then to provide post-natal care for both ewe and lamb. This involves the identification of issues requiring emergency veterinary attention, which can then be actioned.
- In the absence of a constant on-site presence, the farming business would be forced to accept an increased mortality rate which would be financially

detrimental and affect business viability. This would be exacerbated by the gradual reduction in farm subsidies under the Basic Payment Scheme.

- Outside of the lambing period, there remains a daily requirement for multiple livestock checks and to perform other farming duties as required.
- The farm regularly experiences instances of rural crime and the holding's proximity to several main roads and the conurbation of London, means that statistically the holding is likely to continue experiencing farm crime. Without an on-site presence the farming business would also have to accept these regular instances of crime as part of their business and regularly travel to and from the holding.
- The additional enterprises which are currently extant at Bluebell Barn, do not have an exact Standard Man Days requirement and so whilst an attempt has been made using figures supplied by the landowner in Table 2, the exact figure for the various businesses cannot be accurately quantified. It is however acknowledged that the current labour requirement of the land at Bluebell Barn is adequately met by Miss Hunter and Miss Watson.
- Having reviewed all the relevant factors, it is clear that there is an essential need for a permanent on-site presence at Bluebell Barn to ensure that the livestock kept on the farm receive the required level of care and the business can continue to develop in a sustainable way.

The mobile home has dimensions of 10.7m x 3.7m and the office / store is 6m x 2.5m.

The siting of the units is as detailed on the submitted drawing.

Relevant Planning Considerations

Government policy is set out within the National Planning Policy Framework (2023) is relevant as is Planning Practice Guidance and The Development Plan for the site that comprises the adopted Gravesham Core Strategy (2014) and the saved policies of the Gravesham Local Plan First Review (1994). The Gravesham Landscape Character Assessment (2009) is a further material consideration.

The National Planning Policy Framework (2023)

Advice within the Framework on decision taking from Paragraph 38 advises that Local Planning Authorities should approach decision taking in a positive way to foster the delivery of sustainable development and should look for solutions.

Paragraph 84 of the Framework seeks to support a prosperous rural economy. This includes the promotion of the development and diversification of agricultural and other land-based rural businesses.

Paragraph 80 of the Framework advises that Local Planning Authorities should avoid new isolated homes in the countryside unless there are circumstances such as the essential need for a rural worker including those taking control of the farm business to live permanently at or near their place of work in the countryside. There is no further advice provided by Government in relation to assessing the need for agricultural worker accommodation. The methodology explained in Annex A to PPS7, whilst it no longer forms part of Government policy as such, nevertheless seems the appropriate way in which this issue should be approached. This is also relevant as Gravesham Council's saved policy refers to consideration of agricultural accommodation in the same way.

Annexe A advised that temporary agricultural buildings, as proposed, are a sensible way of providing agricultural worker accommodation but should satisfy certain criteria.

These criteria are met in the following ways by the farm enterprise the subject of this application:

- There is evidence of and a clear intention to continue to develop the enterprise concerned. This is evidence from the business plan and will also be apparent from a site visit and discussion with the applicants.
- There is a functional need for residential accommodation on site to ensure essential care of animals which have been at risk and have required emergency attention due to the action of trespassers. Also, for care during lambing and in the event of sick animals. The applicants would not be able to manage the business safely from accommodation away from the site, hence the emergency stationing of the mobile home.
- The updated agricultural business is planned on a sound financial basis as detailed in the business plan.
- There is no other available residential accommodation on or close to the site that would provide the require surveillance and security
- The site is located close to the barn, a siting that was chosen to minimise visual impact, taking account of existing landscaping.

Green Belt policy within Section 13 of the Framework is also relevant for the consideration of the acceptability of the proposed stationing of a mobile home and office / store. Paragraph 149 of the framework allows for buildings for agriculture as an appropriate form of development within the Green Belt.

Section 15 of the Framework highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes.

Core Strategy Local Plan

Paragraph 4.2.22 of the Core Strategy advises that the rural economy of the Borough has traditionally been dependant on agriculture, and to a lesser extent forestry, but has increasingly diversified as the agricultural industry has changed in response to modern requirements.

The Green Belt designation within the Borough has assisted in protecting the best and most versatile agricultural land and conserving soil resources and this will continue to occur.

The Core Strategy includes policy seeking to maintain the openness of the Green Belt, reflecting the policies within the National Planning Policy Framework.

Core Strategy SO8 seeks to preserve the openness of the Green Belt, maintain its national and local planning purposes, and protect it from inappropriate development.

Core Strategy Policy CS12 states that the overall landscape character and valued landscapes within the Borough will be conserved, restored and enhanced and that proposals will take account of the Gravesham Landscape Character Assessment.

Gravesham Local Plan First Review (2014)

Policy C10 (Agricultural Dwellings) states the following:

“The Borough Council will only give favourable consideration to applications for agricultural dwellings, where an overriding case can be demonstrated and when no satisfactory alternative means of provision is available. Such applications will be considered against the advice contained within PPG7 (Annexe E), other Government advice effective at the time and the following criteria: -

- (i) The agricultural unit must be commercially viable of itself at the time of the application.

- (ii) Where the Borough Council's agricultural adviser indicates that an existing and established agricultural unit is capable of becoming commercially viable, the sitting of a caravan for a limited period may be considered.
- (iii) It must be necessary rather than just convenient for an agricultural worker to be resident on the agricultural unit.
- (iv) The Borough Council will need to be satisfied that there is no suitable housing available in the vicinity of the site.
- (v) Care must be taken to select the most suitable site for the dwelling on the agricultural unit, in order to achieve a good relationship with existing farm buildings and the point of access and to minimise impact by making use of natural features.
- (vi) The dwelling should be of a modest size and of a design appropriate to its Green Belt and countryside location."

Emerging Local Plan.

Policy DM 2 (New Dwellings for Agricultural, Forestry and other rural workers in the Green Belt) also allows for accommodation for a rural worker, including temporary accommodation.

Conclusions

The key issues for consideration comprise the following:

1. Whether there is a case for the need for a continuing residential presence to support the established agricultural business.
2. Whether the proposed development will complement the character of the landscape and protect local wildlife.

Firstly, as detailed within the Farm Business Plan, it has been demonstrated that there is an essential need for a permanent on-site presence at Bluebell Barn to ensure that the livestock kept on the farm receive the required level of care and the business can continue to develop in a sustainable way.

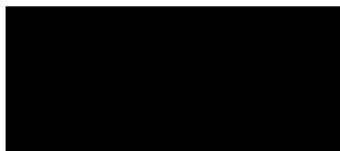
Secondly, the agricultural business contributes to the character of the local landscape that is derived from agriculture. It is secured for the future by a sustainable business. No harm to local wildlife will arise from the proposed development, as found in the assessment of previous applications.

The farm business has worked to diversify and generate links with the local community to enhance local understanding of farming.

The proposed retention of the mobile home is compliant with Government Policy within the National Planning Policy Framework as well as adopted and emerging Development Plan Policy. In conclusion, it is respectfully requested that planning permission is granted to allow the retention of the mobile home and office / store permanently or for a further temporary period of three years. This will allow the farming business to continue.

If you require any further information or wish to arrange to visit the site, then please do not hesitate to contact me.

Yours sincerely



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