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land

Planning Statement prepared on behalf of Mr A Thompson

Barn at Brimsole Farm, Brimstone Hill, Meopham DA13 0BN

February 2023
DHA/30275

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1 Introduction

1.1 Context

- 1.1.1 This statement has been prepared on behalf of Mr A Thompson in respect of a full planning application for the conversion of a disused agricultural barn to a new 3-bedroom dwelling with associated parking, amenity area and landscaping.
- 1.1.2 The barn complex is situated within the Metropolitan Green Belt ('the Green Belt') and so careful consideration has been given to the design approach to ensure the development would not result in any adverse impacts to openness. Nevertheless, in principle, the re-use of an existing building is an 'appropriate' form of development within the countryside as defined by both the National Planning Policy Framework ('NPPF').
- 1.1.3 The site is located within a nationally protected AONB. However, the proposal would not represent major development and would not have any material impact upon the natural beauty of the area.
- 1.1.4 From a design perspective, the current barn complex is structurally sound, capable of conversion and of no architectural or historic merit. A structural survey is provided and information provided in respect of recent Inspector decisions relating to Green Belt conversions.
- 1.1.5 Turning to material considerations, the ability to deliver a new home in the short-term is extremely important given the extent of the housing land supply shortage in Gravesham Borough. Indeed, based on the Government's standard methodology for calculating housing need, the annual housing requirement for Gravesham is 707 dwellings – nearly double the current 363 house per year target contained within the out-of-date Core Strategy. Furthermore, the latest Housing Delivery Test results require the Council to automatically apply the presumption in favour of sustainable development owing to recent under delivery.
- 1.1.6 The importance of housing need and supply is also reflected in national planning policy, which requires local authorities to provide a five-year housing land supply. Where authorities are unable to do so, circumstances significantly tilt decision making in favour of the grant of permission.
- 1.1.7 Finally, the site has been subject to ecological evaluation and it has been confirmed that no protected species will be impacted by the proposal.
- 1.1.8 Considering the above context, we acknowledge that there are sensitive matters to be balanced. However, the proposals are well-informed, and we firmly consider that the circumstances justify this sensitively planned conversion.

1.2 Document Structure

- 1.2.1 This statement forms part of the application and should be made available for inspection with the other application details.
- 1.2.2 This statement provides an overview of the application site and proposals. Section 2 sets out the context of the site and the immediate surroundings, including the site history whilst Section 3 provides details of the proposed development.

- 1.2.3 Section 4 outlines the planning policy context by which the application will be considered.
- 1.2.4 Section 5 summarises the Council's housing land supply position.
- 1.2.5 Section 6 considers the principal of development and wider planning considerations. Section 7 draws conclusions to having assessed planning merits of the scheme, having regard to any relevant planning history and the applicable planning policy framework.
- 1.2.6 This statement concludes that the proposal is appropriate in planning terms and accordingly requests that planning permission be granted.

2 Site Context

2.1 Site Overview

- 2.1.1 The barn complex is formed of an L-shaped structure comprising a large agricultural storage barn with a lower cattle store return. It forms part of a wider complex of former farm buildings, the ownership of which has been disaggregated.
- 2.1.2 To the south of the building is a Dutch barn and open sided storage bay that also falls within the applicant's ownership.



Figure 2.1 Site Location (demarked boundary in red – not to scale)

- 2.1.3 To the north and south are two neighbouring properties, The Cottage and The Farmhouse respectively, whilst to the east is an equestrian complex. The land parcel is bounded by Brimstone Hill Lane to the west.
- 2.1.4 Established hedgerows line the west boundary of the site. The site topography is on a lower gradient than Brimstone Hill and so the buildings are naturally well contained.
- 2.1.5 Access onto Brimstone Hill is established and serves the existing barn complex.

2.2 Planning Constraints

- 2.2.1 According to the online proposals map published by Gravesham Borough Council ('GDC'), the site is outside any defined settlement boundaries and so is in the countryside for town planning purposes.
- 2.2.2 The site is located within the Metropolitan Green Belt and the Kent Downs AONB.

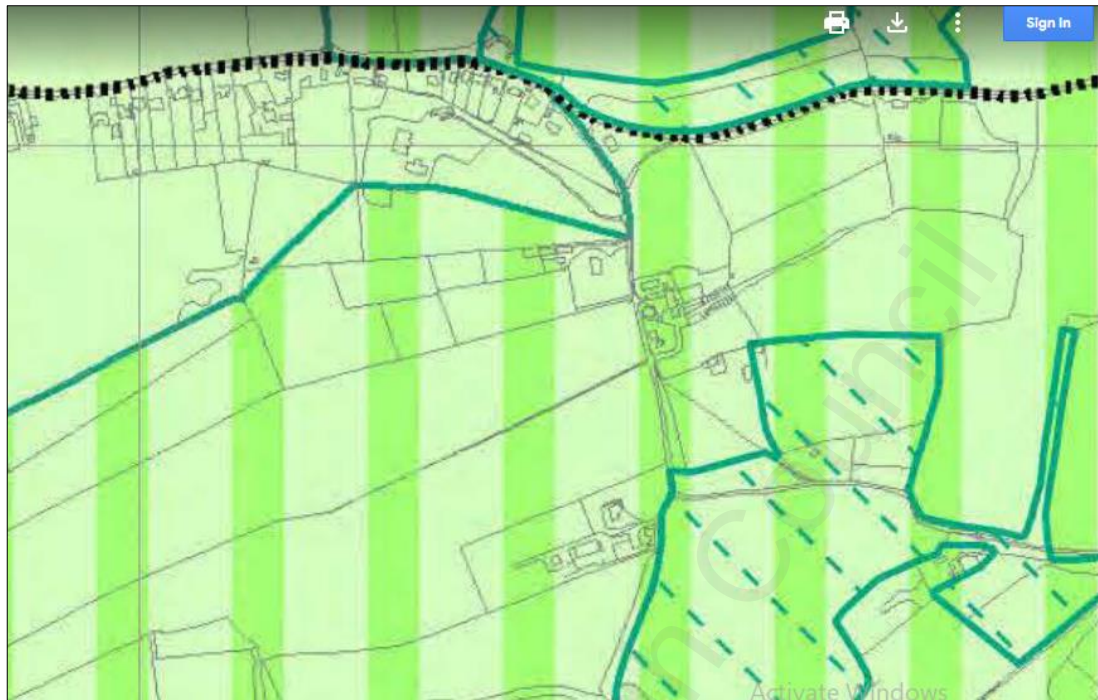


Figure 2.2 Site Designations (Extracted from Gravesham Borough Council's Planning Map)

- 2.2.3 The closest public rights of way are to the north and south of the site via public footpaths NS259 and NS258

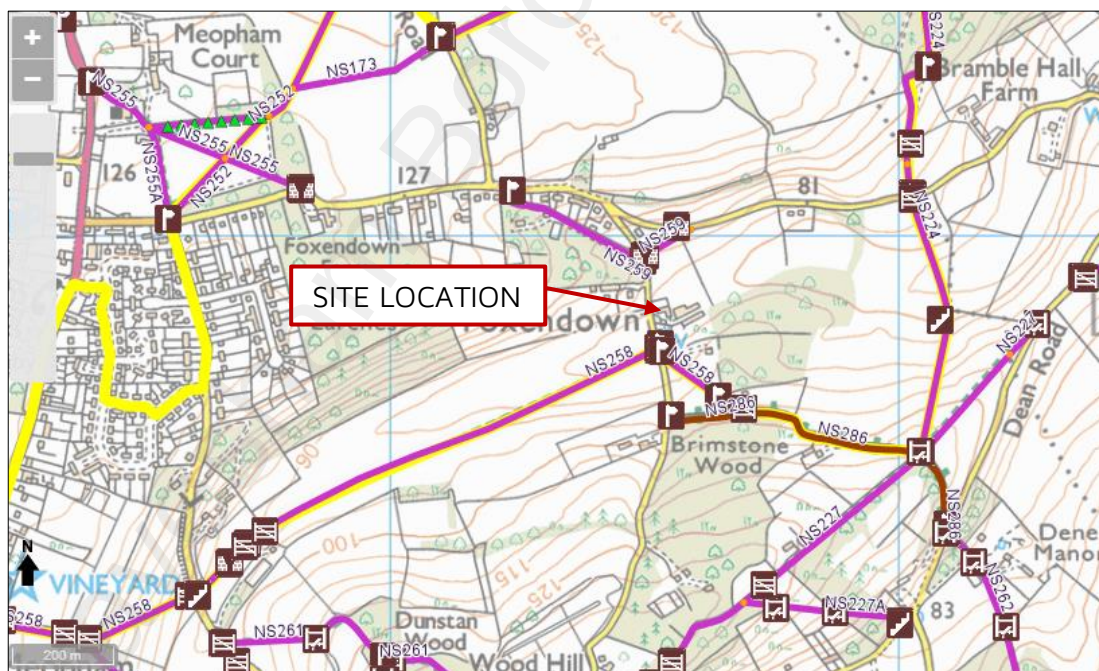


Figure 2.3 Public Right of Way Map (Courtesy of Kent County Council)

- 2.2.4 The site is in flood zone 1, an area with low probability of flooding.
- 2.2.5 There are no nearby listed buildings or heritage assets that would be impacted by the development.

2.3 Accessibility

- 2.3.1 In respect of accessibility, the site is situated 1km east of the settlement confines of Meopham as defined on Gravesham's Core Strategy Proposals Maps and is therefore within the countryside in planning policy terms. The site is also located within the Metropolitan Green Belt.
- 2.3.2 Nevertheless, the site is situated within walking distance or a short drive of Meopham Secondary School located on Wrotham Road (A227) opposite the Meopham Village Hall.
- 2.3.3 The site also benefits from being located within close proximity to a number of local services and facilities which include, but are not limited to a village hall, country club, Meopham Secondary School, Fitness Centre, a veterinary surgery and a number of public houses, restaurants and local convenience stores.
- 2.3.4 Furthermore, within Meopham bus services 223, 304, 305, 306, 308 and 418 which offer daily routes into Gravesend, Sevenoaks, Stansted, Tonbridge, New Ash Green as well as other surrounding areas. Meopham railway station is within also within close proximity to the application site, and is on the Chatham Main Line. The typical Monday to Saturday off-peak service is 3 trains per hour to London Victoria, 1 train per hour to Gillingham and 2 trains per hour to Ramsgate and Dover Priory dividing at Faversham.

2.4 Planning History

- 2.4.1 According to the online records held by GBC, there is no specific history for the agricultural buildings proposed for conversion. However, the building is clearly visible in 1940 historic imagery.



Figure 2.4: Google 1940s extract

3 The Proposal

3.1 Overview of the Proposal

- 3.1.1 Full planning permission is sought for the conversion of the barn to create a new 3-bedroom dwelling with associated covered parking, private space, and landscaping.
- 3.1.2 The barn will be reclad but in a manner that would maintain the simple agricultural form of the building. New openings will be sensitively inserted to ensure adequate natural light.



Figure 3.1. Ground Floor Plan of Proposed Development

- 3.1.3 A partial mezzanine level will be added to create a master bedroom with Ensuite. All other accommodation will be at ground floor.
- 3.1.4 Car parking will be provided within the existing storage building.
- 3.1.5 In terms of materials, these are to be confirmed but the intention is to ensure that these are designed appropriately for residential use and compliments the surrounding area.
- 3.1.6 From a landscaping perspective, mature boundary vegetation will be retained, and indigenous landscape enhancements can be included to soften the proposed garden area that sits to the front of the dwelling.

3.2 Structural Assessment Summary

- 3.2.1 The proposal is supported by a structural assessment. The report should be read in full; however, it concludes that the building is structurally sound and capable of conversion.
- 3.2.2 Notwithstanding the evidence provided, regard should also be had to an appeal decision at Vine Cottage in Penshurst APP/G2245/W/17/3181949, which also related to the conversion of a barn to a dwelling within the neighbouring Sevenoaks Green Belt. As part of the appeal decision, the Planning Inspector considered that the complete recladding of the whole building, underpinning, the inclusion of a plinth and additional supports to the frame and roof did not amount to major reconstruction but are just alterations.
- 3.2.3 Although a neighbouring authority, this decision sets a clear benchmark that the current proposal falls patently within the scope of a building capable of conversion for the purpose of Green Belt policy.

4 Planning Policy Framework

4.1 Overview

- 4.1.1 Section 38(6) of the Planning and Compulsory 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 4.1.2 For this planning application, the Development Plan comprises the Gravesham Local Plan Core Strategy (2014) and the Saved Policies in the Gravesham Local Plan First Review (November 1994).
- 4.1.3 In addition to the development plan, the Government published an updated National Planning Policy Framework (NPPF) in July 2021. The NPPF sets out the Government's requirements and policies for planning in England. It must be deemed as a material consideration.
- 4.1.4 This chapter therefore highlights the parts of the NPPF and development plan that are most relevant to this application and the weight that can be given to the existing adopted policies.

4.2 National Planning Policy Framework (2021)

Achieving Sustainable Development

- 4.2.1 **Paragraph 7** defines the purpose of the planning system, which is to contribute to the attainment of sustainable development. Sustainable development can be defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.2.2 **Paragraph 8** goes on to explain that the planning system has three overarching objectives which are interdependent and must be pursued in mutually supportive ways:
 - (a) **An economic objective** – to help build a strong, responsive, and competitive economy;
 - (b) **A social objective** – to support strong, vibrant and healthy communities; and
 - (c) **An environmental objective** – to protect and enhance our natural, built and historic environment.

Presumption in Favour of Sustainable Development

- 4.2.3 **Paragraph 11** states that plans and decisions should apply a presumption in favour of sustainable development.

'For decision-taking this means:

- (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 (footnote 8) granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (footnote 7); 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’.

4.2.4 **Footnote 7** refers to policies in this framework that related to habitat sites or sites designated as Sites of Special Scientific Interest; the Green Belt; Local Green Space, an Area of Outstanding Natural Beauty, a National Park, Heritage Coast, irreplaceable habitat, designated heritage assets or areas at risk of flooding or coastal change.

4.2.5 **Footnote 8** regards the provision of housing where local planning authorities cannot demonstrate a five-year supply of deliverable housing sites with an appropriate buffer; or where the Housing Delivery Test indicates that the delivery of housing was less than 75% of the housing requirement of the past three-years.

Decision Making

4.2.6 In terms of decision making, **paragraph 38** states local planning authorities should approach decisions on proposed development in a positive and creative way, working with applicants to secure development that improves economic, social and environmental conditions of an area.

Delivering a Sufficient Supply of Homes

4.2.7 **Paragraph 60** states to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

4.2.8 **Paragraph 61** sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be considered in establishing the amount of housing to be planned for.

4.2.9 In terms of affordable housing **paragraph 64** states provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

Identifying Land for Homes

- 4.2.10 To this end, **paragraph 66** states that strategic plan-making authorities should have a clear understanding of the land available in their areas through the predation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, considering their availability, suitability, and likely economic viability. Planning policies should identify a supply of:

- a) *Specific, deliverable housing sites for years one to five of the plan period, and*
- b) *Specific deliverable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the plan.*

- 4.2.11 **Paragraph 69** then goes on to stress that small and medium sized sites can make an important contribution to meeting housing requirements of an area, and are often built out relatively quickly. Therefore, to promote the development of a good mix of sites local planning authorities should support the development of windfall sites through their policies and decisions.

Maintaining Supply and Delivery

- 4.2.12 To maintain delivery and supply, **paragraph 74** requires local planning authorities to 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. This supply should include a buffer of between 5% and 20%, which varies depending on the rate of past delivery.

Rural Housing

- 4.2.13 **Paragraph 79** states 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.
- 4.2.14 **Paragraph 80** seeks to avoid the development of isolated homes in the countryside other than in limited circumstances; including where the development would re-use redundant and disused buildings and enhance its immediate setting.

Considering Development Proposals

- 4.2.15 **Paragraph 111** states development should only be prevented or refused on highways ground if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Making Effective Use of Land

- 4.2.16 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.
- 4.2.17 **Paragraph 120** states that planning policies and decisions should (amongst other things) 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.

Achieving Well Designed Places

- 4.2.18 **Paragraph 126** highlights that:

'the creation of high-quality, beautiful, and sustainable buildings and places are fundamental to what the planning and development process should achieve. 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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process'.

- 4.2.19 **Paragraph 130** states *planning policies and decisions should ensure that 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 (such as increased densities);*
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (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; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

- 4.2.20 **Paragraph 132** furthers that design quality should be considered throughout the evolution and assessment of individual proposals.

- 4.2.21 **Paragraph 134** is clear that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, considering any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).

Protecting Green Belt Land

- 4.2.22 **Paragraph 137** reinforces that

'the government attaches great importance to Green Belts, with the fundamental aim being the prevention of urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

Paragraph 138 clarifies the five purposes of Green Belt:

- (a) 'To check the unrestricted sprawl of large built up areas;*
- (b) To prevent neighbouring towns from 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'.*

Proposals Affecting the Green Belt

- 4.2.23 **Paragraph 147** states that 'inappropriate development' is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

- 4.2.24 **Paragraph 149** explains that:

'a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- (a) buildings for agriculture and forestry;*
- (b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*

- (d) *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- (e) *limited infilling in villages;*
- (f) *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- (g) *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *not have a greater impact on the openness of the Green Belt than the existing development; or*
 - *not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority'.*

4.2.25 **Paragraph 150** defines those '*certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*

- (a) *mineral extraction;*
- (b) *engineering operations;*
- (c) *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- (d) *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
- (e) *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
- (f) *development brought forward under a Community Right to Build Order or Neighbourhood Development Order'.*

Conserving and Enhancing the Natural Environment

4.2.26 **Paragraph 174** sets out how planning policies and decisions should contribute to and enhance the natural and local environment.

4.2.27 When it comes to applications that affect Areas of Outstanding Natural Beauty, **paragraph 176** is clear that great weight should be given to conserving and enhancing the landscape and scenic beauty. The scale and extent of development in these areas should be limited and due regard should be given to the conservation and enhancement of wildlife and cultural heritage.

Habitats and Biodiversity

- 4.2.28 With respect to habitats and biodiversity, **paragraph 180** says that when determining applications, local planning authorities should apply the following principles. Limb (a) states:

(a) If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

- 4.2.29 Equally proposals that conserve or enhance biodiversity to seeking net gains should be supported and encouraged.

4.2.30 ***Conserving and enhancing historic environment***

- 4.2.31 **Paragraph 197** is worded as follows:

'in determining applications, local planning authorities should take account of:

- (a) The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- (b) The positive contribution that conservation heritage assets can make to sustainable communities including their economic vitality; and*
- (c) The desirability of new development making a positive contribution to local character and distinctiveness'.*

4.3 Development Plan

Gravesham Local Plan Core Strategy (2014)

- 4.3.1 The Gravesham Local Plan Core Strategy 2014 was adopted on 30 September 2014.
- 4.3.2 Policy CS01 (Sustainable Development) states that when the Council considers development proposals it will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF and in the Boroughs Core Strategy. The Council will work with the applicant to secure the development and improve the economic, social, and environmental conditions in the area. Where there are no policies relevant or they are out of date the Council will grant permission unless material considerations indicate adverse impacts would outweigh the benefits, or that specific policies should be restricted.
- 4.3.3 Policy CS02 (Scale and Distribution of Development) states that the borough is to retain and improve the existing housing stock and to make provision for the objectively assessed need for at least 6,170 new dwellings between 2011 and 2028, with at least 363 dwellings per year for 2019/2020 – 2023/2024. The policy claims that around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt. In the rural area development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map.

- 4.3.4 Policy CS11 (Transport) asserts that new developments should mitigate their impact on the highway and public transport networks as required and the necessary transport assessments and travel plans be carried out, along with sufficient parking in accordance with the adopted parking standards.
- 4.3.5 Policy CS12 (Green Infrastructure) claims that a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife steppingstones and corridors be created, protected, enhanced, and maintained.
- 4.3.6 Policy CS14 (Housing Type and Size) states that the Council will expect new housing development to provide a range of dwelling types and sizes considering the existing character of the area and evidence of local need to create sustainable and balanced communities.
- 4.3.7 Policy CS15 (Housing Density) lays out that sites will be developed at a variety of densities dependant on the sites location and access to public transport. All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the surrounding area and that in the rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.
- 4.3.8 Policy CS18 (Climate Change) states that development will be directed to areas of low flooding risk, that surface water run-off from all new development has a no greater adverse impact than the existing use and where feasible the implementation of a Sustainable Drainage System. The Council will also seek to manage the supply of water and the affect new development will have on portable water and will aim to reduce the overall carbon footprint of the Borough.
- 4.3.9 Policy CS19 (Development and Design Principles) states that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic, and natural environment, integrate well with the surrounding local area, and meet anti-crime standards.
- 4.3.10 Policy CS20 (Heritage and the Historic Environment) claims that there will be high priority towards the preservation, protection and enhancement of heritage and historic environment as a non-renewable resource. Proposals and initiatives will be supported where the Borough's heritage assets and their setting will be enhanced and conserved.

Local Plan First Review – Saved Policies

- 4.3.11 Policy P3 (Vehicle Parking Standards) states that the Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception.

4.4 Other material considerations

Residential Layout Guidelines (adopted 1996 – amended 2020) SPG2

- 4.4.1 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.

Kent Vehicle Parking Standards (July 2006) SPG 4

- 4.4.2 This SPG supplements Policy TP3: Transport and the Location of Development and Policy TP19: Vehicle Parking Standards from the Kent and Medway Structure Plan 2006.

Gravesham Borough Council

5 Housing Need and Supply Overview

5.1 Context

- 5.1.1 Paragraph 74 of the NPPF states 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.
- 5.1.2 In the absence of an up-to-date plan, the Council's housing supply target should be based upon the Government's standard methodology.
- 5.1.3 The supply of specific deliverable sites should also include a buffer (moved forward from later in the plan period) of;
- *5% to ensure choice and competition in the market for land; or*
 - *10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
 - *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.*

5.2 Determining the Target

- 5.2.1 Paragraph 61 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. Based on the latest standardised methodology calculation, the housing need for Gravesham Borough is circa 707 dwellings per year.
- 5.2.2 This is considerably greater than both the current target and current delivery rate and represents a fundamental change in how the Council will need to approach housing applications going forward to address this stark contrast in housing numbers.

5.3 Past Delivery

- 5.3.1 The latest Housing Delivery Test results were published by the Ministry for Homes, Communities and Local Government in January 2022 and show that Gravesham achieved only 67% delivery. This performance automatically triggers the presumption in favour of sustainable development.
- 5.3.2 In terms of the ability to meet their five year housing land supply requirement, the Five Year Housing Land Supply Statement (January 2021) identifies a total 5 year supply of 3.27 years and a deficit of **1,356 homes**. Furthermore, we consider the situation has likely materially worsened since this document was published.

Table 7: Calculation of the Borough's housing land supply 2020-2025

Component	No. of Deliverable Homes (net)	No. of Years
(a) Deliverable Housing Supply	2,574	
(b) Local Housing Need Figure (plus 20% buffer)	3,930	
Housing Supply Surplus/Shortfall (a) - (b)	-1,356	
(c) Annual requirement	786	
Years Supply Equivalent Over Five Years $(a \div c)$		3.27

Extract from Five Year Housing Land Supply Statement (January 2021)

- 5.3.3 Having regard to these findings, there is a compelling case that the Council cannot demonstrate a deliverable five-year supply of housing land as required by paragraph 74 of the NPPF and the presumption in favour of sustainable development is engaged on the basis of housing policies being out of date. It is therefore vital that the development management system intervenes to take a permissive stance to development and deliver the homes that are urgently needed in the short term.

6 Planning Considerations

6.1 The Principle of Development

- 6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.1.2 For the purpose of this application, policy CS01 states that when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 6.1.3 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:
- *Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
 - *Specific policies in that Framework indicate that development should be restricted.*
- 6.1.4 In the absence of an up to date or saved conversion based policy, the second part of policy CS01 applies and regard should be had to NPPF guidance. As outlined above **paragraph 149** and **paragraph 150** of the NPPF states that certain forms of development are not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These include the re-use of buildings provided that the buildings are of permanent and substantial construction.
- 6.1.5 The proposal complies with this element of national Green Belt policy given the building is lawful and capable of conversion. The application is supported by a structural survey confirming that the building is capable of conversion. Furthermore, the appeal decision at Vine Cottage in Penshurst APP/G2245/W/17/3181949 related to the conversion of a barn to a dwelling. As part of the appeal decision, the Planning Inspector considered that the complete recladding of the whole building, underpinning, inclusion of a plinth and additional supports to the frame and roof did not amount to major reconstruction, but are just alterations. The only part of the barn that remained was the portal metal frame and ground slab but the building was still deemed capable of conversion without major re-construction. This therefore sets a clear benchmark that the current proposals and extent of structure falls patently within the scope of a building capable of conversion.
- 6.1.6 In light of this decision, it would be considered that the proposal would retain sufficient elements of the existing building to protect the character of the existing buildings.

- 6.1.7 Regard must also be had to the extent of the housing shortfall in Gravesham Borough and the delay in progressing an updated Local Plan, which is a significant material consideration for the reasons outlined in chapter 5.
- 6.1.8 The current published supply position has been highlighted and there is not a robust supply of housing land within the borough and the current shortfall is significant. Not only are policies for the supply of housing out of date, but there is significant further concern about when an up-to-date Local plan can be brought into place.
- 6.1.9 In the absence of up-to-date policies, the application must be considered in accordance with the presumption in favour of sustainable development. For decision-taking this means approving development proposals that accord with the development plan without delay given that there are no policies that seek to restrict development.
- 6.1.10 As set out above, the proposal complies with the NPPF and so the key passage in **paragraph 11** of the NPPF asserts that planning permission must be granted unless adverse consequences of doing so significantly and demonstrably outweigh the benefits. Consequently, it would now be wrong for the Council to undertake a simple balancing between positive and negative factors related to this proposal.
- 6.1.11 Until a plan is up to date, the only proposals that should not be granted permission are those that have adverse impacts which “significantly” outweigh the overall benefits of development.
- 6.1.12 This proposal provides a plethora of benefit. Of particular importance are the following:
- (1) A family home will be created in an area already characterised by low density residential uses.
 - (2) Prudent use of an underutilised but structurally sound buildings and a range of modest enhancements (i.e. ecological and visual betterment).
- 6.1.13 The proposals would cause little or no resultant harm and certainly nothing to a level that would demonstrably outweigh the benefits.
- 6.1.14 In summary, the proposal provides an excellent opportunity to create a much-needed home in an area with growing housing need. The proposal is consistent with the wider strategic objectives of the Core Strategy and NPPF. The principle of development is therefore acceptable.

6.2 Sustainability

- 6.2.1 There is a need to foster sustainable development which is the concept that underpins the Government’s planning policy.
- 6.2.2 In terms of housing, it is confirmed that housing applications should be considered in the context of the presumption in favour of sustainable development and that there are three dimensions to sustainable development, ‘economic, social and environmental’.

- 6.2.3 Socially, the proposed development would replace an underutilised building with a new home. This is particularly important in the context of the recently identified need to provide in excess of 700 new homes per year.
- 6.2.4 Consideration has been given to the environmental value of this site in terms of its landscape quality, ecology, residential amenity, land contamination, air quality, noise impact, flood risk and locational sustainability. The site is not of high ecological or agricultural potential, the site is not subject to flooding or excess impacts of noise.
- 6.2.5 In economic terms, the home would provide jobs for construction workers as well as additional spending power which can support local shops and services.

6.3 Design Concepts

- 6.3.1 **Paragraph 126** of the NPPF highlights states that 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'.
- 6.3.2 The core design concept has been to retain the integrity of the original barn complex, utilising its original structure to create an attractive living space. The external materials will be designed to reflect the local vernacular, which is varied in nature, and would result in an enhancement to the immediate setting of the area.

6.4 Flood Risk

- 6.4.1 **Paragraph 159** of the NPPF states inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- 6.4.2 According to Environment Agency Flood Risk Mapping the site falls within Flood Zone 1 which has the lowest risk of flooding. Accordingly, a Flood Risk and Drainage Assessment is not required to support this application.

6.5 Ecology

- 6.5.1 Greenlink Ecology have prepared a Preliminary Ecological Appraisal.
- 6.5.2 The report is provided in full, but in summary the potential presence of legally protected/notable species was considered, including bats and breeding birds. It was concluded that there is no significant risk of potential impacts to bats and so mitigation measures are not recommended for bats.
- 6.5.3 To avoid the seasonal risk of impacts to breeding birds, in relation to the buildings and potentially suitable habitats (i.e. sections of hedgerow and tree), mitigation measures are recommended.
- 6.5.4 Although there are designated site for nature conservation in the local area, there is no perceived risk of impacts as a result of the proposed works and therefore, no need for mitigation measures.

6.5.5 In accordance with the NPPF, recommendations have been made for ecological enhancement measures to benefit local biodiversity, in particular habitats, bats and breeding birds.

6.5.6 Overall, there are no known overriding ecological constraints that would prevent the proposed works going ahead, subject to the recommendations made in this report being correctly implemented.

6.6 Transport

6.6.1 Vehicular access to the site exists via the established access track on Brimstone Hill.

6.6.2 The proposed development would not be expected to generate significant additional vehicle trips and would not demonstrably impact upon local highway capacity, amenity or operation nor would it have any severe impact on the local highway network in line with **paragraph 111** of the NPPF.

6.6.3 Parking and turning area for the new dwelling will be provided via a private forecourt to the front of the plot. Two car parking spaces are provided in accordance with the KCC Interim Guidance Note 3 (IGN3) vehicle access parking standards for residential development in rural locations.

6.7 Impact on Residential Amenities

6.7.1 The wider surrounding area characterised by a wide variety of rural house types and sizes. Whilst neighbours are situated to the north and south of the site, the existing layout is such that the insertion of the proposed openings would not result in any loss of privacy or overlooking that would result in harm.

6.8 Developer Contributions

6.8.1 In accordance with **paragraph 57** of the NPPF, planning obligations should only be sought where they meet all of the following tests:

- *Necessary to make the development acceptable in planning terms;*
- *Directly related to the development; and*
- *Fairly and reasonably related in scale and kind to the development*

6.8.2 National Planning Practice Guidance also advises that there are specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from non-major development.

7 Summary and Conclusion

7.1 Summary

- 7.1.1 This statement has been prepared on behalf of Mr A Thompson in respect of a full planning application for the conversion of a disused agricultural barn to a new 3-bedroom dwelling with associated parking, amenity area and landscaping.
- 7.1.2 The barn complex is situated within the Metropolitan Green Belt ('the Green Belt') and so careful consideration has been given to the design approach to ensure the development would not result in any adverse impacts to openness.
- 7.1.3 In principle, the re-use of an existing building is an 'appropriate' form of development within the countryside as defined by both the National Planning Policy Framework ('NPPF') and the Development Plan.
- 7.1.4 From a design perspective, the current barn complex is structurally sound, capable of conversion and of no architectural or historic merit.
- 7.1.5 The ability to deliver a new home in the short-term is extremely important given the extent of the housing land supply shortage in Gravesham Borough. Indeed, based on the Government's standard methodology for calculating housing need, the annual requirement for Gravesham is 707 dwellings – nearly double the current 363 house per year target contained within the out-of-date Core Strategy. Furthermore, the latest Housing Delivery Test results require the Council to automatically apply the presumption in favour of sustainable development owing to recent under delivery.
- 7.1.6 The importance of housing need and supply is also reflected in national planning policy, which requires local authorities to provide a five-year housing land supply. Where authorities are unable to do so, circumstances significantly tilt decision making in favour of the grant of permission.
- 7.1.7 Considering the above context, we acknowledge that there are sensitive matters to be balanced. However, the proposals are well-informed, and we firmly consider that the circumstances justify this sensitively planned conversion.

7.2 Conclusion

- 7.2.1 Taking all of the above into consideration, we consider the proposal accords with the development plan. Furthermore, wider material considerations support the proposed conversion. We therefore respectfully request that planning permission be granted without delay.