



# Delegated Report

## Prior Approval Application

**Planning Application No:** 20251206

**Location:** Jeskyns Farm Jeskyns Road Cobham Gravesend

**Description:** Application to determine if prior approval is required for a proposed purpose-built facility for Agricultural or Forestry use for the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) - Schedule 2, Part 6.

**Applicant:** Mr Duncan Slade

**Site Visit Date:** Desktop Assessment

### Submitted Documents/Plans

Application Form  
Location Plan  
Site Plan  
Floor Plan  
Appendix 3 – Floor Plans and Visuals  
Supporting Planning Statement

### Relevant Planning History

| Reference | Description                                                                                                                                                                                                                        | Decision                    | Decision Date |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|---------------|
| 20230967  | Determination as to whether prior approval is required for the erection of a purpose-built facility to support the operational forestry work of Forestry England in managing this site and surrounding parts of the forest estate. | Prior Approval Not Required | 13.10.2023    |

### Consultations, Publicity and Representations

#### Consultees

*Kent Police Designing Out Crime Team*

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. We recommend the applicant review current site boundary treatments. We advise boundary treatments to be a minimum of 1.8m in height with any support beams facing inwards, any gates to a rear/ side access must also be securely lockable from both sides. If a boundary is made up of hedging, we require the hedges be dense, and where possibly prickly, with a secondary layer for security purposed such as a mess fence to avoid trespassers.
2. We recommend natural surveillance for parking areas. As a secondary layer of security, we would also recommend CCTV be installed to further monitor use. If deemed appropriate, we also strongly recommend gating access roads/ parking areas to prevent nuisance parking and misuse out of hours.
3. Defined pedestrian routes to/ from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.
4. If cycle storage is proposed, this must be well lit and with optimal natural surveillance. We recommend the sold secure or SBD recommended products for additional security.
5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g., a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. we recommend that a suitable lighting policy is installed to ensure that the units and staff

Kent Police : Form No. 3058c rev 12/05 v2

[https://kpep.sharepoint.com/teams/K-DesigningOutCrimeTeam/Shared Documents/General/1 CPDA lanning Applications/Gravesend/\(G-439\) Jeskyns Farm Jeskyns Road Cobham Gravesend Kent DA12 AL/DOCO Response.docx](https://kpep.sharepoint.com/teams/K-DesigningOutCrimeTeam/Shared Documents/General/1 CPDA lanning Applications/Gravesend/(G-439) Jeskyns Farm Jeskyns Road Cobham Gravesend Kent DA12 AL/DOCO Response.docx)

have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.

6. We highly recommend installing CCTV, especially covering access points on to the site and the unit proposed, any parking areas, storage areas containing high-value equipment, entrance to the locker room, areas with limited natural surveillance such as rear of the unit, bin stores if proposed, any proposed loading/ unloading areas, CCTV must not infringe any lighting plan.
7. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas.
8. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.
9. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.
10. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.
11. Bin Stores associated with the proposal must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the building that it can be used as a climbing aid into the building when closed.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant,

machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

## Planning Policies

The application is made under the Town and Country Planning (General Permitted Development) Order 2015 (as amended) Schedule 2 Part 6. The test as to whether prior approval is required falls under the criteria in this part. The development plan policies are not relevant.

## Analysis

This application is made under the Town and Country Planning (General Permitted Development) Order 2015 (as amended) Schedule 2 Part 6 and the tests are whether or not prior approval is required as to the siting, design and external appearance of the buildings and in the first instance whether the buildings as proposed are in any event permitted development or whether planning permission is required.

The site is within the Green Belt, but Green Belt policy in the NPPF (2024) indicates that one of the exceptions to inappropriate development is if new buildings are for agriculture and forestry.

The application relates to a holding of over 3000 hectares of land known as the Thames Chase Beat as identified in the Planning Statement provided, which is used for commercial production of sustainable timber products which is an agricultural use.

It is noted that this is an alternative to the scheme proposed under planning ref 20230987. Essentially, this application would alter the siting of the proposed building.



Proposed under 20230987



Proposed by this application

The first test is whether the buildings would fall within the provisions of Article 3 of and Part 6 of schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015, as amended.

Reasonably necessary for the purposes of agriculture within that unit.

The most relevant section within the provisions of Article 3 of and Part 6 of schedule 2 to the Town and Country Planning (General Permitted Development) Order 2015, as amended would be Class E Forestry developments. The relevant sections are included below for reference.

*Class E – forestry developments*

**Permitted development**

*E. The carrying out on land used for the purposes of forestry, including afforestation, of development reasonably necessary for those purposes consisting of—*

- (a) works for the erection, extension or alteration of a building;*
- (b) the formation, alteration or maintenance of private ways;*
- (c) operations on that land, or on land held or occupied with that land, to obtain the materials required for the formation, alteration or maintenance of such ways;*
- (d) other operations (not including engineering or mining operations).*

**Development not permitted**

**E.1** Development is not permitted by Class E if—

- (a) it would consist of or include the provision or alteration of a dwelling;
- (b) the height of any building or works within 3 kilometres of the perimeter of an aerodrome would exceed 3 metres in height;
- (c) any part of the development would be within 25 metres of the metalled portion of a trunk road or classified road; or
- (d) any building for storing fuel for, or waste from, a biomass boiler or an anaerobic digestion system would be used for storing waste not produced by that boiler or system or for storing fuel not produced on land which is occupied together with that building for the purposes of forestry.

Whilst the proposal to erect a building for operational development related to forestry use may fall under class E (a), for it to be permitted under this legislation it would require compliance also with the requirements under E.1 (a,b,c & d). The development would comply with a, b and d based on the information supplied. Jeskyns Road which is located to the south of the site is a C classified , metalled road. Although the building and silos are located over 25 metres away. No development including hardsurfacing can be undertaken within 25 metres of that road and be compliant. However, the hard surfacing would be located to the parking areas only and not the existing drive and so would comply with this requirement. The development would therefore be permitted subject to compliance with the Condition under E.2 as follows. D

## Conditions

E.2—(1) Subject to sub-paragraph (3), development consisting of the erection of a building or the extension or alteration of a building or the formation or alteration of a private way is permitted by Class E subject to the following conditions—

- (a) the developer must, before beginning the development, apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting, design and external appearance of the building or, as the case may be, the siting and means of construction of the private way;
- (b) the application must be accompanied by a written description of the proposed development, the materials to be used and a plan indicating the site together with any fee required to be paid;
- (c) the development must not begin before the occurrence of one of the following—
  - (i) the receipt by the applicant from the local planning authority of a written notice of their determination that such prior approval is not required;
  - (ii) where the local planning authority give the applicant notice within 28 days following the date of receiving the applicant's application of their determination that such prior approval is required, the giving of such approval;
  - (iii) the expiry of 28 days following the date on which the application under sub-paragraph (1)(b) was received by the local planning authority without the local planning authority making any determination as to whether such approval is required or notifying the applicant of their determination;
- (d) where the local planning authority give the applicant notice that such prior approval is required, the applicant must—
  - (i) display a site notice by site display on or near the land on which the proposed development is to be carried out, leaving the notice in position for not less than 21 days in the period of 28 days from the date on which the local planning authority gave the notice to the applicant;
  - (ii) where the site notice is, without any fault or intention of the applicant, removed, obscured or defaced before the period of 21 days referred to in paragraph (d)(i) has elapsed, the applicant is treated as having complied with the requirements of that sub-paragraph if the applicant has taken reasonable steps for protection of the notice and, if need be, its replacement;
- (e) the development must, except to the extent that the local planning authority otherwise agree in writing, be carried out—
  - (i) where prior approval is required, in accordance with the details approved;
  - (ii) where prior approval is not required, in accordance with the details submitted with the application; and
- (f) the development must be carried out—
  - (i) where approval has been given by the local planning authority, within a period of 5 years from the date on which approval was given,
  - (ii) in any other case, within a period of 5 years from the date on which the local planning authority were given the information referred to in paragraph (b).

(2) In the case of development consisting of the significant extension or the significant alteration of the building such development may be carried out only once.

(3) Sub-paragraph (1) does not preclude the extension or alteration of a building if the building is not on article 2(4) land except in the case of a significant extension or a significant alteration.

This application falls under the requirement of condition E.2(a). An assessment is therefore required as to whether Prior Approval would be required as to the siting, design and external appearance of the building.

## Siting

New buildings for agricultural purposes are not inappropriate in the green belt and in this location it is not considered that the proposal would harm the overriding open rural character or natural beauty of the landscape. In these circumstances no objections are raised to the proposed siting, it would be set away from the woodland. From the main public viewpoints from Jeskyns Road and Henhurst Road, there appears to be limited visibility of the site as a result of nearby dwellings and planting interrupting the view.

## Design and External Appearance of the building

The proposed building is well design to fit in with the landscape, using units clad with larch timber and corrugated sheeting to the roof. Whilst timber framed windows, single glazed are preferred in rural areas, the site is set away from the street with limited visibility and there is evidence of upvc windows on nearby buildings in the area.

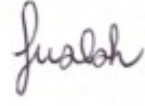
It is considered that the design and materials would sit well within this setting and would not be harmful.

### **Conclusion & Recommendation**

The development is considered to be permitted development and the developer has applied for a determination as to whether prior approval will be required as to the siting, design and external appearance of the building. The proposed development has a traditional style of design and materials for the external walls, and the siting is considered acceptable, in a set back position with limited visibility from the wider street perspective.

The recommendation is that Prior Approval is not Required.

(For detailed conditions and informatives, see draft Decision)

|                      |                                                                                   |                     |                                                                                     |
|----------------------|-----------------------------------------------------------------------------------|---------------------|-------------------------------------------------------------------------------------|
| <b>Case Officer:</b> | Mrs Lisa Fisher                                                                   | <b>Team Leader:</b> | Mrs Faye Walsh                                                                      |
| <b>Signed:</b>       |  | <b>Signed:</b>      |  |
| <b>Dated:</b>        | 18th December 2025                                                                | <b>Dated:</b>       | 19 December 2025                                                                    |