



Delegated Report

Full Planning Application

Planning Application No:	20230678
Location:	Land South of Two Gates Hill, Town Road, Higham, Gravesend
Description:	Use of land for the stationing of 20 caravans for occupation by seasonal agricultural workers.
Applicant:	Mr T Chambers
Site Visit Date:	25 July 2023

Submitted Documents/Plans

Application form
Cover letter dated 23 June 2023
Planning Statement (Ref. 3877.SC)
Drawing no. 01 (Site Location Plan)
Drawing no. 02 (Existing Block Plan)
Drawing no. 03 (Proposed Block Plan)
Drawing no. 04 (Proposed Caravan Floor Plan and Roof Plan)
Drawing no. 05 (Proposed Caravan Elevations)

Relevant Planning History

Reference	Description	Decision	Decision Date
20210645	Erection of general purpose agricultural storage building.	Permitted	15.07.2021
20201290	Use of land for the stationing of x28 caravans for occupation by seasonal agricultural workers, 8 caravans to be occupied all year round with 20 occupied in main season.	Temporary permission	08.03.2021
20200143	Use of the land for the stationing of 4 x caravans for occupation by seasonal agricultural workers all year round; the stationing of 15 x caravans for occupation by seasonal agricultural workers from 01 March to 31 October and the unoccupied storage of the 15 caravans over winter (part retrospective)	Temporary permission	06.04.2020
20190385	Use of the land for the stationing of 4 x caravans for occupation by seasonal agricultural workers all year round; the stationing of 16 x caravans for occupation by seasonal agricultural workers from 01 March to 31 October and the unoccupied storage of the 16 caravans over winter.	Temporary permission	31.07.2019

20191007	Application for Certificate of Lawful Development in respect of retention of polytunnels.	Granted	14.01.2020
20160071	Erection of general purposes agricultural storage/cold store building and hard surface yard area.	Permitted	27.05.2016

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS07 – Economy, Employment and Skills
- CS11 – Transport
- CS12 – Green Infrastructure
- CS19 – Design and Development Principles

Saved Policies in the Gravesham Local Plan First Review (1994)

- T1 – Impact of Development on Highway Network
- P3 – Vehicle Parking Standards
- C10 – Agricultural dwellings

Paragraph 33 of the NPPF (2023) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- 2 – Achieving sustainable development
- 6 – Building a strong, competitive economy
- 9 – Promoting sustainable transport
- 12 – Achieving well-designed places
- 13 – Protecting Green Belt land
- 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG 4 - KCC Parking Standards (2006)
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Internal Consultees

GBC Environmental Protection

We have no comments with regards to this application.

GBC Highways

Generally, the proposal appears to be acceptable, the proposed provision of car parking would reflect the

same caravan to parking place ratio already in use at the site. However, some element of cycle parking should also be provided. Cycles could either be provided on a communal basis, or secure parking could be provided for the work force to park their own cycles. In the circumstances it not possible to predict the exact need, so it is suggested that provision for 6 communal cycles or 10 employee-owned cycles would be a reasonable starting point, with provision being adjusted to accommodate a higher demand if necessary. The cycle area should be secured and covered.

I do have concerns regarding the foul drainage, as it currently states in the application form it is unknown. If the site is connected to mains drainage I have no objections, but any package treatment plant or septic tank may require upgrading and will require access by a tanker to remove sludge at intervals, so foul drainage should be conditioned.

External Consultees

Kent Fire and Rescue Service

I can confirm that on this occasion it is my opinion that the emergency access requirements for the Fire and Rescue Service under the above Act appear to have been met.

Fire Service access and facility provisions are also a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

KCC Biodiversity

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that the proposed development has limited potential to result in ecological impacts. As such, we are satisfied that there is no requirement for an ecological survey to be carried out at this time.

Developer Contributions may need to be provided due to the increase in dwellings within the zone of influence of a Special Protection Area.

If planning permission is granted, we advise that the conditions below are attached.

North Kent Sites

The development includes proposals for accommodation (albeit seasonal) within the zone of influence (6km) of the Thames Estuary and Marshes Special Protection Area, Medway Estuary and Marshes Special Protection Area and the respective/associated Wetland(s) of International Importance under the Ramsar Convention (Ramsar Site). Gravesham Borough Council will need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS). Where workers are expected to be present within the caravans between October and March, mitigation will be required for additional recreational impacts on the designated sites and adequate means must be in place to secure the mitigation before first occupation.

A decision from the Court of Justice of the European Union has detailed that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a full Appropriate Assessment is needed under the Habitats Directive. Therefore, we advise that due to the need for the application to contribute to the North Kent SAMMS, there is still a need for an appropriate assessment to be carried out as part of this application.

Biodiversity Net Gain

Under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 and paragraphs 174 and 180 of the National Planning Policy Framework (NPPF) 2021, biodiversity should be maintained and enhanced through the planning system. If planning permission is granted, we advise the following

condition is attached:

Prior to completion, details of how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include native species planting (e.g., hedgerow planting). The approved measures will be implemented and retained thereafter.

Lighting and Biodiversity

Artificial lighting has been proven to significantly impact on the behaviour of insects, birds, bats, and other nocturnal mammals. This is relevant to both retained and created/enhanced areas of vegetation. If planning permission is approved, we advise the avoidance of increased artificial lighting impacts on retained or planted vegetation. This can be secured if relevant through an appropriately worded condition if planning permission is granted. Suggested wording:

No external lighting, whether temporary or permanent, shall be placed or erected within the site unless details are submitted to and approved in writing by the local planning authority. Any details to be submitted shall be in accordance with the Institute of Lighting Engineers Guidance Notes for the Reduction of Obtrusive Lighting, GN01, dated 2005 (and any subsequent revisions), and shall include a layout plan with beam orientation and a schedule of light equipment proposed (luminaire type; mounting height; aiming angles and luminaire profiles). Any details to be submitted shall also follow the recommendations within the Bat Conservation Trust and Institution of Lighting Professionals 'Guidance Note 8: Bats and Artificial Lighting 08/18' (or subsequent updates) Bats and artificial lighting in the UK document produced by the. The development shall thereafter be carried out in accordance with the subsequently approved details and maintained as such thereafter.

KCC Heritage

The site of the proposed development lies within an area of high archaeological potential.

Cultivation of the land may have had an impact on any below-ground archaeological remains at the site, but in order to provide advice about the potential archaeological impacts and what mitigation might be necessary, I would need to know what ground works are proposed for the location of the caravans, access, parking and services.

Would it be possible to ask the applicant's agent what groundworks are proposed?

KCC PROW

I can confirm that I do not have any objections to the above planning application at Two Gates Hill. Public Right of Way Footpath NS149 lays to the east of the proposed site.

The granting of planning permission confers no other permission or consent on the applicant. It is therefore important to advise the applicant that no works can be undertaken on a Public Right of Way without the express consent of the Highways Authority.

Neighbouring properties

The application has been advertised by individual neighbour letters to 19 properties, and on site. The overall consultation period expired on 4 August 2023.

No letters of representation have been received.

Medway Council, Higham and Cliffe Parish Councils, and Local Ward Councillors were also consulted and no responses were received.

Officer's Analysis

Procedure Note

It should be noted that the NPPF was updated towards the end of the application process for this proposal. As such, consultee comments refer to the 2021 version of the NPPF. The references have been double checked and the recent amendments to the NPPF have not altered those parts referencing the 2021 version.

Proposal

This application seeks permission for the use of land for the stationing of 20 caravans for occupation by seasonal agricultural workers.

The application site is located within Little Mockbeggar Farm to the west of Town Road. The proposed caravan site will be located to the west of the existing caravan site and on the southern side of an internal circulatory farm track. They will replace the existing polytunnels. An area of amenity space and car parking would be set out to the north of the proposed caravans.

Proposed Site Location Plan



The submitted Planning Statement sets out that the application is in part required 'due to the impending need to relocate units from Mockbeggar Farm to the east of Town Road', which is owned by a different landowner.

The caravans will typically be occupied by 2-4 persons and will have 2 bedrooms, a bathroom, a kitchen and a lounge. Freezers and laundry equipment will be available in two portable cabins for shared use as on the site opposite. Existing Calor Gas tanks will supply gas to the proposed additional caravans.

There will be a break in the residential use of each caravan per calendar year. Occupation of 8 caravans over the winter months would be in rotation. Retaining the caravans in the same positions on the site all year will avoid the need to move them at the end of October and return them at the end of February each year (as could be done under permitted development). The 20 caravans will provide accommodation for up to a maximum of 80 seasonal workers employed on Little Mockbeggar Farm.

Extract from Proposed Block Plan



Background

Most recently, under application 20200143 a temporary permission was granted for a caravan site immediately to the north-east of the application site. This site comprises 19 caravans in total, with 4 occupied all year round, and 15 occupied seasonally between 1 March and 31 October. Subsequently, temporary permission was granted under application 20201290 for the stationing of 28 caravans, 8 with caravans to be occupied all year round.

Principle Issues

Paragraphs 84 and 85 of the NPPF 2023 relate to supporting a prosperous rural economy. The development and diversification of agricultural rural businesses should be enabled, and it should be recognised that proposals to meet local business needs may be required in such areas, in locations that are not well served by public transport. It will be important, however, to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by

public transport).

Policy CS07 of the Core Strategy 2014 also supports proposals that promote the appropriate expansion and diversification of the rural area economy. Policy CS02 supports development outside rural settlements, including proposals to diversify and maintain the rural economy, where it is compatible with national policies for protecting the Green Belt and policies in this plan.

National and local policy is generally supportive of such rural business development and expansion, subject to compatibility with policies for protecting the Green Belt and other policies in the development plan.

The application site lies in the countryside, in the Green Belt and in the Higham Arable Farmlands Landscape Character Area. The principle of the proposed development has already been established by previous permissions on this site. Taking into account the site designations, the main issues for consideration in the determination of this application are as follows:

- Appropriateness of development in the Green Belt
- Impact on openness and encroachment into the countryside
- Rural economy
- Landscape character
- Residential amenity
- Highways and parking
- Ecological impact on the Thames Estuary and Marshes Ramsar/SPA.

Appropriateness of Development in the Green Belt

The application site lies is part of Little Mockbeggar Farm, which is used for soft fruit production under polytunnels, exclusively growing strawberries.



Paragraph 137 of the NPPF 2023 highlights the importance of the Green Belt and its role in preventing urban sprawl and keeping land permanently open. As the site lies in the Green Belt there is a need to establish whether the proposal amounts to inappropriate development.

Paragraph 148 of the NPPF 2023 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Local Planning Authorities should regard the construction of new buildings as inappropriate in the Green Belt (paragraph 149 of the NPPF 2023). However, there are exceptions to this which, as in the case of this proposal, include:

(a) buildings for agriculture and forestry.

The proposal relates to the operation of an existing agricultural holding but comprises the use of the land for the stationing of caravans rather than a built development specifically for agriculture, and therefore paragraph 149 is not considered relevant in this case.

However, paragraph 150 of the NPPF 2023 sets out that material changes in the use of land can be appropriate development in the Green Belt, provided that they preserve its openness and do not conflict with the purposes of including land within it. Paragraph 138 of the NPPF 2023 describes the five purposes of the Green Belt:

- 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.

In this case (c) is considered the most relevant, regarding the encroachment of the proposal on the countryside. Openness and encroachment matters will be considered further below.

Impact on Openness and Encroachment into the Countryside

The Courts have held that the impact on openness has both a spatial and visual dimension and it is a matter of planning judgement as to whether the proposal will result in (any) harm to openness.

Paragraph 137 of the NPPF 2023 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and permanence. Paragraph 001 of the Planning Practice Guidance 2019 on Green Belts looks to assess the impact of a proposal on the openness of the Green Belt by taking into account the spatial and visual aspects of a development, its duration and remediability, and the activity levels generated.

The proposed development would result in the stationing of 20 caravans for accommodating seasonal agricultural workers on a Green Belt site; the application proposal, by its nature, would involve a form of development at the application site that would erode the openness of the Green Belt.

However, the openness of the Green Belt in this location has already been eroded by the lawful presence of polytunnels granted in 2020, which cover large parts of the farm and have clearly encroached over the countryside, with no restrictions on their use. The caravans would replace existing polytunnels, and whilst it is considered that the proposed use of the land for caravans would involve another expanse of man-made structures in this rural location, encroachment over the countryside has already occurred in this location, and openness is already clearly impacted. To some extent, caravans could improve openness in this location as there would be more space around and between them compared to the polytunnels.

Nevertheless, the proposed number of caravans would spread such development further across this farm site, and would result in it having a more residential, semi-urban appearance where currently the land is clearly agricultural, even with the polytunnels. With the proposed additional 20 caravans, the number of caravans at this site would total 67, which is an undoubtedly high number and would bring the number of caravans in line with the size of the site across Town Road. High numbers of caravans would have the potential to change the character of the site.

It is noted that the caravans would be brought over from the site across Town Road, and that the existing caravan numbers serving Little Mockbeggar Farm at least would not be changing, albeit some of them would be in the proposed new location.

The extent of development at the Little Mockbeggar Farm site is constrained by triangular shape of the site and the roads that bound it; Town Road to the east, Lower Rochester Road to the south and Two Gates Hill to the north. This helps restrict the spread of the farm-related development further into the countryside and means that the proposed caravans would only be seen within the context of this existing farm site. The caravans would be well screened by existing polytunnels and vegetation on the site boundaries. Increasing native planting on the southern site boundary would help fill any gaps in the hedgerow and could be conditioned. This would further limit and localise any visual impact on openness.

In spatial terms, openness has already been lost by the unrestricted presence of the polytunnels; the stationing of the proposed caravans would not worsen this existing impact. As before, a temporary permission, along with restrictions about the use of the caravans and their removal when no longer required could be conditioned, which would allow future assessment and control over their impact.

Altogether, due to the presence of the existing polytunnels, and the limited spatial and visual effects of the proposal, the impact on openness and encroachment into the countryside from the proposed caravans would be fairly negligible. On this basis, it is considered that as there is no additional harm to openness or further encroachment, the proposal would be in line with the requirements of paragraph 150 of the NPPF 2023 and Policy CS02 of the Core Strategy 2014 and would therefore amount to appropriate development in the Green Belt.

As stated above, the total number of caravans on this site is understood to be necessary serve the required workforce for this site (this will be considered further below). There would potentially be concerns about the impact of any additional caravans in the future on the character of the site.

Rural Economy

There are a number of other relevant policies to consider in the determination of this application that add weight to the support of the proposal. Paragraph 80 (a) of the NPPF 2023 states that isolated homes in the countryside should be avoided unless specific circumstances apply; in this case, if there is an essential need for a rural worker to live permanently at or near their place of work in the countryside.

Saved Policy C10 of the Local Plan 1994 also provides criteria by which applications for agricultural dwellings can be considered. It states that favourable consideration will only be given where there is an overriding case of need and when no satisfactory alternative is available. It is recognised that paragraph 80 of the NPPF 2023 and saved Policy C10 of the Local Plan 1994 relate to permanent agricultural dwellings; however, the criteria can also be applied in the consideration of this application.

It is appreciated that saved Policy C10 of the Local Plan 1994 pre-dates the NPPF 2023, and therefore the weight attached to it must be considered carefully. Greater weight should be given where the approach is consistent with paragraphs 80 and 149 of the NPPF 2023. Agricultural workers' dwellings are not one of the exceptions listed in paragraph 149 and 80 as considered above; they are inappropriate development in the Green Belt. However, paragraph 80 does allow for housing for rural workers where there is an essential need. As such, saved Policy C10 is broadly in line with the NPPF 2023 and therefore should be afforded weight.

Policy CS07 of the Core Strategy 2014 relates to economic development, and states that in the rural economy, proposals that promote expansion and diversification will be supported. This is endorsed in paragraph 84 of the NPPF 2023, which supports a prosperous rural economy through the development and diversification of agricultural rural businesses.

In considering the proposal and the application of these policies, it is necessary to discuss the need for the proposed development at Little Mockbeggar Farm and the possibility of alternative accommodation elsewhere.

Need

The submitted Planning Statement does not set out a 'special circumstances' argument but does assert that the proposal is necessary for the efficient and effective operation of this agricultural business, without which viability may be threatened. The farm serves as the storage/packing and distribution base for all the production from the land in north Kent that the farming operation owns and leases. With this and the cultivation on the site within the polytunnels, the site provides employment for around 200 workers.

The siting of the caravans at the site, albeit moving them from one side of Town Road to the other, will provide space for workers to be accommodated on site. This accommodation will serve a significant proportion of the total Little Mockbeggar workforce. The type of accommodation proposed is sought by the best seasonal agricultural workers who are considered to be a valuable and reliable source of labour, which is essential for the operation of the farm business. Good quality on-site accommodation will help the farm business to secure high quality labour. It should be noted that there is now a shortage of labour, so the

business needs to compete with other farms also looking for labour.

The Planning Statement also goes on to say that removing caravans can result in damage to the caravans and farm surfaces and can cause disruption and harm to local traffic and the local road network.

The Statement asserts that the proposal is in line with the aspirations of the NPPF 2023 in Section 6 to support a prosperous rural economy, particularly paragraph 84, which states that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas and the development and diversification of agricultural businesses.

The Statement sets out that the proposed caravan site is enclosed and screened and therefore the impact on the openness of the Green Belt, and on landscape and visual amenity, will be limited. It is also important to consider the impermanent nature of the structures and that they will only be kept on the land for as long as they are needed by the farm and removed when no longer needed. It is also requested that it be considered that the caravans would be able to be stationed on the land lawfully for the main season under permitted development, and that there are significant advantages of keeping them in situ rather than moving them away and then back onto the site every year.

Under the previous application 20201290 which proposed the stationing of caravans at the site, comments were sought from the Council's Agricultural Advisor at the time. These are worth re-iterating here:

The applicants, based at Oakdene Farm, Langley, are large-scale established Kentish fruit growers, mainly producing soft fruit, utilising in total some 420ha of owned or rented land in various locations.

The land they farm at Higham is understood to extend to some 45 ha (17 ha owned, 28 ha held on a long lease at the neighbouring Mockbeggar Farm, just to the east), virtually all of which is used for cropping under polytunnels. The Mockbeggar Farm site includes a camp of 20 caravans for the applicants' workers.

To the west, a further 20ha for polytunnel cropping is rented at Scadbury/Hazel Farm, Southfleet, where there are currently no workers' caravans. Further west again, the applicants rent 159ha at Sutton at Hone (Homefield Farm) which includes another seasonal workers' caravan site purely to serve that farm.

The statement support of the current application explains that its purpose is to enable the applicants to house up to 100 more workers for the period 01 March to 31 October in any year, and retain the caravans on site out of season, 20 unoccupied and 8 occupied (in rotation) by a residual workforce of 20, undertaking maintenance and new planting work. Occupants would only work at Little Mockbeggar Farm where production is being switched from mixed cropping to wholly intensive strawberry production. The additional caravans will assist alleviating the daily transportation of workers from other sites outside the area to service the enterprise (last summer some 140 workers had to be brought in each day).

As you are aware, temporary workers' caravan accommodation can be utilised as "permitted" development on a seasonal basis. Planning consent is required, however, if the units concerned are left on site throughout the year, and thus effectively stored there out of season when vacant, or if the accommodation is sought for a worker year-round.

It is common now for fruit and vegetable farms in Kent, and across the UK as a whole, who rely heavily upon casual workers (usually from abroad) to seek, and obtain, consent to leave "seasonal" caravans for workers on site all year round, subject to suitable conditions typically including requirements as to keeping a register of occupancy, and agreed periods of occupancy/vacancy in any one year, without continuous year-to-year occupation. This avoids the costs and upheaval (and traffic impact) of having to move such units back and forth off the site.

It is clearly far preferable for the necessary workers to be accommodated, on, or relatively near, the production base, (in this case the polytunnels at Cliffe Woods) so as to minimise journeys to and fro.

In conclusion, as with GR/20200143, the proposal appears to be designed to secure and retain a sufficient

number of caravans of a suitable standard to attract, and properly accommodate, the required workforce at this intensive fruit production holding. Following the Brexit vote it has become more difficult to engage such staff.

Clearly with any planning application of this type, the specific siting of seasonal workers' caravans needs to be weighed against the suitability of the particular location, having regard to other planning considerations. That said, I would imagine the ability to site caravans here for seasonal use in any event, under the provisions of the GPDO, would be an important material consideration.

Circumstances have not changed with regards to the need for accommodation for agricultural workers at this site. As before, due to the excessive cost and lack of suitable alternative accommodation close to the application site, it is considered that the proposed caravans would be the only viable means to accommodate the required seasonal agricultural workers.

Taking the above into account, it is considered that there would be a functional need for the proposed development at this agricultural operation. As such, the proposal would be in line with the requirement of paragraph 80 (a) of the NPPF 2023, Policy CS07 of the Core Strategy 2014, and saved Policy C10 of the Local Plan 1994.

Fallback Position

Utilising permitted development rights, the applicant could station any number of seasonal workers caravans at the application site without the need for planning permission. However, this fallback position has a limited relevance, as such caravans could not be located at the site all year round.

Nevertheless, the impact of any number of caravans located on Green Belt land for seven months of the year would inevitably cause harm to openness and landscape character. Therefore, there would be some benefit in approving this proposal and imposing planning conditions that would mitigate potential adverse effects and any other harmful impacts associated with an uncontrolled seasonal caravan use. In addition, permitted development rights for seasonal workers caravans at the application site can be removed, in order to preclude the uncontrolled future expansion of the site. This is also an important material consideration in the assessment of this application.

Conclusion on Green Belt Issues

The proposed development is considered to be in line with Green Belt policy (specifically paragraph 150 of the NPPF 2023 and Policy CS02 of the Core Strategy 2014) and would therefore be appropriate development in the Green Belt. This is due to the impact from the presence of existing polytunnels on the site and the resultant lack of harm to openness from their replacement with caravans, together with no further encroachment into the countryside.

Added to this is the clear policy support for the rural economy, and the demonstrable need for caravans to accommodate the agricultural workers at this farm, which are indeed already present at Mockbeggar Farm over the road.

Landscape Character and Appearance of the Area

Policy CS19 of the Core Strategy 2014 requires that new development is well designed and respects the character and appearance of surrounding area. The application site is located in the Higham Arable Farmland Landscape Character Area and as such, Policy CS12 of the Core Strategy 2014 is also relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment (LCA) will be taken into account in determining applications.

In relation to the Higham Arable Farmlands Landscape Character Area, the LCA states that the overall condition of the landscape is poor and that it has moderate sensitivity. It recommends that the landscape

elements in poor condition should be restored, whilst safeguarding the character area as a prominent landscape feature within the wider landscape.

The proposed development would result in the application site having a residential, semi-urbanised appearance. The caravans would be out of character with the natural, rural surroundings and would appear incongruous. However, it is noted that the application site is largely surrounded by fields populated with polytunnels, which although are agricultural features, do cover the open fields and have an unnatural, man-made appearance. The polytunnels, together with additional planting on the southern site boundary (which can be conditioned) and the existing trees and vegetation on the northern and eastern boundaries, would provide screening for the proposal and as such, it would not be widely visible in the surrounding countryside.

Overall, provided that further planting and the retention of the existing boundary vegetation is controlled by condition, it is considered that the proposed development would not be significantly detrimental to visual amenity or landscape character and would be in line with the requirements of Policies CS12 and CS19 of the Core Strategy 2014.

Residential Amenity

The NPPF 2021 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 130f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land, and avoid adverse environmental impacts.

Future Occupiers

The proposed caravans and associated infrastructure would provide acceptable living conditions for the proposed occupiers and as such, it is considered that the proposed development would be in line with Policy CS19 of the Core Strategy 2014.

Neighbouring Properties

The closest residential properties to the application site are Nos. 1 and 2 School Cottages, which are located opposite a farm track leading into the site. Nos. 1 and 2 Rose Cottages are located some 180 metres to the south-east of the site.

As the proposal involves the relocation of existing workers' caravans from across Town Road, there would potentially be fewer comings and goings at the application site and as such, Nos. 1 and 2 School Cottages would not be subject to any increased noise and disturbance. Furthermore, proposal will be carried out within the context of the existing caravans, the seasonal nature of their occupation and the busy road and existing use of the entrance for agricultural operations.

In terms of privacy, as a result of the distance between the proposed caravans and existing residential properties, and the screening provided by vegetation on the site boundaries and by the polytunnels, it is considered that there would be no adverse overlooking, overshadowing or overbearing impacts on the neighbouring properties.

In terms of noise and disturbance from the caravans themselves, they would be a significant distance from neighbouring properties and in the context of the existing agricultural use, it is again considered that any increase in noise/disturbance would not be significant.

Overall, the proposed development would have no significant adverse impacts on residential amenity, and it would be in line with Policy CS19 of the Core Strategy 2014 and paragraph 130f of the NPPF 2023.

Parking and Highways

The proposal would utilise an existing access and provide areas within the site for the parking and turning of vehicles. The proposed provision of car parking would reflect the same caravan to parking place ratio already in use at the site. There is also a container on the existing caravan site that can be used for bicycles.

As previously considered, in the context of the existing agricultural use, the seasonal nature of the occupation, the capacity of Town Road (an A class road) and the fact that there is a footpath on the eastern side of Town Road, it is considered that there would be no significant adverse impact on highway safety.

In addition, the proposed accommodation of seasonal workers on the site would reduce the need to transport people to and from other agricultural holdings, and to transport caravans to and from the site at the beginning and end of the season. In this regard it is considered that the proposal would be beneficial in highways terms.

Overall, it is considered that the proposed development would be acceptable in parking and highways terms and would comply with Saved Policies P3 and T1 of the Local Plan 1994 and Policy CS11 of the Core Strategy 2014.

Any Other Material Planning Considerations

Biodiversity

The NPPF 2023 in paragraph 180(a) states that 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. Policy CS12 of the Core Strategy 2014 reflects this stance and states that sites designated for their biodiversity value will be protected. There will be no net loss of biodiversity in the Borough.

KCC Biodiversity advise that the proposed development has limited potential to result in ecological impacts. However, biodiversity enhancements and details of lighting should be secured by condition.

Archaeology

The site of the proposed development lies within an area of high archaeological potential. However, as the proposal involves the siting of caravans it would be unlikely to impact on any below-ground archaeological remains at the site. On this basis, the proposal would comply with Policy CS20 of the Core Strategy 2014 and paragraph 197 of the NPPF 2023.

Agricultural Land

The application site is located on Grade 1 agricultural land. The applicant has set out that the proposed development is related directly to the operation of an existing farm and as the proposal involves a use of the land, the impermanent caravans can be removed when no longer required. As such, it is considered that there would be no permanent loss of prime agricultural land.

Ecological impact on the Thames Estuary and Marshes Ramsar / Special Protection Area (SPA)

As the application site is within 6km of the Thames Estuary and Marshes SPA/Ramsar Sites and would provide additional residential accommodation, the proposed development is likely to have a significant effect, either alone or in-combination, on the coastal North Kent Special Protection Areas (SPAs)/Ramsar sites from recreational disturbance on the over-wintering bird interest. On this basis a tariff of £6,281 is required (given there are 20 additional dwellings proposed on the site).

The applicant has signed a SAMMS Contribution Agreement and paid the appropriate tariff to meet the requirements of paragraphs 174 and 180 of the NPPF 2023 and Policy CS12 of the Core Strategy 2014.

Conclusion and Recommendation

The proposed development would be in line with Green Belt policy (specifically paragraph 150 of the NPPF 2023 and Policy CS02 of the Core Strategy (2014) and would be appropriate development in the Green Belt due to the presence of existing polytunnels on the site and the resultant lack of harm to openness and no further encroachment into the countryside from the stationing of caravans. The proposal would be well-screened and would not harm landscape character, residential amenities, highway safety and ecology. Furthermore, the proposal would fulfil a functional need at the application site to accommodate seasonal agricultural workers where no suitable alternative exists elsewhere and would support the rural economy. As such, the proposed development would be in line with the requirements of paragraph 80 of the NPPF 2023 and saved Policy C10 of the Local Plan 1994. Accordingly, the application is recommended for approval.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Miss Faye Hobbs
Signed:		Signed:	
Dated:	16 August 2023	Dated:	14 September 2023