



Delegated Report

Full Planning Application

Planning Application No: 20220473

Location: Stables Cottage, Hermitage Road, Higham, Rochester

Description: Retention of existing stables buildings (with 7 stables, tackroom, kitchen/WC, solarium and wash bay) and the construction of 12 new stables to increase the number of horses kept on the land from 19 to 21, together with storage and communal seating/social buildings, 2 storage containers for manure, and the change of use of agricultural land to form a new hardstanding for vehicular access to the stables and a new parking area for 11 cars.

Applicant: Miss Katie Roberts

Site Visit Date: 10 January 2023

Submitted Documents/Plans

Covering Letter dated 12 April 2022

Application form

Drawing no. S02 Rev. P1 (Elevations)

Drawing no. S03 Rev. P1 (Site Plan and Elevations)

Drawing no. S04 Rev. P2 (Existing Plan with Proposed Entrance Gate and Associated Parking Area)

Equestrian Justification dated March 2022 (The Rural Planning Practice)

Foul Drainage Assessment Form

Retrospective and Preliminary Ecological Appraisal (ref. 2022/06/10 dated 9 September 2022)

Relevant Planning History

Reference	Description	Decision	Decision Date
20200957	Retrospective Application for, extension of 19 stables, proposed parking area with use of existing access, extension of residential curtilage to allow for proposed parking to be kept with the confines of the exiting development, condition on agricultural land permissible horses allowed to be increased from 19 to more than 21.	Withdrawn	
20190613	Application for the removal of conditions 4, 5 & 6 attached to planning permission reference number 20141054 for the formation of a sand school (menage) on land to the rear of Stables Cottage; to allow outside riders and their horses to visit the property to use the area for training, exercise and coaching clinics and to allow the use of the area lighting.	Withdrawn	

20180581	Application for the approval of conditions 4, 5 and 6 attached to planning permission reference number 20141054 relating to the sand school hereby permitted shall only be used for the practice and training of horses kept at Stables Cottage and for those in livery at the yard, shall be not used for gymkhanas, any commercial riding events or competitions, must not be illuminated at any time prior to the details and specifications.	Withdrawn	
20180272	Formation of new vehicular access on to Hermitage Road.	Withdrawn	
20170958	Retrospective application for decking to the rear of the dwelling.	Refused Appeal dismissed	13.12.2017 30.05.2018
20170831	Application for the removal of conditions 4, 5 and 6 attached to planning permission reference number 20141054 for the formation of a sand school (menage) on land to the rear of Stables Cottage; to allow the arenas to be hired out, to provide a venue for commercial riding events and competitions and to allow the sand school to be illuminated.	Withdrawn	
20170713	Formation of new vehicular access on to Hermitage Road.	Refused	03.10.2017
20161229	Retention of a new vehicular access.	Refused Appeal withdrawn	30.03.2017
20160681	Application for the approval of condition 3 attached to planning permission reference no. 20141054 relating to details of the materials to used on the sand school.	Permitted	20.10.2016
20141054	Formation of a sand school (menage) on land to the rear of Stables Cottage.	Permitted	30.04.2015
20141034	Retention of two stables and concrete base and field shelter thereon and extension of the concrete base.	Permitted	30.04.2015
20141013	Change of use of agricultural land at the side into residential curtilage, alteration to the driveway to create additional off-road parking, erection of front and side boundary fence and entrance gates to the front boundary varying in height from 1.23-1.35m.	Permitted	30.04.2015
20130186	Application for variation of condition 1 attached to planning permission reference number 20010753 to allow the number of horses and foals kept on the land to be increased from 14 to 19.	Permitted	14.10.2013
20080569	Demolition of existing buildings and erection of a block of four stables attached to existing stable block, increasing the number of horses kept from 14 - 17.	Withdrawn	
20010753	Variation of condition (ii) attached to planning permission reference number 1996/0844 to allow the number of horses and foals kept on the land to be increased from 9 to 14.	Permitted	30/11/2001
20010219	Erection of single storey front, side and rear extension to form garage, utility room, w.c. and	Permitted	10.05.2001

	kitchen.		
20000850	Stationing of a mobile field shelter.	Permitted	31.01.2001
19970498	Application for the approval of the details of the storage and disposal of waste and the proposed site levels of the ménage as required by condition (ix) and (xi) of planning permission reference number 19960844.	Withdrawn	
19960844	Retention of the extension comprising of 3 no. stables attached to the existing barn; removal of condition (ii) of planning permission reference no. 1986/0113 relating to the existing use of the storage building as 4 no. stables to enable the use of the 7 no. stables for livery purposes and construction of a ménage.	Permitted	08.04.1997

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS11 – Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Design and Development Principles

Gravesham Local Plan: First Review (1994)

- T1 – Impact of Development on the Highway Network
- P3 – Vehicle Parking Standards.
- C17- Use of Land for Horse-riding and the Erection of Stables

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving sustainable development
- 9 – Promoting sustainable transport
- 11 – Making effective use of land
- 12 – Achieving well-designed places
- 13 – Protecting Green Belt land
- 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

- SPG4 – KCC Parking Standards (2006)
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

External Consultees

KCC Biodiversity Officer

We have reviewed the ecological information submitted by the applicant and advise that sufficient ecological information has been provided. We have taken this view due to a Preliminary Ecological Appraisal report (KB Ecology, September 2022) having been submitted which describes the site as comprising “an access drive (with pea shingle then concrete grass slabs) with an area of short-mowed grass to its west, leading to a large sand school with timber stable blocks to the west. A very large muck heap is present along to the east of the access track.”

It is understood from the Design and Access Statement (Rural Planning Practice, March 2022), and applicant's letter dated 12th April 2022, that the removal of the existing structure, clearance for access and parking areas and construction of the new stables has already been undertaken. Remaining works include the installation of hard surface over the access and parking areas, and alongside the sand school. It is understood that existing access points will be used, with no hedgerow being removed under the proposals.

The site has already undergone substantial pre-application clearance and groundworks, as indicated by aerial photographs within the Preliminary Ecological Appraisal report (KB Ecology, 2022) and more recent aerial photographs. As a result of reviewing the data we have available to us, and the information submitted with the planning application, we advise that if planning permission is granted, the following conditions be included:

Biodiversity Method Statement

There are local records of protected/priority species including slow worm, grass snake, badger and hedgehog. In 2008, a grounded Leisler's bat was recorded within the immediate vicinity of the site. However, we agree with the conclusions of the ecological report that the habitats/opportunities for protected species within the demolition/construction area at the time of the previous development works mean that the likelihood of a breach of wildlife legislation having occurred is low.

Regarding the remaining works, due to the existing habitats we advise that there are limited opportunities for protected species to occur within or immediately adjacent to the works area. However, due to the presence of a small area of rough grassland in the south-east corner of the site, the roadside hedgerow, stored materials and less managed land with large manure pile to the east, we advise that if planning permission is approved a condition for a short Biodiversity Method Statement (BMS) is attached. As construction works can provide opportunities for short-term shelter within spoil and stored materials, the BMS should include details of precautionary working methods to be followed during construction, and we advise that it form part of the site Construction Management Plan.

Biodiversity Net Gain (BNG) and Enhancements

In the absence of compensation, the replacement of green space with hardstanding constitutes a loss of biodiversity (soil organisms, ground flora, feeding and sheltering resources). Under section 40 of the NERC Act (2006), paragraph 174 of the NPPF (2021) and the Environment Act (2021), biodiversity must be maintained and enhanced through the planning system. Paragraph 180 of the NPPF (2021) also states that “the implementation of measurable net gains for biodiversity (integrated as part of design) should be encouraged”.

If planning permission is approved, we advise that a condition is attached securing a Biodiversity Enhancement Plan. Given the existing habitats there is potential to achieve net gain in biodiversity through appropriate native species landscaping and management; this can be demonstrated through a Biodiversity Net Gain calculation using the latest version of the Defra metric. Additional enhancements for protected and priority species should also be included. The plan should include timescales for implementation and a habitat management schedule. Suitable landscaping and enhancement features include the following:

- New native species-rich hedgerow (protected from horse-grazing until established and with connectivity to

existing hedgerow)

- Enhancement of existing hedgerow
- Wildflower grassland and scrub planting in non/lightly grazed areas
- Nest boxes for priority / declining bird species on stables
- Bat boxes on suitably high buildings within the wider land ownership
- Insect and hedgehog boxes within new hedgerow / landscaped areas
- Planting of native climbers along walls and fences
- A new pond.

Lighting and Biodiversity Plan

New artificial lighting is included within the proposals (Drawing No. S04/P2) and paragraph 4.8 of the PEA report includes a recommendation for sensitive lighting. The behaviour of species including insects, bats, badger and birds has been shown to be sensitive to increased levels of artificial lighting. If planning permission is granted, we advise that a condition is attached for a Lighting Plan.

Internal Consultees

GBC Highways Officer

It is noted as far as I can ascertain the permitted number of horses on site is 19, application 20130186. This proposal increases that by two and potentially could increase in vehicle movements at the access albeit slightly. The access onto Hermitage Road is far from ideal with visibility restricted particularly to the east by hedging. Considering the hedge is in the ownership of the application, it could be set back to achieve a considerably improved sight line. As Hermitage Road is subject to 60mph (National Speed Limit), without the benefit of a speed survey the request should be for a 203m x 2.4m x 203m, which is outside the control of the applicant to the west, but this is less of an issue. Whilst to the east there is scope to improve the sight line, as the site frontage is some 154.5 metres measured from the approximate centre of the existing access, at which time the sight line is projected further due to the alignment of the carriageway. It is accepted however this does require the hedge/boundary to be set back some 6 metres from the existing carriageway at its maximum. A reduced sight line could be agreed if speed details are known. However, it is noted that there is no injury accident record on Hermitage Road and so it may be difficult to sustain at appeal. However, any improvement in sight lines would be a benefit. By reducing the requirement to extending a sight line to opposite 1 Thames View Cottages the impact on the street scene is reduced considerably but would provide a sight line suitable for 60kph (37mph) and whilst design should not be based on emergency stopping distances should accommodate a vehicle travelling at 50mph in good conditions. It is a compromise that is worth considering as any improvement is better than the existing situation.

In terms of the vehicle parking, the applicant's parking spaces do not conform to the requirements of SPG4 of 2.5m wide by 5 metre long. However, the additional length can easily be accommodated within the parking area provided. The additional width seems unnecessary unless people are using vans or larger vehicles in which case the length should be increased. There would appear to be some scope to reduce the parking area by 10 metres in length if only 11 vehicles are required to be parked on site at any one time whilst visiting the stables. However, it should be noted that the parking spaces shown on drawing SO4 Rev P2 do not represent the size of bay specified.

I note the position of the gates to the stables and this is acceptable

Most importantly is the matter of the cesspit under Stable 6. Building Regulations are very specific in the siting of cesspits.

Cesspools

Siting

1.58 The site of the cesspool should preferably be on ground sloping away from and sited lower than any existing building in the immediate vicinity.

1.59 Cesspools should be sited at least 7m from any habitable parts of buildings and preferably downslope.

1.60 Cesspools should be sited within 30m of a vehicle access and at such levels that they can be emptied and cleaned without hazard to the building occupants or the contents being taken through a dwelling or place of work. Access may be through a covered space which may be lockable.

I am unsure about the reference to habitable on whether or not it includes horses, I see no reason why it shouldn't, but ignoring that, the cesspool does require its contents being taken through a place of work, even if it is in a pipe.

There is also the question of the soakaway located adjacent to the communal seating social area. The building regulations require a soakaway to be located a minimum of 5 metres from a building. Here the distance is less than one metre.

Soakaways and other infiltration drainage systems

3.23 Infiltration devices include soakaways, swales, infiltration basins and filter drains.

3.24 Further information on the design of infiltration drainage systems can be found in CIRIA Report 156 – *Infiltration drainage – Manual of good practice*.

3.25 Infiltration drainage is not always possible. Infiltration devices should not be built:

- a. within 5m of a building or road or in areas of unstable land (see Planning Policy Guidance Note 14 Annex 1);

In conclusion I would like to see improvements to the visibility at the access, but it is unlikely an objection would be sustained at appeal given the limited number of vehicle movements. Of more concern is the issue of the drainage both foul and surface water which appear to conflict with Building Regulations and the application should be refused on that basis, although it should be possible for the applicant to rectify the issues.

GBC Environmental Protection

No objection to this application but a storage/disposal of manure condition and drainage/sewerage and lighting informatives are recommended. We have received complaints in the past regarding the manure piles, so the option to moving towards composting the manure will hopefully be an improvement. However, it will still be important to ensure that manure/waste is stored and dealt with appropriately to ensure that there is no detrimental impact on the amenity of the neighbourhood in terms of odour and flies etc. Bearing in mind the size of the site, providing a suitable distance from the curtilage of neighbouring properties should not be an issue.

Neighbouring properties

The application has been advertised by individual neighbour letters to 11 properties, and on site. The

consultation periods expired on 27 December 2022 and 6 January 2023 respectively.

No letters of objection have been received from neighbouring properties.

Local Ward Councillors were also consulted and no responses were received.

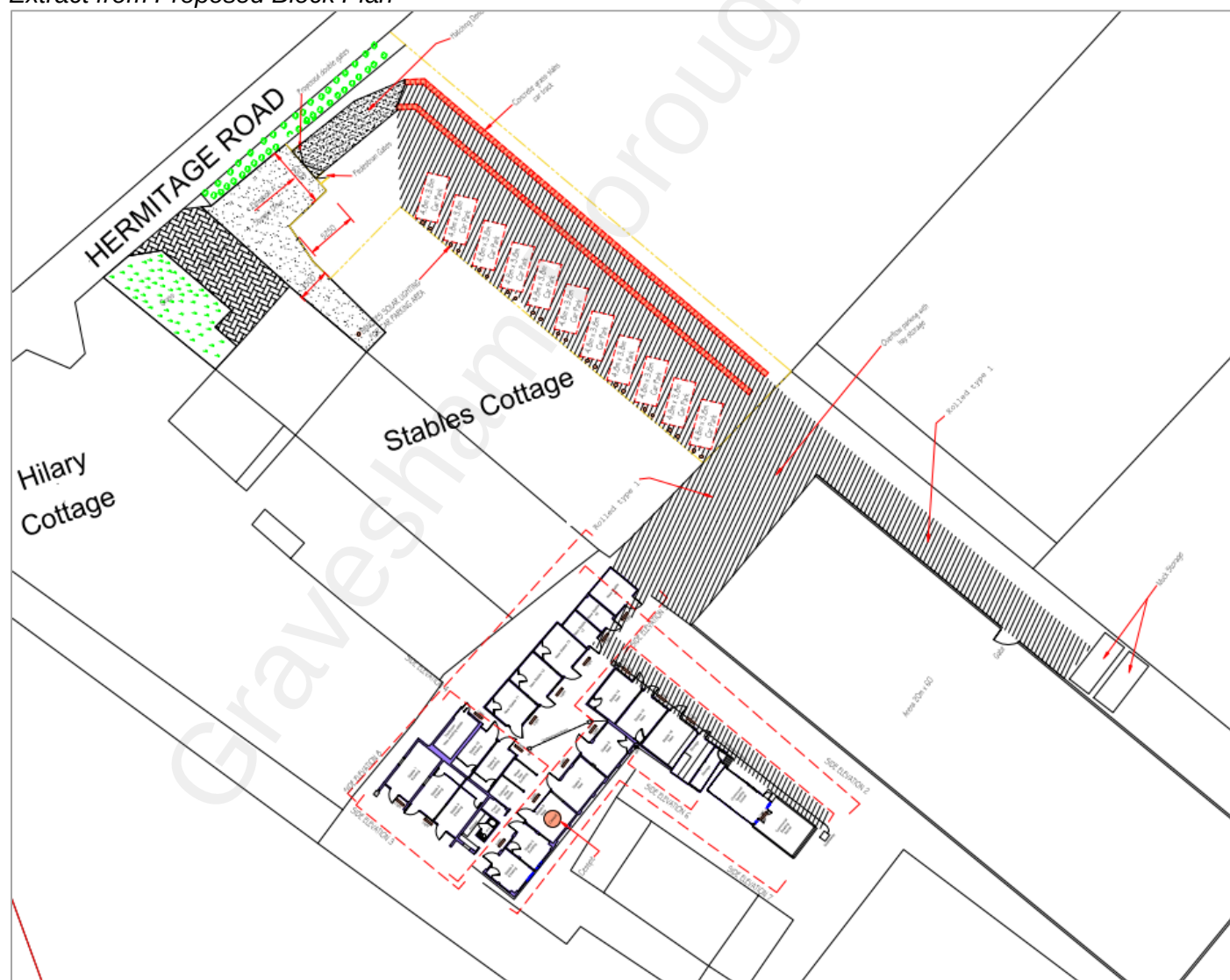
Officer's Analysis

Proposal

This proposal seeks permission for the retention of existing stables buildings (with 7 stables, tackroom, kitchen/WC, solarium and wash bay) and the construction of 12 new stables to increase the number of horses kept on the land from 19 to 21, together with storage and communal seating/social buildings, 2 storage containers for manure, and the change of use of agricultural land to form a new hardstanding for vehicular access to the stables and a new parking area for 11 cars.

A new extended drive/access is proposed to run alongside the front boundary behind new hedging, turning 90 degrees to extend down to the stables and existing arena. The parking area will run alongside the access.

Extract from Proposed Block Plan



The buildings and access (with an unfinished surface) are already in situ but the parking area and storage

containers are not:

Current Google Earth Image



The applicant has submitted a supporting statement as part of the application submission. The livery business at the site, RockOn Livery Services Ltd, keeps 19 horses and 2 Shetland ponies. The extended yard has been designed to provide sufficient stabling for the horses, as well as storage for feed, bedding and rugs, as well as a wash down and solarium for drying wet horses or for use after clipping. The extended stables have been incorporated into the stables and field shelter allowed by permission 20141034.

There have been difficulties with access to some parts of the site since it was subdivided by a previous owner. The proposed access and parking arrangements will be more effective for larger vehicles accessing and manoeuvring on the site. The parking surface will be rolled hogging and the access track is concrete blocks. The parking space will provide enough space for farriers, vets and emergency vehicles.

The proposed hardstanding will extend around the sides and top of the arena allowing access for manure removal and safe access for horses, livery owners and for parking.

The two storage (shipping) containers will store muck and will introduce a natural, faster composting process using worms.

The changes will result in an overall improvement to the yard arising from better storage, parking and muck

containment reducing the need for ad hoc external storage.

Foul drainage comprises a cesspit located beneath Stable 6.

Solar lighting is also proposed.

Site and Surroundings

The site is located in the countryside outside any settlement boundary, in the Green Belt and in the Higham Arable Farmlands Landscape Character Area.

Stables Cottage is a two storey semi-detached property in use as a single dwelling. There is considerable land attached to the property which is used in relation to equestrian activities. A large proportion of the land is used as paddocks for horses, but there are also stables situated to the rear of the adjoining Hillary Cottage and a sand school to the south-east of the stables. This forms the land that is part of RockOn livery. Much of the site is untidy, with areas of dumped rubbish and a huge pile of manure.

There is a large barn adjacent to the application site, which once formed part of the curtilage of Stables Cottage, but this has become separated, along with an outdoor arena adjacent to the site. There is another livery yard with a smaller ménage further to the south of the site. These are all accessed via Hermitage Road.

The site has been subject to enforcement action relating to the application proposal, which has essentially been submitted in an attempt to regularise the situation.

Principle Issues

As the property lies within the Green Belt, this is the starting point for the determination of this application. Therefore, the main issues for consideration with this proposal are as follows:

- Principle of development in the Green Belt
- Impact on openness and the character and appearance of the surrounding area
- Residential amenity
- Highways

Principle of Development

Green Belts are of great importance. The fundamental aim of Green Belt policy is to prevent urban sprawl by preserving the open and permanent characteristics of Green Belts (paragraph 137 of the NPPF 2021). Paragraph 147 of the NPPF 2021 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 2021). However, there are exceptions to this which, as in the case of this proposal, include:

- (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;

Policy CS02 of the Core Strategy 2014 prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Core Strategy 2014.al

Saved Policy C17 of the Gravesham Local Plan First Review relates to the use of land for horse-riding and the erection of stables. It states that proposals for the recreational use of land in the countryside for horse-riding, riding schools and the erection of stables will only be permitted if they are compatible with the agricultural, landscape and transport policies of this Plan. Where proposals are acceptable in principle, the Borough Council will expect stables and horse shelters to be properly designed and constructed of sound materials appropriate to the countryside and to be in an acceptable location within the site. This policy does pre-date the NPPF, and therefore greater weight should be given where the approach is consistent with paragraph 149 the NPPF.

The proposed development is considered to fall under the category of outdoor recreation and therefore the principle of additional stables is considered acceptable subject to an assessment of the impact that the development would have on the openness of the Green Belt and the purposes of including land within the Green Belt.

Google Earth Image 2018



Google Earth Image 2022



The above images show the increase in built development at the site since 2018. The additional stables have been added onto the existing stables; there has been a large increase in terms of the external footprint of the building (which is over 50% larger) and this has clearly affected the openness of the site in this location. The extensions are also disproportionately larger than what was existing; together this leads to the conclusion that the development is inappropriate in the Green Belt.

Impact on openness and the character and appearance of the surrounding area

Whilst the proposal is considered inappropriate development, its impact on the openness of the Green Belt must be also assessed, and in turn the impact on the character and appearance of the surrounding area.

Paragraph 137 of the NPPF 2021 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.

Paragraph 130 of the NPPF 2021 seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 of the Core Strategy 2014 reflects these aims and requires that new development is well-designed and respects the character and appearance of the surrounding area.

The application site is also located in the Higham Arable Farm 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. The LCA states the area is defined by gently undulating topography with open arable farmland, hamlets and settlements, isolated farmsteads and scattered properties with locally distinct styles and materials that contribute to the rural character of the area. The condition of the landscape is generally poor, its sensitivity moderate. The guidelines for the area focus on restoring landscape elements in poor condition, whilst safeguarding it as a prominent landscape feature within the wider landscape.

The site is located within the countryside in the Green Belt and is an established equestrian site. Whilst the additional stables have increased the spread of built development on the site, this has at least been restricted to the area of the existing stables, and therefore the stabling remains contained together. This part of the site is not particularly visible from a public vantage point as the stables are low in scale and behind fencing to the rear of the nearby cottages and adjacent existing large barns/stables.



The impact of the development is therefore limited and localised. The development remains in line with the use of the site for the keeping of horses, and the addition of keeping a further 2 horses is unlikely to increase activity levels to any great degree. This is not out of character with the rural nature of the area in this location. On balance, this is considered to preserve the openness of the site.

With regards to the proposed access, parking and storage arrangements, there is a concern that this will affect openness to a greater degree. However, it is understood that access to the site has become problematic due to land ownership changes, and there are no other options for access to the stables. It must also be considered that much of the site is untidy and control over the parking/storage areas and landscaping of the site through conditions could help improve the visual amenity of the area, which would

certainly be beneficial given unkempt state of the site as it is and would preserve openness if appropriately controlled.

However, given the inappropriate nature of the development in relation to the size of the additional stables and the resultant impact on openness, special circumstances are required to be considered if the harm to the Green Belt is to be outweighed in any way. It is therefore necessary to consider whether the development causes any other harm and whether there are any other considerations that are relevant to the overall planning balance.

Very Special Circumstances

As discussed above, inappropriate development in the Green Belt should not be approved except in very special circumstances.

There has been enforcement action related to the development proposal, and immunity from such action is now imminent (March 2023). Given the state of the site as it is, the clear need to control and improve the appearance of the site combined with the possibility of immunity for the development that has already been carried out, is considered to amount to the very special circumstances required to outweigh the harm to the Green Belt from leaving the site as it is.

In this instance, the harm from the development in terms of its size and spread is considered to be outweighed by these special circumstances. Given that the proposal relates to the extension of what are generally appropriate facilities for outdoor recreation and where, through the use of appropriate conditions, the visual amenity of the site could be improved, and that considering the development already carried out would soon be immune from enforcement action, altogether the balance is therefore tipped towards the acceptability of the proposal, as this carries greater weight over the harm to the Green Belt from the existing development. This is considered to render the proposed development as appropriate in the Green Belt, subject to the further considerations below.

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.

The main neighbouring property to be affected by the proposal is Hilary Cottage, adjoining Stable Cottage. However, the additional stables are located over 30m away from the building at the nearest point and as the land slopes down to the rear the stables are at a lower level, and are therefore unlikely to adversely affect outlook, light or privacy to any significant degree. With regards to activity, the increase in the number of horses at the site by 2 is not likely to cause any adverse impacts over and above what is already experienced by the established use.

No neighbour representations have been received.

Overall, the impact on amenity is considered to be acceptable. As such, it would comply with Policy CS19 of the Core Strategy 2014 and paragraph 130(f) of the NPPF 2021.

Parking and Highways

The currently permitted number of horses on the site is 19. This proposal will increase this by two, which has the potential to increase vehicle movements at the access, albeit slightly.

The access onto Hermitage Road is far from ideal with visibility restricted particularly to the east by hedging. Considering the hedge is in the ownership of the application, it could be set back to achieve a

considerably improved sight line. Given that part of the front boundary hedge has been removed, this could be conditioned to be reinstated and set back to achieve greater visibility. A replacement hedge should be formed of a native species.

In terms of the vehicle parking, the parking spaces do not conform to the requirements of SPG4 of 2.5m wide by 5 metre long. However, the additional length can easily be accommodated within the parking area provided. The additional width would seem unnecessary unless people are using vans or larger vehicles. The applicant has confirmed that the size of the spaces are to make provision for liveries and their associated vehicles (some being horse boxes and trailers). Large vans also regularly visit the site, including farriers for example. A condition could be included to detail the size and scope of the parking area, including the proposed surface, which would have to be porous and appropriate in terms of appearance to reduce the visual impact of the parking area when not in use.

The position of the gates to serve the stables is acceptable.

Overall, subject to conditions, parking and highway safety matters are considered to be acceptable. The proposal would therefore comply with Saved Policies T1, T5 and P3 of the Local Plan 1994 and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Environmental Protection

There have been complaints in the past regarding the manure piles on the site, so the proposal to move towards storing and composting the manure in containers will be an improvement. However, it will be important to ensure that manure/waste is stored and dealt with appropriately to ensure that there is no detrimental impact on the amenity of the neighbourhood in terms of odour and flies etc. Bearing in mind the size of the site, and the distance from the curtilage of neighbouring properties, this will not be an issue. However, a storage/disposal of manure condition, together with drainage/sewerage and lighting informatives, should be imposed on any forthcoming planning permission.

The proposal would therefore comply with Policy CS19 of the Core Strategy 2014 and paragraph 185 of the NPPF 2021.

Biodiversity

The NPPF 2021 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.

The site has already undergone substantial pre-application clearance and groundworks, and therefore biodiversity impacts at this stage are low. The submitted ecology report is considered acceptable, and any planning permission should include conditions related to biodiversity enhancement, together with a lighting plan.

On this basis, the proposals are considered to be acceptable in terms of the impact on biodiversity.

Drainage

Concerns have been raised about the drainage arrangements on the site, and in particular the location of the cesspit and soakaway. However, this is a separate matter from Planning that would be dealt with under Building Regulations. An informative can be added to that effect.

Conclusion and Recommendation

Whilst the proposal includes facilities for outdoor recreation in the form of stables, the amount and spread of development would impact on the openness of the Green Belt and encroach into the countryside, and would therefore comprise an inappropriate development in the Green Belt. However, it is recognised that the impact of the development would be relatively limited and localised, and it would be in keeping with the rural nature and activities of the area, which would go some way towards maintaining the openness of the site.

The harm from the development in terms of the impact on the Green Belt is further considered to be outweighed by the very special circumstances surrounding this case, that include the imminent immunity of the development already carried out from enforcement action, together with a real need to be able to control and improve the visual appearance of the site, which is currently very untidy.

On this basis, subject to conditions, the proposal would be considered to be acceptable and is accordingly recommended for permission. The proposal would also be acceptable in terms of amenity, parking and highways, environmental protection and biodiversity impacts. As such, the proposal would comply with the requirements of Policies CS02, CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014, saved Policy C17 of the Gravesham Local Plan 1994 and paragraphs 126, 130, 137, 138, 147, 148, 149, 174, 176 and 185 of the National Planning Policy Framework 2021.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Miss Faye Hobbs
Signed:	<i>K. Parkin</i>	Signed:	
Dated:	8 February 2023	Dated:	09 February 2023