

Planning Statement

Proposed change of use of an agricultural building into Five
Holiday Let Accommodation Units

At

Abbey Farm Barn, Church Street, Higham Rochester ME3 7LS

Our Ref: 22/003

Consilium
Town Planning Services Limited
Northdown House
Lower Street
Leeds
Maidstone
Kent ME171RJ

January 2024

Contents Page

- 1 Introduction
- 2 Site and Surrounding Area
- 3 Planning History
- 4 Proposals
- 5 Planning Appraisal
- 6 Summary/Conclusion

Appendices

- 1 Photographs of Site and Buildings
- 2 Structural Engineering Report prepared by Alan Baxter Partnership

1 Introduction

- 1.1 This revised application is made under Section 191 of the Town and Country Planning Act 1990 (As Amended). The application is made by Provectus Developments Limited (referred to in this statement as the applicant) who seek planning permission for a change of use of the redundant agricultural building to five holiday let units.
- 1.2 The previous application was refused on the following grounds:
- 1 The proposed change of use of barn to holiday lets would result in an increase in on-site parking and
 - 2 The proposal would result in the erection of boundary treatments and introduction of residential paraphernalia
- 1.3 As such, it was considered there was resulting in harm to the openness of the Green Belt contrary to policy.
- 1.4 This revised proposal has sought to address these points raised above. The proposals include the provision of one car parking space per unit which is sufficient for this holiday let use. It has already been agreed, as part of the previous planning application that the proposed change of use and associated works will not create a form of development that will significantly increase traffic and activity on Church Street.
- 1.5 With regard to boundary treatments, there was no intention of securing the gardens with timber fencing. The revised proposal show that the communal area for all five properties with no separation fence or boundary between each unit. On the boundary we have shown a post and rail fence that will be landscaped. There will be no residential paraphernalia as these units are short term holiday let units.
- 1.6 In order to prepare a comprehensive and thorough assessment to support the planning application, a number of specialist technical advisors and consultants have been appointed by the Applicant.
- 1.7 The following reports have been prepared in support of the application:
- Site Location Plan
 - Existing Site Layout Plan
 - Proposed Site Layout Plan
 - Heritage Statement
 - Ecology Report
- 1.8 Within this statement we provide the history, that substantiates our case, that the barn has been used solely for agricultural as part of an established

agricultural unit and is capable of conversion to short stayholiday let accommodation. It is a form of appropriate development within the greenbelt.

1.9 The statement will provide an overview of why it is considered that a planning permission be allowed in this case. Accompanying the application are a Site Location Plan, Existing and Proposed Drawings, Flood Risk Assessment (Create) dated December 2022 and a Structural Engineering Report (Alan Baxter Partnership) dated 19 May 2022.

1.10 Below we set out the history of the use, description of the proposal, and an assessment of the evidence presented in the appendices to this statement. The application seeks to establish the lawful use of the building for holiday let use

2 Site and Surrounding Area

2.1 Abbey Farm lies to the north of Church Street, within the hamlet of Church Street which lies north of the villages of Higham and Lower Higham. Church Street connects Lower Higham to the south with Buckland Road to the east which connects with the B2000 and the settlement of Cliffe Woods.

2.2 The site lies to the north of a cluster of existing residential dwellings. This comprises a number of detached residential properties whose gardens border the farm's boundary. The wider surrounding area is characterised by open agricultural land with drainage ditches, small ponds and a watercourse to the north and east of the site on the boundary. To the north of the barn is a second livestock barn (not subject to this application) that will be retained. To the west of site lies a listed building church (St Marys Church).

2.3 The site is level and flat with levels approximately 3.2 metres AODN and 3.4 metres AODN.

Photograph 1: Photograph of Existing Barn



- 2.4 The barn itself is a single storey pre-cast concrete for livestock farm building constructed in the late 1960's. The barn has a corrugated sheeting roof and is supported by concrete purlins.
- 2.5 The barn is single storey precast concrete framed building with steel & timber push walls at low level, timber slats at high level and a corrugated cement. It was built as a cow sheet in circa 1960's, based on aerial photography dating from this period, and is part of Abbey Farm. The fabric, concrete columns, trusses and walls remain intact. However, the existing windows and door openings are in need of repair and the barn will require a new roof.
- 2.6 The barn is not part of any agricultural tenancy. To the west of the building is unfarmed agricultural land. The land between the barn and Church Street is covered with hard standing surface.
- 2.7 The site is not in an area at risk of flooding or a conservation area, an Area of Outstanding Natural Beauty (AONB), an area specified under section 41(3) of the Wildlife and Countryside Act 1981, a National Park or World Heritage site.

3 Planning History

- 3.1 There is no planning history with regards to the barn with the exception of the previous planning application (reference 20230399) that was refused last year (21 August 2023). This re-submission seek to clarify matters relting to the refusal and undertake a number of design amendments to make the proposal acceptable for holiday let accommodation.

4 Proposals

- 4.1 The proposal is to convert the barn into five holiday let accommodation units. The curtilage of the five new dwellings is identified in red on the site location plan.
- 4.2 The proposal will retain the existing structure of the barn including the existing concrete walls, concrete columns and trusses and introduce new windows and doors. The existing cement roof profile will be replaced with corrugated metal roof sheeting. The elevation of the building will be timber clad (see drawings attached) with new windows and doors to the proposed dwellings. The footprint and height of the converted barn will match that of the existing building and the total area will be 450 sq metres.
- 4.3 **As part of this proposal, the applicant will accept a condition limiting the use of the units for short stay accommodation or alternately accept a condition restricting occupation to 11 months of the year with a one month shut down.**
- 4.4 One car parking space per unit is shown on the drawings which is appropriate for holiday let accommodation.
- 4.5 The proposal includes an open communal grassed area at the rear of the units. Individual gardens and boundary fencing have been removed and the external boundary is denoted by a post and rail fence that will also be landscaped. We ask that details of the landscaping be submitted at a later date.

5 Planning Policy

Development Plan

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision.
- 5.3 One such consideration will be whether the plan policies are relevant and up to date. The Development Plan comprises of the following:
- Gravesham Local Plan Core Strategy and Policies Map (2014); and
 - Saved policies in the Gravesham Local Plan First Review (1994).
- 5.4 The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy 2014:

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS10 – Physical and Social Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS19 – Design and Development Principle
- CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review 1994:

C11 - Change of Use of Redundant Buildings
P3 – Vehicle Parking Standards
T1 – Impact of Development on the Highway Network
TC2 – Policy for Listed Buildings
TC3 – Development Affecting Conservation Areas

National Planning Policy Framework 2021:

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 6 – Building a strong, competitive economy
- Section 8 – Promoting healthy and safe communities
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Green Belt land
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Other Material Considerations

Supplementary Planning Guidance and other Documents:

- 5.6 The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

The following documents are relevant to the consideration of this proposal:

- SPG4 – KCC Parking Standards (2006).
- Landscape Character Assessment (2009)
- Church Street, Higham Conservation Area Appraisal (2017)

6 Planning Appraisal

- 6.1 The main planning considerations relating to this proposal are:

1. Is the proposed development an appropriate use in the Green Belt
2. The effect of the proposal on the openness of the Green Belt
3. Economic and tourism benefits
4. Impact on landscape
6. Heritage assets
7. Impact on residential amenity
8. Highway issues
9. Flood risk
10. Ecology and biodiversity

Is the proposed development appropriate in the Green Belt

- 6.2 The site (or barn) is defined on the Policies Map of the Core Strategy as lying within the Metropolitan Green Belt (MGB) and a rural area. In the consideration of this proposal, Policy CS02 of the Core Strategy is relevant. Development in the urban area is prioritised as the sustainable location for development.
- 6.3 In the rural area, Policy CS02 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, that were within the MGB, proposals will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy.
- 6.4 This site lies outside the confines of any rural settlements inset from the MGB. National policies for protecting the Green Belt are set out in Section 13 of the National Planning Policy Framework (NPPF). Paragraphs 147 and 148 are particularly relevant in the consideration of planning applications within the Green Belt.
- 6.5 The NPPF states a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

(a) buildings for agriculture and forestry;

(b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

(c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building (emphasis added);

(d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

(e) limited infilling in villages;

(f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or*
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

6.6 Paragraph 150 of the NPPF states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This proposal is for the conversion of an existing agricultural barn and will therefore maintain the openness of the greenbelt. **The proposal is therefore an appropriate form of development.**

6.7 The conversion of farm buildings to other uses will be permitted in accordance with saved policy C11 of the IGravesham Local Plan (1994) where:-

- (i) It can be demonstrated that the building was originally erected as an agricultural building but is no longer needed for farming.*
- (ii) The building is a substantial one, of permanent construction and is in an appropriate location in relation to roads and services.*
- (iii) The building is attractive, in having some architectural, historic or landscape interest or being of a type representative of the Kent Countryside and the proposed alterations preserve that interest.*
- (iv) The proposed use will diversify the rural economy and not result in the longer term dilution of farm viability**
- (v) The curtilage is confined to the minimum necessary to operate the use.*
- (vi) The nature and intensity of the proposed use is not detrimental to amenity or traffic safety.*

6.8 The building was originally erected as a cattle shed and it is confirmed by the owner that it is no longer needed for farming purposes. The building is a substantial building and attached with this submission is a report prepared by Alan Baxter Associates. This confirms the building is structurally sound and can be adapted for holiday let accommodation.

6.9 The conversion of the building to holiday let accommodation will result in an improvement to the setting of the conservation area. The building will be re-clad with weatherboarding which is traditional local building material. The use as holiday let units will diversify the local economy by providing short stay tourism accommodation.

- 6.10 The red line plan shows the limited extent of the holiday units and a communal area the use by occupapnts in the holiday let units. The number of additional car parking spaces and vehicle movements will not be detrimental to highway safety. This has been previously agreed in the previous application.
- 6.11 Therefore, the proposed use of the land is considered to be appropriate development within the Green Belt if the use and facilities were considered to preserve the openness of the Green Belt and not conflict with the purposes of including land within it as required by paragraphs 149(b) and 150(e) of the NPPF.
- 6.12 As such it is considered that the proposal would not have a harmful effect on the openness of the Green Belt in this location. There is no negative effect on the openness of the Green Belt that would conflict with the requirements of paragraphs 149(b) and 150(e) of the NPPF and the aims of Green Belt policy as set out in paragraph 137 of the NPPF. In light of this, this development must therefore be defined as appropriate development in the Green Belt. Paragraph 147 of the NPPF advises that inappropriate development should not be approved except in very special circumstances. In this instance there the proposal does not warrant the submission of special circumstances to justify this scheme.

SAMM/ RAMSAR Bird Mitigation Contributions

- 6.13 As the application site is within 6 km of the North Kent Marshes SPA/Ramsar Sites, 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. Natural England has advised that an appropriate tariff of £250.39 per dwelling should be collected to fund strategic measures across the Thames, Medway and Swale Estuaries.
- 6.14 The applicant will make the appropriate contribution on submission of the application to the Local Planning Authority. Therefore, on the basis that the applicant has agreed to pay the tariff the proposal is compliant with Paragraphs 175 and 176 of the NPPF (2021).

Highways

- 6.15 It is considered that the holiday units would not result in a level of additional traffic movements that would warrant an objection. Car parking provision (one space per dwelling) is provided on site for use by occupants of the units.
- 6.16 The propsoed holiday let properties are designed to accommodate two bedrooms and the maximum capacity would be 4 people for each holiday let. Concern was previously raised (in the earlier planning application) that the internal arrangements could be provided for additional people in the lounge area, resulting in 5 or 6 people being accommodated. However, the applicant will accept a limit on the number of people that can occupy each unit at any

time. This can be made a condition of planning. The accommodation will also have to be managed by a holiday letting agency so the maximum number of occupants (i.e four) can be carefully controlled.

- 6.17 In term staff parking space for maintenance and/or cleaning, this will occur when the holiday lets are not occupied (during a change over day). Occupants will vacate the premises by 10:00 hrs and new occupants will not be able to access the property until 15:30 hrs. Therefore, there is sufficient space for a maintenance vehicle to park although there may not be an allocated space, which is not unusual situation for this type of use.

- 6.18 With regards to traffic generation, paragraph 111 of the National Planning Policy Framework states.

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

- 6.19 There is no injury accident record on Church Street and a few movements for the holiday lets will in part or total be offset by traffic movements associated with the previous use as a barn. It is accepted that much of Church Road is single tracked with limited informal passing places. But vehicles can pass and the impact of five holiday lets is not considered to be significant. The absolute maximum number of movements per unit, would be a return trip for breakfast, followed by return trips for a morning and afternoon excursion and an evening meal. Resulting in 8 vehicle movements per unit per day or 40 in total. This cannot be described as significant or severe.
- 6.20 In addition, from this total it would be necessary to subtract the number of vehicle movements associated with the use as a barn.
- 6.21 Provision can be made for cycle parking. We request that this be made a condition of planning and dealt with a a condition of planning
- 6.22 We note that there were no objections raised on highways grounds to the previous proposal.

Flood Risk

- 6.23 The site is located within Flood Zone 3. The NPPF confirms that a site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. This requirement is replicated in Policy CS18 of the Core Strategy: Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime.

- 6.24 The planning application is accompanied by a flood risk assessment. Further information on flood risk assessments is set out in the Government's Planning Practice Guidance "Flood risk and coastal change"

Heritage

- 6.18 A Heritage Statement accompanies the planning application. This demonstrates that there is no impact arising from the proposal on the setting of the nearby listed church. The proposals result in less than substantial harm to the setting of the listed building.
- 6.19 It has previously been stated that the proposed change of use and associated works will create a form of development that will increase traffic and activity to this small rural conservation area and will result in harm to the character of the conservation area
- 6.20 However, the previous report also confirms that the number of movements will not be severe or harmful. Vehicles can pass and the impact of five holiday lets is not considered to be significant. The maximum number of movements per unit, would be return trips for a morning and afternoon excursion and an evening meal. Resulting in 8 vehicle movements per unit per day or 40 in total. This cannot be described as significant or severe and will not pose harm on the conservation area.
- 6.21 In addition, from this total it would be necessary to subtract the number of vehicle movements associated with the agricultural use of the barn.

Ecology

- 6.19 A ecological assessment of the barn has been undertaken by Arbtech Consultants. A copy of the report is attached

7 Summary/ Conclusion

- 7.1 For the reasons set above, we consider the proposal is 'appropriate development' within the MGB and furthermore we consider there is no negative impact on the openness of the Green Belt by virtue that the proposal is for the conversion of the barn to holiday let accommodation. The use of the accommodation is seasonal and occupation periods can be agreed by means of a suitably worded planning condition.
- 7.2 The proposal is therefore policy compliant with existing Green Belt policy as set out in the NPPF and Policy CS11 of the Gravesham Local Plan 1994 (saved policies). **It is an appropriate form of development within the Green belt**
- 7.3 The supporting documents and plans submitted as part of this application have demonstrated that the proposal represents a high-quality sustainable development that accords with the relevant planning policies of the

Development Plan and other material considerations including the NPPF and, as such, that the proposal should be supported.

- 7.4 A number of amendments have been made to the proposals including the removal of boundary fencing for each property creating a communal area for occupants of the holiday let units. Clarification is also made on the maximum number of occupants per unit
- 7.5 The opportunity to bring forward a tourist scheme for short stay accommodation of this scale and in this nature is uncommon in the Council's area and will be a significant economic and tourist benefit to the local area.
- 7.5 In light of the above, we respectfully request that this revised planning permission be allowed for conversion to holiday let accommodation.

Appendix 1: Site Photographs



Existing Barn (Viewed from East)



Existing Barn (Viewed from North Elevation)

Planning Statement: Abbey Farm (Barn), Church Street, Higham ME3 7LS



Existing Barn (Viewed from North East Elevation)



Existing Barn Viewed Internally



Existing Barn Viewed Internally