



Delegated Report

Application No:	20220583
Location:	Meopham Veterinary Surgery, Wrotham Road, Meopham DA13 0QG
Description:	Erection of a rear extension and change of use of land to form an extended carpark with EV charging comprising 10no. additional parking spaces on the adjoining parcel of land.
Applicant:	Mr Martin Hobbs
Site Visit Date:	16 June 2022

Submitted Documents/Plans

The application comprises the following documents and plans:

Application form
Planning Statement
Letter of support from Red House Kennels
Letter of support from Ward Security
Letter of support from University of Surrey
Second letter of support from University of Surrey
Letter of support from Two Gates Boarding Kennels
Drawing no. 2118-TP-00 (existing plans)
Drawing no. 2118-TP03 (proposed elevations)
Drawing no. 2118-TP02 (proposed floor plans)
Drawing no. 2118-TP-01 (proposed block plan)

Relevant Planning History

20200865	Engineering works and change of use of paddock land to create 20 parking spaces including landscaping, access and associated works.	Refused	27.10.2020
20181229	Erection of a single storey rear extension existing building to provide 14no. additional kennels.	Permitted	22.01.2019
20150525	Display of two internally illuminated fascia signs and a double-sided, internally illuminated, projecting box sign on the front elevation, a free-standing, externally illuminated	Consent	21.07.2015

totem sign at the front and two non-illuminated wall signs.

20140694	Erection of single storey side and rear extension with enlarged rear gables and two dormer windows to form enlarged veterinary hospital and re-modelling of car park to form additional parking facilities with improved landscaping.	Permitted	22.12.2014
20080822	Erection of single storey rear extension in substitution to that previously permitted under planning permission reference number 20080195 for revised internal layout of the rooms.	Permitted	04.11.2008
20080195	Erection of single storey rear extension to form sterilisation/sluice room, ophthalmic room and surgical instrument store.	Permitted	28.04.2008
20060819	Erection of storage shed to replace existing greenhouse.	Permitted	23.11.2006
20050864	Alterations to the rear roof to provide a gable end to south west wing and conversion of additional roof space into overnight veterinary accommodation and an enlarged office.	Permitted	02.12.2005
20050002	Application for variation of condition 17 of planning permission reference number GR/2002/159 which prevents horse boxes being kept or parked on the site at any time, to allow horse boxes and trailers to be parked in the car park.	Refused, appeal allowed	17.02.2005
20030666	Display of an externally illuminated free-standing 'v' shaped signboard in the front garden.	Consent	23.09.2003
20020159	Change of use of dwelling/former nursing home into a veterinary surgery with associated offices, overnight accommodation and the laying out of 18 no. car parking spaces.	Permitted	08.07.2002
19830102	Use of part of premises as a nursing home	Permitted	23.05.1983

19820814	Construction of extension at 1st floor level at the rear and construction of dormer extensions in side and rear roof slopes to form two bedrooms and bathroom	Permitted	05.01.1983
19820693	Section 53 determination as to whether planning permission is required for construction of dormers in the side and rear roof slopes	Not required	20.10.1982

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS10 – Physical and Social Infrastructure
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Design & Development Principles

Paragraph 33 of the National Planning Policy Framework (2021) sets out those 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 The review 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 a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the National Planning Policy Framework (2021), the Council will also seek to replace these saved policies via the emerging Local Plan.

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

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

Other material considerations

National Planning Policy Framework (2021)

- Section 2 – Achieving sustainable development
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Green Belt Land

Supplementary Planning Guidance

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

Consultations, Publicity and Representations

Meopham Parish Council

Following discussion by Meopham Parish Council's Planning Applications Committee; the Council wishes to provide the following response:

- Whilst the Council wishes to encourage local business, we ask the Borough Council takes full note of the impact on the Green Belt and traffic on A227.

Highway Development Management Officer

This application is a little confusing, the application form and Planning Statement states the car parking will increase from 33 to 43 an increase of 10, yet drawing number 2118-TP-01 shows 49 an increase of 16.

Two of the disabled parking spaces are poorly located as the walking distance is further than it need be. Ideally spaces 16, to 19 should be reserved for the disabled, although this would reduce capacity slightly, alternatively 18 and 19 together with 20 and 21 would be appropriate with no loss of parking provision.

Looking at the proposal, there are no alterations in the clinics in the original building. The planning statement shows in paragraph 1.2.1 that the practice employs 46 staff and so as far as I can ascertain no additional staff will be employed as a result of development.

Looking at SPG4 the adopted but accepted dated car parking guidance. The car parking provision should be 1 space per 2 staff and four spaces per consulting rooms all being a maximum requirement. As the existing building and staff numbers are unchanged I shall only initially consider the extension in terms of new parking spaces. In terms of clinics the new treatment rooms are Euthanasia, physiotherapy and Endoscopy, the first and last are most unlikely to be in constant use and may well divert staff from other activities as there is no increase in numbers for these treatment rooms. So ten spaces are probably more than adequate for the increase in size, not the 16 shown on the plan. No allowance is considered necessary for the on call bedroom as this will be used when no other or limited staff are on site and the public would only attend in an emergency.

It is noted that photos have been submitted regarding potential parking issues with the current site, but these are very specific to adjacent to the entrance without the wider parking area being included. They were also taken on one visit, so do not provide an evidence base to make a judgement on. (People and cars are a constant).

The Google Satellite and Street View images do not suggest there to be a parking issue, so more evidence is required to support such a claim, or dispute it if the objectors to the proposals wish to support their comments. All photos should be dated and timed.

In terms of the sustainability of the site, there is limited information, at its simplest it would require a postcode analysis of existing clients, showing numbers and distance travelled. Ideally the hospital would then be located to provide the greatest benefit of minimising distance travelled to site for the majority of clients, given the list of districts served with the primary urban area to the north, this would probably be to the north of the current site.

Given that the application is not best supported in terms of the information submitted and the issue with the drawings, my conclusion is as follows;

1. The site at most only requires a maximum of 10 additional parking spaces, but 16 are shown on the drawing submitted.

2. There is insufficient information to make a judgement regarding the location being sustainable.
3. A condition is required to ensure a minimum of 2 secure cycle parking spaces are provided to comply with the requirements of SPG4, one space per two consulting rooms.
4. Two of the disabled parking spaces are poorly located and should be positioned closer to the main entrance.

From a highway stance, I do not believe the proposal is ideal, but there is no highway reason to object, given the practice exists.

Neighbouring properties

The application has been advertised by site notice and individual letters to eight neighbouring properties. Five letters of objection have been received (two from the same address). The main concerns are summarised below:

- Development is in the green belt and the building has already been extended more than 1/3
- Further erodes the green belt
- Car park has already been refused
- Owners have destroyed the habitat in the adjacent land
- There is no parking issue at the vets – it is never full
- Light pollution from the signage
- Noise during the building works
- Traffic issues
- The owner has other veterinary sites that are not in the green belt
- Expansion is not necessary
- Would staff staying overnight require a change of use?
- The increase in size of 368sqm on a base of 480sqm is an increase of 80%
- arguments for very special circumstances are not convincing
- the owners have not engaged with neighbours
- noise from dogs barking, car doors shutting, generators etc
- why has the name changed from Meopham vets to Meopham veterinary hospital?
- This is not a community vet, but a national one
- Acoustic fences do not work
- Cars in the pictures are parked at the front even though there are spaces in the car park which is misleading
- The business has out grown the site and should move to a brownfield site
- Proposal is out of character
- The specialist equipment statement is argumentative – what evidence is provided that other Vets do not match this facility.

Analysis

Proposal

This application seeks planning permission for the erection of a rear extension and change of use of land to form an extended carpark with EV charging comprising 10no. additional parking spaces on the adjoining parcel of land.

The proposed rear extension will project a maximum of 13m to the rear of the building and will be approx. 30m wide. It will have a hipped roof at approx. 4.8m high. The plans show solar panels on the southern and western roof slopes. Internally the extension will provide for a library/clinical offices/meeting space, kitchen, staffroom/dining room, toilets, on-call bedroom, euthanasia room,

hospital pharmacy, physiotherapy room, clinical storage/medical records room, surgical instrument prep and autoclaves room and endoscopy and ethylene oxide room.

The new car park will be located to the south of the site and will provide for no. 49 spaces, including no. 6 EV charging points. There are currently 33 spaces and therefore the proposed plans show an increase of 16 spaces despite the application form and Planning Statement stating 10 spaces.

Principle

The application site lies within the Green Belt where development is inappropriate with few exceptions and except in very special circumstances. The site is also located within the Meopham Downs Landscape Character Area. The application therefore is assessed against:

- Green Belt
- Landscape character
- Amenity
- Parking/highways safety

Green Belt

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green Belt serves five purposes:

- 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.

Para. 147 of the National Planning Policy Framework 2021 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

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

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-

use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Point (c) is relevant in this case and the applicant has relied upon it in their Planning Statement.

According to the planning register the floor space of the building was originally as the following:

Ground floor 210sqm

First floor 53sqm

Between 1982 and 2008 there were four permissions granted and implemented which resulted in the following increase in size:

Ground floor 269sqm

First floor 92sqm

In 2014 there was permission granted and implemented for an additional:

173sqm at ground floor

46sqm at first floor

In 2018 a further 36.5sqm was approved at ground floor which brought the total additions to approx. 134% increase over the original footprint. The 2018 application was granted on the basis that very special circumstances exist because the business supports the rural economy and also that the extension was located to a corner, did not extend beyond the rear wall and that was not readily visible.

This proposed extension will add a further approx. 375sqm to the building. This is a total increase of 991.5sqm which is 377% increase over the original floor area. Given that the previous extensions already amounted to more than 1/3 of the original building, and therefore were considered disproportionate additions, this further extension cannot meet the exception point (c). The applicant's agent has wrongly interpreted this exception and has used the size of the existing building in their calculations rather than the *original* building as stated in the NPPF. Para. 5.4.2 of the Planning Statement also make reference to the residential permitted development rights. It says that, if the property was still in residential use, it would benefit from being able to extend 8m to the rear, however the building is not in residential use, and has already been heavily extended.

Para. 150 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. These are:

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

The extension to the car park is a change of use of land from paddock to parking to serve a commercial business. Whilst engineering operations may fall within the list of exceptions, a material change of use to a car park does not fall within the exception list of para. 150. The proposal therefore fails to comply with this National Policy which was also the case when application 20200865 was refused for the change of use of the paddock to car park due to the negative impact on the openness of the Green Belt.

Given that the proposals meet none of the exceptions it has to be decided if there are any very

special circumstances why the proposals should be allowed in the Green Belt.

Very Special Circumstances

Para. 148 states that, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. '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.

The applicants state that the Meopham Vets is a specialist facility, being one of only three vets in Kent that has a CT scanner. It provides employment for 10 vets, 26 nurses and 10 admin and support staff. The practice also employs a further 6 vets, 10 nurses and 2 admin and support staff in practices in Swanscombe, Sevenoaks and Tonbridge.

The reasons for the expansion are given as being:

- Increase in pet ownership
- Insufficient parking
- Insufficient storage space
- Insufficient sterilisation and surgical prep facilities
- Inadequate pharmacy space
- Insufficient rest facilities
- Inadequate library space
- No space for physiotherapy or euthanasia

As such, the facility needs to expand to meet the need of the community. It is also noted that the statement also relies on the increase in housing in Kent and the placements the veterinary surgery offers to university students.

The applicant's agent states that the proposed extension aligns with para. 148 (c) of the NPPF (the Council is assuming they mean para. 149 (c)). In addition to this they believe the circumstances of the case present a coherent set of 'Very Special Circumstances' which support development in the Green Belt, including:

- The site is a certified RCVS veterinary hospital (one of only eight in the country);
- The veterinary hospital is a significant employer;
- The site has specialist equipment and facilities essential to meet needs in the Gravesham BC area;
- The site is a training centre for veterinary professionals and provides an essential role for both students and specialists. This ongoing training will also help to address the chronic shortage of suitably qualified and skilled veterinary professionals;
- The proposal meets current needs arising from the operation of the hospital (a matter exacerbated by the Covid-19 pandemic, changes to the situation of EU vets caused by Brexit, and an increase in demand for vets driven by a surge in pet ownership in the UK) in response to a RCVS inspection such that the works are 'required';
- The veterinary profession is currently listed on the Government's 'Skilled Worker visa: shortage occupation (updated February 2022);
- The site provides an essential 'community service' and constitutes 'community infrastructure' necessary to provide sustainable communities;
- The provision of specialist services that are not available at other local veterinary practices, such that failure to expand the facility will simply result in additional 'patient miles', which would not present a sustainable approach to development; and
- The current parking is inadequate and usage levels could result in backing up on the highway unless additional provision is made.

Policy CS07 of the Gravesham Local Plan Core Strategy 2014 supports the appropriate expansion

and diversification of the rural economy and has supported expansion of this business in the past. However, in this instance the extension is significant and, together with the increase in car parking on a former paddock, cannot be considered to maintain the openness of the Green Belt. The letters of support are acknowledged but do not outweigh the damage to the openness of the Green Belt.

Impact on the Surrounding Street Scene and Landscape Character Area.

The application site is located opposite residential properties that are mixed in design and type. There are grass verges and soft landscaping with low walls to the front of dwellings. The site immediately to the south of the application site was a paddock. Regrettably, the applicants have cleared this site of all vegetation.

The site is located within the Meopham Downs Landscape Character Area where the topography is gently undulating and the dominant land use is agricultural with a mix of grazed pasture and arable use. There is a presence of horse related activity scattered throughout the landscape. The condition of the landscape is good and its sensitivity is moderate. Overall, the guidelines state that Meopham Downs should be conserved and reinforced. It is not considered that the proposed extension, due to its size and roof design which is incoherent with the host building, meet these objectives.

Policy CS19 sets out the key principles for the design of proposals. This states that new development will be visually attractive, fit for purpose and locally distinctive.

The proposed extension will be readily visible from the fields to the rear and from passing traffic travelling north. Due to its size and appearance and cumulative impact of all the additions to this building, the proposed extension will result in a detrimental impact on the character and appearance of the surrounding landscape. With regards to the laying of the car park, the issues are the same as raised under 20200865:

There is a presence of horse related activity scattered throughout the landscape. The condition of the landscape is good and its sensitivity is moderate. Overall, the guidelines state that Meopham Downs should be conserved and reinforced. It is not considered that the laying of a car park would conserve or reinforce the landscape and therefore conflicts with Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

The replacement of a paddock with a car park which is a typically urban feature, results in the loss of biodiversity and introduced an urban development that is not visually attractive.

Whilst it is recognised that there are listed buildings close to the site, they are a sufficient distance away that the proposed development would not have a significant impact on their setting.

The proposed development therefore conflicts with the objectives of Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014 and para. 130 of the National Planning Policy Framework 2021.

Neighbouring Amenity

The closest neighbour is Lewin House to the north of the site. This property is set away from the boundary and the boundary treatment consists of a high acoustic fence. There is also a lower fence and planting beyond this. The extent of projection is large, however as it is single storey, it will have no detrimental impact in terms of loss of outlook, sunlight or daylight. A window is proposed in the northern flank to serve the endoscopy room however, due to the height of the boundary treatment, this window will be screened and will not result in any loss of privacy to this neighbour.

There have been a number of objections relating to noise and disturbance. A condition was recommended to the previous permission that a noise scheme should be submitted to the Local Planning Authority prior to first occupation. Due to the potential increase in customers and staff, in the event of an approval, a similar condition should be imposed.

No other neighbour is within close proximity to suffer from loss of amenity from the development.

The proposed extension and car park, subject to a condition relating to the submission of a noise scheme, will have no significant detrimental impact on any neighbouring property and therefore accords with policy CS19 of the Gravesham Local Plan Core Strategy 2014 and para. 130f of the National Planning Policy Framework 2021.

Parking and Highways

This planning application is not consistent. The application form and Planning Statement states the car parking will increase from 33 to 43 an increase of 10, yet drawing number 2118-TP-01 shows 49 an increase of 16.

Two of the disabled parking spaces are poorly located as the walking distance is further than it need be. Ideally spaces 16, to 19 should be reserved for the disabled, although this would reduce capacity slightly, alternatively 18 and 19 together with 20 and 21 would be appropriate with no loss of parking provision.

Looking at the proposal, there are no alterations in the clinics in the original building. The planning statement shows in paragraph 1.2.1 that the practice employs 46 staff and there is no mention of any additional staff that will be employed as a result of development.

Looking at SPG4 the adopted but accepted dated car parking guidance. The car parking provision should be 1 space per 2 staff and four spaces per consulting rooms all being a maximum requirement. In terms of clinics the new treatment rooms are Euthanasia, physiotherapy and Endoscopy, the first and last are most unlikely to be in constant use and may well divert staff from other activities as there is no increase in numbers for these treatment rooms. So ten spaces are probably more than adequate for the increase in size, not the 16 shown on the plan. No allowance is considered necessary for the on call bedroom as this will be used when no other or limited staff are on site and the public would only attend in an emergency.

It is noted that photos have been submitted regarding potential parking issues with the current site, but these are very specific to adjacent to the entrance without the wider parking area being included. They were also taken on one visit, so do not provide an evidence base to make a judgement on. (People and cars are a constant).

When visiting the site the amount of parking available was significant. There was no suggestion that there are parking problems at this site. This conclusion is corroborated by those neighbours that have written in to the Council to object against the proposals. Furthermore the Google Satellite and Street View images do not suggest there to be a parking issue, so more evidence is required to support such a claim, or dispute it if the objectors to the proposals wish to support their comments. All photos should be dated and timed.

In terms of the sustainability of the site, there is limited information, at its simplest it would require a postcode analysis of existing clients, showing numbers and distance travelled. Ideally the hospital would then be located to provide the greatest benefit of minimising distance travelled to site for the majority of clients, given the list of districts served with the primary urban area to the north, this would probably be to the north of the current site.

In the event of an approval a condition would be required to ensure a minimum of 2 secure cycle parking spaces are provided to comply with the requirements of SPG4, one space per two consulting rooms.

A condition would also be recommended that the parking layout is amended to show two of the disable parking spaces positioned closer to the main entrance.

Overall in terms of parking and highway safety, subject to conditions, no objection is raised.

Conclusion

The proposed extension and change of use from paddock to car park will result in inappropriate development in the Green Belt without demonstrating that any very special circumstances exist. The proposal, by virtue of its size, appearance and location, will result in a detrimental impact on the openness of the Green Belt, an unattractive development within a landscape character area and loss of biodiversity out of character with the area and contrary to Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy 2014 and paras. 130, 147 and 149 of the National Planning Policy Framework 2021.

Recommendation:

Refuse

See draft Decision

Case Officer: AW	Team Leader: Faye Hobbs
Signed: 	Signed: 
Dated: 25 July 2022	Dated: 26 July 2022