

The Golden Lion pub, Luddesdown

Planning Statement including Heritage Statement

ST/TS/33852
(January/2025)



Inspiring. Planning. Delivering

With nearly 40 years of knowledge and sector experience, DHA, the South East's largest independent planning and highways consultancy delivers solutions built for success.

The DHA team share the same values, vision and approach to our work and clients, and we benefit from the knowledge of our multiple business units, providing integrated solutions to reach the optimum outcome. We believe that is what keeps us unique is our ability to provide exceptional quality customer care and adaptability to the projects we take on.

Planning
Transport and Infrastructure
Masterplanning and Design
Environmental Impact Assessment
Flood Risk and Drainage
Land & Viability
GIS

Our Offices:

Kent
01622 776226

Gatwick
01293 221320

London
020 3005 9725

www.dhaplanning.co.uk

info@dhaplanning.co.uk



DATE	Version	Revision Notes
20.12.2024	0.1	ST/TS

CONTENTS

1	INTRODUCTION.....	6
1.1	PURPOSE OF THIS DOCUMENT	6
1.2	APPLICANT	6
1.3	APPLICATION DOCUMENTS	7
2	APPLICATION SITE	8
2.1	THE SITE	8
	Planning Constraints	10
2.2	PLANNING HISTORY	10
2.3	PRE-APPLICATION RESPONSE	12
	Green Belt.....	12
	Design, Character and Appearance	13
	Landscape and Visual.....	13
	Conservation Officer Comments	13
	Lighting, Restaurant and Takeaway Noise	14
3	THE PROPOSED DEVELOPMENT	15
3.1	CONTEXT TO THE PROPOSED DEVELOPMENT	15
	The existing pub	19
3.2	THE PROPOSED DEVELOPMENT	20
	Layout and form	20
	Design and appearance	23
	Landscaping	23
	Access and Parking	23
4	PLANNING POLICY FRAMEWORK	24
4.1	INTRODUCTION	24
4.2	MATERIAL CONSIDERATIONS	25
	National Planning Policy Framework.....	25
	Decision Making	26
	Conserving and enhancing the historic environment.....	29
4.3	ADDITIONAL MATERIAL CONSIDERATIONS.....	30
	SPG4 – KCC Parking Standards (2006).....	30
	Landscape Character Assessment (2009)	30
	Kent Downs Management Plan 2021-2026.....	30
5	PLANNING APPRAISAL.....	32
5.1	OVERVIEW	32
5.2	PRINCIPLE OF THE PROPOSED DEVELOPMENT	32
	Green Belt Assessment	33
	Landscape impacts and The Kent Downs National Landscape	36
5.3	OTHER MATTERS	37
	Access and Highways.....	37

Ecology	38
Flood and Drainage	38
Noise	39
6 HERITAGE STATEMENT	40
6.1 INTRODUCTION.....	40
6.2 SETTING OF BROOKERS FARMHOUSE.....	42
6.3 IMPACT OF THE PROPOSAL ON THE SETTING OF BROOKERS FARM.....	45
7 PLANNING BALANCE AND CONCLUSION	47

TABLE OF FIGURES

FIGURE 2-1: SITE LOCATION PLAN.....	8
FIGURE 2-2 VIEWS TOWARDS THE SOUTH WEST ELEVATION OF THE PUB AND ITS GARDEN.....	9
FIGURE 2-3 VIEWS OVER THE PUB CAR PARK AND NORTH EAST ELEVATION OF THE PUB	10
FIGURE 2-4: PROPOSED PLAN FROM APPLICATION REF19550198.....	11
FIGURE 3-1: ILLUSTRATIVE PROPOSED MASTERPLAN OF THE KYNG RESERVE SITE	17
FIGURE 3-2: ILLUSTRATIVE PROPOSED MASTERPLAN OF THE SILVERHAND SITE	18
FIGURE 3-3: EXISTING SITE LAYOUT.....	19
FIGURE 3-4: AREAS IN RED SHOWING THE BUILT FORM TO BE DEMOLISHED AS PART OF THE PROPOSED APPLICATION.....	21
FIGURE 3-5: CONSOLIDATED LAYOUT OF THE PROPOSAL	21
FIGURE 3-6: PROPOSED GROUND FLOOR LAYOUT OF THE PUB	22
FIGURE 6-1: BROOKERS FARMHOUSE (COURTESY OF HERITAGE ENGLAND).....	41
FIGURE 6-2: LUDDSDOWN SHOWING BROOKERS FARMHOUSE 1797	43
FIGURE 6-3: LUDDSDOWN 1895	43
FIGURE 6-4: 1960 AERIAL PHOTOGRAPH OF THE SITE.....	44

TABLES

TABLE 1-1: SUBMISSION DOCUMENTS.....	7
TABLE 1-2: SUBMITTED DRAWINGS.....	7
TABLE 2-1: PLANNING HISTORY.....	11

1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1 This statement has been prepared in support of a full planning application submitted on behalf of Vineyard Farms Ltd to Gravesham Borough Council (GBC) for the:

"Proposed extension and refurbishment of the Golden Lion pub at Luddesdown including landscaping, parking and associated works."

- 1.1.2 This statement provides an overview of the site, the proposed development and the relevant planning history; and a review of all applicable development plan policies as well as the National Planning Policy Framework (NPPF) and other relevant guidance.

1.2 APPLICANT

- 1.2.1 MDCV is the parent company of Vineyard Farms Ltd, based in Luddesdown, Kent. Vineyard Farms Ltd own a vineyard extending between Luddesdown and Upper Bush. Their wine making facility and shop is located to the southwest of the Golden Lion pub.
- 1.2.2 MDCV has a vision to bring the finest English and Provençal wines to the UK market. It has a long history of producing award-winning Provence Rosé and English Sparkling Wines, with extensive infrastructure in France and the UK.
- 1.2.3 Vineyard Farms Ltd 1,200-acre farm is a family-owned operation. They have a growth plan to invest up to £60m in infrastructure and vineyards, creating over 150 permanent new jobs for local people. Their UK estate is the largest single organic vineyard in the UK with 800 acres under vine, with a plan to grow to over 1,000 by 2027. The remainder of the estate comprises woodland and meadows and is managed under the Higher Tier Stewardship Scheme.
- 1.2.4 Vineyard Farms Ltd currently employs over 120 permanent employees based in Luddesdown and Upper Bush. Throughout the year, this number increases with the arrival of seasonal workers required during crucial periods such as harvest or to carry out maintenance tasks such as trellising.
- 1.2.5 Vineyard Farms Ltd have achieved Approved Body Status under S35 1 (c) of the Wildlife and Countryside Act on 11 December 2024. This recognises that Vineyard Farms Ltd meets Natural England's high standards of nature conservation and expertise, highlighting the Silverhand Estate contribution to the establishment of the new North Kent Woods and Downs National Nature Reserve by Natural

England. This newly emerging National Nature Reserve could be designated as early as February 2025).

1.3 APPLICATION DOCUMENTS

- 1.3.1 This Statement summarises and appraises the proposed development in the context of the relevant planning policy requirements. It should be read together with the following reports and plans

DOCUMENT	AUTHOR
Application Form and Certificates	DHA
Planning Statement (Including Heritage Statement)	DHA
Design and Access Statement	Clague Architects
Transport Statement	DHA Transport
Noise Assessment	Lustre Consulting
Landscape and Visual Appraisal	Briarwood Landscape Architecture
Preliminary Ecological Appraisal	JW Biodiversity
Biodiversity Net Gain Assessment	JW Biodiversity
Biodiversity Net Gain Metric Calculation	JW Biodiversity

TABLE 1-1: SUBMISSION DOCUMENTS

APPLICATION DRAWINGS	AUTHOR
Site Location Plan	Clague Architects
Existing Site Plan Demolition	Clague Architects
Existing Site Block Plan	Clague Architects
Existing Site Plan - Areas	Clague Architects
Proposed Site Block Plan	Clague Architects
Proposed Ground Floor Plan	Clague Architects
The Proposed First Floor Plan	Clague Architects
Proposed North-West And South-East Elevations	Clague Architects
Proposed The South-West And North-East Elevations	Clague Architects
The Proposed Site Plan - Areas	Clague Architects
Proposed Site Plan - Ground Floor	Clague Architects

TABLE 1-2: SUBMITTED DRAWINGS

2 APPLICATION SITE

2.1 THE SITE

- 2.1.1 The site is situated in the hamlet of Luddesdown in the Kent Downs National Landscape (formerly AONB) and the Green Belt in between Cuxton, Meopham and Cobham.

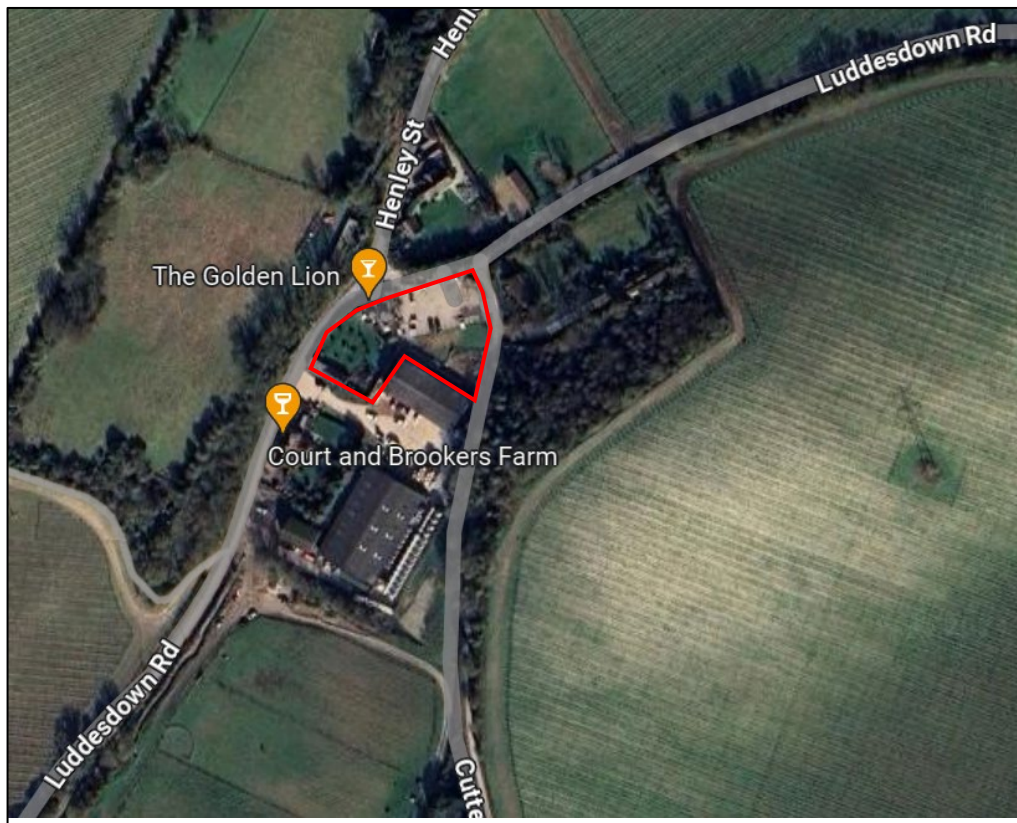


FIGURE 2-1: SITE LOCATION PLAN

- 2.1.2 The Golden Lion sits south of and abuts Luddesdown Road with the pub garden extending south and west along Luddesdown Road. The pub's car park is to the east. The proposal site encompasses the Golden Lion pub with its associated car park, pub garden and landscaping. The pub lies south of the junction between Henley Street and Luddesdown Road.
- 2.1.3 There has been a public house on the site since at least 1869. The age of the current building is unknown, but it is said to have been built in the 19th Century. The building is not listed.

- 2.1.4 Historically, a series of cottages were adjoined to the pub running eastwards along Luddesdown Road, located in part on the existing car park. The terrace of cottages was demolished in the 1960s, leaving only the pub. Historical maps of the site are available in the Heritage Statement in Section 6 of this report.
- 2.1.5 To the east of the site, beyond the car park, is the Grade II listed Brookers Farmhouse. A further residential property lies immediately to the north, adjacent to Henley Street, with two further cottages located to the south along Luddesdown Road. Immediately to the east and south of the site are two buildings owned by Vineyard Farms Ltd, used as a shop and as part of their wine-making facilities. Much of the surrounding landscaping is used for wine growing by the applicant, interspersed with woodland and rural properties.
- 2.1.6 Figures 2-2 and 2-3 below show the pub in its existing form.



FIGURE 2-2 VIEWS TOWARDS THE SOUTH WEST ELEVATION OF THE PUB AND ITS GARDEN



FIGURE 2-3 VIEWS OVER THE PUB CAR PARK AND NORTH EAST ELEVATION OF THE PUB

Planning Constraints

- 2.1.7 For planning purposes, the site is located in the countryside, the Kent Downs National Landscape (formerly AONB), and the Green Belt.
- 2.1.8 At the local level, GBC's Luddesdown Landscape Character Assessment shows that the site is within the Luddesdown Downs character area. GBC identify that the main characteristics of the built form in the Luddesdown Downs Character Area is the clustering of buildings around Lane junctions, farmstead development, timber framed buildings and the use of Kent Peg roof tiles.
- 2.1.9 The site is located in Flood Zone 1.

2.2 PLANNING HISTORY

- 2.2.1 GBC's online planning register records the following planning history for the site:

APPLICATION REF	DESCRIPTION	DECISION	DATE
19480145	Sanitary accommodation	Permission not required	09.02.1949
19550198	Alterations and additions	Approved	23.06.1955
19790648	Formation and layout of 10 additional car parking spaces	Withdrawn	22.11.1979
19900471	The single-storey side and rear extension will be erected to form an enlarged kitchen, restaurant, functions room, lobby, and toilet accommodation.	Refused	21.08.1990
19940416	Erection of conservatory on west elevation.	Approved	14.07.1994
20200612	Application to operate as a takeaway from 10.07.2020 until 23.03.2021. Proposed hours to be from 6.00pm until 8.00pm on a Friday and from 12.00pm until 3.00pm on a Sunday	Invalid application returned	06.12.2023

TABLE 2-1: PLANNING HISTORY

2.2.2 Application ref. 19550198 proposed alterations and additions to the pub which were approved and are shown in *Figure 2-4* below. The alterations and additions included the extension of the toilet block together with the provision of a new WC, which has subsequently been removed.

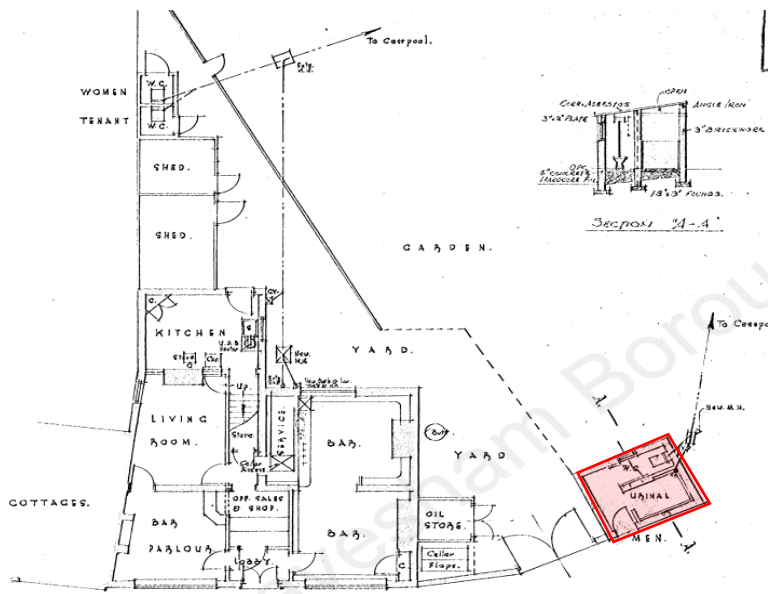


FIGURE 2-4: PROPOSED PLAN FROM APPLICATION REF19550198

- 2.2.3 Application re. 199000471 proposed an L-shaped single-storey side and rear addition to form a restaurant, kitchen, and toilet accommodation. The application appears to have been refused due to the scale of the proposed extension in the Green Belt and the potential highway impact.
- 2.2.4 The approved application ref. 19940416 for the addition of a conservatory on the pub's western elevation remains in-situ on site.
- 2.2.5 There appears to be no planning record for the demolition of the former terrace of cottages adjoined to the pub.

2.3 PRE-APPLICATION RESPONSE

- 2.3.1 Pre-application advice was received from Gravesham Borough Council (GBC) on the 8th of October 2024 following a site visit to the Golden Lion pub on the 18th of September. The below summarises the Council's advice based on a full application submission:

Green Belt

- 2.3.2 The pre-app response set out whether GBC considered the development to be appropriate in the Green Belt, including the effect on the openness of the Green Belt. The response from the officer set out the following:
- The pre-app proposal would result in a 55% increase in the floor area of the existing pub. The officer considered that by virtue of the above, the proposal would constitute inappropriate development within the Green Belt contrary to paragraph 154 (c) of the NPPF.
 - The Planning Officer confirmed that the site would be considered Previously Developed Land in accordance with paragraph 154 (g) of the NPPF.
 - Concerns were raised over the proposed extension to the pub with the "open views across the car park" and the need for the addition to be clearly and visibly subservient to the main building part of any future planning application.
 - The officer confirmed that the consultation NPPF will likely be published in early 2025. The consultation NPPF has revised the wording of paragraph 154 (g) to allow the partial redevelopment of previously developed land where it would not cause substantial harm to the openness of the Green Belt. It is outlined in the pre-app response that if this could be demonstrated, the proposals could fall under what is acceptable in accordance with the emerging NPPF.

- The Council considered that no Very Special Circumstances were demonstrated as part of the pre-application submission.

2.3.3 The Planning Officer outlined that with appropriate design revisions, particularly considering the size of extensions in relation to the original building, there may be scope for a more acceptable scheme to come forward.

Design, Character and Appearance

- In general, the development design should be in line with the Kent Design Guide. Car parking should be in line with the Kent Vehicle Parking Standards (2006). Emergency access should also be demonstrated.
- The Planning Officer set out that any future development should ensure that it does not take over the use of the building as a pub, which is considered the building's key function. Therefore, the development should be designed appropriately by virtue of the size and scale of the addition.
- The extent of additional covered spaces in the pub garden also needs to be considered; this area should remain as open as possible, with regard to the Green Belt location.

Landscape and Visual

- It was considered that the overall proposal has the possibility to enhance the setting of the pub. It was advised that any future planning application should include a Landscape and Visual Impact Assessment to ensure the landscape impacts of any proposal are fully considered.

Conservation Officer Comments

- The Conservation Officer set out that the proposal enhances the setting of the pub and its boundary, which could also enhance the setting of Brookers Farm.
- It was advised to ensure the car park entrance is minimised and that native hedgerow and an estate fence are planted along the boundary of Luddesdown Road with a grass verge to keep rural in character.
- The side extension to the main pub buildings should blend with the 19th century appearance of the building. Painted brick with a lean too pitched slated roof would be more in keeping with the building's appearance and the preservation of the setting of the listed building.
- The new rear extension appears to be acceptable, reflecting the area's agricultural character of local buildings, where the colour of cladding

reflects traditional tar-stained barns associated with rural locations. Slate or lead roofs would also be appropriate roofing materials.

Lighting, Restaurant and Takeaway Noise

- Details pursuant to the kitchen extract system are advised to be submitted as part of a future planning application in accordance with the "EMAQ/Defra Control of Odour and Noise from Commercial Kitchen Exhaust Systems (2018 update)". After installation of the approved plant, no new plant or ducting system shall be used.
- External lighting will only be allowed where it illuminates the curtilage on the premises. Lighting in the pub garden will need careful consideration.
- The Council requested details to be submitted as part of any future planning application relating to the outdoor cooking operation and extraction system.
- The Council set out the noise from the extractor system also needs to be considered and it was advised that any planning application should include a Noise Impact Assessment.

3 THE PROPOSED DEVELOPMENT

3.1 CONTEXT TO THE PROPOSED DEVELOPMENT

- 3.1.1 The Golden Lion pub has been purchased by Vineyard Farms Ltd to form part of its customer offering and drive wine sales through the adjacent wine shop as well as providing a destination for visitors to the National Landscape.
- 3.1.2 The scheme forms the first part of the delivery of Vineyard Farms Ltd vision for Luddesdown and their estate.
- 3.1.3 Vineyard Farms Ltd has produced a masterplan for their vision which was presented to the Leader of Council and Officers in August 2024. The site and the masterplan were also submitted as part of GBC's Employment Call for Sites exercise in October 2024 as a scheme that would significantly benefit the rural economy of the borough.
- 3.1.4 The Applicant's land holding comprises Luddesdown Court and its historic farmstead, Brookers Farm, the Golden Lion pub and the wider farmland, which operates as a vineyard.
- 3.1.5 The area proposed as the Kyng Reserve (Luddesdown Court and Its Farmstead) and the Silverhand Site (the Golden Lion pub and the Court and Brookers Farm building) are shown in Figure 3-1 below.
- 3.1.6 The vision for Kyng's Reserve is to provide a new high-end visitor experience as part of the wider vineyard and winery business as follows:
- The sensitive conversion and extension of Luddesdown Court to provide high-end overnight accommodation (8 double bedrooms);
 - The reinstatement of a former oast house within the farmstead to provide further high-end overnight accommodation (4 double bedrooms);
 - Construction of a boutique lodge;
 - Construction of a new barn/outbuilding to provide wine-tasting and hosting facilities, conferencing and education facilities;
 - Refurbishment of barns to provide a second conference centre and wine cellars;
 - Conversion/repurposing of two existing farmstead buildings to create a servicing block and pool/spa;
 - Redeveloping the existing site office to provide a small on-site restaurant;

- Landscaping, drainage and other works.

3.1.7 The Vision for the Silverhand Site comprises:

- Expansion and refurbishment of the Golden Lion pub to provide a vibrant, prosperous local rural pub and an important community asset.
- New offices for MDCV;
- An on-site wine shop for the sale of MDCV produce for a boutique wine experience (already now existing);
- An area for a food market;
- New offices and community spaces.

3.1.8 The proposed development of the estate will attract tourists to the region who wish to partake in short breaks, wine tours, conferences and to purchase produce from the proposed shop. In addition, the proposed development will open the site to the public to visit and appreciate its historical significance and National Landscape setting, which has otherwise not been possible due to its private ownership.

3.1.9 The extension and refurbishment of the Golden Lion will form the delivery of the second part of the masterplan vision (the first being the wine shop which now exists) and should be view in this context.



FIGURE 3-1: ILLUSTRATIVE PROPOSED MASTERPLAN OF THE KYNG RESERVE SITE



FIGURE 3-2: ILLUSTRATIVE PROPOSED MASTERPLAN OF THE SILVERHAND SITE

The existing pub

- 3.1.10 The Golden Lion in its current form does not benefit from an optimal layout. The existing car park is poorly defined and provides an unattractive sense of arrival to the pub. The kitchen is also too small, and the general layout of the pub has suffered by successive add-ons to the property over time rather than a cohesive rationalisation. The overall appearance of the property is beginning to look tired, and the overall aesthetic appearance of the property is deteriorating.
- 3.1.11 As with most public houses in the current climate, the economic prosperity of the industry is largely driven by food sales over wet sales. This is not to say that Vineyard Farms Ltd wishes to remove the long-established use of the pub as a drinking establishment, but it wishes to enhance the food offering and experience. The existing bar area will retain its traditional character and function. It is very much intended to retain and respect the community feel of the pub.
- 3.1.12 The above sets a different economic context to the proposed extension of the property refused in 1990. Further, we also consider the proposed development to represent a proposal that is of a higher standard of design, respecting the character of the original building and the agricultural buildings that surround the pub.

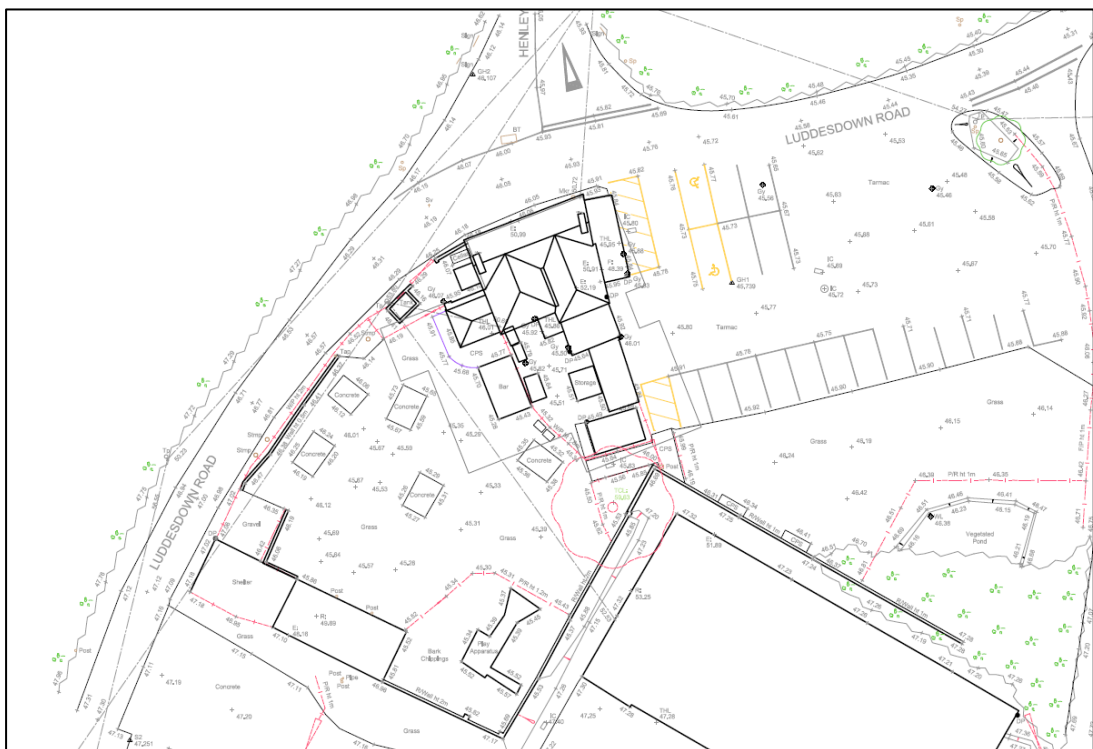


FIGURE 3-3: EXISTING SITE LAYOUT

3.2 THE PROPOSED DEVELOPMENT

3.2.1 The proposed development seeks to refurbish and extend the pub to rationalise the internal layout and external spaces. This includes its garden and car park, the enhancement and extension of the dining area, an improvement to the overall aesthetic of the property and its contribution to the street scene of Luddesdown Road and the setting of nearby listed buildings. The development proposals include:

- Demolition of the existing rear extension(s) including the existing pub kitchen and construction of a new single-storey rear extension to provide a new kitchen and space for up to 40 restaurant covers;
- Demolition of existing conservatory to be replaced with new W.C. facilities;
- Remodelling of the eastern elevation to create an enhanced legible entrance;
- Internal works to upgrade the existing bar area;
- Installation of a new flint boundary wall that fronts onto Luddesdown Road;
- A new ramp providing access to the adjacent wine shop
- Re-organising and enhancing the existing car park including landscaping; and
- Enhancements to the existing access to the car park from Luddesdown Road.

Layout and form

3.2.2 The proposed development seeks to demolish all of the single-storey rear extensions to the property that have occurred in the twentieth century, including the existing conservatory as well as the removal of all covered structures from the pub garden.

3.2.3 The proposed layout seeks to consolidate all of the component parts of the existing pub into a more logical and usable form that increases its functionality but also the customer experience. This will comprise a new single-story rear and side additions providing a new kitchen, dining area and toilet facilities (See Figure 3.4 Below).



FIGURE 3-4: AREAS IN RED SHOWING THE BUILT FORM TO BE DEMOLISHED AS PART OF THE PROPOSED APPLICATION



FIGURE 3-5: CONSOLIDATED LAYOUT OF THE PROPOSAL

3.2.4 The proposed extension to the pub will include:

- A single-story side extension to the south-west elevation of the existing pub. This addition measures 9m in width and a depth of c.4.8m and eaves height of c.2m and a total height of c.3.4m. This addition will provide toilet facilities for the pub.
- A single-storey rear extension comprising flat and dual pitch roof element. This element of the proposal has a maximum depth of c.13m, a ridge height of 4.4m, a total height of 5m (measured to the top of the proposed chimney) and a maximum width of 18.4m. This element will provide seating areas for the pub's proposed restaurant, the pub kitchen and service and bin area.
- The single-story side addition to the north-west elevation will provide a new main entrance to the building and additional seating for the bar area. The addition comprises a width of 2.2m, a depth of 8.4m and has an eaves height of 2.8m and a total height of 3.3m.

3.2.5 Figure 3.6 below shows the proposed layout of the pub.

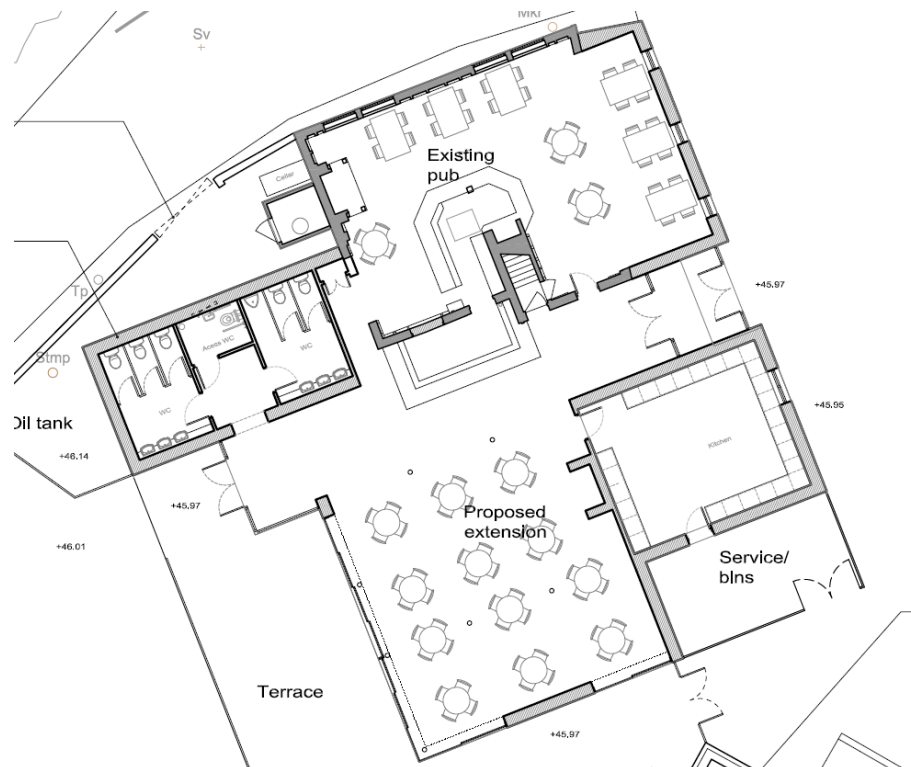


FIGURE 3-6: PROPOSED GROUND FLOOR LAYOUT OF THE PUB

- 3.2.6 The proposed additions will open onto a new outside terrace, providing step access to the existing pub garden and new step access to the existing wine shop.

Design and appearance

- 3.2.7 Full details on regarding the design approach and use of materials of the proposed development are provided in the Design and Access Statement submitted with the application.

Landscaping

- 3.2.8 The car park to the pub will be re-landscape reintroducing areas of grass verges and chestnut post and rail fences. The pub garden boundary fence along Luddesdown road is to be replaced by a flint faced masonry wall and three new trees.

Access and Parking

- 3.2.9 The existing car park has a largely undefined frontage onto Luddesdown Road with no defined entrance or exit. Vehicles choosing to exit the property closest to the pub have limited visibility from the left (west) when existing and whilst vehicle speeds are likely to be low, this does present a potential highways safety issue.
- 3.2.10 A newly defined access to the car park is proposed off the southern side of Luddesdown Road. The parking area will allow for the provision of 37no. of vehicles, including accessible spaces close to the pub's proposed main entrance.

4 PLANNING POLICY FRAMEWORK

4.1 INTRODUCTION

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.

4.1.2 For the purpose of this planning application the relevant development plan documents comprise the following:

- (1) Gravesham Local Plan Core Strategy (2014)
- (2) Gravesham Local Plan First Review Saved Policies (1994)

4.1.3 The following Local and National Planning Policies are considered most relevant to the proposal:

Gravesham Local Plan Core Strategy (2014)

4.1.4 **Policy CS01 Sustainable Development** states that the council will work proactively with applicants jointly to find solutions, which means that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area.

4.1.5 **Policy CS02 Scale and Distribution of Development** states that in rural areas development proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in the plan.

4.1.6 **Policy CS07 Economy, Employment and Skills** states that the Council will support proposals that promote the appropriate expansion and diversification of the rural area economy.

4.1.7 **Policy CS09 Culture and Tourism** states that the Council will seek to maximise opportunities for expansion in culture and tourism activity derived from its rich and diverse heritage and green infrastructure assets. Support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors where it is compatible with national policies for protecting the Green Belt.

4.1.8 **Policy CS11 Transport** states that new developments should mitigate their impact on the highway and public transport networks as required. As appropriate, transport assessments and travel plans should be provided and implemented to ensure the delivery of travel choice and sustainable opportunities for travel.

- 4.1.9 **Policy CS12 Green Infrastructure** states that sites designated for their biodiversity value will be protected will be given to the conservation and enhancement of the landscape natural beauty of the Kent Downs AONB and its setting. There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought within new development.
- 4.1.10 **Policy CS18: Climate Change** states that the council will require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use and support other proposals which lead to a reduction in carbon footprint including the retrofitting of existing homes and businesses.
- 4.1.11 **Policy CS19: Development and Design Principles** states that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area. It must also take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use.

Gravesham local plan first review (1994) – saved policies

- 4.1.12 **Policy T1 Impact of Development on Highway Network:** The Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.
- 4.1.13 **Policy T4 Impact of Development on Highway Network:** The Local Planning and Highway Authorities will not normally permit any proposed development outside the confines of the built-up area that generates significant vehicular or pedestrian traffic.
- 4.1.14 **Policy P3 Vehicle Parking Standards:** The Borough Council will expect the development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception.

4.2 MATERIAL CONSIDERATIONS

National Planning Policy Framework

- 4.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The latest version was recently updated on the 12th of December 2024.

Achieving sustainable development

4.2.2 Paragraph 8 of the NPPF sets out that planning has three independent objectives to support the achievement of sustainable development that need to be pursued in mutually supportive ways. These objectives are:

- (a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- (b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- (c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.2.3 Paragraph 10 of the NPPF states:

So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

4.2.4 Paragraph 11 states that decisions should apply a presumption in favour of sustainable development. For decision taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date.

Decision Making

4.2.5 Paragraph 39 states that local Planning authorities should approach decisions proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Building a strong, competitive economy

- 4.2.6 Paragraph 88 states that planning policies and decisions should enable:
- (a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;
 - (b) the development and diversification of agricultural and other land-based rural businesses;
 - (c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
 - (d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

- 4.2.7 Paragraph 89 states:

"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important 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). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

Promoting healthy and safe communities

- 4.2.8 Paragraph 98(d) seeks to ensure that established shops, facilities and services are able to develop and modernise and are retained for the benefit of the community.

Promoting sustainable transport

- 4.2.9 Paragraph 116 states that 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, following mitigation, would be severe, taking into account all reasonable future scenarios.

Making effective use of land

- 4.2.10 Paragraph 124 states that strategic policies should set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously-developed or 'brownfield' land.
- 4.2.11 Paragraphs 129 (d) and (e) state that planning policies and decisions should support development that makes efficient use of land, taking into account the desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change and the importance of securing well-designed, attractive and healthy places.

Achieving well-designed and beautiful places

- 4.2.12 Paragraph 131 states that creating high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.
- 4.2.13 Paragraph 135 states that Planning policies and decisions should ensure that developments:
- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

Protecting Green Belt land

- 4.2.14 Paragraph 143 sets out the five purposes of Green Belt. These are:
- (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.

- 4.2.15 Paragraph 153 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 4.2.16 Paragraph 154 lists exceptions to development in the Green Belt. These include:
- Paragraph 154 (c) states that 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 is not inappropriate development.
 - Paragraph 154 (g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause **substantial harm** to the openness of the Green Belt (our emphasis).

Conserving and enhancing the natural environment

- 4.2.17 Paragraph 189 states that great weight should be given to conserving and enhancing the landscape and scenic beauty National Landscape.
- 4.2.18 With respect to habitats and biodiversity, paragraph 193 says that when determining applications, local planning authorities should apply the principles 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.
- 4.2.19 Equally proposals that conserve or enhance biodiversity to seeking net gains should be supported and encouraged.

Conserving and enhancing the historic environment

- 4.2.20 Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 4.2.21 Paragraph 216 deals with applications affecting non designated heritage assets and that the impact needs to be weighed in the planning judgement having regard to the scale of any harm or loss and the significance of the heritage asset.

4.3 ADDITIONAL MATERIAL CONSIDERATIONS

SPG4 – KCC Parking Standards (2006)

- 4.3.1 This document describes the parking standards across Kent. For public houses, the parking guidance is a maximum standard requiring 1no space per 10 m².

Landscape Character Assessment (2009)

- 4.3.2 The Landscape Character Assessment shows that the site is within the Luddesdown Downs character area. GBC identify that the main characteristics of built form within the character area comprises buildings clustered around Lane junctions with farmsteads, timber framed buildings and Kent Peg tiles are common along with fruit buildings reflecting the geology of the Downs.

Kent Downs Management Plan 2021-2026

- 4.3.3 The aim of the Kent Downs Management Plan is to help guide development in the National Landscape.
- 4.3.4 **Section 3 of the Kent Downs Management** plan sets out how sustainable development can be achieved in the National Landscape it sets out that the Kent Downs has a rich tradition of half-timbered and weather-boarded buildings. There is also a legacy of locally distinctive architecture in locally derived building materials such as Ragstone, flint and chalk. Section 3 provides a number of policies to guide development in the National landscape the most important of which are:
- **SD2** The local character, qualities, distinctiveness and natural resources of the Kent Downs AONB will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements; and
 - **SD8** Ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs AONB.
- 4.3.5 **Policy LLC1** sets out to protect, conserve and enhance of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued.
- 4.3.6 **Policy FL5** seeks to promote appropriate farm diversification. It sets out that farm diversification activities will be supported if they help achieve the vision, aims and principles of the Kent Downs AONB Management Plan.

- 4.3.7 **Section 11 of the Management Plan** relates to the quality of life and vibrant communities within the National Landscape. It sets out that the secondary purpose of the National Landscape designations is to take account of the needs of land based and rural industries and of the economic and social needs of local communities.

5 PLANNING APPRAISAL

5.1 OVERVIEW

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.1.2 In determining whether the proposal accords with the development plan, the following issues are considered:
- Principle of the proposed development
 - Green Belt Assessment
 - Landscape impacts and The Kent Downs National Landscape
 - Other Matters
 - Access and Highways
 - Ecology
 - Flood and Drainage
 - Residential Amenity and Noise

5.2 PRINCIPLE OF THE PROPOSED DEVELOPMENT

- 5.2.1 Policy CS07 Economy, Employment and Skills States that:
- ‘The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy’.
- 5.2.2 Paragraph 88 of the NPPF ‘supporting a prosperous rural economy’ states that planning policies and decisions should enable:
- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;
 - the development and diversification of agricultural and other land-based rural businesses;
 - sustainable rural tourism and leisure developments which respect the character of the countryside;

- the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 5.2.3 Paragraph 98(d) seeks to ensure that established shops, facilities and services are able to develop and modernise and are retained for the benefit of the community.
- 5.2.4 The proposed development seeks to extend and refurbish an existing pub to enhance its food sales and visitor experience whilst also retaining it as a valued rural community pub. The primary function of the proposed development is to provide a vibrant prosperous rural pub but also help support Vineyard Farm Ltd's wider wine-making business and wine sales by providing a functional link between the pub and the adjacent wine shop within the setting of the wider wine making estate and surrounding vineyards.
- 5.2.5 We, therefore, believe that the principle of the proposed development is supported by the adopted development plan and the NPPF subject to consideration of the impact on the Kent Downs National Landscape and the Green Belt amongst other material considerations.

Green Belt Assessment

- 5.2.6 Policy CS02 of the core strategy (2014) states that the Council will apply national Green Belt policy when determining development within the Green Belt outside of any defined settlement confines.
- 5.2.7 The site lies within the Green Belt, where paragraph 153 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 5.2.8 However, a small number of exceptions to the above are set out within paragraph 154 of the NPPF, including:
- (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'.*
- (g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- 5.2.9 It is our position that the proposed development is not inappropriate development in accordance with paragraph 154 parts c and g.

Assessment under paragraph 154 (c)

- 5.2.10 The Framework neither defines nor quantifies 'disproportionate additions' in the Green Belt. GBC's pre-app advice states that saved Policy CS13 provides a general rule of thumb that there is an overall limit of one third of the gross floor area of the original building in terms of extensions within the Green Belt. It is however acknowledged that this is not directly applicable to the proposed development as it relates to residential development.
- 5.2.11 In respect of the proposals at the time of seeking pre-application advice, the Council stated:
- "As the submitted plans are not scaled, the gross external floor area of the original building cannot be calculated, and when considering the proposed floor area of the building as a whole it is recognised that the percentage increase in its size will not be as great as over 50%. Nevertheless, there is a concern that when considering the size of the proposed extensions together with the further covered seating areas in such close proximity to the main building, the proposals would amount to disproportionate additions over and above the size of the original building(s). This would be contrary to the requirements of paragraph 154 (c) of the NPPF 2023. On this basis, the proposals would be inappropriate and therefore harmful development in the Green Belt. However, it is felt that there is scope to rationalise the proposals to fall more in line with what would be considered to be a more proportionate addition to the premises".
- 5.2.12 The Applicant has taken this advice onboard, and the scheme submitted as part of the formal planning application has been revised in accordance with this advice as follows:
- The removal of proposed additional covered seating areas in the pub garden and the removal of the existing covered outbuildings within the pub garden.
 - A reduction in the ridge height of the main element of the proposed extension to 4.3m
 - Reconfiguration of the rear extension such that it is reduced in length but increased in depth, reducing the visible building mass from Luddesdown Road.
 - A reduced covered structure GEA increase for the site of only 26% when including all existing cover structures including the pub and its outbuildings (overall GEA of 325sqm) and the proposed development (410.7 sqm GEA).
- 5.2.13 Taking the above into account and following the pre-application advice from the Council, it is our firm belief that the proposed development does not represent a disproportionate extension to the property and the development does not therefore represent inappropriate development in the Green Belt.

The assessment under paragraph 154 (g)

- 5.2.14 Paragraph 154(g) of the NPPF 2024 (updated December 2024) now allows for the limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or continuous, which would not cause substantial harm to the openness of the Green Belt. At the pre-application stage, the Planning Officer agreed that the site can be described as previously developed land as per Annex 2 (Glossary) of the framework. The proposal site comprises the existing Golden Lion pub and its associated grounds.
- 5.2.15 The proposed extensions to the main building and within the garden area, together with the increase in the amount of hardstanding for parking, would increase the extent of built development across the site in spatial terms.
- 5.2.16 Visually, however, the proposed extension would be single-storey and to the side and rear in the pub garden.
- 5.2.17 Taking into account the Council's pre-app advice, careful consideration has been given to the open view across the car park as the building is approached from the east on Luddesdown Road. Following pre-application advice, the building height has been to the minimal possible (4.3m ridge height) whilst still maintaining a pitched roof addressing the Council's concerns regarding subservience to the main building.
- 5.2.18 As stated above, the redesign of the proposals following the Council's advice has resulted in a reduced covered structure GEA increase for the site of only 26% when including all existing cover structures, including the pub and its outbuildings (overall GEA of 325sqm) and the proposed development (410.7 sqm GEA).
- 5.2.19 Overall, as submitted, when considering the above spatial and visual aspects of the proposed development, it is clear that the development would not result in substantial harm to the green belt in accordance with paragraph 154(g). The proposed development is not, therefore, inappropriate development in the green belt.

Very Special Circumstances

- 5.2.20 In the unlikely event that the Council should consider that the proposed development still does not meet the requirements of either paragraph 154(c) or 154(g) of the framework set out above, rendering the proposal 'inappropriate development' we have set out Very Special Circumstances that we believe would outweigh any perceived harm to the Green Belt by virtue of paragraph 153 of the framework. It should be noted that those very special circumstances, as case law has established, need only be sufficient to outweigh the degree of harm caused by a proposal.

5.2.21 The very special circumstances in respect of this proposal are considered to be as follows:

- Securing the long-term viability and prosperity of an existing rural pub and its value as a community asset
- Support the diversification of Vineyard Farm Ltd's wine-making business through the creation of a viable, prosperous rural pub and through driving associated wine sales.
- Secure long-term jobs in the rural economy.
- Enhance the sites contribution to the National Landscape and the setting of grade II listed Brookers Farmhouse.

Landscape impacts and The Kent Downs National Landscape

5.2.22 The proposed development proposals include a single-storey rear extension to the pub and other works and structures within its existing curtilage.

5.2.23 Policy SD2 of the Kent Downs Management Plan also seeks to ensure that the scale and siting of new development are appropriately designed to reflect the setting of Kent Downs. Whilst policy SD8, states that proposals should not negatively impact the landscape and spatial characteristics and qualities of the Kent Downs.

5.2.24 Policy LLC1 of the Management Plan sets out to protect, conserve and enhance the special characteristics and qualities, natural beauty and landscape character of the Kent Downs. Whilst the proposed development will increase built form within the National Landscape, it is to be located to the rear of the property within its existing curtilage, single storey in scale and set in the context of larger former agricultural buildings behind. The effect is a minimal appreciable increase in built form within the National Landscape and within the curtilage of an existing public house. However, whilst the development increases built form, the overall effect of the development will increase the aesthetic appeal of the property and, therefore, enhance its contribution to the street scene within the local context of the National Landscape within which it sits.

5.2.25 With specific reference to the Kent Downs Management Plan, section 11 states:

"The secondary purposes of the AONB designation are to take account of the needs of land based and rural industries and the economic and social needs of local communities".

5.2.26 In recognition of the importance of vibrant communities in supporting the purposes of the National Landscape, the Government's Landscape Review 2019 seeks to ensure that National Landscapes:

'Foster the economic and community vitality of their area in support of the first two purposes (safeguarding and enhancing the special character of the national landscape)'.

- 5.2.27 One of the main issues affecting 'vibrant communities' within the National Landscape is stated to be the loss of local services. The Management Plan expressly seeks to retain and improve access to local services and facilities including pubs.
- 5.2.28 We, therefore, consider that despite the proposed increase in built form, the proposal represents an opportunity to improve and enhance the visual and aesthetic contribution of the property to the National Landscape (the primary purpose of the National Landscape) whilst also diversifying and supporting a rural wine-making business and safeguarding a local community asset (the second and third purposes of the National Landscape).
- 5.2.29 We do not consider that the development proposals are of sufficient scale to constitute major development in a National Landscape that requires wholly exceptional circumstances to justify them.
- 5.2.30 Overall, it is considered that the proposal has been designed to accord with the characteristics of the site's setting and the principles set out in GBC's Landscape Character Assessment, the Kent Downs Management Plan, local policy CS12 and the relevant provisions of the NPPF.

5.3 OTHER MATTERS

Access and Highways

- 5.3.1 A review of the local highway safety record has concluded that the proposed development should have no material adverse impacts in this regard.
- 5.3.2 The existing car park will be formalised and extended to provide 37 vehicle parking spaces. This provision will include four disabled parking spaces located near the main entrance, eight cycle parking spaces, one active electric vehicle charging point and eight passive charging points in accordance with Approved Document S of The Building Regulations.
- 5.3.3 It has been demonstrated that the proposed restaurant extension has the capacity to generate approximately 176 vehicle trips across the 12-hour Saturday period (07:00-19:00), equating to approximately 15 movements per hour on average, or one movement every four minutes. It is not considered that this represents a 'severe' residual impact with reference to Paragraph 116 of the National Planning Policy Framework.

- 5.3.4 Given the above, it is concluded that the proposed development should not have any material adverse transport impacts and therefore there should be no sound transport-based objections to the planning application.
- 5.3.5 A full Transport Statement has been submitted with the application.

Ecology

- 5.3.6 A preliminary ecological appraisal of the site was completed by JW Biodiversity Management. This confirms, that with the exception of bats the site does not have the potential to support protected species. Outside of the built structures the site comprises areas of modified grassland, sealed surfaces, tall forbs or bare ground.
- 5.3.7 Two emergence surveys have been completed; one in August and one in September. The main findings of the surveys were as follows:
1. Relatively low levels of bat activity was recorded;
 2. Four species of bat were recorded; one of which are known to be light-averse when commuting; and
 3. No bats were observed emerging from the survey buildings.
- 5.3.8 A planning condition is proposed securing the installation of bat sensitive lighting in accordance with the Bat Conservation Trust guidelines and the installation of a bat box.
- 5.3.9 A Biodiversity Net Gain assessment has been completed and a strategy to achieve a demonstrable 13.80% net gain included. This is achieved through enhancing areas of retained grassland into higher quality modified grassland, the creation of additional grassland, and the planting of 2x medium and 1 x small trees will be planted in the pub garden.

Flood and Drainage

- 5.3.10 The site lies within Flood Zone 1 and is not at risk of fluvial flooding. As the site is less than 1ha and in Flood Zone 1 no flood risk assessment is required to support the planning application.
- 5.3.11 The proposed development is located over existing buildings or hardstanding. The proposed extension to the building will connect to the sites existing drainage facilities both in respect of surface water and foul drainage.
- 5.3.12 The car park will be re-surfaced with a permeable paving solution.

Noise

- 5.3.13 A noise assessment relating to the proposed development has been completed by Lustre Consulting and submitted in support of the application.
- 5.3.14 The assessment identified key sources of noise, quantified prevailing and source noise through monitoring. Using these data and consideration of the proposal, the potential for future noise effects have been assessed, against Local and British guidance where applicable.
- 5.3.15 Assessment of prevailing environmental noise levels has been undertaken over what is deemed to have been a typical period, including a weekend. The prevailing noise environment was observed as being tranquil, as expected for such a rural location.
- 5.3.16 The report concludes that subject to appropriate design and selection of plant and equipment that the proposed development will not adversely affect current noise levels at or from the property for surrounding noise sensitive receptors.

6 HERITAGE STATEMENT

6.1 INTRODUCTION

- 6.1.1 There has been a public house on the site since at least 1870. The age of the current main building is unknown, but it may have been built in the 19th Century. The building is not listed.
- 6.1.2 Historically, a series of cottages were adjoined to the pub running eastwards along Luddesdown Road, located in part on the existing car park. The terrace of cottages was demolished in the 1960s leaving only the pub.
- 6.1.3 The site does not lie within or in proximity to a Conservation Area, Scheduled Monument or a World Heritage Site.
- 6.1.4 Brookers Farmhouse (a Grade II Listed Building) is located c.50 meters east of the site. The site sits outside of the curtilage of the property but within the wider setting thereof. In accordance with Chapter 16 of the NPPF and the Listed Building and Conservation Area Act 1990, the proposed development must preserve and, where possible, enhance the heritage asset and its setting.
- 6.1.5 GBC stated in their pre-application response in October 2024 (see Section 2.3) that any future development on this site will require a Heritage Statement, which considers the significance of this Grade II listed building and the impact of the proposed development upon this Farmhouse (originally Farmstead), with consideration of the impact to its setting and wider views.



FIGURE 6-1: BROOKERS FARMHOUSE (COURTESY OF HERITAGE ENGLAND)

- 6.1.6 Chapter 16 of NPPF states that heritage assets range in significance from World Heritage Sites to local listings and that each heritage asset should be conserved appropriately.
- 6.1.7 Given the above, regard must be had to the following paragraphs of the NPPF when considering the impacts on heritage assets.
- 6.1.8 **Paragraph 210** states: "In determining applications, local planning authorities should take account of:
- (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - (c) the desirability of new development making a positive contribution to local character and distinctiveness."

- 6.1.9 **Paragraph 212** states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
- 6.1.10 **Paragraph 215** states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

6.2 SETTING OF BROOKERS FARMHOUSE

- 6.2.1 Brookers Farmhouse is circa 18th century according to Heritage England's official list entry. The listing description for the property is as follows:
- "Ground floor faced with knapped flints with red brick quoins. The upper part in brick with blue headers. Tiled gabled roof with pentice at rear. Two gabled dormers at front. Two storeys and attic. String course at first floor level. Modernised casement windows. C19 gabled porch. Original beams internally and central chimney stack with back-to-back inglenooks."
- 6.2.2 Brookers Farmhouse was originally associated with and formed part of an agricultural landholding and farming business, having subsequently become severed from its landholding and farming business it became an independent residential dwelling. Historically the property would have been associated with and have had a physical link to the former farmstead and farm buildings to the south shown on historical maps, remnants of which survive today. The Golden Lion has existed in its current location/form and within the context of the farmhouse since at least the 1870s.
- 6.2.3 There have been significant changes to the immediate historic setting of the farmhouse in the 19th and 20th centuries. A terrace of cottages was built, attached to the Golden Lion and extending eastwards towards the property sometime in the late 19th century together with an extensive barn complex to the south.
- 6.2.4 As the motor car became more widespread in the mid-20th century the former green space in front of the property became a car park and the terrace of cottages were demolished in the 1960s extending the car park further.
- 6.2.5 The 19th century barns were also presumably demolished because they were either no longer fit for purpose or there was a desire for more modern equivalents. It is understood from GBC's online planning that the two large existing agricultural buildings were granted planning permission in 1988.



FIGURE 6-2:LUDESDOWN SHOWING BROOKERS FARMHOUSE 1797



FIGURE 6-3: LUDESDOWN 1895



FIGURE 6-4: 1960 AERIAL PHOTOGRAPH OF THE SITE

6.3 IMPACT OF THE PROPOSAL ON THE SETTING OF BROOKERS FARM

- 6.3.1 The has been a building on the site of the Golden Lion pub since at least 1797 albeit it is unclear whether the existing main building of the pub dates from this period or if it is a later mid-19th century construction.
- 6.3.2 An undeveloped parcel of land has existed between Brookers Farmhouse and the site of the pub since at least 1797. Its exact use at this time is unclear but by the mid-19th century the land contained a small terrace of houses attached to the pub and a small part of a wider barn complex. In the mid-20th century the area was again devoid of built form, but with the increasing widespread use of the motor car the area increasingly became used for vehicle parking for patrons of the pub. This remains its current use through to the modern day.
- 6.3.3 In terms of the pub itself, the 20th century additions to the rear have done little to enhance the form or the aesthetic of the property and its addition to the setting of Brookers Farmhouse.
- 6.3.4 The pub and its car park at present are run down, tired and aesthetically unappealing visually detracting from the listed property and an appreciation of it in its setting (see figures 2-2 and 2-3 in this report).
- 6.3.5 Utilising pre-application advice from the Council's Conservation Officer the proposal has been carefully designed to prevent harm to the setting of Brookers Farm whilst also seeking to enhance its setting.
- 6.3.6 The proposal's bulk and mass are visually reduced using a combination of brickwork, painted brickwork, dual and flat roofs and slate roof tiles and more contemporary zinc roofing and black vertical timber cladding. The latter materials have been used to reflect the area's agricultural character. Traditionally, agricultural buildings would have had wood cladding, finishing with a tar stain. The zinc roofing and black timber cladding provide a modern take on traditional techniques to finish rural agricultural buildings.
- 6.3.7 The proposed use of exposed brickwork, painted brickwork, and slate roof tiles reflects materials used to finish the pub historically.
- 6.3.8 The design of the scheme therefore reflects both the character of the existing pub, whilst providing a subservient extension that respects the agricultural character and history of the site.
- 6.3.9 The existing car park has been redesigned, and landscaped elements, grass verges and traditional estate fencing reintroduced restoring its aesthetic and character; furthermore, enhancing the setting of Brookers Farmhouse.
- 6.3.10 As set out, it is considered that the proposed design of the development would provide clear enhancements to the existing pub, the street scene, and the wider setting of Brookers Farmhouse.

- 6.3.11 It is not therefore considered that the development proposals would result in harm to Brookers Farmhouse. The proposed development therefore meets the local and national policy tests for heritage assets.

7 PLANNING BALANCE AND CONCLUSION

- 7.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the development plan in force unless material considerations indicate otherwise.
- 7.1.2 This Planning Statement has demonstrated that the proposed development is supported in principle by both local and national planning policies, that it does not constitute inappropriate development in the Green Belt, that it will not harm the special character of the Kent Downs National Landscape and that there are no other material considerations that indicate that planning consent should be withheld.
- 7.1.3 In accordance with the NPPF Local Planning Authorities should approve development proposals that accord with the development plan without delay and decision-makers at every level should seek to approve applications for sustainable development where possible.
- 7.1.4 For the reasons given above, we respectfully request that the Council give this planning application favourable consideration and grant planning permission for the proposed development, subject to appropriate conditions.