

Delegated Report

Planning Application

Planning Application No: 20240700

Location: Cheneys Farm Barns, Thong Lane, Shorne, Gravesend

Description: Demolition of the southern barn and erection of a new steel frame barn with mezzanine floor used for an office space, pedestrian access doors to the east and vehicle access doors to the west. Landscaping to include hedges and tree to the front of the buildings with alterations to parking and hardstanding.

Applicant: Mr M Brown, BB Contacts Ltd

Site Visit Date: 7 August 2024

Submitted Documents/Plans

Planning application form

Cover Letter

Preliminary Ecological Appraisal by KB Ecology

Transport Statement by Nick Culhane

Biodiversity Gain Statement by Biodiversity Net Gain for Kent and Medway October 2024

Small Sites BNG Metric

HSE Information Sheet (Removing asbestos cement sheets, gutters etc and dismantling a small AC structure)

Planning, Design and Access Statement

Drawing no. 23/422/03 rev A (proposed elevations)

Drawing no. 23/422/07 (proposed roof plan)

Drawing no. 23/422/06 (proposed first floor plan)

Drawing no. 23/422/05 (proposed elevations)

Drawing no. 23/422/04 (proposed block plan)

Drawing no. 23/422/02 (existing plans)

Drawing no. 23/422/01 (existing elevations)

Relevant Planning History

20181280	Change of use of an agricultural building and land to a B8 (Storage and Distribution) use and continuance of a further agricultural building and land for B8 (Storage and Distribution) use.	Permitted	12.02.2019
19880855	Outline application for the erection of a terrace of 5 no dwellings.	Refused	19.12.1988

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 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

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

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

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

National Planning Policy Framework (2023)

- Section 2 – Achieving sustainable development
- Section 4 – Decision-making
- Section 5 – Delivering a sufficient supply of homes
- Section 8 – Promoting healthy and safe communities
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed and beautiful places
- Section 13 – Protecting Green Belt land
- Section 15 – Conserving and enhancing the natural environment
- Section 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- Design for Gravesham: Design Code (2024);
- SPG 4 - KCC Parking Standards (2006);
- Gravesham Landscape Character Assessment (2009)
- Thong Rural Conservation Area Appraisal

Consultations, Publicity and Representations

Consultees

Dickens' Country Protection Society

The Society notes the applicant is a building contractor who may wish to extend the use outside Class B8 and the Society would suggest if consent is granted, conditions should be attached to control any extension of the use.

The use of the area to the north of the barns for access and parking could impact on the amenity of the adjoining properties.

National Highways

This is a small-scale development that would not have a material impact on the SRN (A2).

We have checked the location of the development against the general arrangement maps for the Lower Thames Crossing (LTC).

This part of Thong Lane is located outside of the confines of the LTC. It falls within a Conservation Area. The proposal would not impact on the land needed for the LTC.

We have no objection to this application.

KCC Biodiversity

This advice note supersedes our previous comments (dated 13th September 2024). New BNG information has been submitted. Suggested condition wording has been amended.

SUMMARY – SUFFICIENT INFORMATION PROVIDED

We have reviewed the information submitted by the applicant and advise that sufficient ecological information has been provided to determine the planning application and recommend that conditions to ensure adherence to mitigation and biodiversity net gain measures are attached to any notice of planning consent.

SITE IMPACTS

The application site contains two barns, hardstanding, modified and neutral grassland, ephemeral vegetation, scrub and bare ground as well as a non-native ornamental hedgerow.

Whilst breeding birds, Hedgehogs and foraging/commuting bats may occupy the site, no significant ecological constraints have been identified by the submitted Preliminary Ecological Appraisal (KB Ecology, April 2024). As such, commencement of works outside of the core nesting period (March through August inclusive) or the presence of an ECoW at commencement is recommended, as well as general avoidance/mitigation measures for Hedgehogs and bats¹ as detailed in the submitted PEA. Adherence to these simple mitigation measures is suitable to avoid a wildlife offence. The following condition wording is suggested:

Suggested condition: From commencement of works (including site clearance), methods for the protection of retained habitats and precautionary mitigation measures for nesting birds, Hedgehogs and foraging/commuting bats will be followed in accordance with the details contained in Section 4 of the Preliminary Ecological Appraisal associated with the planning application (KB Ecology, April 2024). Measures include:

- *Vegetation clearance with the potential to disturb nesting birds should be carried out outside of the core nesting season (March through August inclusive) or under ecological supervision;*
- *A sensitive lighting strategy should be adhered to with reference to GN08: 'Bats and Artificial Lighting' published by the ILP and BCT; and*
- *Excavated areas should be backfilled, covered overnight, or ramps placed in to allow terrestrial mammals (e.g. hedgehogs) to escape should they become trapped.*

Reason: To avoid a wildlife offence under Section 1 of the Wildlife and Countryside Act 1981 and to protect Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006.

We note that there are five Great Crested Newt (GCN) records within 1.5km of the application site (all of which are located within Shorne Wood Country Park). The nearest waterbody to the site is 280m southeast. Given the absence of any waterbodies within 250m and the bisection of the wider landscape by busy roads, GCN are not seen as an ecological constraint for this application. A lack of suitable onsite habitat for reptiles also precludes further consideration for this species group.

The existing barn buildings (including the southern barn proposed for demolition) were assessed as having 'Negligible' suitability to support roosting bats in the PEA. As such, roosting bats are not seen as an ecological constraint for this application.

BIODIVERSITY NET GAIN AND ENHANCEMENTS

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from the 12th February 2024 and all minor applications from the 2nd April 2024. Where required, the Defra Statutory Metric will need to be used to demonstrate a minimum 10% biodiversity net gain. Local policy may request a higher level of net gain. Habitats created/enhanced to achieve net gain will need to be secured for at least 30 years.

Biodiversity gain is a statutory requirement of this proposed development. References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric. A metric and biodiversity gain statement have been submitted.

The 0.2ha site is described in the submitted Small Sites Metric (KB Ecology, October 2024) as having a baseline value of 0.6 habitat units and 0.04 hedgerow units. Post-development, these values have increased to 0.67 habitat units and 0.42 hedgerow units (an 11.99% habitat net gain and 962.77% hedgerow net gain). Therefore, the statutory requirement to deliver 10% biodiversity gains is met, subject to feasibility.

These proposed gains will be delivered through the creation of neutral and modified grassland, the addition of a biodiverse green roof and the planting of 23 small trees and 127m of native hedgerow. Given the significant nature of the proposed gains, a Habitat Management and Monitoring Plan (HMMP) condition should be attached to any notice of planning permission to ensure that these habitats/features can be secured for a 30-year period. A BNG informative is also suggested.

Suggested condition: The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved biodiversity gain plan and including:

- (a) a non-technical summary;*
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority, has been submitted to, and approved in writing by, the local planning authority. Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.*

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

Suggested informative: The development hereby permitted is subject to the general condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—
(a) a biodiversity gain plan has been submitted to the planning authority, and
(b) the planning authority has approved the plan.

This condition cannot be varied or removed.

¹ Measures to avoid impacts to Hedgehogs, a priority species, are given in section 4.9 of the PEA; measures to avoid impacts to foraging and commuting bats are recommended in section 4.8 (with reference to the BCT/ILP document 'Guidance Note 8 Bats and Artificial Lighting' which is freely available online: Guidance Note 8 Bats and Artificial Lighting | Institution of Lighting Professionals (theilp.org.uk)

² As defined here: Make on-site biodiversity gains as a developer - GOV.UK

KCC Highways

This proposal is for the renewal of consent for Class B8 use of the two existing barns together with the additional of a small quantity of Class E office use. This is likely to result in a moderate increase in traffic movements, most particularly in car usage rather than HGV use. Given the location on Thong Lane, which is an unclassified road but of adequate width and alignment, this is not considered to raise any highway issues of concern.

The existing access, with gates set back 10 metres from the edge of the road, is acceptable for this change of use. The car / van parking arrangement is adequate and complies with Kent Parking Standards (SPG4). There is adequate space within the curtilage of the development for vehicles to turn such that they may enter and leave in forward gear.

I would therefore raise no objection on highway grounds to this application provided that the following Conditions are applied to any consent granted:

- 1 Provision and maintenance of 43 metres x 2.4 metres x 43 metres visibility splays at the access with no obstructions over 1.05 metres above carriageway level within the splays, prior to use of the site commencing.
- 2 Gates to open away from the highway and to be set back a minimum of 10 metres from the edge of the carriageway and retained as such in the future.
- 3 Provision and permanent retention of the vehicle parking spaces shown on the submitted plans prior to the use of the site commencing.
- 4 Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.

It is important to note that Local Planning Authority (LPA) permission does not convey any approval to carry out works on or affecting the public highway.

Any changes to or affecting the public highway in Kent require the formal agreement of the Highway Authority, Kent County Council (KCC), and it should not be assumed that this will be a given because LPA planning permission has been granted.

For this reason, anyone considering works which may affect the public highway, including any highway-owned street furniture or landscape assets such as grass, shrubs and trees, is advised to engage with KCC Highways and Transportation at an early stage in the design process.

Across the county there are pieces of land next to private homes and gardens and near the highway that do not look like roads or pavements but are actually part of the public highway. Some of this highway land is owned by Kent County Council whilst some is owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Works on private land may also affect the public

highway. These include works to cellars, to retaining walls which support the highway or land above the highway, and to balconies, signs or other structures which project over the highway. Such works also require the approval of the Highway Authority.

Kent County Council has now introduced a pre-application advice service in addition to a full formal technical approval process for new or altered highway assets, with the aim of improving future maintainability. Further details are available on our website below: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>.

This process applies to all development works affecting the public highway other than applications for vehicle crossings, which are covered by a separate approval process. Further details on this are available on our website below: <https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/apply-for-a-dropped-kerb/dropped-kerb-contractor-information>

Once planning approval for any development has been granted by the LPA, it is the responsibility of the applicant to ensure that before development commences, all necessary highway approvals and consents have been obtained, and that the limits of the highway boundary have been clearly established, since failure to do so may result in enforcement action being taken by the Highway Authority.

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under the relevant legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Further guidance for applicants, including information about how to clarify the highway boundary and links to application forms for vehicular crossings and other highway matters, may be found on Kent County Council's website:

<https://www.kent.gov.uk/roads-and-travel/highway-permits-and-licences/highways-permissions-and-technical-guidance>. Alternatively, KCC Highways and Transportation may be contacted by telephone: 03000 418181.

Kent Police Designing Out Crime

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. We recommend boundary treatments be a minimum of 2m and the installation of lockable gates to the sides of the unit to provide controlled access to the rear. These gates must be flush to the building line to optimize surveillance.
2. As above, we recommend natural surveillance for parking areas. As a secondary layer of security, we

would also recommend CCTV be installed to further monitor use. We also strongly recommend gating access roads/ parking areas to prevent nuisance parking and misuse out of hours.

3. Defined pedestrian routes to/ from the building are recommended to improve safety and avoid pedestrian and vehicle conflict.

4. Cycle storage must be well lit and with natural surveillance. We recommend the sold secure or SBD recommended products for additional security.

5. Lighting - Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g., a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. we recommend that a suitable lighting policy is installed to ensure that the units and staff have safe access to and from the units and to help deflect criminality. External lighting to conform to min standard of BS5489-1:2020.

6. CCTV to be installed, especially in areas with limited natural surveillance such as rear of the units, utility areas/ bin stores and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; any stairs, emergency access doors, lifts, loading/ unloading areas, car park and reception, main office/ safe. The CCTV must not infringe any lighting plan.

7. We strongly recommend alarms, with an auto-dial function, be installed on all external doors, including emergency exits.

8. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation, and locks) including folding or sliding to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+. Please Note, PAS 24: 2012 tested for ADQ (Building Regs) has been superseded and is not suitable for this development.

9. Windows on the ground floor to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. Any curtain walling and fixings should be tested and meet BS EN 1627:2011 and/or be certified to LPS 1175: Issue 7, SR1 or STS 202: Issue 3, BR1.

10. Access control. Adequate access control is required for entrances used by staff only such as storage rooms and other restricted areas. Internal doorsets for those areas should be certified and comply with PAS 24:2022 as a minimum security standard.

11. Any Shutters should be as close to the building line as possible and must avoid the creation of a recess. Shutters must be certificated to LPS 1175: Issue 7, SR2; STS 202: Issue 3, BR2; Sold Secure Gold or PAS 68:2013

12. Bin Stores must be secure, lit and, if in an area with limited natural surveillance we recommend CCTV cameras be installed. We also strongly advise against placing this store close enough to the building that it can be used as a climbing aid into the building when closed. Please note where there is a mixed-use building, residential and commercial bins must be segregated.

13. If any buildings are to have roof access for maintenance of solar panels and lift shafts etc., we recommend that ladders/ access doors to these areas are securely locked so that members of the public are unable to access this area. We also require CCTV to cover this area in order to monitor unauthorized access.

14. New trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Shorne Parish Council

Overall, the Parish Council has to OBJECT to this application.

While this Application has some good aspects with removal of the Asbestos panels and improvement in the appearance of the buildings, there are significant concerns about whether the middle of a residential Conservation Area is an appropriate location for a business of this type, which might be more appropriately located at an industrial estate.

There appears to have been a pre-application discussion with GBC but there has not been any contact made with the Parish Council.

Background:

The Barns were previously used for drying grain but became redundant. They are located in the centre of the Thong Conservation area. They are not visually attractive, but are set back well from the road. Excepting to the rear which is agricultural land, there are residential dwellings on the other three sides (across Thong Lane on the eastern side) and a public footpath adjacent to the southern boundary. Thong Lane is narrow and winding, and not suitable for access by HGV's and other large vehicles, or for additional traffic volumes.

Permission was granted in 2018 for a change of use of the Barns, under ref 20181280. At the time, the Parish Council expressed concerns (please see Appendix), which are still valid. Since the change of use there have been matters raised by local residents about the introduction of, and use that has been made of, skips at the property. Also, other waste materials have been stored in the open, as can be seen on the applicant's own photographs, despite Condition 3 of the previous planning permission. The proposal relocates the two skips to the rear.

There are also several other concerns as follow:

- Increase in traffic movements: Especially of commercial vehicles of various sizes as well as staff and visitors. The number of staff, both permanently on-site and visiting needs clarification, as the office area is large.
- Vehicle access route: Although the Planning Statement says that "delivery vehicles are advised to use the route from the Gravesend Road", this is not mandatory at present.
- Single, narrow access point: The single narrow access point could lead to conflicts between vehicles leaving and wanting to enter the site, an "In and out" or double-width entrance should be considered.
- Impact of Lower Thames Crossing (LTC): The applicant refers to the potential construction of the LTC nearby but should be made aware that there would be considerable traffic disruption, including prolonged A2 bridge closures, during construction. Subsequently there would be altered, more convoluted, access routes to and from the Thong Lane site.
- Non-sustainable location: Realistically, motor transport is the only way to access this location. There are few buses per day and no shops or catering facilities in Thong itself or close nearby, which increases trip generation.
- Traffic movements within the site: Although a "loose stone road" is mentioned as being on the north side of the Barns, this does not seem to have been in use for some time and there would not previously have been any reason for vehicles to frequently use this route. The application proposes to create a major building entrance at the rear, serviced by a one-way vehicular route around the buildings, and with eight new parking spaces on the north side. This will cause noise and fumes from motor vehicle movements to impact on the amenity of the neighbouring public footpath and residential properties, especially that to the north. The number and types of vehicles to use this route requires clarification.
- Increased parking on the site: The application proposes 13 parking spaces (one disabled use) including 8 on the north side of the Barns, which will also impact on the amenity of the neighbouring residential property. Three van spaces are also shown at the front. Some EV charging points should be provided, and also bicycle facilities, which should have a defined location shown.
- Use of the buildings/noise generation: The planning Statement states that so far the buildings have been

used for “storage of building materials and goods” which are issued to workers and the remainder returned. There is concern that the premises should not be used as a workshop due to noise generation issues.

- Drainage: Foul drainage/sewerage arrangements are not mentioned, and require clarification.
- Exterior Lighting: No exterior lighting is shown. A plan should be submitted detailing this. Exterior lighting should be at low physical level and of low intensity. Any security lighting should have detectors and beams angled well downwards and shielded to illuminate only within the boundaries, and be controlled with daylight overrides and short duration after activation.

Suggested Conditions if to be permitted:

- Hours of operation/work: Previously a restriction of working hours to 07.00 to 19.00, Monday to Saturday (no Sundays or Bank Holidays) was attached. This should be reviewed or at least repeated.
- Access route for HGV's and large vans: A requirement for all vehicles except cars to access from the A226 Gravesend Road could be considered.
- Number and location of skips/waste handling: This should be limited to only the two proposed at the rear, with the size and type specified. This presumably means however that skip transporters will need to circle the building. No burning of materials should be allowed on the site.
- Outside storage: No outside storage of materials or waste, either in the open or in containers, should be allowed.
- Exterior Lighting: This should be controlled as indicated above.
- No workshop/processing of materials on site: The use of the site only for delivery and distribution, plus offices, should be a Condition.

Appendix: Previous representation on Application ref 20181280:

16th January 2019.

GR/2018/1280

Cheneys Farm Barns Thong Lane Shorne Gravesend Kent

Change of use of an agricultural building and land to a B8 (Storage and Distribution) use and continuance of a further agricultural building and land for B8 (Storage and Distribution) use.

The Parish Council has no objection in principle to this application but must express the following concerns:

1. The Barns are located in a Conservation Area which is largely residential, and the change of use of the Barns will impact on the character and amenity of the area.
2. Conservation Area status and possible need for a formal change of use were both stated clearly on the sale particulars.
3. We are very concerned about potential increase in traffic volume, particularly of large/heavy vehicles, as the local roads and approach routes are not suitable.
4. Additional traffic and work usage of the site could impact on local tranquillity, working days and hours should be formally defined.

GBC Environmental Protection

There is no objection to this application. It's noted that the building to be demolished contains asbestos cement material. Care must be taken during the demolition to ensure that this does not result in contamination of the site or surrounding area by wind blown or deposited asbestos material. The applicant/contractor is advised to consult the HSE.

The operating hours of the building/site should be restricted to the hours on the application form.

In addition, the following is recommended.

Watching Brief

The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the local planning authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

Code of Practice on Construction and Demolition

Please apply as appropriate to minimise the impact of the demolition and construction on the nearby residential premises.

Lighting

Artificial lighting can cause a statutory nuisance under the Environmental Protection Act 1990. It is important that the applicants are not permitted to install external lighting that illuminate anything other than the ground within the curtilage of the premises in order to assist in preventing a nuisance from occurring.

Neighbouring properties

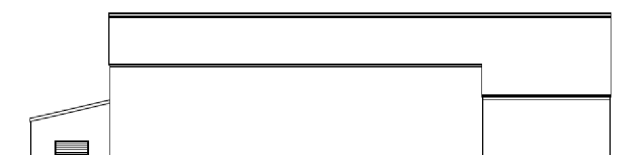
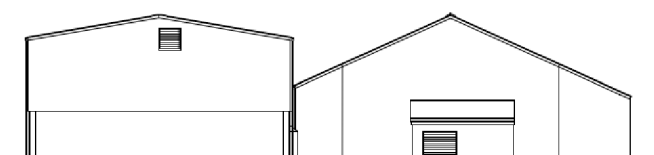
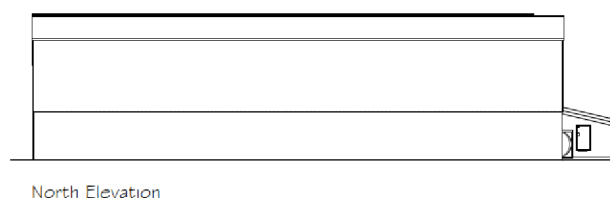
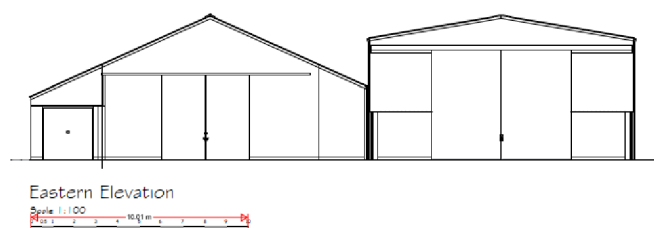
The application has been advertised by site notice and press notice and individual letters to nine neighbouring properties. No letters of representation have been received.

Officer's Analysis

Proposal

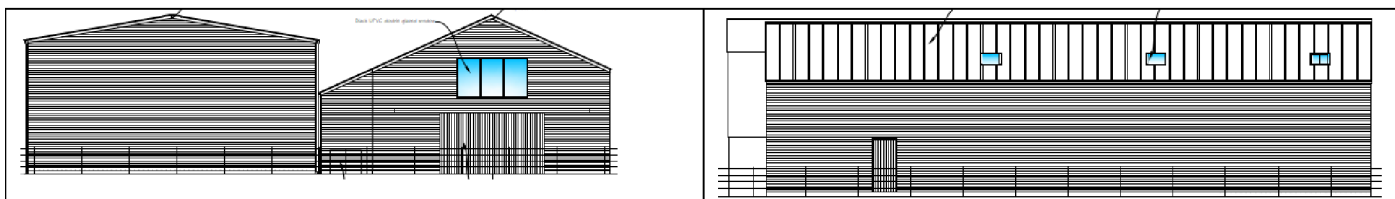
This application seeks planning permission for the demolition of the southern barn and erection of a new steel frame barn with mezzanine floor used for an office space, pedestrian access doors to the east and vehicle access doors to the west. Landscaping to include hedges and tree to the front of the buildings with alterations to parking and hardstanding.

Existing plans:



Proposed plans:





The replacement building will have the same profile as the existing barn but will have a larger infill area between the two barns. As well as new hedge and tree planting there will also be bat and bird boxes.

The barns will be clad in black stained weatherboarding. There will be full height glazing to the east side of the replacement southern barn. Timber doors will be installed which will be closed over the glazing for security reasons and hinged back during the day. There will be a new pedestrian door in the eastern elevation and another in the northern barn. There will be a new window in the western flank at first floor and rooflights in the southern barn to serve the offices. The landscaping and planting is shown below:

Principle of Development

The application site is located within the Metropolitan Green Belt, Thong Conservation Area and Higham Arable Farmlands Landscape Character Area.

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.

Para. 152 of the National Planning Policy Framework 2023 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

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.

Para. 154 states that 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.

Para. 155 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 southern building will be demolished and rebuilt and will infill a small area that currently existing between the two barns. This area is not large and although it will be slightly larger, it will not be materially larger. The current spacing between the buildings is not readily visible due to the various lean-tos that currently exist in this gap. The building will be in the same use, save for an additional office area that will occupy less than a quarter of the entire building and therefore the proposal meets exception 154 (d).

The proposed development will not conflict with any of the exceptions in para. 155 of the NPPF.

Economy, Employment and Skills

Rural Economy

Para. 88 of the NPPF 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, beautiful 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.

Para. 89 goes on to say that 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.

The principle of bringing an office use to this building together with the lawful use of B8 (storage) is acceptable.

Policy CS07 is relevant to this application. It does state that proposed office development will be first directed to Gravesend Town Centre and then to edge of centre locations. In this instance the building is already in use as B8 and the offices are related to this existing use. As stated above, less than a quarter of the building will be used as offices.

The policy goes on to say:

5.1.33 In considering development proposals, particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises. The Council will also support the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and

communications technology to facilitate more flexible working practices and the changing economic needs of the Borough.

In addition to this:

5.1.37 The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy. Support will be given to the conversion of rural buildings to employment use/live-work units where it is compatible with national policies for protecting the Green Belt and where it accords with policies in this plan, in particular relating to Green Infrastructure.

The proposal for an office use to support the existing B8 use therefore accords with policy CS07 and para. 88 of the NPPF.

Design, Character and Appearance

The site is within the Thong Conservation Area and Higham Arable Farmlands Landscape Character Area.

Conservation Area

Although Thong is referred to in the Conservation Area Appraisal as a village, it is not a village for the purposes of the exception policies in the NPPF or identified as a rural settlement in the Gravesham Core Strategy 2014.

The Thong Conservation Area Appraisal mentions the buildings in question and states that they have little in common visually with their agricultural predecessors and are of little architectural interest. The appraisal lists the buildings as a negative feature being the 'modern roadside open yard space and pair of prefabricated agricultural buildings at the south' of the northern half of the village.

The proposals involve the rebuilding of the southern barn, limited infilling to join the two barns together and the recladding of the buildings. There will also be large glass panels and some new rooflights. The black timber cladding is typical of the area and can be seen at the adjacent property. No objection is raised to this as will improve the appearance of the site. The glass panels will complement the building and the timber doors that will be close when the building is not in use will also enhance the building.

Light spill will not be a significant issue as the hours of operation will be limited to 07:00am until 18:00pm Monday-Friday.

The proposed site layout to include parking and planting will enhance the site and therefore enhance the surrounding Conservation Area.

The proposed works therefore accords with Policies CS02, CS19 and CS20 of the Core Strategy and chapter 16 of the NPPF.

Higham Arable Farmlands Landscape Character Assessment

The key characteristics of the landscape are very undulating topography, open arable farmland and views to the marshes and River Thames. The condition of the landscape is poor and the sensitivity is moderate. The guidelines are to restore and create. The proposals for the barn attempt to restore field boundary hedgerows and increase ecology on the site and therefore accord with policy CS12 of the Gravesham Core Strategy 2014 and Section 15 of the NPPF.

Amenity

The main issues with an office use is the potential increase in transport from staff and visitors. The usage of the building is currently restricted by planning condition. This condition states:

6. No goods shall be loaded, unloaded, stored or otherwise handled and no vehicles shall arrive or depart, within the site outside of the hours 07:00 to 19:00 Monday to Saturday or at any time on Sunday or Public Holidays.

Reason To ensure that the development does not prejudice the amenities of neighbouring properties in accordance with Policy CS19 of the Core Strategy 2014.

The introduction of an office use with three additional employees is not considered to result in any significant impact in terms of noise and therefore it is reasonable to impose the same condition on this application.

Concerns have been raised by the Parish Council that the building could be used as a workshop. This would fall within a different Use Class and therefore would require planning permission in its own right.

The buildings are a sufficient distance (over 21m) from any neighbouring property and therefore will have no detrimental impact in terms of loss of outlook, privacy, sunlight or daylight.

A condition is recommended to control external lighting in terms of the impact on neighbours and also surrounding biodiversity.

The proposed development, subject to relevant conditions, accords with policy CS19 of the Gravesham Core Strategy 2014 and para. 135f of the National Planning Policy Framework 2023.

Ecology and Biodiversity

Ecology

The application site contains two barns, hardstanding, modified and neutral grassland, ephemeral vegetation, scrub and bare ground as well as a non-native ornamental hedgerow. No significant ecological constraints have been identified. A condition is recommended to ensure methods for the protection of habitats are followed in accordance with the submitted ecological appraisal.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications received in England (with a few exemptions) must deliver at least a 10% biodiversity net gain (BNG) from the 12th February 2024 and all minor applications from the 2nd April 2024. Where required, the Defra Statutory Metric will need to be used to demonstrate a minimum 10% biodiversity net gain. Local policy may request a higher level of net gain. Habitats created/enhanced to achieve net gain will need to be secured for at least 30 years.

The 0.2ha site is described in the submitted Small Sites Metric (KB Ecology, October 2024) as having a baseline value of 0.6 habitat units and 0.04 hedgerow units. Post-development, these values have increased to 0.67 habitat units and 0.42 hedgerow units (an 11.99% habitat net gain and 962.77% hedgerow net gain). Therefore, the statutory requirement to deliver 10% biodiversity gains is met, subject to feasibility.

These proposed gains will be delivered through the creation of neutral and modified grassland, the addition of a biodiverse green roof and the planting of 23 small trees and 127m of native hedgerow. Given the significant nature of the proposed gains, a Habitat Management and Monitoring Plan (HMMP) condition should be attached to any notice of planning permission to ensure that these habitats/features can be secured for a 30-year period. A BNG informative is also suggested.

Subject to the above conditions the proposed development accords with policy CS12 of the Gravesham Core Strategy 2014 and section 15 of the National Planning Policy Framework 2023.

Parking and Highways

No concerns are raised in terms of the number of vehicle movement. The existing access is acceptable for the use and the parking is adequate. Subject to conditions relating to vision splays, the gates opening inwards, permanent retention of the spaces and secure cycle parking, no objection is raised on highways grounds.

Conclusion

The proposed works will have no detrimental impact on the character and appearance of the area, surrounding conservation area, green belt, amenity, biodiversity, parking or highway safety and therefore accord with the abovementioned policies and are recommended for approval.

Recommendation:

Permit

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Alison Webster	Team Leader:	Richard Hart
Signed:		Signed:	
Dated:	06 November 2024	Dated:	8th November 2024