

Your Ref: **PP-14468549**
Our Ref: HPD/DSP/21/092
Date: 07 November 2025

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Dear Sir/Madam,

RE: NURSTEAD COURT, NURSTEAD CHURCH LANE, MEOPHAM, GRAVESEND, KENT, DA13 9AD

On behalf of our client, Doggy Base Ltd., we are instructed to submit a retrospective full planning application for the change of use of agricultural land to a dog day care facility (Sui Generis), together with the siting of 3 no. portakabins and a perimeter fence for a temporary period of 2 no. years.

Accordingly, please find enclosed the following documents which comprise in addition to this letter, the application:

- Duly completed Planning Application Form;
- Completed Certificate B and copy of notice as served;
- Site Location Plan at scale 1:1,250 with the site edged in red;
- Drawing Pack prepared by Ackroyd Lowrie; and
- Transport Note prepared by Smart Transport Hub.

The statutory application fee of £588.00 has been paid electronically by card following submission of this application via the Planning Portal.

The following sections of this letter outline the site background, the proposed operation, and an assessment of the proposal against the relevant national and local planning policy.

SITE BACKGROUND

The application site comprises a circa 1ha plot of land that currently operates as a dog day care facility, with 3 no. portakabins, and a 1.6m perimeter fence around the associated pens. The site was previously used for agricultural purposes, albeit it is understood the dog day care facility has been in operation since 2022. The wider site includes Nurstead Court itself which is a Grade I listed building used for weddings and event hire, a livery consisting of 27 no. stables, Hooper and Sons Ltd building yard, a residential mobile home and two holiday let properties.

The application site is located within the Green Belt, although not covered by any other statutory designations. The site is not located within a conservation area, and is also within Flood Zone 1, therefore at the lowest risk of flooding.

PLANNING HISTORY

There is an extensive planning history in relation to the wider site, albeit the following applications are considered most relevant:

- LPA ref: 20020455 – Change of use of agricultural buildings into a livery yard involving conversion of barns into 27 stables, use of workshop building as offices/tack rooms and w.c. and construction of a sand school in connection with use of part of existing farmland for recreational riding incidental to agricultural use of the land. Approved 03 December 2002.
- LPA ref: 20130539 – Application for Listed Building Consent for internal and external works in connection with the conversion of stable block/former coach house into two holiday lets. Approved 08 May 2014.
- LPA ref: 20130538 – Conversion of stable block/former coach house into two holiday lets with associated internal and external works. Approved 08 May 2014.
- LPA ref: 20140126 - Retrospective Application for the continued use of the existing yard at nurstead court farm for storage of building materials, aggregates, equipment, vehicles and machinery associated with the civil engineering, groundworks and general construction business of Hooper and Sons Ltd. Approved 30 May 2014.
- LPA ref: 20210927 - Application for temporary change of use of agricultural land to a dog day care facility (Sui Generis), together with the temporary siting of 3 no. portakabins and a perimeter fence. Refused 30 September 2021.
- LPA ref: 20210994 - Application for Listed Building Consent for temporary change of use of agricultural land to a dog day care facility (Sui Generis), together with the temporary siting of 3 no. portakabins and a perimeter fence for a period of five years. Refused 30 September 2021.

Further to the above, there have been the followings appeals:

- Ref: APP/K2230/W/21/3286748 - temporary change of use of agricultural land to a dog day care facility (Sui Generis), together with the temporary siting of 3 no. portakabins and a perimeter fence. Dismissed 20 October 2022.
- Ref: PP/K2230/Y/21/3286750 - temporary change of use of agricultural land to a dog day care facility (Sui Generis), together with the temporary siting of 3 no. portakabins and a perimeter fence. Dismissed 20 October 2022.

The above appeals were dismissed on the following grounds:

- The proposal is for a material change of use which would not preserve the openness of the Green Belt and would conflict with one of the purposes of including land in the Green Belt. Accordingly, having regard to the Framework, it would amount to inappropriate development which should not be approved unless very special circumstances can be shown.
- The proposal would be harmful to the character and appearance of the area. It would be contrary to Policy CS19 of the Core Strategy which states that new development should be visually attractive and should conserve the character of the natural environment. It would also conflict with Policy CS12 which seeks to conserve landscape character.
- The proposal would conflict with Policy CS20 which states that the Council will accord a high priority towards the preservation, protection and enhancement of heritage assets.
- The proposal is likely to result in a significant increase in traffic at peak times. No means of mitigating this increase has been identified. Without such mitigation, I do not consider that there would be a safe and suitable access to the site. This would be contrary to the Framework. It would also be contrary to Policy CS11, which states that new developments should mitigate their impacts on highway networks.

DOGGY BASE LTD

Doggy Base Ltd. aims to provide dog owners with a space in which they can have their dog looked after and cared for. Life can be very busy and complicated at times so providing dog owners with a safe, happy environment for their dog is vital. It not only allows the owners to engage in activities that we may not be able to do alongside our dog but also socialisation is invaluable for dogs and key in their growth and happiness.

DEVELOPMENT PROPOSALS

This planning application has been submitted for the retrospective change of use of agricultural land at Nursetead Court in Meophan to provide a dog day care facility (Sui Generis), for a temporary period of 2 no. years.

The proposals include the temporary siting of 3 no. portakabins, which provide a reception area in which owners can safely check in their dogs to the day care, as well as a staff area, and separate respite area for dogs. The containers will not be used continually throughout the day, although the dogs will have access to the indoor area should they wish.

In accordance with the applicant's license, the facility has a maximum capacity of 40 dogs. Notwithstanding, it should be noted that some customers own more than one dog.

There are also associated outdoor pens and a 1.6m high perimeter welded mesh fence to provide enclosed exercise/play areas and ensure the dogs cannot escape.

The site is accessed via the existing private access road utilised by the other businesses at the site.

NATIONAL PLANNING GUIDANCE

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF), published in December 2024 (and updated in February 2025), aims to strengthen local decision making and to reinforce the importance of up to date plans.

Paragraph 11 of the National Planning Policy Framework (NPPF), states that plans and 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, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

As it stands, the adopted Local Plan for Gravesham is considered out-of-date.

Paragraph 88 suggests 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

As set out in **Paragraph 143** of the NPPF (2024), the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;

- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF states that development in the Green Belt is considered inappropriate unless it falls within one of the exceptions to Green Belt development provided in **Paragraph 154**:

- 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), including buildings, 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; 55 Other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.
- 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 (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.
- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
 - i. mineral extraction;
 - ii. engineering operations;
 - iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
 - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
 - v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
 - vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

Notwithstanding the above, the recent updates to the NPPF have introduced greater flexibility with regards to lower quality green belt sites, and paragraph 155 states that:

“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b) There is a demonstrable unmet need for the type of development proposed;
- c) The development would be in a sustainable location, with particular reference to [paragraphs 110 and 115 of this Framework]; and
- d) Where applicable the development proposed meets the ‘Golden Rules’ requirements.”

As explained within the NPPF, for the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 (set out above).

Paragraph 212 explains 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Furthermore, **Paragraph 215** confirms 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.

LOCAL PLANNING POLICY

The current Local Plan for Gravesham Borough Council consists of the Gravesham Local Plan Core Strategy (2014), and the 'Saved' Policies of the Gravesham Local Plan First Review (1994), in addition to several Supplementary Planning Documents.

In accordance with the adopted Policies Map, the site is located within the Green Belt.

Policy CS02 confirms in the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and 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 this plan.

Policy CS07 states 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.

Policy CS11 explains new developments should mitigate their impact on the highway and public transport networks as required, and sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

Policy CS12 advises a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained.

Policy CS19 states 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 and meet anti-crime standards.

Policy CS20 confirms when considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset's conservation value will be commensurate with the importance and significance of the asset.

Due regard has been given to the above policies in the preparation of this application.

PLANNING ASSESSMENT

Principle of Development

The proposals seek to provide a dog day care facility for dog owners. Life can be very busy and complicated at times and a safe, happy environment for dogs to be looked after is vital.

The service would enable members of surrounding communities to have dogs and be able to work/leave the dogs for the day in a secure, controlled and purpose-built environment. This would provide a social benefit as it facilitates a better work-life balance for the people who would use the facility. This would meet the social objectives of the NPPF.

It is understood dog ownership rose exponentially during COVID-19 and a lot of owners did not think about the consequences when returning to work.

Policy CS02 of the Gravesham Local Plan Core Strategy (2014) confirms development outside of rural settlements will be supported where it is compatible with national policies for protecting the Green Belt and

policies in the Local Plan.

The proposals do not include the construction of any permanent buildings, and this would be a temporary change of use for a period of 2 no. years, following this the site will be restored to its previous state which can be secured by way of an appropriately worded planning condition.

As stated above, the wider site includes Nurstead Court itself which is a Grade I listed building used for weddings and event hire, a livery consisting of 27 no. stables, Hooper and Sons Ltd building yard, a residential mobile home and two holiday let properties. As such, the site adjoins previously developed land which currently comprises a range of commercial, industrial and agricultural operations.

Given the above, it is not considered that the immediate surroundings are significantly contributing to the five purposes of the green belt in their current form, and therefore the site could be considered as 'grey belt' land in accordance with the definitions explained within the NPPF.

Paragraph 155 of the NPPF sets out that there must be a demonstrable unmet need for the type of development proposed and that it is within a sustainable location. The business has been operating since 2022 and on average has up to 30 customers day. Furthermore, there is not another licensed dog day care facility within the borough, thus demonstrating an unmet need within the area. The site is also located 500m from the main Meopham settlement and as such is considered a sustainable location.

Furthermore, Paragraph 88 of the NPPF supports the development of businesses in rural areas where a rural location is required and where it is appropriate and sensitively designed for a rural location. Likewise, Policy CS07 of the Gravesham Local Plan Core Strategy (2014) provides the Council will support proposals that promote the appropriate expansion and diversification of the rural area economy.

The dog day care facility will have capacity for up to 40 dogs and will employ at least 5 members of staff. A rural location is required for a facility of this nature as significant external space is necessary for the enjoyment and exercising of the dogs visiting the site.

In light of the above, the development proposals would provide a facility that would benefit the local community, whilst not having a detrimental impact on the openness of the Green Belt. Therefore, the proposed development is acceptable at national and local policy level.

Design

The proposals include the temporary siting of 3 no. portacabins, which will provide a reception area where owners can safely check in their dogs, a dedicated staff area, and a separate respite area for the dogs. The portacabins will not be in constant use throughout the day, although the dogs will have access to the indoor space as desired.

At present, the containers are finished in a turquoise green colour; however, the applicant is willing to repaint them in a more recessive tone if this would assist in integrating the structures more effectively within the wider setting. This could be secured by way of a planning condition, if considered appropriate.

A perimeter fence is required to ensure the safety and containment of the dogs. The fence design has been carefully considered to minimise visual impact, comprising a 1.6-metre-high welded mesh fence that will remain in place for the duration of the temporary consent.

In addition, it is understood that supplementary planting has been agreed with the landowner and Natural England, which includes planting on the land adjacent to the application site, as illustrated below. Therefore, the additional planting will also further shield the facility.



The wider site already accommodates a variety of building types, including stables and a builder's yard.

Given the existing context, it is considered that the proposals would not result in any detrimental impact on the character or openness of the surrounding area.

Heritage

The application site is not situated within a designated Conversation Area and although Nurstead Court is Grade I listed, the building itself which holds the heritage significance lies approx. 210m east of the site and is also well secluded and screened by existing mature trees.

Furthermore, the existing approved uses at the wider site, including a livery and Hooper and Sons Ltd. building yard are within 100m of Nurstead Court. Therefore, much closer to the listed building than the application site.

Given this separation and the level of existing screening, in addition to the additional planting mentioned above, it is considered that the proposed development will not adversely affect the setting or significance of the nearby listed building.

Therefore, on the balance of harm in accordance with the NPPF it is considered that the proposals would cause less than substantial harm and should therefore be considered acceptable.

Highways Impacts

The site is accessed via a private road from Nurstead Church Lane, and the opening hours are 7am to 6.30pm Monday to Friday (exc. Bank holidays) to allow for people working long hours the opportunity to drop off their dog before work.

Due to the unique nature of this proposal, we do not believe there are car parking standards applicable. However, there is an existing hardstanding area which can be used informally for drop offs/pick ups and staff parking.

A highways note has been prepared by Smart Transport Hub, which concludes there are no anticipated issues from a highways perspective in relation to the single track access road or visibility splays, as these are currently utilised by the existing businesses at the site with no issues. Smart Transport Hub also believe ample parking is provided, and do not foresee any issues with the vehicle trips although suggest providing more information regarding the vehicle trips and how the booking system will work could be beneficial.

In order to meet customer needs and mitigate impact on the local highway network, staggered start and finish times are proposed which include a maximum of customers per slot. The slots will be booked online via the applicant's website to ensure the number of customers do not exceed each time slot.

The table below explains the time slots and maximum number of customers per slot. These are based on a maximum of 30 customers a day. As mentioned above, the facility is licensed up to 40 dogs, but customers often own more than one dog.

Drop Off Time	Max no. of Customers	Collection Time	Max no. of Customers
7:00	4	14:45	6
7:30	4	15:30	4
8:00	4	4:15	2
8:15	2	4:45	2
8:30	4	17:00	4
8:45	2	17:30	4
9:30	4	18:00	4
9:45	6	18:30	4

As set out above, this equates to a maximum of 30 no. customers a day who would make a two-way trip twice a day, once to drop off their dog/dogs off and once to collect. The time slots provided ensure customer numbers are limited during peak hours and throughout the day.

In light of the above, it is considered the development mitigates its impact on the highway and public transport networks as required by Policy CS11 of the Gravesham Local Plan Core Strategy (2014).

CONCLUSION

In conclusion, it is considered that the proposals are acceptable in principle and will provide an essential facility for the surrounding communities, whilst having minimal impacts on surrounding Green Belt and wider area, the nearby listed building and local highway network.

In addition, the site can be restored to its previous state after the temporary 2 year period.

In light of the above, it is considered that the proposals accord with the provisions of the NPPF (2024), Gravesham Local Plan Core Strategy (2014), and the 'Saved' Policies of the Gravesham Local Plan First Review (1994),

We trust that you have sufficient information to determine this application, but should you have any questions or queries in the meantime or require any further information, please do not hesitate to contact me.

Yours faithfully,



Charlotte Mills
PLANNER

Encs.