



Delegated Report

Planning Application

Planning Application No: 20221315

Location: Eastfield Farm Stables Heron Hill Lane Meopham Gravesend

Description: Demolition of an existing ageing stable complex and construction of a new equestrian barn

Applicant: Mr & Mrs C Oakes

Site Visit Date: 21/12/2022 plus previous visits

Submitted Documents/Plans

- Application form;
- Drawing no. DHA/15967/01 Rev. A – Site Location Plan;
- Drawing no. DHA/15967/02 Rev. A – Existing Site Layout Plan;
- Drawing no. DHA/15967/03 Rev. A – Existing Stables Layout Plan;
- Drawing no. DHA/15967/04 Rev. A – Existing Stables Elevations;
- Drawing no. DHA/15967/05 Rev. A – Proposed Site Layout Plan;
- Drawing no. DHA/15967/06 Rev. A – Proposed Barn Stabling Floor Plan & Roof Layout;
- Drawing no. DHA/15967/07 Rev. A – Proposed Stables Building Elevations; and
- Planning, Design & Access Statement.

Relevant Planning History

Reference	Description	Decision	Decision Date
20211294	Demolition of an existing stable complex and construction of a new equestrian barn/stables.	Refused	17.12.2021
20210112	Application for variation of conditions 1 and 6 and removal of conditions 5 and 7 to planning permission reference no. 20170113 for the retention of stable block; to allow the relocation of the existing gates and allow retention of the existing visibility sight lines and parking layout.	Permitted	07.09.2021
20190593	Application for the removal of conditions 5 & 6 attached to planning permission reference no. 20170113 for the retention of stable block; to allow the retention of the existing visibility sight lines and the existing gates.	Refused	15.06.2020
20181292	Application for the approval of condition 3 attached to planning application reference number 20170113 relating to details of the arrangements for the storage and disposal of waste bedding, stable waste and manure (including the means of enclosure where necessary)	Approved	13.02.2019
20170113	Retention of stable block.	Permitted	17.09.2018

19860748	Erection of a block of 5 loose boxes tack room and hay feed store	Permitted	22.12.1986
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Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS07 – Economy, Employment and Skills
- CS12 – Green Infrastructure
- CS11 – Transport
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS18 – Climate Change
- CS19 – Development and Design Principles

Gravesham Local Plan: First Review (1994)

- Policy C17: Use of Land for Horse Riding and the Erection of Stables
- Policy T1: Impact of Development on the Highway Network
- Policy T2: Channel traffic to the Primary and District Distributor Network
- Policy T3: Development not well related to the Primary and District Distributor Network
- Policy T4: Development outside the Built-Up Area
- Policy P3: Vehicle Parking Standards

Paragraph 33 of the NPPF (2021) 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 (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 6 – Building a strong, competitive economy
- 8 – Promoting healthy and safe communities
- 9 – Promoting sustainable transport
- 11 – Making effective use of land
- 12 - Achieving well designed places
- 13 - Protecting Green Belt land
- 15 – Conserving and enhancing the natural environment

Supplementary Planning Guidance

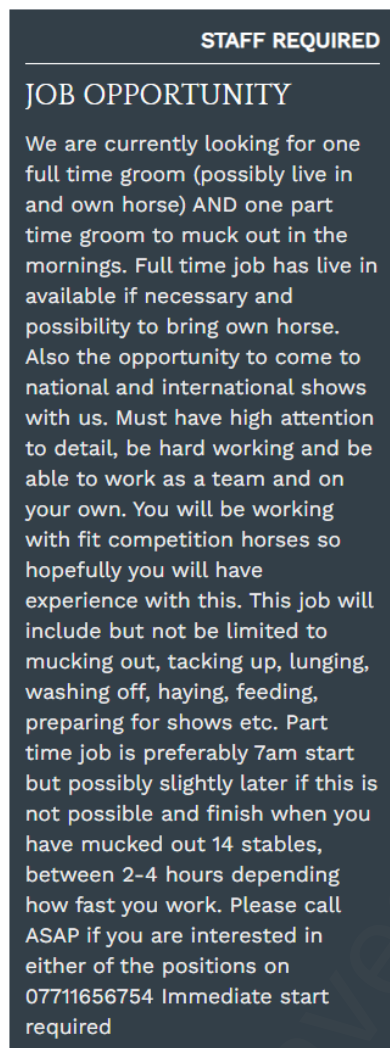
- SPG 4 - KCC Parking Standards (2006);
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

Consultees

GBC Highways Officer

I have no highway objections providing there is no increase in the number of stables. However, I'm slightly confused by the statement on the Horse Scout web site for this stable.



The image is a screenshot of a job opportunity advertisement. At the top, it says 'STAFF REQUIRED' in white text on a dark blue background. Below that, the title 'JOB OPPORTUNITY' is also in white. The main body of the text is in white on a dark blue background and describes a job for a groom. It mentions looking for one full-time groom (possibly live in and own horse) and one part-time groom to muck out in the mornings. It details the responsibilities, including mucking out, tacking up, lunging, washing off, haying, feeding, and preparing for shows. It also mentions the opportunity to come to national and international shows. The text ends with a phone number and a request for an immediate start.

STAFF REQUIRED

JOB OPPORTUNITY

We are currently looking for one full time groom (possibly live in and own horse) AND one part time groom to muck out in the mornings. Full time job has live in available if necessary and possibility to bring own horse. Also the opportunity to come to national and international shows with us. Must have high attention to detail, be hard working and be able to work as a team and on your own. You will be working with fit competition horses so hopefully you will have experience with this. This job will include but not be limited to mucking out, tacking up, lunging, washing off, haying, feeding, preparing for shows etc. Part time job is preferably 7am start but possibly slightly later if this is not possible and finish when you have mucked out 14 stables, between 2-4 hours depending how fast you work. Please call ASAP if you are interested in either of the positions on 07711656754 Immediate start required

<https://www.horsescout.com/yards/kent-horse-producers/profile/584>

The job opportunity clearly states there are 14 stables that will require mucking out, although only 12 are shown on the proposed layout.

KCC Public Rights of Way

Public Rights of Way NS284 lies to the south of the application area and I therefore enclose a copy of the Public Rights of Way network map showing the definitive line of the path for your information.

As in a previous application we are concerned that vehicles using the stables may have to stop on the

byway to open and close the gates when entering or leaving the site. As such we would like to see a recessed fence and gate large enough that horse boxes and lorries can pull off the byway. This is necessary as there are very few passing places on this highway.

It is important to advise the applicants that a public right of way must not be stopped up, diverted, obstructed or the surface disturbed and there must be no encroachment on the current width, at any time now or in future. This includes any building materials or waste generated during any of the construction phases. Please note that no furniture or fixtures may be erected on or across Public Rights of Way without the express consent of the Highways Authority.

Meopham Parish Council

No objection provided that the Borough Council is satisfied by the arguments made and that the safety issues relating to Heron Hill Lane have been properly addressed.

Dickens Country Protection Society

The Society would wish to raise an objection on the grounds that the site is in an area within which Green Belt Policies apply and the proposed building, because of its size, is likely to impact on the openness of the Green Belt. The Society notes there does not appear to be sufficient land to provide for the grazing and exercising of the number of horses it is envisaged housing.

Neighbouring properties

1 surrounding property was consulted plus site notice – overall consultation expiry date was 13 January 2023 – one response received (objection) the comments of which can be summarised as follows.

Item 1.7.7 landscaping in D&A Statement is factually incorrect as to the east elevation of the application there is no "existing mature landscaping" the east elevation is virtually bare of landscaping.

Given the lack of landscaping and as the proposed building has been turned 90 degrees to the previously refused application 20211294 the proposed larger north elevation of the new building will be clearly visible from their and other adjacent properties.

Would like better control over the used stables bedding and it be kept as far away as possible as the stacks of it give off unpleasant odours.

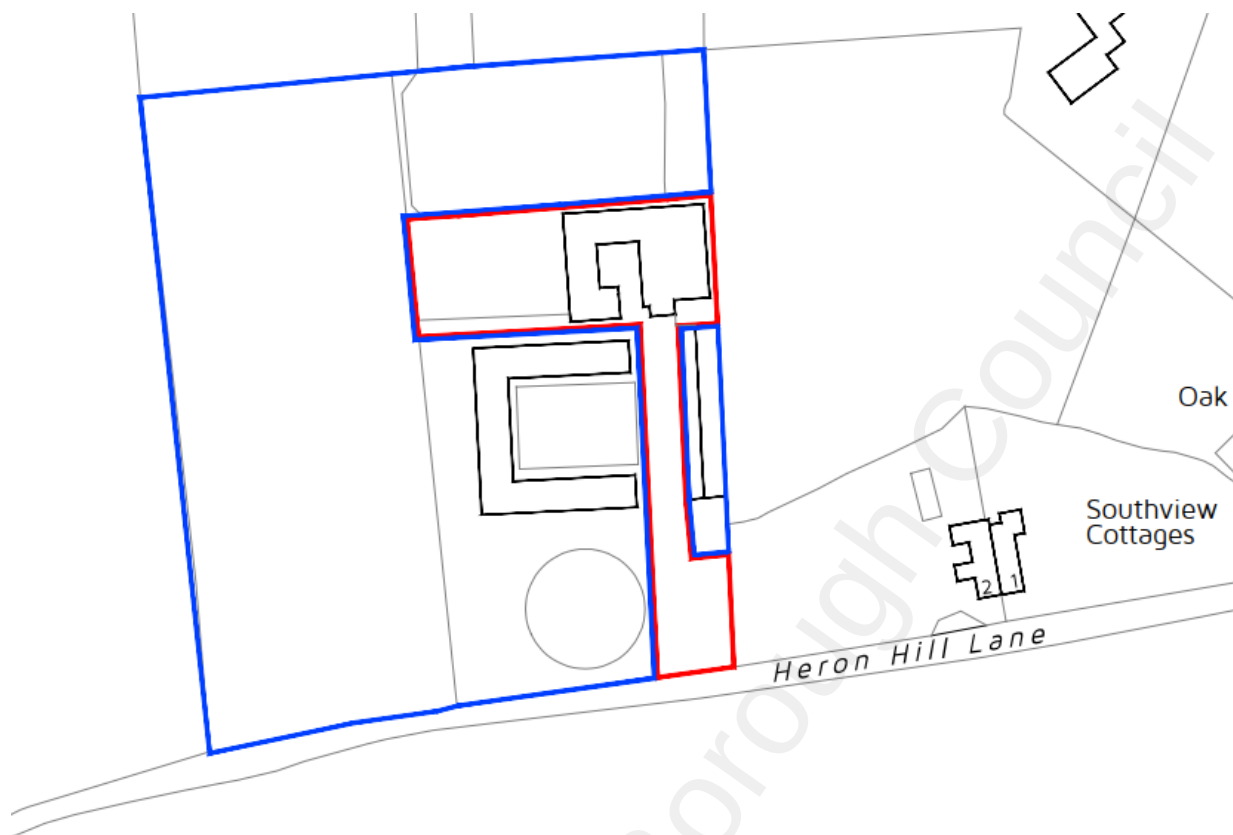
Would welcome no further bad language or loud music from the stables.

Officer's Analysis

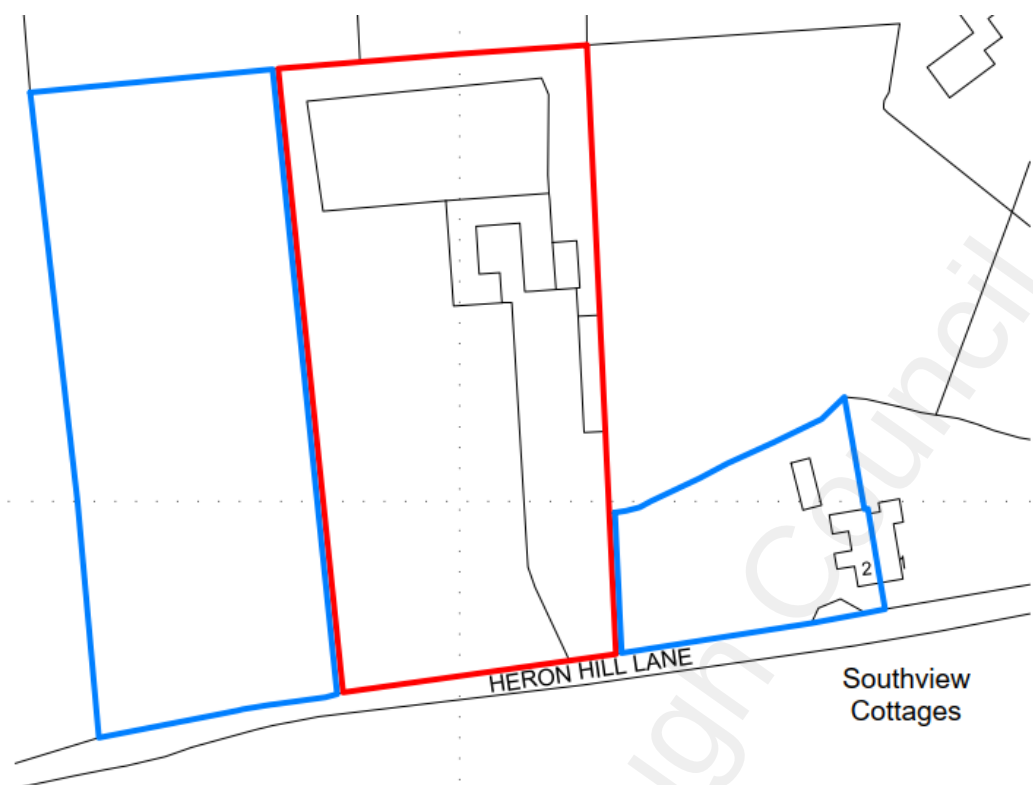
Procedural note

The red line boundary has been drawn around the stables subject of this application which are those that are towards the top part of the site, were constructed sometime around circa. 1990 and which contain 12 stables. However, the red line excludes the rest of the buildings and land which has formed Eastfield Farm Stables previously – see comparison of the red line boundaries between this current application and the 2017 application which was for proposed new stables to the south of this one which was to provide an additional 14 stables to the existing 12:

Current Application site plan showing red line boundary:



2017 Application – ref. 20170113 site plan showing red line boundary:



In the 2017 application for the stables to the south the red line boundary included the whole of the site of Eastfield Stables and questions are raised therefore as to why the red line has been drawn as such if the site is as one or if it is not as one anymore and the stables subject of this application are now separate from the rest of the site?

Had permission been forthcoming for the proposal this would have been raised with the agent further.

Site Description and Surroundings

The application site consists of a stable building and adjacent open structure situated on the northern side of Heron Hill Lane containing 8 stables, a store, drying room, equipment store, bridles and riding equipment and a washroom and drying area surrounding a central yard. There is then an open structure adjacent to this on the eastern side which houses 4 more stables; the main opening into the stables is in the southern side.

The existing main stables building measures:

- 160 sq. m in footprint;
- 15.7m in width;
- 16.1m in depth; and
- 2.7m in height

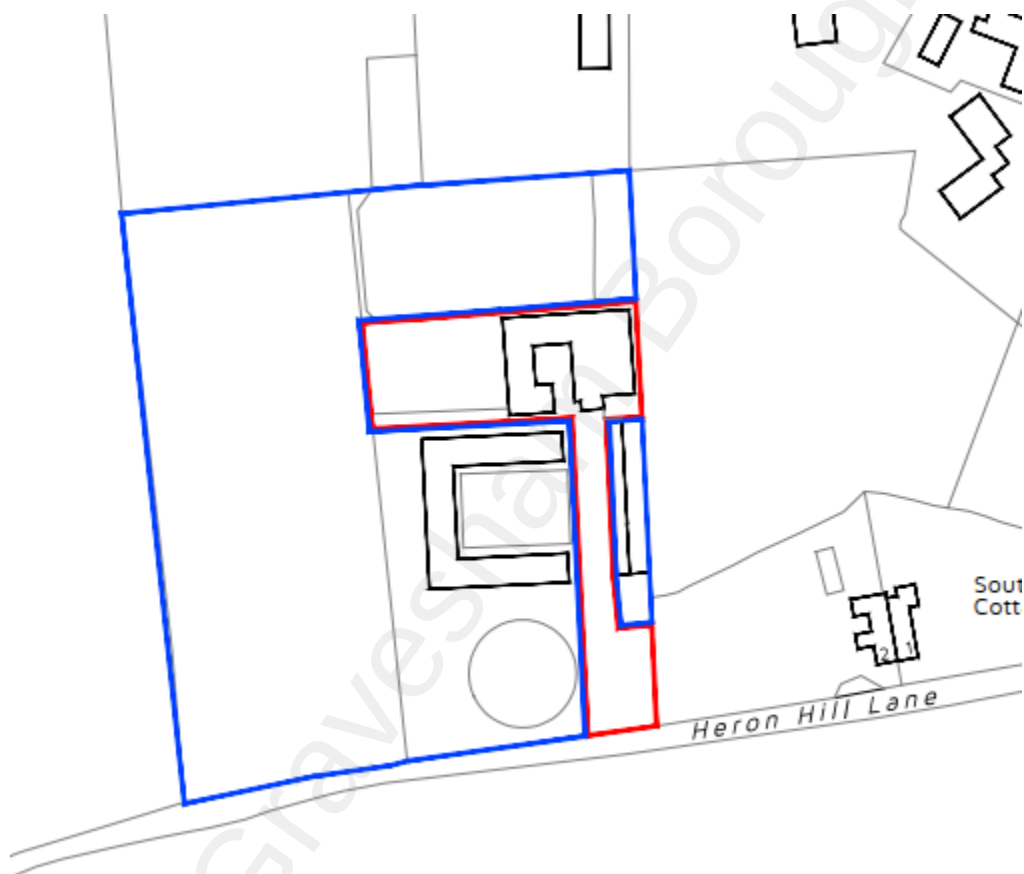
The open structure part to the east is 47.2 sq. m in footprint, 3.3m in width, 14m in depth and 4m in height at its tallest point.

The walls are faced with timber cladding and boarding and the roof is corrugated metal. The stables are in a fairly poor condition and appear somewhat dilapidated.

There is no record of planning permission for the stable building and indeed the stables building is part of a wider site which contains a number of other structures which when application reference 20170113 was submitted for retention of the stable block to the south of the existing stable block it was ascertained by the case officer that there was no record of any planning permissions for the use of the site for equestrian use nor for any of the buildings on the site at that time. However, the officer found that the use and buildings would now be lawful and therefore immune from enforcement. It was found from a review of Google Earth that the overall site was a vacant field in 1960 but by 1990 it had the stables which are subject of this application and the sand school to the north. It could also be seen that by 2013 there were other buildings erected to the south-east of the existing stables as well as an exercise paddock to the west and by now those elements were also essentially immune from enforcement.

The 2017 application (ref. 20170113) granted retention of a new stable building to the south of the circa. 1990 stables which were to remain; the new building was to provide 14 additional stables for the acquisition of high-class show-jumping horses, keeping and stabling them, training and exercise, and displaying them to potential purchasers.

The below extract from the site location plan for this current application shows the red line boundary for this application which is concerning the circa 1990 stables and shows this in the context of the wider site containing the other equestrian buildings and uses as described:



Furthermore, the site and surroundings can be seen in the below aerial imagery:



The site is located within the Green Belt, the Harvel Wooded Downs Landscape Character Area, an Area of Archaeological Potential and Heron Hill Lane is a Public Byway (Ref. NS284) which is open to traffic.

Previous application

Planning permission was refused for the demolition of the existing stable complex on the application site and construction of a new equestrian barn/stables on 17 December 2021 under application reference number 20211294. The replacement stables were to be on the site of the existing stables and of a larger footprint measuring:

- 441.2 in footprint;
- 25.1m in width;
- 17.7m in depth; and
- 5.6m in height to the top of the pitched roof

It was to have 18 stables, rug room wash/drying room, tack room and bridles and riding equipment room, isolation loose box with 3m circulation aisles. The entrance would have been in the southern side with a secondary entrance in the western side. The proposed materials were exposed concrete plinth blocks to 1.5m height with uPVC Plastisol coated profile steel sheeting in Moorland Green or similar colour with a darker edge trim for the walls for the upper sections and for the roof; doors would be dark stained with a sliding mechanism.

The application was refused on the following grounds:

1. *The application site is located within the Green Belt, as identified on the Policies Map accompanying the adopted Gravesham Local Plan Core Strategy (2014). National planning policies for the Green Belt set out within the NPPF sets out a presumption against inappropriate development in the Green Belt. The proposals are considered to constitute inappropriate development with reference to national policy and would by definition be harmful to the Green*

Belt. The identified harm to the Green Belt is not clearly outweighed by other considerations so as to amount to the very special circumstances required to justify inappropriate development. The proposal is therefore contrary to CS02 of the adopted Gravesham Local Plan Core Strategy (2014) and chapter 13 of the National Planning Policy Framework 2021.

2. *The proposed development would, by reason of its scale, height and materials of the design fails to preserve the Rural Landscape and Green Belt character of the site and wider area. The proposal is therefore contrary to the requirements of policy C17 of Gravesham Local Plan First Review and Policies CS12 and CS19 of the adopted Gravesham Local Plan Core Strategy (2014) and the National Planning Policy Framework (2021).*
3. *Given the nature of the rural business it is considered the proposed development would result in increased activities, resulting in increased vehicular movements to and from the site. The application does not sufficiently demonstrate how the proposals would not have an adverse impact on highway network. The proposals are therefore contrary to Saved Policy T3 of the Gravesham Local Plan First Review (1994) and CS11 of the Gravesham Local Plan Core Strategy (2015) and paragraph 113 of the NPPF.*

Pre-application advice

Further to this the applicant sought post refusal pre-application advice from the Council where an amended scheme for a replacement stable block was submitted and advice given. The advice given can be summarised as follows:

Ground of refusal no. 1 (Green Belt)

- Referenced the agent explaining at the site visit that current health and safety requirements for stabling horses sets the parameters in terms of size of a replacement facility;
- Officer noted that the proposed stables had been reduced in size (to 402 sq. m which is the footprint proposed in this application) which was said to be an improvement on the refused application and will go some way to lessening the impact on the openness of the Green Belt but in order to lessen the impact on openness as far as possible, a replacement block should be as close to the size of the original footprint as possible;
- Officer pointed out that the height had remained the same as the refusal – 5.6m to top of ridge;
- Advice given that height remained a concern but if the footprint can be reduced there may be some flexibility in terms of height although a reduction would clearly be preferable in terms of decreasing the overall size of the building and therefore lessening the impact on the Green Belt;
- There had been a reduction in the proposed number of stables to 12;
- The nature of the use of the stables and the intention of the current proposal should be clearly set out within any further application;
- If the concerns about the size of the replacement stable block can be addressed and justified, a revised proposal may be considered more favourably in terms of its impact on the openness of the Green Belt and overcoming ground of refusal no. 1;

Ground of refusal no. 2 (Design, Character and Appearance)

- Reduction in scale and height of building is required;
- Materials should be re-considered – the walls should be clad in timber.

Ground of refusal no. 3 (Highways and Parking)

- Information about the nature of the use is required;
- As fewer stables are proposed – there were 12 shown which is the same as the existing stables and the nature of the use is apparently not commercial stables but involves horses for pleasure and

performance then there is likely to be reduced activity and vehicular movements on the site and a further application is therefore likely to be viewed more favourably in terms of highway impacts.

Summary

- With further adjustments and information on the submitted plans in order to primarily reduce the impact on the openness of the Green Belt, an application for planning permission would be likely to be considered favourably if submitted for planning permission.

Proposal

In this application the proposal is for demolition of the existing stable block and erection of a new equestrian barn/stables. It would be built on the site of the existing stables to a larger footprint than the existing but less than the previous application. The proposed stable building would now be:

- 402.3 sq, m
- 11.3m in width;
- 8.8m in depth; and
- 4.93m in height to the top of the pitched roof.

It would have 12 stables therefore the same number as the existing stables (instead of the 18 previously proposed), three wash bays, rug room wash/drying room, tack room and bridles and riding equipment room, a feed room and a tack and trunk store with 3m wide circulation aisles. The entrance would be the same as the previous application – on the eastern side with a secondary entrance on the western side. The proposed materials according to the application form are the same as previously proposed i.e. for the walls it would be exposed concrete plinth blocks to a height of 1.5m with uPVC Plastisol coated profile steel sheeting in Moorland Green or similar colour with a darker edge trim above and also for the roof; doors would be dark stained with a sliding mechanism.

In this application it will need to be assessed whether the three grounds of refusal have been addressed.

The principle considerations in the assessment of this application are as follows:

- Whether the proposal would be inappropriate development in the Green Belt including impact on openness;
- Character and Appearance including the effect on landscape character;
- Parking and Highway Safety
- Other Matters
- Whether very special circumstances exist

Whether the proposal would be inappropriate development in the Green Belt including impact on openness

This matter related to ground of refusal no. 1 of previously refused application reference 20211294.

In the previous application it was considered that by virtue of footprint and height the proposed stables would represent a significant increase in built form at the site compared with the existing stables and would therefore fail to preserve the openness of the Green Belt and would conflict with the purposes of including land in the Green Belt and as such the proposal constituted inappropriate development in the Green Belt.

In terms of the pre-application enquiry the applicant had reduced the proposed footprint from 443 sq. m to 402 sq. m, reduced the number of stables from 18 to 12 but the height and materials remained the same. The advice given on how to address ground of refusal no.1 was essentially that the footprint of the stables should be as close to the size of the original footprint as possible and would therefore need to be reduced further; reduce the height of the stables and the nature of the use of the stables and the intention of the proposal should be clearly set out.

Policy CS02 (LPCS) states that development in the Green Belt will be supported where it is compatible with national policies for protecting Green Belt.

Paragraph 147 (NPPF, 2021) states that inappropriate development if, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 of the NPPF (2021) states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 149 (NPPF, 2021) states that the construction of new buildings should be regarded as inappropriate development in the Green Belt but there are some exceptions to this as follows:

- 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.

In this case it is considered points (b) and (c) are most relevant.

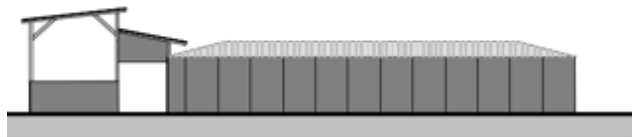
149 (b) is relevant as stables are considered to fall within the category of outdoor recreation. The principle of the replacement stable building is therefore considered acceptable subject to an assessment of the impact that the development would have on the openness of the Green Belt and the purposes of including land within the Green Belt.

149 (d) is also considered relevant as there is an existing building on the site which would be replaced and be in the same use and therefore in this case the principle of the replacement building is considered acceptable subject to an assessment of whether the proposed building would be materially larger than the existing building.

In order to assess these points it is necessary to make an assessment of the scale and design of the proposed replacement stable building in comparison to the existing stables.

A comparison of the existing, previously refused and current proposals are given below:

Existing stables



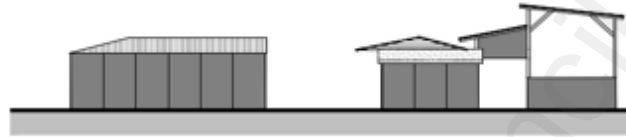
NORTH ELEVATION



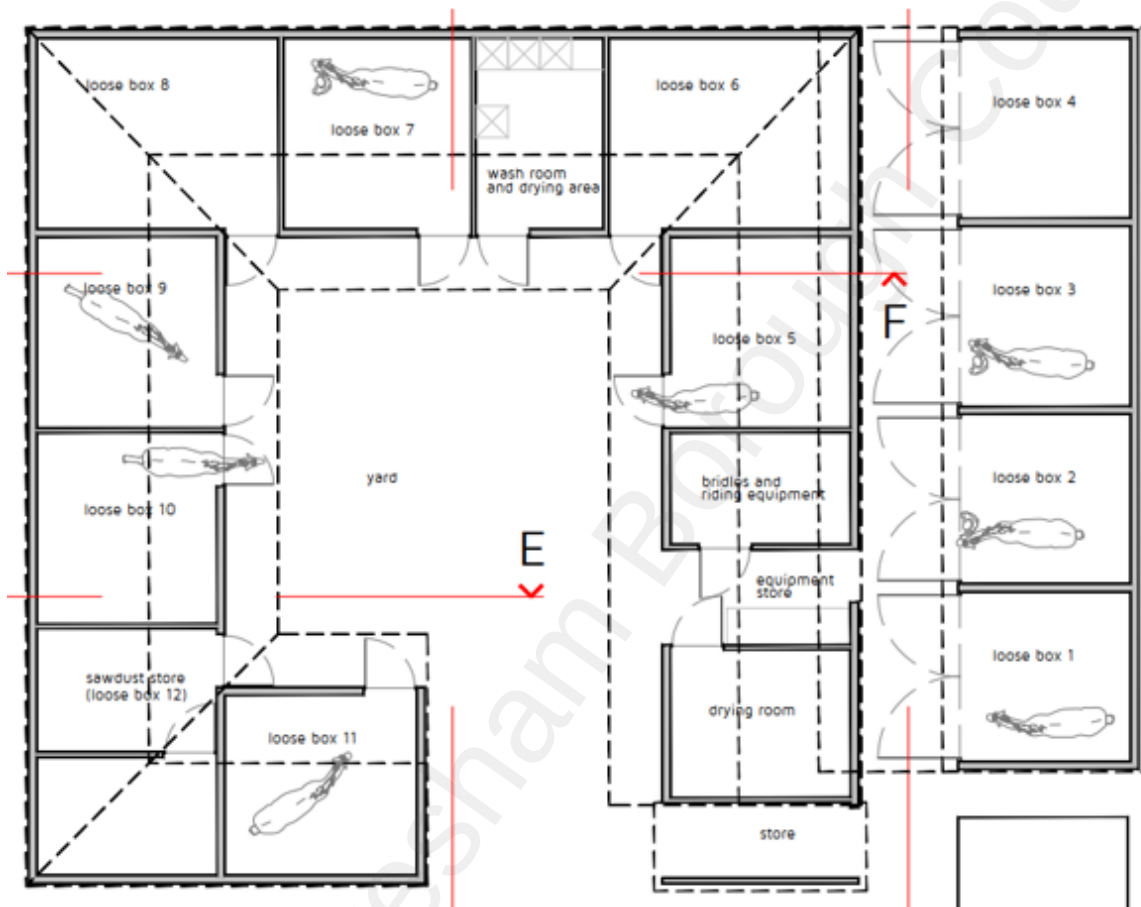
WEST ELEVATION



EAST ELEVATION



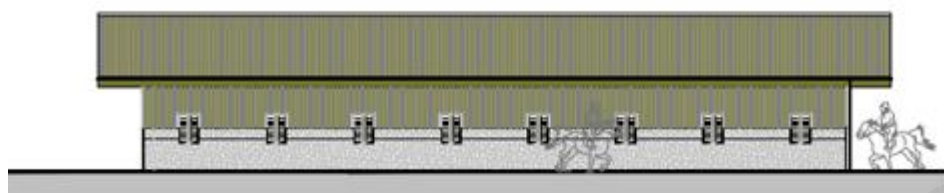
SOUTH ELEVATION



Refused stables (ref. 20211294)



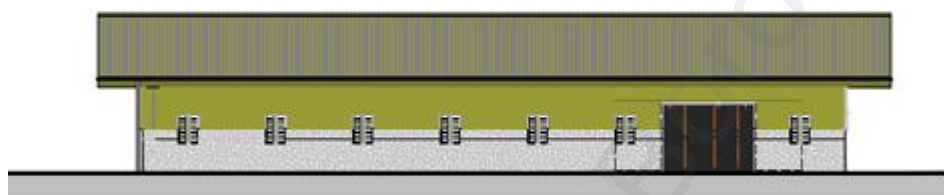
EAST ELEVATION



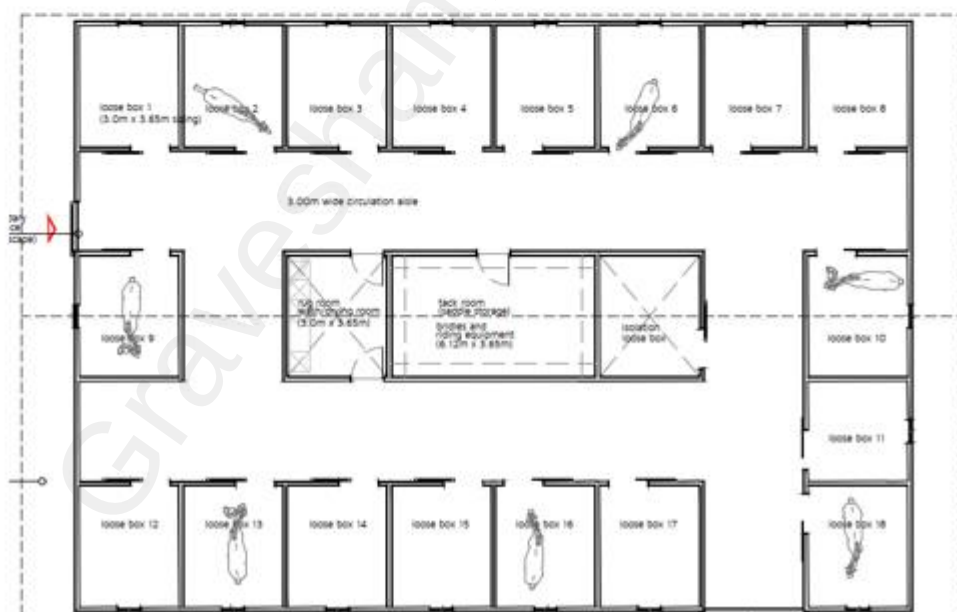
NORTH ELEVATION



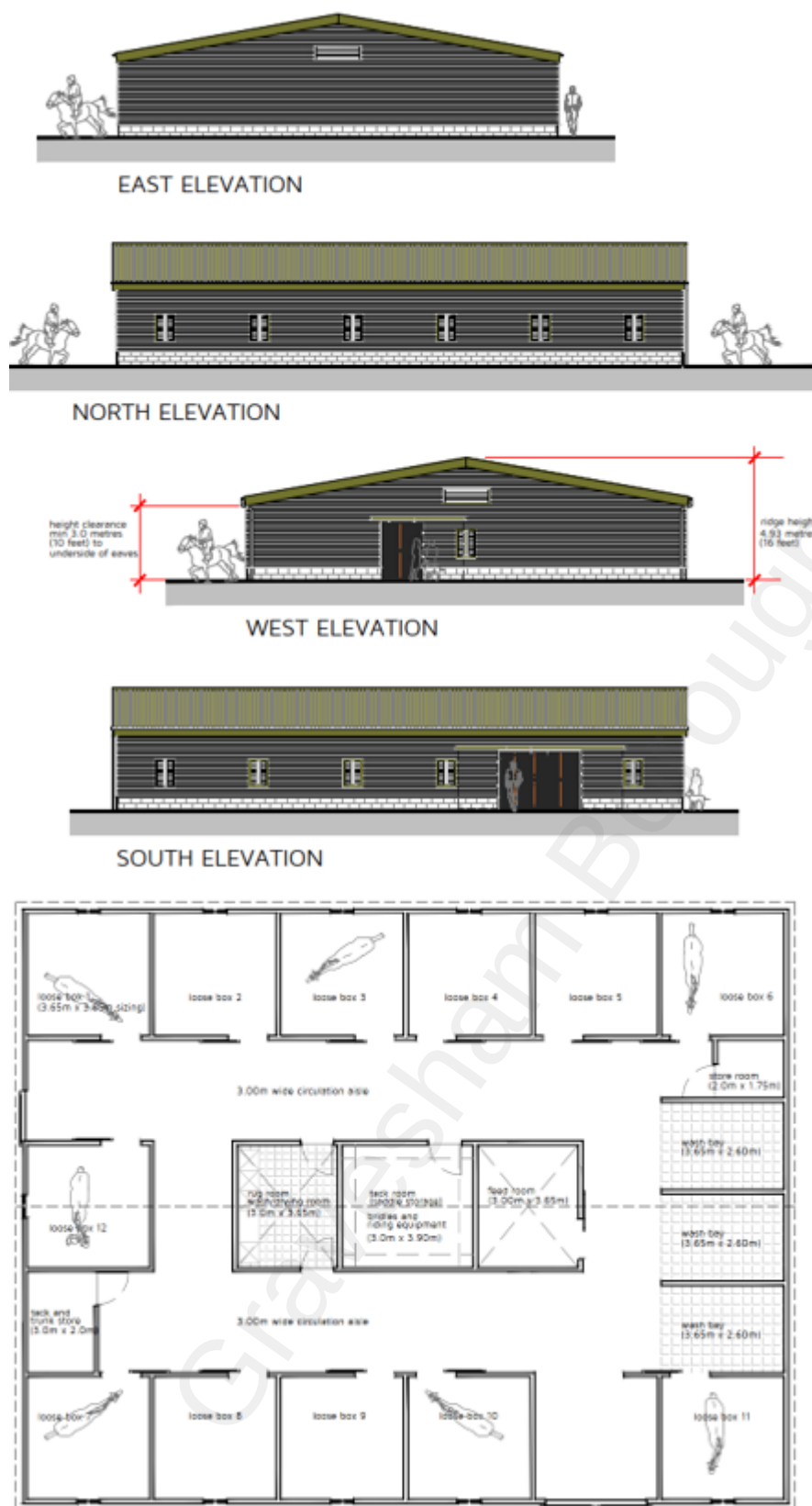
WEST ELEVATION



SOUTH ELEVATION



Current proposal (ref. 20221315)



A helpful visual comparison of the footprints of the existing, refused and proposed stable buildings are provided in the proposed site layout plan submitted with the application an extract of which is shown below:



KEY:

existing buildings and built form



original application (refused)
443 sqm excluding canopy overhang



existing stables footprint 267 sqm
(building to be demolished to make way for proposed replacement stables)



A numerical comparison of the footprints of the existing, refused and proposed stable buildings is as follows:

	Existing stables	Refused stables	Proposed stables	% increase above original (with refused scheme figure in brackets)
Footprint	160 sq. m (excluding the adjacent open structure to the east)	443 sq. m	402.3 sq. m	151% (176%)

There has therefore been a reduction in the footprint of the proposed stables of 41 sq. m when compared to the previously refused scheme but it would still constitute a 151% increase over the footprint of the existing stables which is considered significant. The footprint has not been reduced at all from what was proposed in the pre-application enquiry which was 402 sq. m which is the proposed footprint in this application.

As stated there is also an open detached structure adjacent to the stables which contains stables nos. 1-4 which is 47.2 sq. m. When this is taken into account as existing built form on the site and as it forms part of the existing stables the % increase in footprint over the original would be less but would still be significant:

	Existing stables	Refused stables	Proposed stables	% increase above original (with refused scheme in brackets)
Footprint	207.2 sq. m	443 sq. m	402 sq. m	94% (113%)

Therefore, in terms of an assessment of footprint, whether only the main stable building is counted or the adjacent open structure which contains stables nos. 1-4 is also included, the proposed stables would still vastly exceed the original stables; there has been only a minor reduction in footprint compared to the previously refused scheme and no reduction in footprint from what was proposed in the pre-application enquiry.

In terms of height a comparison of the existing, refused and proposed schemes are as follows:

	Existing stables	Refused stables	Proposed stables	Increase in height of proposed stables over existing (with refused scheme in brackets)
Height	2.7	5.6	4.9	2.2m (2.9m)

The proposal would therefore be 2.2m greater in height than the existing stables. Although this is less of an increase than the previously refused scheme (and what was proposed in the pre-application enquiry) it is still considered a significant amount and would appear as a large and prominent building.

In terms of an assessment of footprint and height, the proposed stables would still represent a significant increase in built form at the site compared to the existing building. This is the case whether only the main stable building is counted or even when the adjacent structure to the east housing loose boxes 1-4 is also included.

From a visual comparison of the existing and proposed elevations (as shown above) it can also be clearly seen that the proposed stables would be of much greater bulk and massing than the existing which would

be a building of much greater prominence.

In respect of materials, the existing stables are timber clad with a corrugated metal roof. The proposed materials are the same as the previously refused application – it is stated in the application form they would be exposed concrete plinth blocks for the walls to 1.5m height with the upper sections being uPVC Plastisol coated profile steel sheeting in Moorland Green or similar colour with a darker edge trim; the roof would also be the same steel sheeting. These were not considered sympathetic in the original application (and this was advised in the pre-application also) and it is still not considered acceptable now when timber would be a much more sympathetic material for the walls as per the existing stables and the new stable block permitted under the 2017 permission. .

It is therefore considered that in respect of an assessment of footprint, height, scale, bulk, massing and design the proposed stables would be materially larger than the existing stables on the site and would therefore fail to preserve the openness of the Green Belt.

Paragraph 138 (NPPF, 2021) sets out that 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.

In respect of these it is not considered that the proposal would conflict with any of the Green Belt purposes however, in finding that the proposal would fail to preserve the openness of the Green Belt and would be materially larger than the one it would replace, it would not meet the relevant exceptions set out in paragraph 149 (NPPF, 2021) and as such constitutes inappropriate development. The proposal is therefore contrary to Policy CS02 (LPCS) and has not addressed ground of refusal no. 1 of previous application reference 20211294.

Character and Appearance including the effect on landscape character

This matter related to ground of refusal no. 2 of previously refused application reference 20211294.

It was considered that the proposed stables by virtue of their footprint, massing, scale and height were considered to cause significant harm to the site out of character with this rural location. Furthermore, the proposed materials of a 1.5m concrete plinth followed by uPVC plastisol coated profile steel sheeting in green for the walls and roof were not acceptable given the scale of the development, its countryside location and furthermore the approved stables to the south were constructed with timber cladding for the walls.

In terms of the pre-application enquiry the applicant had reduced the footprint of the proposed stables to 402 sq. m, the height and materials remained the same. The advice given was the same as for ground no. 1 i.e. – reduce scale and height and propose timber cladding for the walls.

The site is located in the Harvel Wooded Downs Landscape Character Area. Paragraph 174 of the NPPF (2021) requires development to contribute to and enhance the natural and local environment by (amongst other things) protecting and enhancing valued landscapes (in a manner commensurate with their statutory status or identified quality in the development plan). Policy CS12 (LPCS) states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications. Saved Policy C17 (LPFR) states that proposals for the recreational use of land in the countryside for horse-riding, riding schools and the erection of stables will only be permitted if they are compatible with the agricultural, landscape and transport policies of this Plan. Where proposals are acceptable in principle, the Borough Council will expect stables and horse shelters to be properly designed and constructed of sound materials appropriate to the countryside and to be in an acceptable location within the site.

The Gravesham Landscape Character Assessment (2009) advises that the Harvel Wooded Downs Landscape Character Area is characterised by varied topography with steep valley sides and plateaux, ancient woodland, chestnut coppice and small paddocks and pasture, the traditional historic settlement of Harvel set around the village green, occasional traditional farmsteads and haphazard mosaic of residential plots and small holdings set within the woodland. It's condition and sensitivity is classed as moderate; it is stated that the landscape should be conserved and created.

The area the site is located is rural in character with open fields to the west and south and sporadic development to the east in Harvel village. The site itself contains an existing stables on it which has an open quadrant design surrounding a central yard whereas the proposed building would be one rectangular footprint with no open yard area. The proposed stable building would be significantly larger than the existing stables it would replace. In terms of footprint although this has been reduced to 402 sq. m compared to the previous application it would still represent a 151% increase in footprint over the original when just the main stable building is included but even if the adjacent open structure containing stables nos. 1-4 is also included it would still represent a 94% increase. The height of the proposed stables has been reduced by 2.2m compared to the previous proposal and would now 4.9m but this is still considered to be significant. In terms of overall bulk and massing the proposed building would be significantly larger than the existing stables and the proposed materials are still the unsympathetic metal sheeting for the walls as opposed to timber.

The proposed development would result in an increase in the amount of built development within the site and it is therefore considered that the proposal would have an adverse impact on the wider landscape character of the area. As such the proposal would be contrary to Policies CS12 and CS19 (LPCS) and saved Policy C17 (LPFR). The proposal has therefore not addressed ground of refusal no. 2 of previous application reference 20211294.

Parking and Highway Safety

This matter related to ground of refusal no. 3 of previously refused application reference 20211294.

It was considered that insufficient information had been submitted to demonstrate the impact the proposal would have on the highway network. There were concerns from the Highways Officer that with the proposed increase in stables (it was proposed to have 18 instead of the existing 12) then this would be likely to result in additional activity relating to the commercial enterprise of the site; further information would also be required about the nature of the use of the site.

In terms of the pre-application enquiry the applicant reduced the number of stables from 18 to 12 and it was explained on site that the nature of the use is not commercial stables but involves providing horses for pleasure and performance. The advice given was that as there would be 12 stables and the use is not commercial but for pleasure and performance then it was likely that a further application was likely to be viewed more favourably in highway terms.

This current proposal is for a new stable building with 12 stables and so in that respect this is still the same amount as the existing stables. The Highways Officer advises that as there would be no increase in the number of stables, he has no objections to the proposal. The officer makes reference to a job advert online where 14 stables are mentioned however, this is the number of stables in the stable building to the south granted permission under the 2017 application and not the stable building on the application site which has 12 stables.

Although there would be no increase in the number of stables, it is still the case that very little information has been submitted with the application on the nature of the use of the site, even less than in the pre-application enquiry. Although it was stated in the pre-application enquiry that the stables were not commercial and were for leisure and performance none of this information has been included or expanded on in this application which the applicant was advised would be required. As it is not stated in this application how the existing stables exactly operate (and how the proposed would) a true assessment of

the impact of the proposed stables cannot take place as general information given in a pre-application enquiry cannot be carried through into an application – the information should be submitted in a planning application itself and what was stated in the pre-application discussion needed expanding and greater detail given in any case.

Throughout the planning, design and access statement submitted with this application the stables are referred to in only general terms i.e. – ‘stables’ or ‘well-established equestrian premises’ with no information on how the existing stables are exactly used i.e. whether the stables are for personal use and if so by whom and in connection to what, whether it’s commercial, livery etc. It is prudent to note that the red line boundary on the site location plan is around the original stable block only and the access to it. It does not include the wider site of Eastfield Farm Stables and specifically excludes all of the other buildings and land. In the 2017 application for the stables to the south, the red line boundary included the whole of the site and as such questions are raised as to why the red line has been drawn as such if the site is as one or if it is not as one anymore are the stables subject of this application now separate?

Furthermore, in the 2017 application the adjoining property no. 2 Southview Cottages was outlined in blue as other land owned by the applicant on the site location plan, but it is not outlined in blue on the site location plan submitted with this current application, questions are therefore raised as to whether the application site and the wider site of Eastfield Stables does not form part of no. 2 Southview Cottages anymore which again raises questions on how the stables are used and by whom.

Therefore, on the basis of the proposed stables being the same number as the existing (12) then this in itself would not raise any additional highway or safety concerns. However, as very limited information has still been submitted with the application regarding how the existing stables on the site are used, how they relate to the wider site (outside of the red line boundary) and how the proposed would be used it is considered there is still insufficient information submitted as to the impact on the highway network. Given this is a narrow country road which is a public byway open to traffic it is considered that to ensure there would be no harmful impact as a result of the proposal further information as set out above is required. As such the proposal is considered contrary to Policy CS11 (LPCS) and saved Policy T3 (LPFR). In this regard the proposal has therefore not addressed ground of refusal no. 3 of previous application reference 20211294.

Other Matters

Neighbouring Amenity

By virtue of the distance of the nearest neighbouring properties from the application site it is considered that the proposed stables would not have any impact with regards overshadowing, loss of light or loss of outlook. Issues are made in the neighbour response concerning odours, noise and disturbance but this would be covered under Environmental Health legislation. In respect of neighbouring amenity the proposal is considered compliant with Policy CS19 (LPCS).

Archaeology

KCC Heritage advised in the previous application that the site lies within an area of multi-period archaeological potential but that it is considered unlikely the proposed works will have a significant archaeological impact. As such it is considered there would be no archaeological impact from the proposal and in this respect the proposal is compliant with Policy TC7 (LPFR).

Any Other Material Planning Considerations

It is stated in the planning, design and access statement that the existing stables are well established but are an aging, out of date and declining stable complex which is not fit for purpose and in disrepair without enough space to conduct necessary everyday activities safely. This

Much detail is given on this matter as follows:

The current stable complex is not fit for purpose and is in disrepair, without enough space to conduct necessary everyday activities safely. For example, outdated stable complex has no crosstie areas, so staff and contractors must walk behind horses when clipping, shoeing, physio, tacking up, untacking, washing off, grooming, inspecting, and treating horses. Also, due to space constraints, the existing concrete yard area on site is used for work, preparation, and inspection of horses. Meanwhile existing overhangs store equipment creating a cluttered working environment. A detailed explanation of the justification for a new stable complex and operational challenges faced by staff, contractors, and the owners will be provided at the meeting.

The proposal is therefore for a new stable block to address all these concerns. It is stated that no additional horses will be kept on site as a result of the proposal. These reasons are appreciated however it is the proposal which must be judged against relevant planning policies. The reasons behind it are therefore given limited weight in any balance.

Whether very special circumstances exist

The proposal would be inappropriate development within the Green Belt. In accordance with paragraph 148 of the NPPF (2021) substantial weight should be given to any harm to the Green Belt. In addition, openness would be eroded. The proposed stable building would also harm landscape character and insufficient information has been submitted in respect of the stable use to assess parking and highway impact.

The applicant states the existing stables are in decline and the proposed stable block would address all of the substandard issues with the existing stables. However, this not considered of sufficient strength to outweigh the totality of harm which has been found. As a result very special circumstances do not exist.

Balancing Exercise/Conclusion

The proposed stable building would be inappropriate development in the Green Belt and there are no very special circumstances to justify it. Whilst there would be no harm to neighbouring amenity or archaeology, there would be harm to landscape character and there are concerns with parking and highway safety matters due to insufficient information having been submitted. The proposal would not accord with the development plan and there are no other material considerations to outweigh this finding. Therefore, it is recommended that planning permission is refused.

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

Case Officer:	Ms Rebecca Harrison	Team Leader:	Richard Hart
Signed:	<i>Rebecca Harrison</i>	Signed:	<i>R Hart</i>
Dated:	6 February 2023	Dated:	6 th February 2023