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Planning Statement

**Brimsole Farm Barns, Brimstone Hill,
Meopham, DA13 0BN**

CLIENT: MR. A. THOMPSON

NOVEMBER 2023
DHA/32311



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APPENDICIES

- A** Gravesham Borough Council Extant Application Decision Notice (20230184).

1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This Planning Statement has been prepared on behalf of Mr. A. Thompson in respect of a full planning application for the conversion of two disused agricultural barns to create two new 3-bedroom dwellings.
- 1.1.2 One of the units already benefits from an extant consent for the conversion granted under application reference: 20230184 and in this regard these changes seek only to alter the surrounding curtilage.
- 1.1.3 The application is therefore described as such:
- "Conversion of existing barns into two new three bedroom dwellings with associated parking, amenity garden, and landscaping"*
- 1.1.4 This Statement provides a detailed overview of the Site and proposals, it assesses the planning merits of the scheme with regard to any relevant planning history, and the applicable planning policy framework, and subsequently concludes that the proposal is acceptable in planning terms and therefore planning permission should be granted.

1.2 APPLICATION DOCUMENTS AND PLANS

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

Documents:

DOCUMENT	REFERENCE	AUTHOR
Application Forms and Ownership Certificate	n/a	DHA Planning
Planning Statement	DHA/32311	DHA Planning
Structural Assessment	Structural Assessment – Brimsole Farm Barns Meopham	TSC Consulting Engineers
Design and Access Statement	23121-P002	OPEN Architecture
Preliminary Ecological Appraisal	23_1714_ReportX02_MF_AT	GreenLink Ecology

TABLE 1.1: SUBMITTED DOCUMENTS

Plans:

PLANS	REFERENCE	AUTHOR
Site Location Plan	23121-E002-Site Location Plan	OPEN Architecture
Consented Elevations	22098-P450	OPEN Architecture
Consented Floor Plans	22098-P200-Proposed Floor Plans	OPEN Architecture
Proposed Site Plan	23121-P150-Proposed Site Plan	OPEN Architecture
Proposed Floor Plans	23121-P200-Proposed Floor Plans	OPEN Architecture
Proposed Elevations	23121-P450-Proposed Elevations	OPEN Architecture
Proposed Car Port Elevations	23121-P451-Proposed Car Port Elevations	OPEN Architecture
Phasing Plan	23121-C160-Phasing Plan	OPEN Architecture
Structural Assessment Plan and Photographs	3068	TSC Consulting Engineers

TABLE 1.2: SUBMITTED PLANS

2 SITE AND SURROUNDINGS

2.1 THE APPLICATION SITE

- 2.1.1 The Site comprises an L-shaped structure that comprises a large agricultural storage barn and features a cattle store, in addition to this a Dutch barn and open sided storage bay are present on the Site, alongside associated hardstanding, scrubland, and vegetation. The Site is accessed via Brimstone Hill.
- 2.1.2 The Site is approximately 0.12 hectares in size and falls within the administrative boundaries of Gravesham Borough Council (hereafter 'the Council').
- 2.1.3 The Site is bound by Brimstone Hill to the west with agricultural fields beyond this. To the north lies a detached residential dwelling, with residential development associated with Foxendown Lane beyond this. To the south lies a residential dwelling with agricultural land and woodland beyond this. To the east lies an equestrian complex with woodland and agricultural land beyond this. Established hedgerows line the western Site boundary, the Site topography is set at a lower gradient than Brimstone Hill, which naturally contains and compartmentalises the Site.

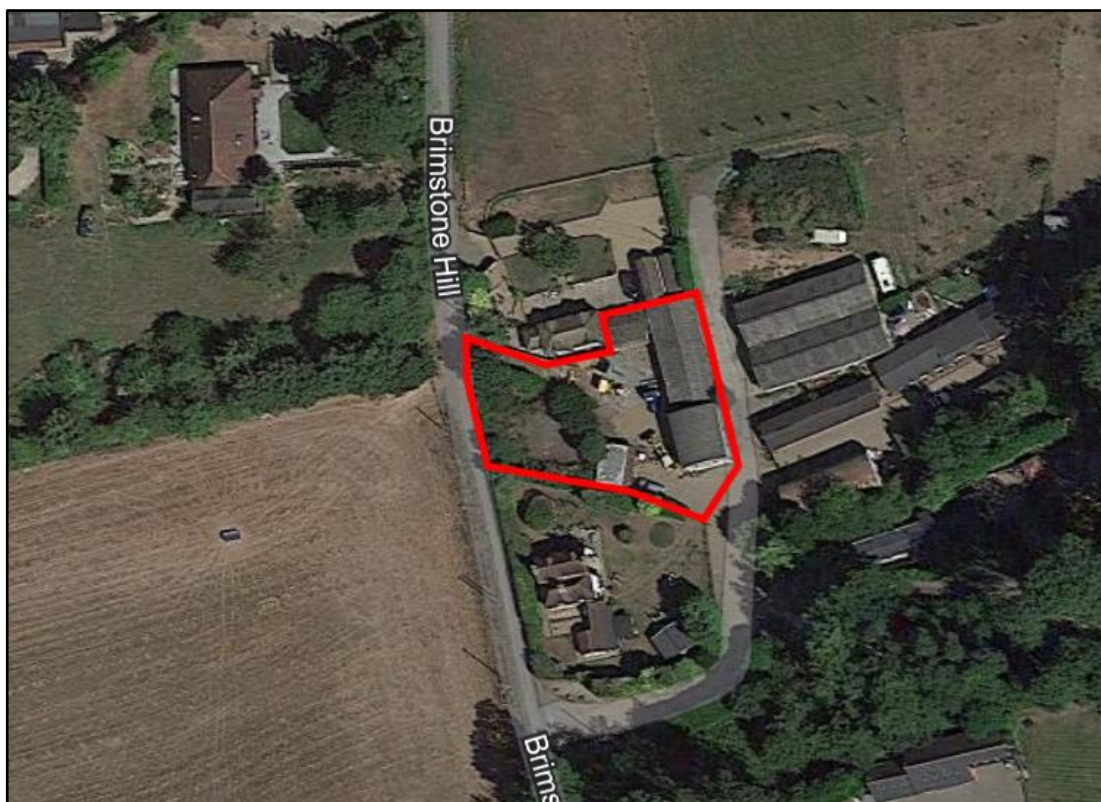


FIGURE 2.1: APPROXIMATE SITE LOCATION EDGED IN RED (GOOGLE EARTH).

- 2.1.4 The Site historically formed part of a wider complex of former farm buildings, however, the ownership of which has since been disaggregated.

2.2 PLANNING DESIGNATIONS

- 2.2.1 According to the Gravesham Borough Council ('GBC', 'the Council', or 'Gravesham Council') online planning proposals map, the Site is outside any defined settlement boundaries and is therefore considered as being within the Countryside. The Site is designated as falling within the Metropolitan Green Belt and the Kent Downs Area of Outstanding Natural Beauty (AONB).
- 2.2.2 The closest Public Rights of Way (PRoW) are located to the north (Footpath NS259) and south (Footpath NS258) of the Site, as demonstrated by Figure 2.2 below.

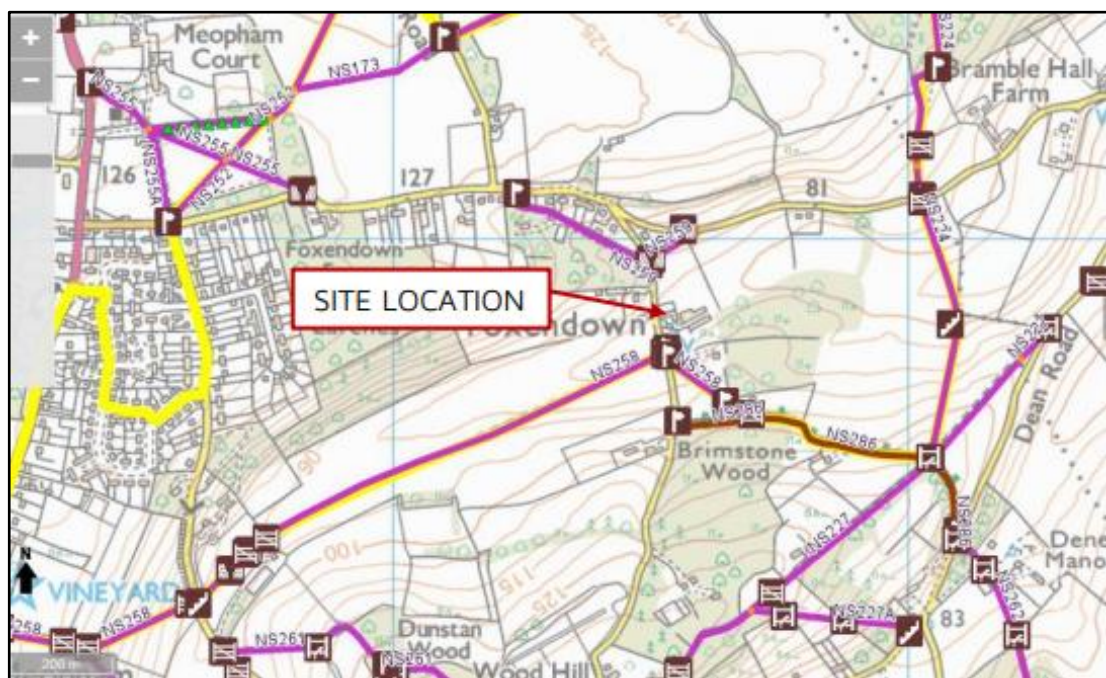


FIGURE 2.2: PUBLIC RIGHTS OF WAY MAP (KENT COUNTY COUNCIL).

- 2.2.3 The Site is also identified in the Environment Agency's flood risk maps as being located entirely within Flood Zone 1 and is therefore at the lowest level risk of flooding. Accordingly, a Flood Risk and Drainage Assessment is not considered to be required in support of this application.
- 2.2.4 According to Historic England's Listed Building Map Search, there are no nearby Listed Buildings or heritage assets that are within the setting of the development.

2.3 ACCESSIBILITY

- 2.3.1 In terms of accessibility, it is noted that Brimstone Hill provides a connection to Meopham via Foxendown Lane, which provides a connection to Wrotham Road (the A227) which connects to Gravesend in the north and Wrotham in the south.
- 2.3.2 From Meopham, a number of bus services are accessible, including '223', '305', '306', '308', '311', and the '418', which provide a connection to Gravesend, Sevenoaks, Tonbridge, Vigo Village, and Cobham. Meopham is served by a Train Station which provides services to Gillingham, London Victoria, Dover Priory, and Ramsgate.
- 2.3.3 Several services and facilities are located within close proximity to a number of local services and facilities which include, but are not limited to a village hall, Post Office, church, restaurants, bars, post office, convenience stores, fitness centre, Secondary Schools, Nursery, and Community Academy.

2.4 PREVIOUS PLANNING HISTORY

- 2.4.1 As previously noted, the Site has been the subject of an extant planning permission, which is detailed below. However, it is noted that the Site, according to the Gravesham Borough Council Planning Application database has not otherwise been the subject of any relevant previous applications.

REFERENCE	PROPOSAL	DECISION
20230184	Conversion (change of use) of existing barn into new three bedroom dwelling with associated parking.	Granted Permission April 2023.

TABLE 2.1: SITE PLANNING HISTORY (COURTESY OF GRAVESHAM BOROUGH COUNCIL)

3 PROPOSED DEVELOPMENT

3.1 NORTH PLOT – AS APPROVED BY APPLICATION REFERENCE: 20230184

- 3.1.1 Permission was granted for the conversion of the northern most barn to create a new 3-bedroom dwelling alongside associated covered parking, private space, and landscaping. As part of the conversion, the building would be reclad with materials that maintained the simple agricultural form of the building in addition to the sensitively additions of new openings to ensure adequate natural light.
- 3.1.2 Internally, the barn included the addition of a partial mezzanine level to create the master bedroom with ensuite, with all other living accommodation at the ground floor.
- 3.1.3 Under these new proposals the proposed conversion itself will remain as per application reference: 20230184 but with a rearrangement of the surrounding allocation of curtilage land.



FIGURE 3.1: RED LINE BOUNDARY OF PROPOSED DEVELOPMENT UNDER APPLICATION REFERENCE: 20230184

3.2 SOUTH PLOT

- 3.2.1 The south plot currently comprises a double height barn with a detached car port and store area. This barn has large full height doors and sits within the eastern portion of the wider Site, the building is clad with corrugated sheet cladding and features a curved corrugated roof. The detached car port is constructed with timber and shiplapped cladding.
- 3.2.2 The further conversion comprises of a two-storey three-bedroom dwelling and associated works. The new dwelling will emulate and respect the form and materials of the agricultural style of the surrounding farm building, with the eave and ridge heights of the building will be maintained, as shown in Figure 3.2 and 3.3 below. The existing car port will be demolished, and a replacement car port will be located closer to the southern boundary.
- 3.2.3 The property will have access to two car parking spaces and an appropriately sized private amenity space, which will be laid to lawn.
- 3.2.4 The existing dry pond will be infilled with a new soakaway for the run off from the road and barns, additionally this expands landscaping opportunities and create additional private garden space, which will further enhance the biodiversity of the Site. To further assist with biodiversity, the converted barn and the replacement car port will feature 2no. bat boxes each.
- 3.2.5 The converted building will feature a kitchen / dining room, utility room, office, toilet, and living room on ground floor, with 3no. bedrooms, one of which benefits from an en-suite and dressing room, and a bathroom on the first floor.
- 3.2.6 The application is supported by a further Structural Assessment produced by TSC Consulting Engineers (October 2023) which concludes that the building is structurally sound and capable of conversion.
- 3.2.7 The proposed boundaries of the north and south plots are shown in Figure 3.2 overleaf.



FIGURE 3.2: RED LINE BOUNDARY OF PROPOSED DEVELOPMENT

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the Development Plan in force unless material considerations indicate otherwise.
- 4.1.2 This section sets out the relevant policies of the statutory Development Plan and refers to any other material considerations that should be taken into account in determining this application.
- 4.1.3 Rather than rehearsing policies, this section highlights relevant policies applicable to the application at hand. Policies are then explored in further detail within the below section.
- 4.1.4 In this case, the following documents are relevant to the application:
- The Gravesham Local Plan Core Strategy (2014);
 - The Saved Policies in the Gravesham Local Plan First Review (1994); and
 - The National Planning Policy Framework (September 2023).

4.2 GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 4.2.1 The following Policies within the Gravesham Local Plan Core Strategy are deemed relevant to the proposed development:
- **Policy CS01:** Sustainable Development;
 - **Policy CS02:** Scale and Distribution of Development;
 - **Policy CS11:** Transport;
 - **Policy CS12:** Green Infrastructure;
 - **Policy CS14:** Housing Type and Size;
 - **Policy CS15:** Housing Density;
 - **Policy CS18:** Climate Change;
 - **Policy CS19:** Development and Design Principles; and

4.3 GRAVESHAM LOCAL PLAN FIRST REVIEW SAVED POLICIES (ORIGINALLY ADOPTED 1994, SAVED AND DELETED POLICIES 2014)

- 4.3.1 The following policies within the Gravesham Local Plan First Review Saved Policies are deemed relevant to the proposed development:

- **Policy H5:** Increasing the Housing Stock by Conversion;
- **Policy C11:** Change of Use of Redundant Buildings in the Countryside;
- **Policy T1:** Impact of Development on the Highway Network;
- **Policy T4:** Development outside the Built-Up Area;
- **Policy P3:** Vehicle Parking Standards; and
- **Policy P5:** Change of Use of Buildings and Vehicle Parking Standards.

4.4 NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF), Updated September 2023

- 4.4.1 The NPPF sets out the Government's planning policies for England and puts "the presumption in favour of sustainable development" at the heart of the planning system. Those sections of the NPPF which are relevant to the determination of this application include:

- **Section 2:** Achieving Sustainable Development;
- **Section 4:** Decision Making;
- **Section 5:** Delivering a Sufficient Supply of Homes;
- **Section 11:** Making Effective Use of Land;
- **Section 12:** Achieving Well-Designed Places;
- **Section 13:** Protecting Green Belt Land; and
- **Section 15:** Conserving and Enhancing the Natural Environment; and
- **Section 16:** Conserving and Enhancing the Historic Environment.

Planning Practice Guidance

- 4.4.2 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance. The PPG is a 'living document' and is constantly being updated / reviewed.
- 4.4.3 As well as providing technical guidance the PPG sets out the importance of good design. It advocates the need for quality of design which it considers is an integral part of achieving the fundamental objective of sustainable development. The relevant sections of the PPG are listed below:
- Design: Process and Tools;
 - Effective Use of Land;
 - Green Belt;
 - Historic Environment;
 - Housing: Optional Technical Standards;
 - Housing Supply and Delivery; and
 - Natural Environment.

4.5 OTHER MATERIAL CONSIDERATIONS

Residential Layout Guidelines (Adopted 1996 – Amended 2020) SPG2

- 4.5.1 All planning applications for new dwellings, extensions to existing dwellings, flats, maisonettes, and bedsitters (new build or conversion), must comply with the Borough Council's adopted Residential Layout Guidelines.

Kent Vehicle Parking Standards (2006) KCC SPG4

- 4.5.2 This SPG supplements Policy TP3: 'Transport and the Location of Development' and Policy TP19: 'Vehicle Parking Standards' from the Kent and Medway Structure Plan 2006.

Gravesham Site Allocations and Development Management Policies

- 4.5.3 The Council undertook a Regulation 18 Stage 1 consultation on the Site Allocations: Issues and Options and Development Management Policies between April and July 2018. This, alongside additional technical work, informed the Regulation 18 Stage 2 help between October and December 2020.
- 4.5.4 As of November 2023, no further details have been made available on the Council's website since the Report to Cabinet held on Tuesday 3rd January 2023, whereby it was proposed under the revised Local Development Schedule that the Public Consultation (Regulation 19) would take place between September and October 2023, with submission for independent examination (Regulation 22) in February 2024. At this point details are awaited from the Council over the Regulation 19 consultation.

Five Year Housing Land Supply

- 4.5.5 National Planning Policy Framework (NPPF) Paragraph 74 is clear that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.
- 4.5.6 In the absence of an up-to-date plan, the Council's housing supply target should be based on the Government's standard methodology.
- 4.5.7 The published Housing Land Supply Position for the Council as of 2023 sets out a 2.90 years' supply of housing against the Borough's local housing need figure with a 20% buffer applied for the period of 2022 - 2027. The Housing Delivery Test (HDT) 2021 results were published in January 2022, demonstrating that over the last three years (2018 - 19, 2019 - 20, and 2020 - 21), the Council has achieved a delivery rate of 57% when compared to the required number of houses over this

period, and therefore the presumption in favour of sustainable development applies.

- 4.5.8 In view of the Council's 5YHLS and HDT figures, the Council cannot demonstrate a deliverable five-year supply of housing land as required by NPPF Paragraph 74 and therefore the presumption in favour of sustainable development is engaged on the basis of the housing policies being out of date.

5 PLANNING CONSIDERATIONS

5.1 INTRODUCTION

- 5.1.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is necessary to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.
- 5.1.2 In determining whether the proposal accords with the development plan, the following planning policy considerations are assessed in this section in relation to the proposal:
- (1) The Principle of Development;
 - (2) Design;
 - (3) Residential Amenity;
 - (4) Ecology; and
 - (5) Highways, Access, and Parking.

5.2 THE PRINCIPLE OF DEVELOPMENT

- 5.2.1 Local Plan Policy CS01 is clear that when considering proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as contained within the NPPF, therefore they will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development improves the economic, social, and environmental conditions in the area.
- 5.2.2 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decisions then the Council will grant permission unless material considerations indicate otherwise, taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF when taken as a whole or if specific policies in the Framework indicate that development should be restricted.
- 5.2.3 Under Paragraphs 149 and 150 of the NPPF, it states that certain forms of development are not considered inappropriate in the Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt, which includes the re-use of buildings provided that the buildings are of permanent and substantial construction. By virtue of the sound construction of the building and it being lawful, the proposal complies with

this element of national Green Belt policy. As noted previously, the application is supported by a structural survey which confirms that the buildings are capable of conversion. It is noted that the precedent for a building being considered capable of conversion was addressed under Appeal Reference APP/G2245/W/17/3181949, whereby the Inspector considered that the complete recladding of the building, underpinning, inclusion of a plinth and further supports for the frame and roof did not amount to major reconstruction and instead were alterations. The only remaining parts of the barn under the above Appeal was the portal metal frame and ground slab, however, it was still considered the building was capable of conversion. Further to this it is noted that within the Delegated Report of the extant consent, the Council were clear that the proposed re-use of the barn building which is of permanent and substantial construction would not be inappropriate development provided it preserves the openness of the Green Belt and would not conflict with the purposes of including land within it, similarly to the extant permission the proposed development would not increase the size of the building. By virtue of this it is considered that Officers would be minded to consider this application in the same light as the previously approved scheme, importantly the impact on openness as a result of the development would not be any greater than the previous use and therefore openness would be preserved in both spatial and visual senses.

- 5.2.4 NPPF Paragraph 80 is clear that planning policies should avoid the development of isolated homes in the countryside, with reference to a recent appeal APP/K2230/W/22/3297257 at Greenacres opposite the Ste, it was concluded that this particular location was not considered isolated. It is therefore concluded that the same conclusion can be made in respect of this application.
- 5.2.5 In view of this, it is noted that the development as proposed seeks to retain sufficient elements of the building as existing to ensure the protection of the character of the existing buildings. The proposed development comprises the comprehensive and sensitive re-development of a developed site in a sustainable rural location and is therefore supported in principle by the Development Plan and the NPPF, the scheme also provides high-quality landscaping and ecological enhancements. In terms of the Site itself, the proposed development provides an opportunity to provide an active use for the currently underutilised agricultural building.
- 5.2.6 Notwithstanding this, the extent of the housing shortfall in the Borough and the delay in progressing an up-to-date Local Plan is reiterated, which is a significant material consideration in the determination of the application. By virtue of the Council demonstrating a significant shortfall of housing supply, in addition to the policies regarding housing supply being out of date the application must be considered in accordance with the presumption in favour of sustainable development, as previously noted. The proposals are in complete accordance with the NPPF, with Paragraph 11 asserting that Planning Permission must be granted unless adverse consequences of doing so significantly and demonstrably outweighs the benefits. Chapter 11 of the NPPF further outlines that planning decisions should make effective use of land by promoting it, and further supporting the use of underutilised land and buildings, particularly when they would contribute

toward housing need and where sites can be used more effectively. The NPPF continues to highlight under Paragraph 69 that small and medium sized sites can make an important contribution in meeting the housing requirements of an area, with the development making a modest positive contribution to the supply of new homes in the District. To promote the development a good mix of Sites, Planning Authorities should, *inter alia*:

"support the development of windfall sites through their policies and decisions".

- 5.2.7 Consequently, it would be considered wrong for the Council to undertake a simple balancing exercise between the positive and negative factors related to the proposed development. In view of this, until a plan is up to date, the only proposals that should not be granted permission are those that have adverse impacts which *"significantly"* outweigh the overall benefits of development.
- 5.2.8 The proposals provide a number of benefits, however, of particular importance this includes:
- Development of two family homes in a sustainable rural area which is characterised by low density residential uses;
 - Use of underutilised, yet structurally sound buildings;
 - Visual betterment of the existing farm; and
 - Ecological enhancements.
- 5.2.9 Additionally, NPPF Paragraph 8 is clear that the planning system has three overarching objectives to achieve sustainable development which are interdependent and need to be pursued in mutually supportive ways.
- 5.2.10 Economically, the proposed development would provide short-term jobs for local construction workers, in addition to local companies having the opportunity to supply local materials, providing increased spending power within area which can support local shops and services. It is envisaged that the future occupiers of the development will make use of local facilities and services, in addition to the development providing the Council with increased Council Tax payments.
- 5.2.11 Socially, the proposed development would provide much needed new family homes. It is of particular importance in the context of the identified need to provide in excess of 700 new homes per year.
- 5.2.12 Environmentally, the proposed development would make effective use of underutilised farm buildings, in addition to being sensitively designed to conserve the landscape quality, neighbouring amenity, and to provide ecological enhancements on Site. It is also noted that there are a number of significant environmental benefits associated with the re-use of underutilised buildings which should be considered. Namely, the reduced carbon footprint of using an existing building compared to the complete construction of a new building in terms of embodied carbon, the reduction in required building materials and energy consumption associated with the demolition and construction process, which is

pertinent given the recent appeal decision at nos456-472 Oxford Street, London (reference: APP/X5990/V/3301508) despite its location outside of the Borough boundaries.

- 5.2.13 It is noted that the proposals would cause little or no resultant harm and certainly nothing to a level that would demonstrably outweigh the tangible benefits.
- 5.2.14 Therefore, the proposed development provides an excellent opportunity to create much needed homes in an area that has a growing requirement for housing. The proposals are entirely consistent with the wider strategic objectives of the Council and the NPPF and therefore it is viewed that the principle of development is entirely acceptable.

5.3 DESIGN

- 5.3.1 NPPF Paragraph 126 is clear that *'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*.
- 5.3.2 Due to the nature of the development, the conversion of agricultural buildings to dwellings, minimal external material changes are proposed. However, in cases where external material changes are proposed, the development will comprise of similar materials to that of the existing building and the surrounding properties in the immediate area. The proposals have been developed with the core design concept being to retain the integrity of the original agricultural buildings, by utilising its original structure to create an attractive living space. The development would result in an enhancement to the immediate setting of the area by virtue of making effective use of the existing underutilised building.
- 5.3.3 In reference to the previous Delegated Report on the extant scheme, it is noted that the development by virtue of being a conversion there would not be a resulting harm to the AONB.
- 5.3.4 The dwellings have all been designed to ensure that the internal spaces are appropriate and fit for purpose. It is noted that the dwellings exceed the requirements set out under the Nationally Described Space Standards and are provided with adequate internal storage, recycling storage space and access to useable private amenity space.

5.4 AMENITY

- 5.4.1 Paragraph 130 of the NPPF is clear that planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible and which offer a high standard of amenity for existing and future users.

- 5.4.2 Windows within the rear elevation of the dwellings will face onto land associated with the farm, by virtue of the uses associated with the farm, it is not envisaged that this elevation would give rise to any amenity concerns.
- 5.4.3 Windows within the side elevations of the southern plot have been limited to just a ground floor opening on the south elevation, due to its location on the ground floor it is not envisaged that it will give rise to any amenity concerns. Due to the buildings position in close proximity to the building to the north, there are no side windows proposed on the northern elevation.
- 5.4.4 In terms of the front elevation, there are no amenity concerns given that the buildings face on to Brimstone Hill.
- 5.4.5 In view of this, it is considered that there is no likely harm to neighbouring amenity as a result of the proposed development and will indeed provide a high standard of amenity for future occupiers. Additionally, it is noted that the Council did not highlight any amenity concerns associated with a residential development in this location under the extant scheme by virtue of this, the proposal development is considered to be the subject of the same conclusion.

5.5 ECOLOGY

- 5.5.1 By virtue of the development as proposed, i.e., a conversion of agricultural buildings to dwellings a Preliminary Ecological Appraisal has been prepared by Greelink Ecology (October 2023) in support of the application. It is noted that the extant scheme was supported by a PEA which was clear that there were no known overriding ecological constraints that would prevent the proposed works to the northern plot coming forward.
- 5.5.2 In regard to the south plot, the PEA classifies the habitats present, highlights the potential of the Site to support protected species, recommending suitable avoidance, mitigation, compensation, and ecological enhancement measures were appropriate. When successfully implemented, the recommendations in the PEA will ensure that the development proceeds in line with all of the relevant laws pertaining to protected species and their habitats, as well as contributing to an increase in biodiversity on the Site.
- 5.5.3 In terms of bats, the PEA is clear that no evidence of bats was recorded during the internal and external inspection, with the barn being considered to have negligible potential for use by roosting bats due to the absence of any potentially suitable roost features. The PEA highlights that whilst potential for bats was identified in relation to the small, front tiled roof area, this was considered to have low potential due to most of the tiles being machine made with limited gaps between them and there being no underlying membrane. Additionally, no evidence of bats was recorded in association with the self-sown ash tree, which has no significant potential for use by roosting bats, on the basis of its immaturity and absence of potentially suitable roost features. Due to no evidence of roosting bats being recorded in association with the barn, it is considered that there is no

perceived risk of impacts to bats in relation to the barn conversion, with the proposed works being considered to have a positive impact for bats through the provision of wall integrated roosting features. No mitigation measures are recommended for the barn conversion, the front tiled area of the carport should be carefully dismantled outside of winter under the supervision of an experienced Natural England licence holder.

- 5.5.4 No evidence for breeding birds was recorded during the survey, although the buildings along with sections of hedgerow and tree represent potentially suitable habitat for use by birds during the breeding season. To avoid risk of impacts to breeding birds, precautionary mitigation measures are recommended, the works are considered to have a positive impact for birds through the provision of wall mounted nesting features. If it is necessary to conduct this work during the breeding season it should be carried out under the supervision of an experienced ecologist who will check the presence / absence of any active birds' nests.
- 5.5.5 The PEA notes that ordinarily the presence of a pond would require a Habitat Suitability Index assessment to determine the probability of great crested newt presence. However, due to the pond not holding standing water for a significant duration of time it would be unable to support a population of amphibian, including great crested newt, which require standing water of reasonable quality, along with aquatic/marginal flora, of which are absent. It is considered that there is no significant potential for great crested newt to be present and at risk of impacts as a result of the proposals.
- 5.5.6 In view of the PEA and the ecological enhancements as noted within the Appraisal it is considered that the development is entirely in accordance with all relevant National and Local Policy.

5.6 HIGHWAYS, PARKING, AND ACCESS

- 5.6.1 Vehicular access to the Site exists via the established access track on Brimstone Hill, the development will make use of the shared access track as existing.
- 5.6.2 By virtue of the scale of the development, it is not expected that the proposals would generate significant additional vehicle trips and therefore would not demonstrably impact on Local Highway capacity, amenity, or operation, nor would it have any severe impact on the Local Highway Network in line with NPPF Paragraph 111.
- 5.6.3 As noted previously, the parking for the southern plot will be provided in the replacement car port which is located on the driveway for the plot. The car port provides two car parking spaces in accordance with the KCC Interim Guidance Note 3 (IGN3) vehicle access parking standards for residential development in rural locations. The parking and access of the extant permission were considered acceptable; however, it is noted that the northern plot will benefit from parking located in a private forecourt to the front of the plot.

- 5.6.4 Under the extant permission an attenuation tank on the Site was proposed in addition to further drain runs, which was considered acceptable by both KCC and GBC Highways, it is noted that the proposed development will benefit from these improvements.
- 5.6.5 Local Plan Policy 31 is clear that new development that can be a significant generator of travel should be accessible or be capable of being made accessible and supported by a Transport Assessment that sets out the impacts of the development on the local transport network. Local Plan Policy 30 sets out the parking requirements to be provided in new residential development. With Local Plan Policy 32 highlighting that the potential impact on road safety will be considered and the Council will ensure that it is not significantly adversely affected.

6 SUMMARY AND CONCLUSION

6.1 SUMMARY

- 6.1.1 This Statement has been prepared on behalf of Mr. A. Thompson in respect of a full planning application for the conversion of two disused agricultural barns to create two new 3-bedroom dwellings. One of the units already benefits from an extant consent for the conversion granted under application reference: 20230184 and in this regard these changes seek only to alter the surrounding curtilage at Brimsole Farm, Brimstone Hill, Meopham, Gravesend, Kent.
- 6.1.2 The Site is situated within the Metropolitan Green Belt ('the Green Belt') and so careful consideration has been given to the design approach to ensure the development would not result in any adverse impacts to openness. It is highlighted that the in principle re-use of an existing building is an 'appropriate' form of development within the Countryside as defined by the Development Plan and NPPF.
- 6.1.3 It is noted that the agricultural buildings are structurally sound, capable of conversion and is of no architectural or historic merit.
- 6.1.4 The importance of the ability to deliver new family homes in the short-term is reiterated given the extent of the housing land supply shortage in the Borough. Indeed, based on the Government's standard methodology for calculating housing need, Gravesend's annual requirement is 707 dwellings, which is nearly double the current 363 houses per year target contained within the out-of-date Core Strategy. Furthermore, the latest Housing Delivery Test results require the Council automatically apply the presumption in favour of sustainable development owing to recent under delivery. National Planning Policy reflects the importance of housing need and supply, which requires Local Authorities to provide a five-year housing land supply, where Authorities unable to do so, circumstances significantly tilt decision making in favour of the grant of permission.
- 6.1.5 It is noted that the principle of the residential conversion of agricultural buildings in this location is supported by the extant consent on the northern plot.

6.2 CONCLUSION

- 6.2.1 In considering the above context, the development comprises a well-informed, high-quality, sensitive, and well-planned re-development proposal.
- 6.2.2 It is considered that the proposal entirely accords with the development plan, additionally, wider material considerations support the proposed conversion and therefore it is respectfully requested that Planning Permission be granted.