

Planning Statement

Land at East Court Farm, Church Lane, Gravesend

May 2025



1. Introduction

- 1.1 This Planning Statement accompanies a full planning application submission for the installation of 7 no. glamping pods/retreats and 4 no. barrel saunas with cold plunge for overnight guest use, external decking areas, permeable footpaths and vehicular track, parking and turning area, secure cycle storage and recycling/refuse storage, 2 no. private package treatment plants, landscaping and associated works.
- 1.2 This Statement reviews a response from the Council in April 2024 to a pre-application submission for a similar glamping scheme; it assesses the proposed development in this application against relevant local and national planning policy; and, considers the impact of the development on the openness of the Green Belt, which the application site falls within.
- 1.3 Included with this application submission are the following supporting documents:
 - Accompanying letter
 - Planning application forms including ownership certificate
 - Location Plan
 - Proposed plans and elevations
 - Planning Statement
 - Design and Access Statement
 - Market Research Report
 - Drainage strategy plan
 - Transport note
 - Lighting plan and report
 - Preliminary Ecological Assessment
 - Biodiversity Net Gain Report and Metric Calculations
 - GCN and eDNA Assessment
 - Arboricultural Impact Assessment and Method Statement
 - Landscape plans
 - Landscape Visual Impact Assessment
 - Heritage Impact Assessment
 - Archaeological Desk Based Assessment
 - Desktop Study Report
 - Local Planning Authority pre-application response reference PRE20230357
 - Topographical Study

2. Site Context and Proposed Development

- 2.1 The application site is located to the east of Gravesend accessed off Church Lane, which provides access to Lower Higham Road to the north and Rochester Road (A226) to the south. There are bus stops along Rochester Road near to the junction between Church Lane, that provide a frequent bus service into Gravesend and surrounding area. These bus stops are a short distance walk of 700m from the application site along Church Lane and onto Rochester Road. The boundary of the application site has an area of 0.915 hectares.
- 2.2 The application site comprises an existing driveway that provides access to a group of existing properties, some of which are owned by the applicant. It also includes an unkept storage area to the east of these existing buildings and tennis court. The existing driveway will be extended northwards into an existing wooded area. To the west of the site is a paddock field and stables. To the north of Lower Higham Road is countryside leading up to Thames and Meadway Canal and railway line.
- 2.3 Within the southern part of the application site, the unkept storage area will be changed to an area where 3 no of the glamping pods will be located. A parking area for 13 cars will be provided to the north of this area, and, it is proposed to plant new trees within the land to the west and north of the parking area that has been included within the application site. A small outdoor gym/exercise area for visitors use is proposed to the north of the parking area. Within the northern part of the site are 4 no. glamping retreats each with barrel saunas with plunge pools. Secure cycle storage is proposed for each pod.
- 2.4 The 3 no. southern pods will be 4.2m wide, 10m long and 3.04m high, and will accommodate 4 persons. There are two different types of retreat units to the north of the application site ranging in height from 3.9m to 4.1m. The barrel saunas will be 2.02 m wide, 4 m long and 2.2 m high.
- 2.5 The site will be operational between 1st April and 30th September each year. Between March to April the glamping pods and retreats will not be rented out to visitors.

3. Relevant Planning History

- 3.1 Whilst there is an extensive planning history for development and alterations to existing buildings to the west of the application site, there is no relevant planning history relating to glamping or associated works within the application site.

3.2 A pre-application submission was made to the Council for the proposed development of 7 no. glamping pods/retreats at the site on 22nd December 2023 under LPA reference PRE20230357. A copy of the officer's pre-application response dated 30th April 2024 is included with this application submission.

3.3 The following sets out the key issues raised by the officer in their pre-application response, and how the current application has sought to address the points raised.

a) *No ecological information has been submitted with the pre-application* - A PEA has been submitted with the application highlighting the need to undertake great crested newt (GCN) surveys and impact assessment on a pond near to the site. These surveys are currently being undertaken and the results will be submitted when completed. The PEA sets out other mitigation measures that could be applied to the site, such as installing wildlife friendly lighting, provision of native landscaping, and installation of bird boxes.

b) *An assessment of impact of the development proposed on the Thames Estuary and Marshes Special Protection Area needs to be included in the ecological assessment. If the proposals are operational between October and March there will be a need to ensure that the proposals fully adhere to the agreed approach within the North Kent Strategic Access Management and Monitoring Strategy (SAMMS)* - The PEA concludes that given the scale of development proposed and distance of the development from the Ramsar and SSSI sites (approximately 179m to the north of the proposed development), it is considered unlikely that the proposed development will have a direct impact on these designated site. The PEA does acknowledge that indirect impacts cannot be ruled out due to potential increased recreational activities. It should however be noted that it is the applicant's intention to have the site operational and to rent out the glamping pods and retreats to visitors from between 1st April to 30th September each year. Therefore, there is not a requirement to follow the North Kent Strategic Access Management and Monitoring Strategy.

c) *Under the Environment Act 2021 there is a requirement to deliver at least 10% biodiversity net gain* - The proposed application provides additional site area to the north of the parking area to provide more land for planting trees, grassland and additional hedge line. This planting will contribute towards the biodiversity net gain and it is the applicant's intention to provide the 10% either on site or through off site means.

d) *There is potential for contamination to exist on the site and a Phase 1 Preliminary Risk Assessment/Desk Top Study will be required with the application* - A Preliminary Report has been provided with the application.

e) *Drainage details including an on-site wastewater treatment plant have been included* - These continue to be proposed in the south of the site and also to the north of the parking area.

f) Low level LED bollard lighting is acceptable in this location - The low level lighting continues to be proposed in this application and a light report is included providing further details of the impact of this lighting on the surrounding area.

g) The Council Tourism Officer was in favour of the proposal and considered the site and scheme is well placed, with access to public transport, road links and walking routes - This comment therefore highlights the support from the Council's department that promotes tourism in the Borough and should be a material consideration in determining this application.

h) The Borough Council's Highways Officer raised a query about the providing visibility sight line from the entrance to the site onto Church Lane of 203m x 2.4m x 203m - A transport note has been included with the application addressing the issue of providing access into the site from Church Lane.

i) The applicant will need to demonstrate that there is adequate on site turning for a tanker, and confirmation that they can get within 30m of the package treatment plants proposed - The transport note submitted with the application confirms that tankers will be able to turn within the site and that they will be able to achieve the 30m distance required to connect the tankers to the treatment plants proposed.

j) Parking for cycles - Each glamping pod and retreat has been provided with a secure cycle storage unit for two cycles per pod/retreat.

k) A welcome pack for visitors should be provided highlighting local taxi/car hire operators, etc. for those wishing to travel primarily by public transport to the site - It is the applicant's intention to provide a welcome pack for visitors.

l) 13 parking spaces are required for the development - 13 parking spaces are now provided within the proposed parking area.

m) National Green Belt policies do not support the development and outweigh all other considerations - This Planning Statement addresses the Green Belt planning policy consideration.

n) The proposal to use the land for glamping will impact on the surrounding landscape character conflicting with Policy CS12 of the Gravesham Local Plan Core Strategy - A Landscape Impact Visual Impact Assessment (LVIA) has been included with the application and assesses that although the proposals would have a slight impact on the immediate area, the site does have some capacity to absorb development without undue detrimental effects to the Shorne and Higham Marshes landscape characteristics.

The LVIA states that the introduction of a glamping site in this location would result in very little change to the local landscape character and any potential change would be limited to the immediate area.

The LVIA therefore concludes that the proposals will not detract from the local setting.

It should also be noted that an additional area of tree and hedge planting has been provided to the west and north of the proposed parking area, that was not proposed in the pre-application submission. This tree planting and landscaping will assist with softening the impact of the proposed development and glamping use within its immediate surroundings. It is therefore considered that further to the findings and conclusions of the LVIA, and the provision of additional tree and hedge planting, the proposals comply with Policy CS12.

o) A Heritage Statement assessing the impact of the setting of East Court Manor (Grade II listed) should be submitted with the application along with an assessment of the archaeological potential of the site - A Heritage Statement and Archaeological report have been included with the application. The Heritage Statement confirms that there will be no harm caused to any of the listed building, East Court Farmhouse and paragraphs 214-215 of the NPPF 2024 are not engaged by the proposal.

p) A concern was raised about the potential noise and disturbance to properties at the entrance to the site from the proposed development and additional vehicular movements - The transport note confirms that the traffic movements generated by the proposed glamping business will be low level and it is considered with this low level amount of traffic movement there will not be an unacceptable impact on existing residents amenities from noise impact.

q) The site is located within flood zones 2 and 3 and the application should be accompanied with a Flood Risk Assessment - The scheme has been amended so that no structures or works fall within Flood Zone 2 and 3. All constructed works proposed are contained within Flood Zone 1 and as such a FRA is not required for this application.

4. Planning Policies

Development Plan

- 4.1 The current Development Plan for the Borough includes The Gravesham Local Plan Core Strategy adopted in 2014, and, the Saved Policies of the Gravehsam Local Plan First Review adopted in 1994.
- 4.2 The Adopted Proposals Map identifies the application site as falling within the Green Belt. All of the glamping pods and retreats are located within Flood Zone 1.

- 4.3 The following policies contained within the Core Strategy 2014 and Local Plan 1994 are applicable to the consideration of this planning application.
- 4.4 *Core Strategy CS01: Sustainable Development* highlights that the Council will take a positive approach to considering applications that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) and in the Core Strategy.
- 4.5 *Core Strategy Policy CS02: Scale and Distribution of Development* sets out the Council's strategy for prioritising the delivery of development within sustainable urban locations. Within rural areas the policy continues to support development within those rural settlements inset from the Green Belt as defined on the Policies Map. Where there are development opportunities outside of the inset settlements, Policy CS02 states that it will be supported where it is compatible with national policies for protecting the Green Belt and other policies within the Development Plan.
- 4.6 The following section assesses the impact of the development on the openness of the Green Belt. In respect of other policies contained within the Development Plan, it is considered the proposed development complies with the relevant policies as outlined below.
- 4.7 *Core Strategy Policy CS07: Economy, Employment and Skills* provides guidance in respect of promoting employment generating uses within the Borough. Paragraph 5.1.37 of the Policy states that the Council will support proposals that promote the appropriate expansion of and diversification of the rural economy, such as the proposed development in this application.
- 4.8 *Core Strategy Policy CS09: Cultural and Tourism* seeks to “maximise” opportunities for expansion in culture and tourism within the Borough. In terms of considering tourism related development this Policy requires a sequential approach to be applied. Paragraph 5.3.16 of the Policy states:
- “Unless otherwise justified on the basis of a locational connection, functional justification or requirement to meet smaller scale local needs, proposals involving arts, culture and tourism development will be directed in the first instance to Gravesend Town Centre as the sequentially preferred location for such development in advance of edge of centre and then out of centre sites.”*
- 4.9 Policy CS09 therefore requires a sequential review of the proposals. In relation to the consideration of this application, the proposed glamping site use is not appropriate within an urban town centre location or edge of centre location. Typically, this form of tourist accommodation is found in more isolated rural locations, due to the visitors that it attracts and are seeking more outdoor activities. The proposed site in this application therefore caters of the type of use proposed. The Marketing report submitted within the application provides more detail about the demand for this type of use within the Borough. It is therefore the applicant's case that there is a strong locational connection and functional justification for the proposal in this location.

It should also be taken into account that both the Marketing report submitted with the application and comments from the Council's Tourist Officer to the pre-application submission highlight that there is need for this form of tourism accommodation within the Borough. Taking these points into account, it is considered that the proposal is supported by Policy CS09, which is a strong material consideration in determining this application.

- 4.10 *Core Strategy Policy CS11: Transport* requires developments to provide sufficient parking for new developments in accordance with adopted parking standards. It is the Kent Design Guide Movement & Connectivity Parking Standards that are applicable to this application. Within this document there are no specific parking standards that relate to the proposed glamping use of the application site. On this basis, a pragmatic approach should be taken as to the amount of parking that is provided for each glamping pod and the running of the site. 13 parking spaces have been proposed for the development, which is in line with the amount of parking requested by the Council through the pre-application response.
- 4.11 *Core Strategy Policy CS12: Green Infrastructure* highlights the need to provide suitable mitigation towards any harm to biodiversity as a result of a development.
- 4.12 *Core Strategy Policy CS18: Climate Change* requires developments to minimise the impact of drainage on waste water systems, through providing Sustainable Drainage Systems where technically and financially feasible.
- 4.13 *Core Strategy Policy CS19: Development and Design Principles* sets out the Council design requirements ensuring new developments are visually attractive, fit for purpose and locally distinctive. The policy also requires appropriate hard and soft landscaping to be provided, enhances biodiversity, and ensures car parking is well related to the development it serves.
- 4.14 The proposed development provides suitable biodiversity mitigation and the drainage strategy seeks to apply a SuDS system to ensure that Policies CS12 and CS18 are complied with. In terms of design, the scheme has been sensitively designed within the woodland and rural setting of the site. The southern part of the scheme will result in an enhancement to the visual appearance of the existing storage area and additional tree planting is proposed to the west and northern parts of the site, again softening the appearance of proposed development and blending it in with the rural character of the area. Policies CS12, CS18 and CS19 are therefore complied with.
- 4.15 *Core Strategy Policy CS20: Heritage and the Historic Environment* seeks to preserve, protect and enhance the Boroughs heritage and historic environment.
- 4.16 *Local Plan Saved Policy TC2: Policy for Listed Buildings* requires that where development affects the setting of listed buildings, then primary consideration will be the maintenance of the integrity of the original listed buildings, and proposals need to be sympathetic to the listed building in terms of massing, scale, appearance and materials.

- 4.17 A Heritage Statement has been submitted with the application concluded that the proposed development will not harm the setting of nearby listed buildings. Policies CS20 and TC2 are therefore complied with.
- 4.18 *Local Plan Saved Policy T1: Impact of Development on the Highway Network* requires the consideration of the impact on the transport system and on the environment of traffic generated by new development.
- 4.19 *Local Plan Saved Policy T5: Access to the Identified Highway Network* requires that where there is an intensification of use of an existing access it will need to be demonstrated that a properly formed access is provided in a location and to a standard acceptable to the local planning and highway authorities.
- 4.20 *Local Plan Saved Policy P3: Vehicle Parking Standards* expects developments to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.
- 4.21 The proposed Transport note submitted with this application sets out how the proposed development is compliant with Policies T1 and T5 in terms of impact on the highway network, and it is considered the provision of 13 parking spaces for the development is sufficient and complies with the requirements of Policy P3.

National Planning Policy Framework 2024

- 4.22 A revised version of the NPPF was published on 12th December 2024 (updated 7th February 2025) and the guidance contained within the Framework is a material consideration in determining this application.
- 4.23 Paragraph 8 of the NPPF highlights the overarching objectives to achieve sustainable development from an economic, social and environmental perspective.
- 4.24 Paragraph 10 states that at the heart of the Framework there is a “*presumption in favour of sustainable development*”, and Paragraph 11 goes on to state that development proposals that accord with an up-to-date development plan should be approved without delay.
- 4.25 To ensure that this positive approach to sustainable development is pursued, paragraph 10 of the NPPF emphasises that at the heart of the Framework is a “*presumption in favour of sustainable development*”, which paragraph 11 defines as:

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 (footnote 8), granting permission unless:

i) the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed (footnote 7); 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.

4.26 Section 13 of the NPPF provides national planning policy to protect Green Belt land. Paragraph 143 sets out the five purposes of the Green Belt:

- A. to check the unrestricted sprawl of large built-up areas;*
- B. to prevent neighbouring towns merging into one another;*
- C. to assist in safeguarding the countryside from encroachment;*
- D. to preserve the setting and special character of historic towns; and*
- E. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

4.27 Paragraph 153 emphasises that when considering planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. This paragraph goes on to highlight that inappropriate development, by definition, is harmful to the Green Belt and should not be approved except in very special circumstances.

4.28 Paragraph 154 lists the forms of development in the Green Belt relevant to this application, that are considered an exception to the inappropriate rule. Paragraph 154 b) is relevant to this application:

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;

4.29 In the case of this application, a primary consideration is given to whether the proposed facilities preserve the openness of the Green Belt. It is noted that the southern area of the site including 3 no glamping pods are located on previously developed land that could be considered as “grey belt land” under paragraph 155 of the NPPF.

4.30 It is considered that the proposals for the previously developed southern part of the site would not fundamentally undermine the purposes of the remaining Green Belt across the plan area (paragraph 155 criteria a.); it would provide an unmet need for this type of development as confirmed by the submitted Marketing report and Council’s Tourism Officer to the pre-application submission (paragraph 155 criteria b.); and, for the type of tourism development proposed, that is within walking distance of a nearby bus stop that is frequently served by buses, it would constitute a

form of sustainable development, which the Council's Tourism Officer also agrees with in their pre-application response (paragraph 155 criteria c.).

- 4.31 On this basis, it is considered that the southern part of the proposed glamping site, that is located on previously developed land, complies with criteria a., b. and c. of paragraph 155 of the NPPF, and as such, this part of the development is not considered inappropriate development in the Green Belt.
- 4.32 The assessment of central and northern part of the site and activity generated by the scheme is considered under paragraph 154 b) of the NPPF. If it is not considered by the Council that the proposed development falls into this allowed exception, it therefore needs to be considered under paragraph 153 as to whether any very special circumstances exist that outweigh the harm.
- 4.33 In addition to the Green Belt assessment, it should also be noted that paragraph 88 of the NPPF highlights that planning decisions should enable, *"sustainable rural tourism and leisure developments which respect the character of the countryside;..."*. This paragraph therefore supports development, such as the proposals in this application, provided that the development is respectful of the character of the countryside.
- 4.34 Through sensitively designing this scheme to respect the surrounding rustic character of the area; minimising the impact on existing trees; and, adding to the landscaping around the site with new tree and hedge planting, it is considered the proposals comply with paragraph 88 of the NPPF, which should be considered a significant material consideration in determining this application.

5. Green Belt Assessment

- 5.1 A review of both the Council's Adopted Development Plan policies and national planning guidance sets out in the NPPF has highlighted that the southern part of the proposed scheme with 3 no. glamping pods falls with previously developed land and is considered to be grey belt land. Under paragraph 155 of the NPPF this part of the scheme is therefore not considered to be inappropriate development in the Green Belt.
- 5.2 In relation to the central part of the site and northern part of the scheme with 4 no glamping retreats, the assessment required is whether the proposals preserve openness under paragraph 154 b) of the NPPF. It is noted the Council in the pre-application April 2024 response highlighted that openness is not just a physical aspect, but is also a spatial aspect, and that proposed screening of development does not make it acceptable in Green Belt terms.
- 5.3 The applicant would contend that the central and northern part of the site does fall within the allowed exception b) of paragraph 154, due to the small scale nature of the development, contained nature of the site, and preservation of openness. However, if the Council do not agree

with this view under paragraph 153 of the NPPF, it needs to be considered whether very special circumstances exist that would outweigh the harm to the impact on the openness of the Green Belt.

- 5.4 In terms of the level of harm of the proposed development to the openness of the Green Belt, in visual terms the submitted LVIA confirms that the proposals will result in very little change to the local landscape character and any potential change would be limited to the immediate area. Visually, the proposed development will therefore have a minimal harmful impact on openness.
- 5.5 Spatial impact is assessed with reference to criteria A to E of paragraph 143 of the NPPF:
- A. to check the unrestricted sprawl of large built-up areas* - the proposed development is located away from large-built up areas and therefore will not result in unrestricted sprawl.
 - B. to prevent neighbouring towns merging into one another* - whilst the site is located between Gravesend and Higham, it is considered that there is sufficient distance between the settlements that will be retained, and the proposed development is small scale and will only have very limited impact on this criteria.
 - C. to assist in safeguarding the countryside from encroachment* - The site and scheme is self contained and is not considered to encroach into the countryside. Again, in respect of this criteria the impact would only be very limited.
 - D. to preserve the setting and special character of historic towns* - The proposed development would not impact on a historic town, as such this criteria does not apply.
 - E. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land* - This criteria does not apply to the proposed development.
- 5.6 The spatial impact and harm of the openness of the Green Belt is therefore considered to be “very limited” in respect of paragraph 143 B. and C.
- 5.7 Overall, based on this Green Belt review the harmful impact on openness would be “minimal” in visual terms and “very limited” in spatial terms. It could therefore be said that the proposed development does fall within the allowed exception in the Green Belt outline by paragraph 154 b).
- 5.8 If the Council do not agree with this view then the following the very special circumstances are highlighted and should be balanced against the very low harm that has been identified in this Statement. The very special circumstances can be summarised as follows:
1. The proposed tourism development in this application is supported by Policy CS09: Cultural and Tourism, representing a strong positive attribute.
 2. The Marketing report submitted with the application highlights that the proposed scheme will generate an expenditure of over £342,242 per annum of expenditure in Gravesham, with an estimate of £3.42 million generated for the local economy over a 10 year period. The local benefits to the economy from the development are therefore be a significant positive consideration.

3. The proposed development of the southern part of the site will remove a unmanaged and unsightly storage area resulting in visual improvements to character and appearance of this part of the site. This visual improvement would be considered to result in at least a moderate positive impact.

4. The proposed development proposes a new wooded area to the west of the site that will not only contribute positively to the rural character and appearance of the area, but will also enhance biodiversity. These visual and ecological improvements would also result in at least a moderate positive impact.

- 5.9 Overall, taking into account these positive attributes of the development collectively, it is considered that the very special circumstances highlighted outweigh the level of harm that has been identified to the openness of the Green Belt both visually and spatially, and therefore does not conflict with the Green Belt aims and objectives set out in the NPPF and Development Plan.

6. Conclusions

- 6.1 The Statement has outlined how the proposals for a glamping site have taken into account the comments raised by the Council through a pre-application submission in April 2024.
- 6.2 The proposed development has also been assessed against relevant Development Plan policies and found to be compliant with the identified policies.
- 6.3 A key consideration is the impact of the proposed development on the openness of the Green Belt both visually and spatial.
- 6.4 A Green Belt assessment has been included in this Statement setting out how it is considered the southern part of the site, which is previously developed land, is classed as “grey belt land” and as such the 3 no. glamping pods proposed on this part of the site are considered to be appropriate development under paragraph 155 of the NPPF.
- 6.5 The Green Belt assessment also assesses the central and northern parts of the site and concludes that the impact of the development will be minimal. On this basis, it is considered the proposal for these parts of the site do not conflict with the purposes of the Green Belt highlighted by paragraph 143 of the NPPF, and, are also considered to fall within the allowed exception b. in paragraph 154 of the NPPF.
- 6.6 If however the Council do not agree with this view, this Statement sets out the very special circumstances that would outweigh the low level of harm that has been identified by the Green Belt assessment, and confirms that the development should be allowed under paragraph 153 of the NPPF.
- 6.7 It is therefore considered on this basis that planning permission be granted for the proposed development in this planning application.



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