



Delegated Report

Full Planning Application

Planning Application No:	20230070
Location:	Nurstead Hill Farm, Nurstead Lane, Longfield Hill, Longfield
Description:	Change of use of agricultural land to provide a touring caravan site for 10 pitches
Applicant:	Mrs D Bloomfield, C E Broomfield Ltd
Site Visit Date:	8 February 2023

Submitted Documents/Plans

Application form
Covering letter dated 25 January 2023
Planning Statement (Ref. 3784.SC dated January 2023)
Drawing no. 01 (Site Location Plan)
Drawing no. 02 Rev. A (Existing Block Plan)
Drawing no. 03 Rev. A (Proposed Block Plan)
3 Bike Shed Model

The following plans were superseded following revisions further to GBC Highways comments:

~~Drawing no. 02 (Existing Block Plan)~~
~~Drawing no. 03 (Proposed Block Plan)~~

Relevant Planning History

Reference	Description	Decision	Decision Date
20210888	Application for change of use of storage building (B8) to provision of an equestrian water treadmill for horse rehabilitation.	Permitted	21.10.2021
20201139	Application for the removal of conditions 3, 4, 6 and 10 attached to planning permission reference number 20200052 for the change of use from agricultural land to provide a touring caravan site for 10 pitches.	Withdrawn	22.11.2021
20200052	Change of use from agricultural land to provide a touring caravan site for 10 pitches.	Permitted	13.03.2020
20190239	Change of use from agricultural land to provide a touring caravan site for 7 pitches.	Permitted	18.10.2019
20171236	Application for a Lawful Development Certificate in respect of the proposed siting of two additional caravans/mobile homes	Granted	17.10.2018

20131187	Application for Lawful Development Certificate for the proposed siting of an additional two caravans/mobile homes.	Granted	03.04.2014
20130469	Application for approval of condition 5 attached to planning permission reference number 20120896 relating to the method of disposal of waste materials.	Approved	17.07.2013
20120896	Construction of a sand school	Permitted	18.12.2012
20101095	Application for Lawful Development Certificate for the existing use of the southern yard as a residential caravan site.	Granted	23.05.2013
20101094	Application for Lawful Development Certificate for the use of Eclipse Yard to mixed use of land as a residential caravan site with use of open fronted building for caravan storage.	Granted	23.05.2013
19950454	Continued use of farm buildings for storage of touring caravans.	Permitted	15.09.1995
19950457	Application for Lawful Development Certificate in respect of stationing of mobile home for residential use.	Granted	06.09.1995
19950456	Application for Lawful Development Certificate in respect of storage of touring caravans.	Granted	06.09.1995
19930541	Conversion of tack room to single storey dwelling as ancillary accommodation to main dwelling house with use of new farm vehicular access.	Refused Appeal dismissed	21.02.1994 10.08.1994
19920509	Conversion of tack room to single storey dwelling.	Refused	26.01.1993
19870853	Application for Listed Building Consent for demolition of existing rear extension and erection of single storey rear extension to form tack room	Permitted	11.01.1988
19870676	Erection of single storey rear extension to form tack room	Permitted	08.01.1988

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale and Distribution of Development
- CS09 - Culture and Tourism

- 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)

- T1 – Impact of Development on the Highway Network
- T5 – Access to the identified Highway Network
- 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
- 9 – Promoting sustainable transport
- 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

Internal Consultees

GBC Highways

(Comments 08.03.2023)

The applicant needs to make some alterations/improvements to the submission to make it acceptable in highway terms.

1. Parking spaces. Either the bins or one parking space needs to be relocated as currently they conflict with one another. If the car parking spaces are occupied how are the bins emptied? Bins should have a reinforced path to the access track where the refuse freighter will park.
2. Details should be submitted on where the refuse freighter and wastewater tanker will turn within the site to avoid excessive reversing distances. (50metres maximum for a lorry)
3. I would expect a paved path between the access aisle and the wastewater emptying point and the associated cesspool to facilitate access.
4. Reference is made to the sight lines at the access in both the Planning Statement and on the Existing Block Plan, drawing number 02, but they are not plotted anywhere, and they should be shown on the proposed layout.
5. To comply with the requirements of SPG4, secure cycle parking should be provided for at least one cycle. One per ten pitches.

6. The applicant should consider the provision of electric vehicle charging facilities as part of this development. At this stage, a minimum of charging for two vehicles should be provided, whilst the cabling for the other eight spaces should be installed to meet demand as electric vehicles become the dominate form of transport. Charging points should be Mode 3, AC and able to accommodate a 7kW continuous demand (more under surge conditions).

[The agent submitted revised plans on 22.03.2023 following receipt of these comments.]

(Further comments 29.03.2023)

The issues have all be addressed, either by altering the proposal or by stating that the practice currently in use is to be continued. No objections.

External Consultees

Meopham Parish Council

Meopham Parish Council raises no objections to this planning application subject to GBC imposing suitable condition on the permission to preserve the rural nature of the site and protect the amenity of neighbouring properties.

Neighbouring properties

The application has been advertised by individual neighbour letters to 5 properties, and on site. The consultation periods expired on 20 February and 3 March 2023 respectively.

No letters of representation have been received from neighbouring properties.

The Local Ward Councillors were also consulted, and no responses were received.

Officer's Analysis

Background

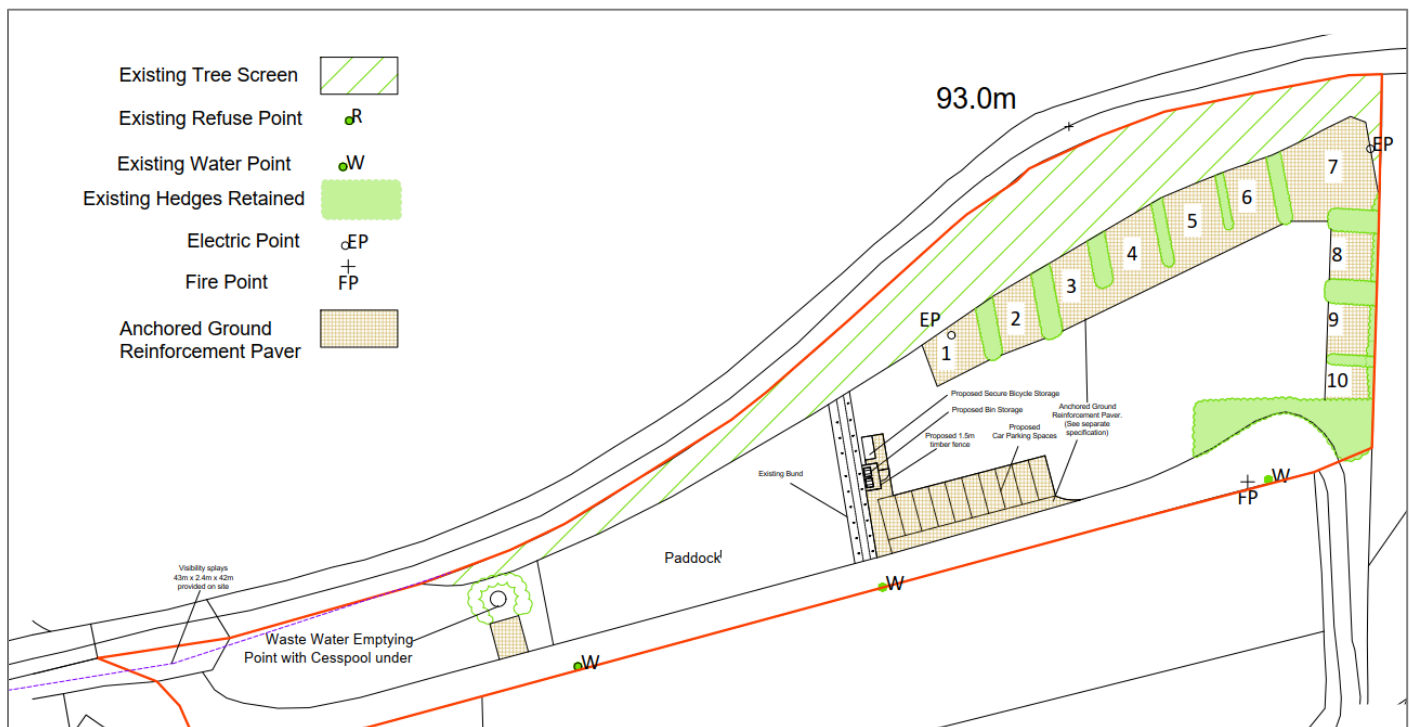
The site has been used as a Caravan Club site for up to 5 touring caravans over the last 20 years under permitted development rights contained within Part 5 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). As the number of pitches at the site was then sought to be increased, planning permission was then required and granted under application 20190239 for the change of use from agricultural land to provide a touring caravan site for 7 pitches on the application site; subsequently application 20200052 granted permission for 10 pitches.

The 20200052 permission expired on 13 March 2023. The current application was submitted prior to the expiration of the previous permission and is essentially a re-submission of that previous application, with additional details on the site layout and surface treatment of the pitches and parking area, together with refuse storage and disposal details, as were required under conditions on the previous permission.

Proposal

This application seeks full planning permission for the change of use of agricultural land to provide a touring caravan site for 10 pitches.

Extract from submitted Proposed Block Plan



The proposal includes a separate parking area and bin storage area. The surfacing of the pitches and parking will comprise ground reinforcement; the likely material to be used is 'Groundtrax CellPave AP' (or similar). This comprises a no-dig ground-anchored paving tile that is rolled into the ground without the need for a sub-base. It is fully permeable and enables the grass to grow back through it whilst maintaining its support. If or when no longer required, the matting is simply lifted.



An enclosed refuse and cycle storage area is also shown adjacent the parking area.

The caravan pitches will be slightly more generously spaced than the minimum model standard required for caravan site licensing. Between each pitch there is a short length of hedge to provide some privacy between individual pitches. The hedging is already in place.

Each pitch will have access to an electric hook up point and a water point, and a separate disposal point for chemical toilets is also provided set within a tree screen to the south of the site at a sufficient distance to maintain amenity.

Vehicular access to the site is along Nurstead Lane from the B260 to the west and the A227 Wrotham Road to the east, and so is well connected to the main road network. Vision Splays of 43m x 2.4m x 43m that were previously required under application 20200052 have been provided by the applicant at the site access on Nurstead Lane. These are as shown on drawing no. 02A Existing Block Plan.

Principle of Development

As with the previous application, the main issue concerning the acceptability of the principle of the proposed development centres around whether it is inappropriate development in the Green Belt. The current proposal should be considered against paragraph 150 (e) of the NPPF 2021, which states that material changes in the use of land such as that proposed are not inappropriate development in the Green Belt, provided they preserve its openness and do not conflict with the purposes of including land within it.

The NPPF 2021 also states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (paragraph 147).

The previous application 20200052 determined that the use of the site as a 10 pitch touring caravan site would introduce more caravans and hardstanding on the site, along with associated paraphernalia, such as awnings, gazebos, outdoor seating, lighting, and associated parked vehicles onto open land, which would inevitably result in a loss of openness, both visually and spatially. Such a change of use would not preserve the openness of the Green Belt nor the purposes for including land within it, and the development was therefore deemed inappropriate in the Green Belt.

However, it was also considered that very special circumstances existed; these being the length of time the site has been used as a touring caravan site, as confirmed by the Camping and Motorhome Club and evidenced from Google Earth images going back at least as far as 2003. Furthermore, it was considered that although there would be additional impact from the stationing of further caravans and the associated paraphernalia, parked vehicles and hardstanding, it was not considered that these changes would intensify the use of the site or alter its character to the extent that it would have an adverse impact on openness or represent further encroachment of development into the countryside, beyond that which already occurs. The imposition of conditions to control the number and use of caravans/motorhomes/tents permitted on the site at any one time, the amount of hard surfacing and external lighting, and to prevent onsite storage and ensure the boundary planting is retained, would further ensure this was the case going forward. Altogether, this encompassed the very special circumstances necessary to outweigh the harm to the Green Belt from the proposed development.

Under the current application, the proposal is no different to what was approved under application 20200052, and therefore the principle of the development is also deemed to be acceptable.

Design, Character and Appearance

Nurstead Hill Farm lies in the rural area on the southern side of Nurstead Lane. This area lies within the Green Belt and within the Meopham Downs Landscape Character Area (LCA), as defined in the Gravesham Landscape Character Assessment.

Nurstead Hill Farm complex comprises agricultural buildings, an area of static caravans, a menage and paddocks associated with keeping horses, and an area of woodland used for paintball games (Gorse Wood).

The application site is a roughly triangular shaped piece of land located to the east of the farm complex via a shared access with the farm complex. Nurstead Lane itself runs along the site's northern boundary. It is lined with mature mixed hedgerow and trees. A single width track runs along its southern boundary, between the site and paddocks to the south. To the east lies a detached dwelling (Elmshaw) that is set back from Nurstead Lane within generous grounds with thick, tall boundary vegetation, and to the west is a small paddock for grazing horses.



As considered before, the application site is well screened from wider public view; it is located away from the site entrance and is enclosed by tall hedgerow/tree planting. There are no public footpaths locally that would provide a view of the site and the adjacent dwelling is enclosed with tall boundary planting. As such the caravans and the associated paraphernalia/vehicle parking would not be seen in the wider landscape.

As seen in the image above, within the site itself there are existing mature hedgerows that separate and provide visual screening between the proposed pitches. These reduce the visual impact of the caravans/motor homes from within the site and assist in maintaining its rural character. They also provide privacy for the occupants. As previously proposed, these are to be retained and the caravans are to be positioned in between.

Under the current application, details of the proposed surfacing has additionally been provided. The ground will not be fully hard surfaced, instead the proposed ground reinforcement is restricted to the pitches and parking area and will enable the grass to grow through it, which will therefore maintain the grassed appearance of the site as existing in those areas where it is proposed to be used.

There would be a small refuse and cycle store alongside the parking area adjacent the existing boundary to the paddock to the west. These would not be excessive in size or height at not more than 1.5m and being of timber construction would not be visually intrusive within the site.

Provided that the proposed landscaping is conditioned to be carried out as specified, the proposal will not have an adverse visual impact on the local or wide landscape and the character of the area will be maintained, in accordance with the requirements of Policies CS12 and CS19 of the Core Strategy 2014 and paragraphs 130, 150 and 174 of the NPPF 2021.

Residential Amenity

The NPPF 2021 states that planning decisions should aim to secure a high standard of amenity for all existing and future users (paragraph 130f). The impact on amenity is also considered with regard to the criteria within Policy CS19 of the Core Strategy 2014, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

Neighbouring Properties

Although there are residential properties located close to the site with the mobile homes located to the west and the detached dwelling (Elmshaw) to the east, no amenity concerns were raised under the previous

application and there are no material changes to the case that would result in any further amenity impacts.

As previously, while the additional caravans are likely to lead to some increase in noise and disturbance, it is considered that this will not be so significant so as to adversely impact the residential amenity of nearby occupants or warrant a reduction in the period of time that the site can operate. A condition to limit the number of caravans on the site at any one time is however considered appropriate to assist in limiting on-site activity and any associated noise and disturbance.

Overall, it is considered that the proposed development would have no significant adverse impact on residential amenities in terms of loss of outlook, light, privacy or increased noise and disturbance. This is further evidenced by the lack of neighbour objections to the proposal. There are therefore no conflicts with the amenity requirements of Policy CS19 of the Core Strategy 2014 and paragraph 130 of the NPPF 2021.

Parking and Highways

There is an existing access to the site from Nurstead Lane that serves the main farm as well as the touring caravan site. No changes are proposed to this arrangement. The initial concerns raised by the GBC Highways Officer relating to conflicts with the location of parking spaces and the bin store, details of turning, sightlines and cycle parking, were addressed through the submission of revised plans and there are no further concerns with these matters.

Parking and highway safety would be unaffected as a result of the proposal. There would therefore be no conflict with Saved Policies T1 and T5 of the Local Plan 1994 and Policies CS11 and CS19 of the Core Strategy 2014.

Any Other Material Planning Considerations

Conditions

The applicant asserts that some of the conditions attached to the previous permission 20200052 for 10 pitches were unnecessary and failed the 'relevant to planning' test outlined for conditions in Planning Practice Guidance, in that they are dealt with under other legislation (the Caravan Sites Acts and Site Licensing regime).

Condition 3 (Details of siting, hedging, surfacing) – The agent states that details submitted with the current application negate the need for this condition.

Officer response – As details have been submitted under the current application, there are no further details required and this condition would no longer be necessary. The approved plans condition would ensure that the details are carried out as permitted.

Condition 4 (No areas of hardstanding other than those approved) – The agent states this condition should not be imposed because that will prevent the implementation of any additional requirements that may be set out in the Caravan Site Licence (CSL) when issued.

Officer response – Planning permission is required for the proposal; the condition is considered necessary in order to preserve the rural character and appearance of the site and prevent further encroachment in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy 2014. Any conflict with the caravan site licence would therefore not be a material planning consideration.

Condition 5 (Visibility splays) – The agent states this condition is no longer necessary as the required vision splays have been provided at the site access to Nurstead Lane.

Officer response – The condition is considered necessary in the interests of highway safety and in accordance with Policy CS11 of the Gravesham Local Plan Core Strategy 2014; the wording can be altered to reference the fact that the visibility splays have been implemented, but it is important to ensure the

maintenance of the hedges with at least a year's growth set back from the edge of the sight line in order to minimise the risk of encroachment.

Condition 6 (Refuse) – The agent states that the storage and distribution of refuse is indicated on the submitted plans and will be covered by the CSL and so is not needed.

Officer response – As details have been submitted under the current application, there are no further details required and this condition would no longer be necessary. The approved plans condition would ensure that the details are carried out as permitted.

Condition 10 – (Lighting) – The agent states this will be dealt within the CSL and the condition is not needed.

Officer response - Planning permission is required for the proposal, the condition is considered necessary in the interests of preserving the rural character and appearance of the site in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy 2014. It would only apply if lighting were being proposed at any time.

Conclusion and Recommendation

It is acknowledged that the site lies within the Green Belt where the change of use of open land for additional touring caravans would be considered inappropriate development. In this particular case, however, given the planning history and permissions for similar development, the length of time that the caravan site use has been operating on the site and the imposition of appropriate conditions, it is not considered that the increase in caravans to 10 will materially harm openness or represent further encroachment into the countryside, and as such the very special circumstances necessary to clearly outweigh the harm to the Green Belt have been demonstrated.

The application is accordingly recommended for permission.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Richard Hart
Signed:	<i>K. Parkin</i>	Signed:	<i>R Hart</i>
Dated:	29 March 2023	Dated:	30th March 2023