

Planning Statement

Little Acres, Longfield Avenue, Longfield, DA3 7LA



Planning Statement

Introduction

Introduction

This Planning Statement is in support of a Full Planning Application for the demolition of all buildings and the erection of up to 16 static homes restricted to those aged 55 and above at Little Acres, Longfield Avenue, Longfield, DA3 7LA.

This statement should be read in conjunction with the submitted existing and proposed plans together with a wealth of statements and reports including a Ecology Survey, Transport Statement and Tree Survey.

This statement provides information on the background to the site, relationship to surrounding buildings, planning policy at a national, and local level and an assessment and justification of the proposal. The statement has been prepared in full accordance with Government guidance, including DCLG Guidance on information requirements and validation for planning applications.



Planning Statement

Site and Surroundings

The site lies within the settlement of New Barn, on the boundary between Dartford and Gravesham Borough. The site is accessed from Longfield Avenue which runs to the south and there are properties to the east and west and a cul-de-sac development to the west. The site is within walking distance of New Barn centre and the primary school and other facilities via a safe pedestrian route.

The site itself is bounded by a high brick boundary wall to the north with two sets of gates providing access to and from Longfield Avenue. The main property is a one and half storey detached dwelling that sits centrally within the site with a further detached building of similar height located to the east. Two mobile homes are located to either side of these buildings, near to the eastern and western boundaries.

A large area of hardstanding is located to the rear and front of the property with a further area of garden located adjacent to the paddock that lies beyond to the north.

A roadway runs along the eastern boundary fronting onto which are a number of structures and buildings and this leads northwards to a stable complex building, yard and sand school.



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Planning History

Planning History

Planning History relating to this property is extensive, and therefore it makes little sense in listing it all. Instead, attention is therefore drawn to the most recent planning permission.

20190003

Demolition of garage, outbuildings and removal of two mobile homes and the erection of detached chalet bungalow with associated car parking and garden and the use of existing stable block, sand school and paddock for equestrian purposes, including the enlargement of the paddock area and the formation of a new access from Longfield Avenue.

Approved – 6th April 2020

The Planning Officer's Report stated the following:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

- *The Green Belt serves five purposes:*
- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

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.

A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- *buildings for agriculture and forestry;*
- *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;*
- *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;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages;*
- *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- *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 reuse previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*

The submitted Planning Statement states that the site can be considered positively under Green Belt Policy with the area of site subject of redevelopment representing an infill location. It goes on to say that the proposal can be considered an appropriate redevelopment or infill of previously developed land, an approach which is supported by para. 145 of the National Planning Policy Framework 2019. Part (e) is not applicable here as the site is not located within a village.

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However, the Council is in agreement that the site can be classed as previously developed land in continuing use (part g). The application would involve the demolition of a substantial amount of outbuildings, sheds, caravans and a large garage/annexe. The submitted planning statement states that the proposed development will represent a reduction in mass of development (volume) by 65% and spread of development (footprint) by 75% as well as reducing the visual and physical spread of development. The 2m high front boundary wall will be removed and replaced with new landscaping which will aid in reinstating more openness to the Green Belt. Overall the amount of built development on the site will be reduced and therefore will have no greater impact on openness than the existing development. The approval of a property on this site also allows the Council an opportunity to ensure that no further development that impacts on the openness of the Green Belt is constructed by removing the permitted development rights for the new property.

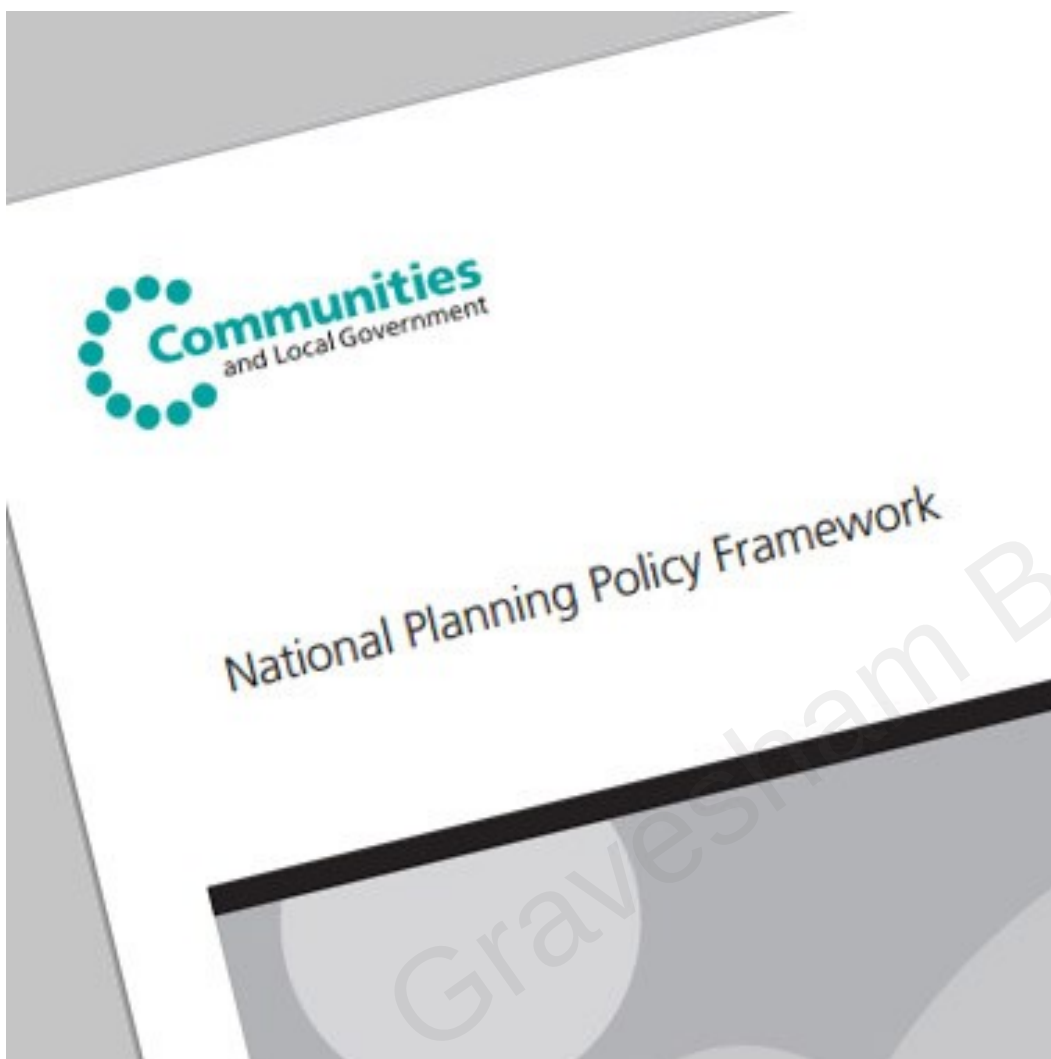
On this basis, it is recommended that any forthcoming approval removes all permitted development rights for the new dwelling including Part 1 and Part 2 and also removes permitted development rights (class e) for the existing property to ensure no other outbuildings are erected within the ground of Little Acres without first obtaining planning permission.

Subject to conditions, the overall impact on the Green Belt, due to the demolition of extensive outbuildings and their replacement with a house of much smaller footprint is consider to have a positive impact on increasing the openness of the Green Belt will be positive and therefore the proposal meets part g of para. 145 of the National Planning Policy Framework 2019."



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Planning Policy



Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states any determination should be made in accordance with the Development Plan unless material considerations indicate otherwise.

The local planning authority is Gravesham Borough Council.

The proposal has been considered within the context of National, Local and emerging planning policy and the key policies are summarised below.

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) was published and adopted on 27 March 2012, which has subsequently been updated as of February 2019. The NPPF replaces a plethora of Planning Policy Guidance (PPGs) and Planning Policy Statements (PPSs) into a single concise framework.

The NPPF must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in the determination of planning applications.

Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.

Paragraph 8 outlines that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles. With regards to social, this includes supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations and by creating a high quality built environment.

Paragraph 38 states that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.

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Paragraph 39 states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community.

Paragraph 47 states that planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible.

Paragraph 62 states that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including but not limited to, those who buy affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people who wishing to commission or build their own homes).

Paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites, Local Planning Authorities should support the development of windfall sites through their policies and decisions giving great weight to the benefits of using suitable sites within existing settlements for homes.

Paragraph 93 states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
- take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Paragraph 105 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Furthermore, paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, taking into account:

- the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- local market conditions and viability;
- the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- the importance of securing well-designed, attractive and healthy places.

Paragraph 126 states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. 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.

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Furthermore, paragraph 130 states that planning policies and decisions should ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 138 states that Green Belt serves five purposes:

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

Paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 149 states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;
- 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;

- 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;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- 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.

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Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Local Planning Policy

Gravesham Local Plan Core Strategy

- Policy CS01 relates to Sustainable Development and states that planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Policy CS02 relates to Scale & Distribution of Development and states that in the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.

Policy CS11 relates to Transport and states that in the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map. A strategic Green Belt boundary review will be undertaken. Gravesham Local Plan Core Strategy Adopted September 2014 35 to identify additional land to meet the housing needs up to 2028 and to safeguard areas of land to meet development needs beyond the plan period, while maintaining the national and local planning purposes of the Green Belt.

Policy CS12 relates to Green Infrastructure and states that there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

Policy CS14 relates to Housing Type and Size and states that the Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties.

The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

Sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas with access to a range of services that provide for the needs of future occupants.

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Policy CS15 relates to Housing Density and states that sites will be developed at a variety of densities, depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas.

All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated.

Policy CS18 relates to Climate Change and states that the Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:

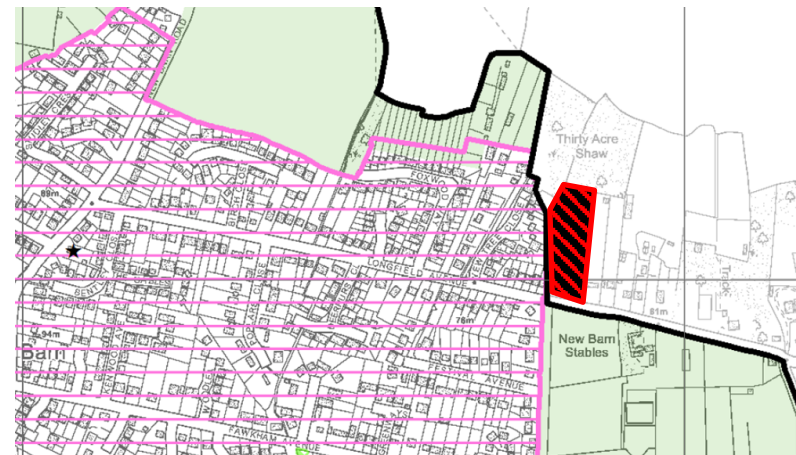
Require that surface water run-off from all new development has, as a minimum, no greater adverse impact than the existing use; and
Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible.

Policy CS19 relates to Design & Development Principles and states that new development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anticrime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through the criteria set out below:

- New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, Gravesham Local Plan Core Strategy Adopted September 2014 including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;
- New development will be located, designed and constructed to:
- safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
- avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and
- not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;

- The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;
- New development will be designed in an inclusive way to be accessible to all members of the community;
- New development will provide appropriate levels of private and public amenity space;
- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
- Car parking will be well related to the development it serves;
- New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- New development will incorporate appropriate facilities for the storage and recycling of waste; and
- The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

In addition to policies within Gravesham, it is important to recognise that the site is immediately adjacent to Dartford Borough Council and the settlement of Longfield (as shown below).



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Pre-Application Advice

Pre-Application Advice was sought in 2020, with a response from Gravesham Borough Council received on 1st March 2021.

This Pre-Application Advice stated:

"In regard to the wider housing need, Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period. Evidence now available shows that the Council is not able to demonstrate a five-year housing supply.

The proposed development for a net increase of 27 static home would offer a some contribution towards meeting this local need, albeit a modest one. Accordingly, modest weight needs to be accorded any application submitted to implement this proposals. However, this has to be balanced against other requirements of the NPPF (2019) and in particular Sections 2,6,9,13, 15 and 16 of the NPPF (2019) which requires development to be sustainable, protect the function of the Green Belt, add to the overall quality of the area, conserve natural environment be visually attractive, sympathetic to local character and create acceptable amenity for future occupiers.

In this instance, the nearest primary school is approx. 1.5km from the site and the nearest local centres are 1.6km away at Hook Green, Meopham and 2.7km away at Longfield. Although policy CS01 do not define essential services, they are likely to include convenience store, GP Services and primary school. Although these services could be reached on foot, the route that must be taken generally unwelcoming, and as such, represents an unattractive pedestrian route, particularly when it is dark.

It is acknowledged site benefits from ready access to bus routes with the nearest bus stop being some 750 metres away. Whilst future residents of the proposed static homes would be just as likely as existing residents living along Longfield Avenue or Yew Tree Close to use a car to get around as cycle or use public transport, the cumulative environmental harm from a development of 27 static homes would be significantly greater than if it were for a single dwelling. Therefore, the location of the site and the cumulative impact from car journeys would not accord with the environmental dimension of sustainability.



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Material Considerations

Although the proposed development would not be isolated, the combined environmental harm that would result from a development of 27 static homes, as proposed, would not be meaningfully reduced by the site's proximity to local services and facilities and access to sustainable transport choices.

The key characteristics of the surrounding area are gently undulating and open arable fields, clusters of properties and farmsteads and field divided by tracks, roads and occasional hedgerows. The proposed development would clearly exceed the area currently covered by structures. In addition, fleeting glimpses of the proposed static homes can be obtained when travelling on the Longfield Avenue in both directions. Whilst majority of the development would be screened by the surrounding vegetation, which would assist in reducing its impact, the increase in plot coverage at the site would still cause a loss of openness.

The statement supporting the submission suggests the proposed static homes would be single storey in scale, therefore would serve to reduce the bulk and mass seen on-site, and that the development would not have a greater impact on the openness of the Green Belt than the existing development. The statement further claims the scale of development across the site is reduced in the proposed scheme, and it is not considered that the proposals would cause substantial harm to the openness of the Green Belt.

Although, the council accepts the classification of the site is previously developed land, this in itself does not imply a development on this scale meets the requirements set out in paragraph 145 (g) of the NPPF (2019).

Of more relevance is the Council's view the proposals given its scale and plot coverage, increases built development and associated domestic paraphernalia at the site. It would clearly extend the residential compound to areas of the site currently devoid of built structures. Moreover, the development would contrast significantly with existing development at the site and surrounding area, being caravans with white external appearance and the spacious character of the surrounding area.

For these reasons, the development given its scale and plot coverage would conflict with the purpose of including the land in the Green Belt, as it would increase built development and associated domestic paraphernalia at the site. It would also extend built development to parts of the site where none currently exist, and would contrast significantly with the spacious and open character of the surrounding landscape.

Whilst it is acknowledged the visual impact of the proposed development would be largely experienced in its local context, the development would be clearly identifiable as static caravan site, which would represent a major change to the character and appearance of the application site. The development would be made all the more apparent by the white colour of the caravans, the associated parked cars and domestic paraphernalia. Rather than reinforce and conserve the key landscape characteristics, the development would impinge on the visual amenity of the locality, by extending built development to parts of the site where none currently exists. Whilst there would be a backdrop of vegetation from public viewpoints, the development would still stand out as being at odds with the prevailing verdant rural, open and spacious character, as it would damagingly consolidate the existing development at the site.

Overall in terms of visual impact, the proposal would represent a discordant feature in the countryside, as it would change the perception of the site to a large caravan site to the detriment of the visual amenities of the local valued landscape. Notwithstanding the additional landscaping proposed, the development would fail to reinforce and conserve the key characteristics of the local landscape, in the Green Belt, to which great weight needs to be accorded.

It is considered the level of additional vehicle movements to and from the site that would result from the proposals would be greater than the existing lawful use of the site, and considering the nature of the local road network such increase in traffic generation, could potentially result in unacceptable intensification of use of the local road network, which would raise overriding highway safety issues.

Conclusion

The National Planning policy Framework NPPF- requires that substantial weight should be given to any harm to the Green Belt. Having regard to all relevant material considerations and specific site circumstances, the proposal would amount to loss of openness and thereby would constitute inappropriate development within the Green Belt. It would cause material harm to the open nature and function of the Green Belt and purposes of including the land within it. Harm would also arise to character and visual amenity of the wider landscape. If an application were submitted to implement this scheme, the identified harm to the Green Belt would need to be demonstrably outweighed by other material considerations to justify granting planning permission.

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Similarly, the cumulative residual impact from trips likely to be generated by the proposed development would not accord with the environmental dimension of sustainability. As such, there would be conflict with Policy SC01 of the Local Plan Core Strategy in that it is an unsustainable development, which would fail to conserve or enhance the landscape character in accordance with provision in Section 15 of the NPPF.

The factors, which weigh in favour of this application when taken as a whole should amount to the very special circumstances required to grant planning permission. These factors includes the under supply of housing land in the district, economic benefits from the construction work associated with the development, and social benefits to be gained from increased housing provision. Unfortunately, these factors would not be sufficient to demonstrably outweigh the harm identified to the openness and function of the Green Belt in paragraph 133 of the NPPF (2019), which direct a refusal of planning permission. It is noted that no special circumstances have been put forward that would outweigh the degree of harm this proposal entails."

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Material Considerations

Green Belt

As set out with the Pre-Application Advice, the biggest challenge for this site is demonstrate how EITHER the site is Appropriate Development as defined by policy or, if Inappropriate Development, that there are Very Special Circumstances to demonstrate how any harm should be outweighed.

In terms of appropriateness, attention need firstly be drawn to the Framework. As the Framework acknowledges, limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use would be APPROPRIATE development subject to the development having:

- no greater impact on the openness of the Green Belt than the existing development; or
- no 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.

The first question, therefore, is whether the site is Previously Developed Land as defined by the Framework. To answer this question, we turn to the comprehensive Planning History.

In support of Application Ref: 20160920 which was approved on 24th April 2017, the applicant provided a Statutory Declaration. This stated the following:

"I can confirm that I have continuously used and maintained the land highlighted in blue at Exhibit WJC Document 1, as residential amenity land in connection with the main dwelling during my ownership. The site is one private dwelling property. More specifically, I have used different parts of the property to (i) park private vehicles, (ii) keep animals as pets connected to the main dwelling and (iii) erect buildings for internal storage and also outdoor storage. This is a non-exhaustive list.

Land immediately north of the dwelling has been mainly lawned and recently fenced for the younger children to play and not wander too far from the dwelling. However, previously this fence division between paddock and lawn did not exist or was in differing locations depending on the age of the children, the number of ponies onsite or the children's interaction between both areas. The current paddock area north of the lawned area has been used by my family for keeping their ponies, playing football and other games, and riding their push and motorised bikes. There is little to no difference between the use of both the immediate lawned area and paddock area at Little Acres. It was not my intention to separate uses by erecting a fence, but instead to keep my

children/grandchildren and pets safe.

I note that like any large garden, the specific residential uses of the land has been compartmentalised and from south to north these can be identified as: immediate parking, residential dwelling and ancillary accommodation, storage, animal keeping and lawned garden, paddock for general play and horse keeping, menage, secondary parking and stable block. This compartmental approach does not reflect separate uses, but in fact are all uses in connection with the main dwelling and occupants of the main dwelling. For such a large garden this is the only approach to make it work for a multigenerational family and to ensure areas do not fall into neglect as it seems happened prior to my purchase of the property.

I confirm that the land highlighted blue at Exhibit WJC Document 1 has been used as a single residential unit with ancillary uses connected with the main dwelling. In my opinion, there is no separate uses on site and the property is one, as it was sold, and as is similar to neighbouring properties to the east of Little Acres. The address is just a large plot with an active large family making use of their home. I can confirm that the land in this Statement has been used as a single residential use with main dwelling and surrounding ancillary residential development, all in connection with the main dwelling. This has occurred for in excess of ten continuous years and at least during my ownership."

The Planning Officer's Report relating to 20190003 stated:

"The submitted Planning Statement states that the site can be considered positively under Green Belt Policy with the area of site subject of redevelopment representing an infill location. It goes on to say that the proposal can be considered an appropriate redevelopment or infill of previously developed land, an approach which is supported by para. 145 of the National Planning Policy Framework 2019. Part (e) is not applicable here as the site is not located within a village.

However, the Council is in agreement that the site can be classed as previously developed land in continuing use (part g). The application would involve the demolition of a substantial amount of outbuildings, sheds, caravans and a large garage/annexe.

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The proposed development will see the loss of an extensive amount of buildings within this Green Belt location and their replacement with one dwelling. It is considered that this accords with paragraph 145 (g) of the NPPF. Notwithstanding its Green Belt location, further restrictive and mitigating measures can be conditions, notably restricting use and the erection of further buildings on the site so that on balance, the proposal is considered acceptable in terms of character, appearance, amenities, parking and highway safety and is therefore recommended for approval."

The above sets out the evidence when considering the previous applications at Little Acres, but it is also important to consider evidence on a wider scale.

Bromley Council
16/03627/FULL1

Kemnal Stables, Kemnal Road, Chislehurst, BR7 6LT

Demolition of existing residential building, stables with sand schools, flood lighting and offices and the erection of 3x five bedroom houses with underground swimming pool, basement accommodation, orangery and garages.

The Planning Officer's Report stated:

"With regard to bullet point 6 it is claimed that the site comprises previously developed land. The application site can be considered 'previously developed land' (PDL) as defined in the glossary of the NPPF"

Waverley Council

WA/2014/1742

Land at Red Gables, Weydown Road, Haslemere GU27 1DS

The Planning Officer's Report stated:

"The use of the existing site is residential with ancillary stables and sand school.

Paragraph 17 of the National Planning Policy Framework 2012 outlines the overarching roles that the planning system ought to play. A set of 12 core planning principles are set out which should underpin both plan-making and decision-taking, which, inter alia, encourages the effective use of land by reusing land that has been previously developed. The Framework defines previously developed land (PDL) as 'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed and any associated fixed surface infrastructure.'"

Three Rivers District Council

18/1109/FUL

Land south of Old House Lane, Langleybury, WD4 9AA

The Planning Officer's Report stated:

"The application site covers approximately 1 acre and contains five buildings which the supporting information details are used for equestrian purposes as a livery yard. The buildings comprise of three barns, one ancillary shed and one stable block with six stables. The buildings within the site are all single storey in design and are a mix of timber and aluminium construction. The footprints of the buildings range from 15sq. metres to 88sq. metres. Further south of the application site is a paddock. The site is screened from view from Old House Lane due to the existing hedgerow and trees which run along the northern boundary of the application site and parallel with the highway.

The application site currently contains five buildings which include three barns, one ancillary shed and a stable block used for equestrian purposes in connection with a livery yard. Planning permission has previously been granted for the redevelopment of the site for the construction of a two storey four bedroom dwelling referenced 17/0990/FUL. The approved scheme was considered redevelopment of a previously developed site which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it that the existing development. This application seeks a similar proposal and as such this report will assess whether the proposed changes would have a greater impact on the openness of the Green Belt in comparison to the existing built form on the site and the extant permission."

APP/C3430/W/19/3241298

Land opposite Finchfield Cricket Club, Trysull Road, Trysull WV5 8DQ

The development is demolition of existing stables and erection of replacement stable block (part-retrospective).

The Appeal Decision stated:

"Turning now to the second exception, the Glossary of the Framework sets out the definition of 'previously developed land'. I acknowledge as an equine use the site falls within the parameters of previously developed land."

Planning Statement

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APP/N0410/W/17/3181513

Land adjacent to Brick House, Brickfield Lane, Burnham, SL1 8LF

The development proposed is outline application for a serviced custom build plot.

The Appeal Decision stated:

"As such, the most relevant exception to inappropriate development listed in paragraph 89 is set out in the 6th bullet point which refers to 'limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development'. The Council regard the use of the land as previously developed as it comprises an equestrian use."

APP/J1535/W/18/3197421

Lilac House, 6 London Road, Stanford Rivers, Ongar CM5 9PH

The development proposed is new dwelling within the residential curtilage of Lilac House and associated car parking for the new and existing dwellings.

The Appeal Decision stated:

"The exception in paragraph 145(g) also refers to the partial or complete redevelopment of previously developed land. Given that much of the land would be redeveloped, this part of paragraph 145(g) is applicable. Therefore, it is necessary to consider the effect of the development on Green Belt openness and purposes."

APP/Z3825/W/18/3207326

Forest House Cottage, Winterpit Lane, Mannings Heath, Horsham RH13 6LZ

The development proposed is the change of use of garage building to a 3-bed dwelling with new access and associated parking.

The Appeal Decision stated:

"The site forms part of a residential curtilage which lies outside of the designated Built up boundary as designated under the Horsham District Planning Framework (HDDF) 2015."

The proposal would make effective use of previously developed land."

Based on the Planning History, comments by the Planning Officer, Pre-Application Advice, and Case Law, it remains unequivocal that the site as whole comprises Previously Developed Land.

Therefore, attention turns to whether the proposals would result in no greater impact on the openness of the Green Belt than the existing development.

The exact configuration of buildings are as follows:

Building No:

1).	64.43sq.m.	Approx. volume = 207m3
2).	7.11sq.m.	Approx. volume = 14m3
3).	9.14sq.m.	Approx. volume = 18m3
4).	75.83sq.m.	Approx. volume = 307m3
5).	1.74sq.m.	Approx. volume = 3.5m3
6).	7.42sq.m.	Approx. volume = 15m3
7).	7.30sq.m.	Approx. volume = 14.5m3
8).	105.14sq.m.	Approx. volume = 293m3
9).	2.14sq.m.	Approx. volume = 3.21m3
10).	9.16sq.m.	Approx. volume = 18.32m3
11).	43.94sq.m.	Approx. volume = 123m3
12).	8.89sq.m.	Approx. volume = 17.78m3
13).	63.56sq.m.	Approx. volume = 190.7m3
14).	41.78sq.m.	Approx. volume = 120m3
15).	33.67sq.m.	Approx. volume = 113.13m3
16).	42.09sq.m.	Approx. volume = 126.3m3
17).	39.58sq.m.	Approx. volume = 130.6m3
18).	82.5sq.m.	Approx. volume = 335m3

Therefore, there is a total of 542sqm and 2,050m3.

The proposed development results equates to 16 residential units and a manager unit, equating to a total of 1,890sqm.

However, it is important to note that openness is not just about floorspace and volume,

Following the Pre-Application Enquiry, the scale and location of development was significantly amended. The proposals no longer extend any built development into previously undeveloped parts of the site. Therefore, the proposals do not have a greater impact on openness than the existing use and in terms of the purposes of the Green Belt would result in encroachment into the countryside.

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In terms of the visual aspects of openness, the ridge of the proposed buildings would be lower than the existing structures, such that the visual impact on openness would be reduced.

The details of the external materials, for a scheme that intends to replicate traditional buildings but with a contemporary feel, are matters that could be controlled by condition.

Overall, the external materials would settle and dull over time to further assimilate the proposed building into its verdant setting in stark contrast to the visually conspicuous bulky mass and anaemic roof sheeting of the existing buildings.

The proposed scale of parked vehicles on the site would not be markedly different to the potential car parking capacity that already exists for the range of uses across the site - as seen in Google Earth images.

The visual impact of parked cars as part of the proposal would be offset by the proposed landscaping - to be discussed later in this statement.

In respect of domestic paraphernalia associated with the proposed use, it would be unlikely that the communal amenity areas would be cluttered by individual washing lines, sheds and such like, especially given the proposed occupiers.

The proposed bin storage would be contained at the front of the site and would not impact on openness.

Visual impact also forms part of the consideration of any harm when viewed against the existing.

Need & Type for Housing

Policy CS02 (LPCS) sets out the Borough's objectively assessed need for housing over the Plan period (up to the year 2028) and finds that there is a need for at least 6,170 new dwellings during the period. Evidence now available shows that the Council is not able to demonstrate a five-year housing supply (a 3.27 year supply has most recently been calculated within the statement published here), and as the delivery of housing was substantially below (less than 75%) that required by the Housing Delivery Test, the housing delivery element of Policy CS02 (LPCS) must be regarded to be out of date, as required by the Paragraph 11(d) of the NPPF (2021).

This requires that in regard to housing development, planning permission should be granted unless: "the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or 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."

In determining applications for planning permission involving housing, the Council will therefore apply a weighted balance in favour of granting planning permission in accordance with relevant case law and guidance, having regard to the acceptability or otherwise of the proposals when evaluated against development plan policy, the need to make efficient use of land (paragraph 124 of the NPPF (2021)) in context, the relative contribution the proposal makes towards the alleviation of any shortfall in housing delivery at that time and any other considerations material to the proposed development.

The proposed development would provide a net increase of 16 homes, which would offer a notable contribution towards meeting local housing need and, accordingly, this weighs in support of the application. The NPPF (2021) also encourages the effective use of land in meeting the need for homes.

It is also important to note that these homes will be restricted to occupants aged 55 and above.

Therefore, the following condition is expected:

- The development hereby permitted shall be utilised solely for the purposes of providing specialist independent residential accommodation for persons aged 55 or over only.

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Design / Layout

Significant work has gone into the design of the scheme, aimed at turning away from the traditional static home appearance.

Instead, the architect's brief has been to develop a scheme which raises the quality of design and responds positively to both the setting and ecological enhancements across the site.

This includes the following:

- Roof - Mono pitch flat roof with sedum 'Green' Roofing to encourage bio-diversity
- Wall - Single story timber frame with sustainable timber cladding. Target $u_value = 0.16\text{wm}^2\text{k}$
- The front cladding of each Dwelling will be painted a different colour by the resident.
- Windows - Double glazed aluminium with aspect orientation South to private alfresco area.

The Manager's Office takes the appearance of a traditional bungalow.

Each property also benefits from landscaping and its own private amenity space.

The development then benefits from extensive communal landscaping, softening the development into the countryside.

The layout of the development aims to replicate the layout of buildings currently found across the site, retaining significant areas of greenery—which are enhanced further to create significant biodiversity net gains.



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Material Considerations

Sustainable Development

Paragraph 8 of the NPPF outlines that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles.

In addition, one aspect of sustainable development which is often forgotten relates to design. The NPPF (paragraph 126) states “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.”

The proposed benefits of the scheme would notably include:

Economic Benefits

- The creation of construction jobs.
- The creation of other jobs in supply chain and wider construction related activities.
- The creation of jobs within the development

Social Benefit

- Delivery of much needed housing
- Delivery of housing specifically designed for a growing age group

Environmental Benefits

- Protecting and enhancing the natural built, and historic environment by developing on a site with no specific environmental or heritage designations, and in a way that would cause no unacceptable harm to the wider landscape and no harm to the significance of heritage assets setting.
- Passive credentials
- Developing within a sustainable location

Landscape enhancements

The development takes on a sustainable form of construction reducing the pressures on energy.

A sustainable location of the proposal means that future residents have the option of using sustainable forms of transport for everyday trip to use services/facilities.

Furthermore, green sedum roofs will encourage ecological enhancements across the whole site.

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Material Considerations

Transport Statement

The Pre-Application Response stated:

"It is considered the level of additional vehicle movements to and from the site that would result from the proposals would be greater than the existing lawful use of the site, and considering the nature of the local road network such increase in traffic generation, could potentially result in unacceptable intensification of use of the local road network, which would raise overriding highway safety issues."

The applicant, to address these concerns, has provided a Transport Statement and Travel Plan.

The Transport Statement (TS) was prepared by Paul Basham Associates to support this application for the redevelopment of Little Acres, Longfield Avenue, Longfield to provide a residential development comprising 16 age-restricted static homes and one management building.

The site is located on Longfield Avenue, a 30mph c. 5.5m wide road with a c. 1.5m footway on either side of the carriageway. Approximately 700m to the west, Longfield Avenue connects to New Barn Road which provides a route to Longfield via Main Road (Longfield being c. 3km from the site location). New Barn Road northbound provides a route to the strategic highway network via the A2 (c.4km from the site location). The A2 provides connections to the wider strategic road network including the M25 to the west and the M2 & M20 to the east.

To the west of the site, Longfield Avenue is suburban in nature and provides direct access to a number of residential properties. However, at the site frontage to the east of the Longfield Avenue/Nurstead Avenue junction the road becomes private as identified by the GeoPlace Find My Street Map.

At this point the carriageway reduces in width to c.3m and becomes unmetalled. It provides access to a handful of further residential dwellings before re-joining the public highway at Walnutt Hill Road c.400m from the site location.

The site is located within New Barn, however it is located in proximity to other villages including Instead Rise and Longfield. This presents a comprehensive range of facilities, amenities and services within a reasonable distance for future residents of the site.

Amenity/Facility	Distance from Site Access	Walking Time (minutes)	Cycle Time (minutes)	Bus Time inc. Walking Time to Bus Stop (Mins)
Findwillow and Walnut Hill Nurseries	500m	6 minutes	2 minutes	-
Paintball Park	650m	8 minutes	3 minutes	-
Bus Stop (Longfield Avenue)	800m	10 minutes	3 minutes	-
New Barn Christian Fellowship	1100m	14 minutes	4 minutes	-
The Green Man Pub	1300m	16 minutes	5 minutes	-
Bus Stop (Nash Bank)	1300m	16 minutes	5 minutes	-
Istead Rise Primary School	1500m	19 minutes	6 minutes	-
Longfield Hill Village Garage	1500m	19 minutes	6 minutes	-
Lanagfel C of E Primary School	1750m	22 minutes	7 minutes	14 minutes
Memorial Hall Community Centre	1900m	25 minutes	8 minutes	23 minutes
St Barnabas Church	1900m	25 minutes	8 minutes	22 minutes
Istead Rise Dental Clinic	2050m	27 minutes	8 minutes	23 minutes
Rowhill School	2050m	27 minutes	8 minutes	14 minutes
Co-op Food Istead Rise	2200m	29 minutes	9 minutes	20 minutes
Istead Rise Butchers	2200m	29 minutes	9 minutes	20 minutes
Young Risers Pre-School	2200m	29 minutes	9 minutes	24 minutes
Bright Horizon Longfield Day Surgery	2200m	29 minutes	9 minutes	17 minutes
Istead Rise Community Centre	2400m	32 minutes	10 minutes	23 minutes
Longfield Academy	2400m	32 minutes	10 minutes	15 minutes
St Mary Magdalene's Church	2800m	37 minutes	11 minutes	16 minutes
Shell Petrol Station	3200m	43 minutes	13 minutes	18 minutes
Bupa Dental Care	3350m	45 minutes	13 minutes	19 minutes
Waitrose Supermarket	3350m	45 minutes	13 minutes	17 minutes
Longfield Railway Station	3350m	45 minutes	13 minutes	18 minutes

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Material Considerations

The local pedestrian infrastructure lends itself favourably in promoting walking as a primary method of travel to local facilities and amenities. Longfield Avenue (westbound from site) is flanked by footways on either side of the carriageway. The footways, crossing points and tactile paving remain present along the route to the amenities within Longfield, along Newbarn Road and Main Road.

Due to the wide carriageways of the local highway network, it is suitable, safe and common for cyclists within the area to cycle. Within the vicinity of the site formalised National Cycle Network (NCN) Routes 1 and 177 are in proximity to the site

The site's ideal location between two bus stops means that future residents of the site have access to many convenient services in Istead Rise and Longfield. These services can be picked up from either the Longfield Avenue bus stop located 800m west of the site or the Nash Bank bus stop 1300m to the east. The location of the site in relation to both the Longfield Avenue and Nash Bank bus stops presents a good opportunity for residents to travel to local amenities by bus.

Longfield Railway Station is located approximately 3350m from the site location and is accessible via a 45 minute walk, 18 minute bus journey or a 13 minute cycle. Longfield Railway Station (LGF) is equipped with sheltered cycle storage spaces, CCTV and toilets. This therefore presents a good opportunity to encourage cycle/bus – train commuter journeys.

Longfield Railway Station provides direct and frequent services to numerous destinations.

The proposed development is anticipated to generate two vehicle trips in both the AM and PM peak period, which will result in an immaterial effect on the highway network. Over the course of a 12 hour daytime period the proposed development is expected to generate 31 two-way vehicle trips.

The Transport Statement has demonstrated that the proposed development will not have a significant impact on the operation of the local highway network, and we therefore encourage Gravesham Borough Council to look favourably upon this development in relation to highways.

Ecology

A Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment was undertaken for the site of a proposed residential development Little Acres, Longfield

Avenue, Longfield, Kent.

The report was prepared to establish the site's suitability for development, inform the design process for the proposal, record the ecological baseline, identify key ecological features within and around the proposal site and assess the scheme's biodiversity impact score.

The proposed development would result in permanent loss of c.1.0 of hardstanding, amenity grassland, ephemeral/short perennial vegetation, buildings, bare ground, tall ruderal, improved grassland, introduced shrubs and species-poor hedgerow. These areas are of low ecological value and of negligible importance, although bordered by Ancient Woodland/Lowland Mixed Deciduous Woodland HPI of high ecological value.

The site provided a baseline of 0.93 Biodiversity Units (BU) for area habitats and development of the site will result in a loss of 0.91 BU. The site provided a baseline of 0.29 BU for linear habitats and development of the site will result in a loss of 0.09 BU.

A combination of habitats will be created as part of the proposed development. This will result in an overall net gain of 1.68 BU for area habitats, (+181.33%) and a net gain of +2.28 BU for linear habitats (+787.55%).



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Landscape

The proposed development results in significant ecological enhancements:

Birds: The value of the site for birds will be enhanced by installing a range of artificial nest boxes. These will be placed on retained mature trees within the development or at the site boundaries or incorporated within building facades.

Bats: The value of the site for bats will be enhanced by installing a range of artificial roost boxes. These will be placed on retained mature trees within the development or at the site boundaries or incorporated within building facades. Boxes suitable for a range of species should be used.

Hedgerow planting: Any hedgerow creation and/or restoration should use a range of native fruit, nut and nectar bearing shrub species, such as: hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, rowan *Sorbus aucuparia* and honeysuckle *Lonicera periclymenum*. If an evergreen hedge is required for landscape screening, suitable native species include holly *Ilex aquifolium*, yew *Taxus baccata*, although both can be rather slow growing, ivy *Hedera helix* and privet *Ligustrum vulgare*. Beech *Fagus sylvatica* and hornbeam *Carpinus betulus* are also widely used as hedging plants and, although not evergreen, these will keep their brown leaves through winter if trimmed in late summer.

Meadow: Buffers of less intensively managed vegetation (e.g. coarse grasses and wildflowers) can be created within soft landscaped areas to maintain/enhance ecological connectivity. The use of tussock-forming grass species such as cock's foot *Dactylis glomerata*, Yorkshire fog *Holcus lanatus*, tufted hair-grass *Deschampsia cespitosa* and false oat-grass *Arrhenatherum elatius* is encouraged.

Habitat piles: should be created within the area of retained grassland and at the edges of the site close to boundary hedgerows and woodland (i.e., towards the north of the site). These will provide additional hibernation and shelter resources for amphibians, invertebrates, reptiles, and a range of other wildlife, and egg-laying substrate for grass snakes. Hibernacula can be created by partially burying logs and stones in sheltered areas away from flood risk and covering over with earth or turf. Breeding habitats can be created by collecting grass clippings and other prunings arising from landscape management of the site, and composting them in a secluded corner of the site.



Planning Statement

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Very Special Circumstances

The National Planning Policy Framework establishes the range of developments that are regarded as appropriate in Green Belt locations and those types of development which are regarded as inappropriate. Inappropriate development is harmful by definition to the Green Belt and should not be approved other than in very special circumstances (Paragraph 147). Substantial weight will be given to any harm to the Green Belt, and for Local Authorities to approve inappropriate development, the potential harm to the Green Belt by reason of inappropriateness, and any other harm, must be clearly outweighed by other considerations (Paragraph 148).

Green Belt Policy in this respect has been constant through various iterations of policy at national level and it is noteworthy how the concept has been applied in the Courts. As Lord Donaldson M.R. in Pehrsson [1991] pointed out, and as repeated in Vision Engineering [1991], it is not only the existence of the planning harm by reason of inappropriateness that has to be taken into account, but it is also its extent and weight. If it were so slight as to be insignificant, then it might readily outweighed by the counterbalancing benefits. Lord Donaldson put it in these terms “this is a balancing exercise, since the extent of the harm to Green Belt interests and the extent of the advantage to be derived from the development can both vary from case to case ... the decision-taker has to go on to express a view on the weight of the damage which would be done to the Green Belt if permission were granted and the weight or lack of weight which he attached to the countervailing considerations.”.

Thus, in order to apply the VSC test, one is nevertheless drawn into examining the level of harm to the Green Belt arising from the inappropriate development.

Housing Need

As already stated in the Material Considerations section, Gravesham are unable to identify a five year housing land supply. Whilst it is accepted that the lack of a five year housing land supply, on its own, does not constitute a Very Special Circumstance, however, when considered with others, this carries significant weight.

Sustainable Development

It is considered therefore that the proposed development would generate economic, social and environmental benefits and there are no adverse impacts that would significantly and demonstrably outweigh said benefits. Additionally, the proposed design is high quality, meeting the fourth element of sustainable development.

The significant weight attached to the fact the development meets the principles of sustainable development provides an element towards the Very Special Circumstances test.

Biodiversity Net Gain

A combination of habitats will be created as part of the proposed development. This will result in an overall net gain of 1.68 BU for area habitats, (+181.33%) and a net gain of +2.28 BU for linear habitats (+787.55%).

The level of net gain is very significant.

Landscape

The existing site comprises a combination of buildings and hardstanding. As set out within the Landscape section, the proposals will result in a significant degree of landscape enhancements including significant areas of greenery.

Visual Impact

The visual impact of the proposed development would be largely experienced in its local context, and needs to be considered against actual views of the development. Given the layout and position of the site, there remains little visual impact on the wider area.

Sites History

It is accepted that, over recent years, the site has attracted a degree of attention from a combination of Planning, Planning Enforcement, Environmental Health and, in some circumstances, local police.

On each occasion, site owners have politely engaged with Council officials.

However, it is accepted that this has used up a significant amount of local authority time. This has focussed on enforcement matters, some with or without substance.

In accepting the application as submitted, this draws a line under this wasted time and puts to bed concerns of Planning Compliance and/or Environmental Health concerns.

Planning Statement

Summary

Summary

This Planning Statement is in support of a Full Planning Application for the demolition of all buildings and the erection of up to 16 static homes restricted to those aged 55 and above at Little Acres, Longfield Avenue, Longfield, DA3 7LA.

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Assuming that the determining Planning Officer disagrees with this assessment, attention need then turn to the Very Special Circumstances test. The Very Special Circumstances include the overwhelming need for housing, landscaping and significant biodiversity net gains.

Taken individually, these VSCs may not be sufficient to overcome any Green Belt concerns. However, taken as a whole, they demonstrate that Very Special Circumstances exist in approving the development.

The site has been accompanied by a Transport Statement, Ecology Survey and Landscape Assessment. These reports conclude that the development would achieve national and local plan policy.