

Our Ref: IA/J100559

**The Planning Department
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU**

16th July 2024

Dear Sir / Madam

**Craft Works Joinery Limited, Unit 2, Queens Farm, Queens Farm Road, Shorne,
Gravesend, DA12 3HU**

Application for the change of use of an agricultural building to Class E (joinery workshop) (retrospective)

On behalf of the owners of the site, Evesham Property Limited, please find in the accompanying submission an application for planning permission for the change of use of an agricultural building to a Class E use (joinery workshop).

The application is seeking consent retrospectively for the use of the end bay of the agricultural barn as additional workshop space for the joinery business, Craftworks Joinery, that currently operates from the site.

To provide some context for this application, Prior Approval was obtained in 2019 (application reference 20181303) under Part 3 Class R of the General Permitted Development Order for the change of use of part of the agricultural building to a flexible B1 (Business use). This consent was implemented, and the unit subsequently occupied by Craftworks Joinery. Following this, the business extended into the end bay of the unit and it has recently become apparent that they did not have approval to operate from this additional space. As such, this application is seeking to regularise the use of the additional space as a joinery workshop.

In support of this application the following documents are provided:

- Application form;
- Covering Letter;
- Drawing No. 240412-L-001 Location Plan
- Drawing No. 240412-SE-001 Existing Site Plan
- Drawing No. 240412-E-001 Existing Plans and Elevations
- Drawing No. 202412-E-002 Existing Plans & Section



- Drawing No. 240412-SP-001 Proposed Site Plan
- Drawing No. 240412-P-001 Proposed Plans & Elevations
- Drawing No. 240412-P-002 Proposed Plans & Sections

Permitted development rights –

Recent changes to Permitted Development Rights, which came into force on the 21st May 2024, allow for the change of use of an agricultural unit to up to 1,000 square metres of Class E (commercial, business or service) floorspace.

432 square metres of floorspace was converted to a B1 use under the 2018 Prior Approval application, and this application is seeking to change the use of a further 255 square metres of floorspace, bringing the total floorspace occupied by the joinery workshop to 687 square metres.

The total amount of floorspace and the use proposed within this building meets the requirements set out in Schedule 2, Part 3, Class R of the GPDO, but as the change of use is being applied for retrospectively, the applicant is unable to apply under the Prior Approval process and therefore planning permission must be obtained. However it should be noted that permitted development rights under Class R do set a precedent that such change of use in this location would be acceptable.

Planning Policy –

Relevant National planning policy is provided in the National Planning Policy Framework (NPPF) together with the National Planning Practice Guidance (NPPG). At a local level, the development plan for the area consists of the Gravesham Local Plan Core Strategy (2014) together with the Gravesham Local Plan First Review (1994) saved Policies. The application site is located within the Greenbelt and therefore national guidance for considering appropriate development within the Greenbelt contained within the NPPF and NPPG is applicable, together with associated policies contained in the development plan.

In addition, the area is covered by the Kent County Council Minerals and Waste Local Plan 2013-2030 (adopted 2020) although this identifies no specific allocations in relation to the site.

The application site falls outside of the defined settlement boundary, within the open countryside and Policy CS02 of the Gravesham Local Plan Core Strategy requires that;

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

The NPPF defines what is considered to be appropriate development within the Green Belt and sets out the extent that the development should take, specifically requiring local authorities to take the following into account;

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Paragraph 88 of the NPPF discusses supporting a prosperous economy and states that planning policies and decisions should enable:

- a) The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;*
- b) The development and diversification of agricultural and other land-based rural businesses;*
- c) Sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

Planning policies and decisions should recognise that sites to meet local businesses and community needs in rural areas may have to be found adjacent or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

Principle of development

This application is seeking planning permission, albeit retrospectively, to convert the end bay of the existing agricultural workshop to a joinery workshop falling within Use Class E.

The proposal involves the conversion of an existing building within the Green Belt, something which is supported in principle by the NPPF. The existing joinery business has been operating from a section of the building since Prior Approval was given in 2019. The increase in Class E floorspace applied for under this application has provided a greater level of workshop floorspace which has enabled the business to expand and operate from the premises more efficiently. The development has contributed towards the sustainable growth and expansion of the local joinery business – something which the NPPF seeks to support in the Green Belt.

No external alterations are proposed to the building as part of this application and as such it is considered that the development does not result in any visual harm to the Green Belt and the Conservation Area in which it is situated.

On this basis, it is considered that the use of this portion of the agricultural workshop, as an extension to the existing joinery workshop, would not cause harm to the openness of the Green Belt nor the historical interests of the Conservation Area. The development is therefore considered to be acceptable in principle, in line with both national and local planning policies.

Highways and Transport -

Policy CS11 of the Gravesham Local Plan Core Strategy (2014) states new developments should mitigate their impact on the highway and public transport networks as required.

With respect to the highways and transport elements of the proposals, it is noted that as part of the original change of use application for the joinery workshop (submitted under Planning Reference: 20181303), the planning statement outlined the anticipated trip generation of the site.

The vehicle movements outlined as part of this application were as follows: -

- 6 staff equating to 12 daily movements;
- One weekly timber delivery, equating to two movements every week; and
- Three deliveries per week, associated with materials and product collection, equating to six movements every week.

Following discussions with the tenant (Craftworks Joinery) it is understood that the above trip generation remains broadly reflective of the site. Small changes to trip generation have taken place since the submission of the application, namely that timber deliveries now occur twice a month as opposed to weekly, with smaller vans coming to the site twice weekly to deliver remaining materials, with all other movements remaining unchanged. This level of change is not considered to materially impact the day-to-day operations of the site or its associated impact on the wider highway network.

Moving forward, the proposal seeks to regularise operations at the site with a small increase in floorspace noted. It is understood that the primary aim of the development is to improve working conditions at the site, to ensure the ongoing suitability of the space to accommodate the bespoke equipment needed for day-to-day operations. Whilst a small increase in floorspace will occur, it is understood from the applicant that this will not impact trip generation at the site, with the same number of staff to be employed along with the same level of delivery activity taking place.

Furthermore, no changes to the existing site access or parking arrangement are proposed in support of the development, both being suitable to accommodate the ongoing operations at the joinery workshop.

Given the above, it is not considered that the proposed regularisation will result in any impact to the existing vehicle movements at the site and as such, there should be no sound transport-based objections to the proposals.

Other issues

The application is considered to be below the threshold and therefore exempt from the requirements to provide Biodiversity Net Gain (BNG) as the application site does not impact a priority habitat and impacts less than 25 square metres of on-site habitat or 5 metres of on-site habitats. In this respect it is noted that the application site, including the road access, is entirely hard surfaced and contains no grassland or hedgerow that would counter this exemption.

We have calculated the fee for the application to be £578 based on a detailed planning application providing an additional circa 255 square metres of commercial floorspace.

I trust you have everything you require to favourably determine the application. However, if you require further clarification on any aspect of the proposal please do not hesitate to contact me.

Yours sincerely



Isabelle Adaway BSc (Hons)

For and on behalf of
Hobbs Parker Property Consultants LLP

