



Delegated Report

Planning Application

Application No:	20250943
Location:	Tudor Cottage, Nash Street, Meopham, Gravesend, Kent, DA13 9AA
Description:	Change of use of land to equestrian, with the erection of a stable block.
Applicant:	Mr and Mrs Booth
Site Visit:	11 th March 2026

Procedural Issue (Redline Plan)

This application is seeking to change the use of the land from agricultural to equestrian, however the redline plan only surrounds the proposed stable block and access way (see below):



Based on this, only the land within the redline would be changed to equestrian use and the remainder of the ownership would be retained as agricultural use. Therefore, any use of the remaining land within the blue line for equestrian purposes would be a breach of planning control.

The agent was contacted regarding this and asked why the redline did not include all land for equestrian use. They set out that the redline plan was submitted to circumnavigate biodiversity net gain requirements by creating a smaller site area.

Submitted Documents/Plans

Application Form;
Site Location Plan – 010.A;
Existing Block Plan – 020.A;
Proposed Block Plan – 030.A;
Proposed Floor Plan – 060.B;
Proposed Elevations – 070.B; and
BNG Mitigation Tree Planting Plan – 080.A.

Planning and Heritage Statement – Prepared by Bloomfields – Dated August 2025
Preliminary Ecological Appraisal – Prepared by Native ecology – Dated 22nd July 2025
BNG: Baseline Habitat Assessment – Prepared by Native ecology – Dated 16th December 2025
Biodiversity Net Gain Assessment: Design Stage – Prepared by Native ecology – Dated 16th December 2025
Biodiversity Metric – Completed by Native Ecology LLP – Dated 16th July 2025

Relevant Planning History

Reference	Description	Decision	Decision Date
20250945	Application for Listed Building Consent; Conversion of outbuilding to form an annexe with erection a single storey extension.	Permitted	20.03.2026
20250944	Conversion of outbuilding to form an annexe with erection of a single storey extension.	Pending	20.03.2026
20200723	Application for the approval of conditions 4, 5 and 6 attached to planning permission reference number 20191062 relating to (4), prior to the installation of the new kitchen. Details of layout, service runs, drains, existing and proposed floor finish and relationship of counter tops to window sills. (5) Prior to the installation of the new bathroom at first floor level. Details of size and appearance of all vents including vent covers, service runs and floor finish. (6) Prior to installation and prior to the water cylinder in the attic space first coming into use, details of the design including pipe runs.	Approval of details	17.09.2020
20200722	Application for the approval of condition 3 attached to planning permission reference number 20191062 relating to the submission of a sample and details of the glazing with the leadwork prior to the installation of any of the timber framed single glazed diamond leaded light windows	Approval of details	16.09.2020
20191062	**REVISED DESCRIPTION** Application for Listed Building Consent for the creation of a new internal doorway opening to provide access between the living room and playroom and other internal alterations including installation of new bathroom at first floor level, adaptations to existing bathroom and conversion of the existing living room into a kitchen; removal, refurbishment and reinstallation of the leaded light windows in the north, south and east elevations; replacement of metal frame and timber windows in the north elevation with timber single glazed windows of the same design to existing and replacement of metal frame and timber windows and porch door and large adjoining window in the west elevation with timber single glazed windows of diamond leaded light design to match original windows; replacement of large timber frame window on north elevation with new rear porch door and installation of set of new French doors; works to chimney stack and roof including repointing, replacement flashing, re-bedding of chimney pots, installation of a new chimney pot, replacement of sand and	Permitted	10.06.2020

	cement fillet at junction of the roof and chimney and removal of redundant flue and replace opening with clay peg tiles and repair works to the front elevation of the property following removal of the conservatory.		
20180836	Application for Listed Building Consent for the creation of a new internal doorway opening to provide access between the living room and playroom; removal, refurbishment and reinstallation of the leaded light windows in the north, south, and east elevations; replacement of all other metal frame and timber windows in the north, south, east and west elevations with timber double glazed windows, replacement of rear porch door with a timber and double glazed door and alteration of the existing window in the west elevation to a set of timber double glazed French doors; works to chimney stack and roof including repointing, replacement flaunching, re-bedding of chimney pots, installation of a new chimney pot, replacement of sand and cement fillet at junction of the roof and chimney and removal of redundant flue and replace opening with clay peg tiles and repair works to the front elevation of the property following removal of the conservatory.	Application Refused	08.04.2019

Planning History Note

This application was submitted alongside refs. 20250944 and 20250945, which are a full planning application and listed building consent, seeking to convert an outbuilding into a residential annexe.

The outbuilding in question is detached from the Grade II listed Tudor Cottage, located to the front of the property and is currently in use as a stable for the applicants' horses. It is set out that the building is unsuitable for the stabling of horses due to incorrect flooring, poor ventilation, lack of natural light and poor access. However, the use of the building for stabling is a material planning consideration in this application and the merits of its conversion are determined under 20250944 and 20250945.

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS12 – Green Infrastructure
- CS13 – Green Space, Sport and Recreation
- CS18 – Climate Change
- CS19 – Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- C17 – Horse Riding and Stables
- P3 – Vehicle Parking Standards
- TC2 - Listed Buildings

Paragraph 34 of the NPPF (2024) 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 (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision-making
- Section 12 – Achieving Well-Designed Places
- Section 13 – Protecting Green Belt Land
- Section 15 – Conserving and Enhancing the Natural Environment
- Section 16 – Conserving and Enhancing the Historic Environment

Supplementary Planning Guidance

- SPG 2 – Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020
- Technical Housing Standards – Nationally Described Space Standard (2015)
- SPG 4 – KCC Parking Standards (2006)
- Gravesham Householder Extensions/Alterations Design Guide (2021)
- Design for Gravesham – Design Code (2024)
- Gravesham Landscape Character Assessment (2009)

The Council has a statutory duty under 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering whether to grant planning permission for development which affects the settling of listed buildings, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Section 72(1) of the Planning Listed Building and Conservation Areas Act 1990 (as amended) requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Consultations, Publicity and Representations

External Consultees

Kent County Council Ecology

*Below is a summary of the comments received by KCC Ecological Officers, the comments are set out in full in **Appendix 1**.*

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination.

Kent Police Designing Out Crime – Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for

Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Perimeter, boundary and divisional treatments including gates. Given the rural and open location of the site, it would be difficult to fully protect the boundary with formal security fencing, which may not be considered Appropriate, Realistic or Cost effective (ARC). Post and rail fencing offers little or no security, thick natural hedging and planting in conjunction with post and rail fencing can provide additional security, but only if the planting is dense and/or a prickly species. We recommend that the access road be fully gated (if not already the case) and secured when the space is unoccupied, in order to prevent/deter unauthorised access, fly tipping, anti-social behaviour etc.
2. Lighting. We appreciate the rural nature of the location, but request lighting be installed at the access to the site and all buildings. Bollard lighting offers little security value and is largely for wayfinding only. Lighting should, however, be installed on the building at all entrances/exits in the interests of site security and safety. Additional lighting may be required for buildings storing high value items, in the interests of site security and safety.
3. CCTV is recommended to cover the main vehicle entrance and all entrances/exits points. Smart CCTV systems are recommended to allow authorised staff to dial in and view images, particularly in the event of any alarm activation. Solar powered and wireless cameras systems are on the market, which may be of interest to the applicant, should long cable runs not be ARC.
4. Doorsets and windows should be certified to PAS24:2022 or LPS1175 SR:1. This includes all entrance/exit doorsets. A door viewer and/or video entry system is also recommended to allow anyone who may stay overnight or lone working to see who is outside the main entrance door. Laminated glazing is recommended for all ground floor or vulnerable windows as an added layer of security. Given the remote location, security grilles are recommended (internal or external) as an added layer of security.
5. We recommend roller shutters to protect the main entrances. Ideally this should be certified to LPS1175 SR:1.
6. Alarms. We appreciate the rural nature of the site, an audible only alarm may not be appropriate as it may not be heard and may alarm any horses on site. However, a fully monitored, possibly silent, security alarm system should be installed, ideally monitored by an ARC (Alarm Response Centre). Flashing alarm beacons may also be considered. This is particularly important given the rural location.
7. Additional security measures may be required to protect any storage areas, especially any areas where medical equipment/ medicines are stored. Doorsets and windows for these areas should also be security rated to PAS24:2022 or LPS1175 SR:1 (or higher).
8. Secure mail delivery will need to be considered.
9. Bin storage. Bins should be stored in a secured area away from buildings. Bins can be used as a means to commit crime, be used as a climbing aid or even be an arson hazard.
10. Tack and feed stores should also be fully secured.
11. Site logs and inventories are recommended.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Dickens Protection Society –

16/10/2025

The Society notes the site is in an area within which Green Belt policies apply. The Society further notes that Tudor Cottage is a Grade II listed building. The supporting statement makes reference to an existing stable but does not give its location. The Society notes the existing stable is visible on Google Earth and is to the north of the application site.

Considering the application, the Society does not see a need to change the land use. The holding (within the blue line) excluding the previously defined residential curtilage is assumed to be grazing. The siting and design of the proposed stable appears reasonable, although three stables (e.g. for three horses) appears to be quite a lot for the size of the holding. As proposed, the access is reasonable and should not impact on the listed building. In the circumstances, the Society would suggest conditions are imposed to control any residential use, since the site is in the Green Belt and that permitted development rights are withdrawn since any changes could impact the setting of the listed building.

It is noted application drawings indicate car parking in front of the cottage which is not apparent on Google Maps which implies engineering works and in the Society's view parking vehicles in this location would impact adversely on the setting of the listed building.

Since your letter was received, the Society has become aware of another application concerning Tudor Cottage (20250944). The Society notes the outbuilding does not form part of the formal listing but is of some antiquity. Referring to KCC heritage maps for the period of 1871-1890 and subsequently, there is a building in this location, and is shown on the current Google Map view. It appears, therefore, that the building forms part of the setting of the listed building and may itself also be listable. In the circumstances, notwithstanding the Society's objection to conversion on policy grounds, the Society would suggest that English Heritage should be invited to inspect the building before any works on it are contemplated.

11/10/2025

The society would suggest that conditions are imposed to control any residential use since the site is in the Green Belt and the permitted development rights are withdrawn since any changes could impact the setting of the Listed Building.

25/01/2026

Thank you for your letter of 19th January 2026 concerning the above. Further to the Society's letter of 17th October 2025. The Society notes the site is in an area within which Green Belt policies apply. The Society further notes that Tudor Cottage is a Grade II listed building, and the proposed stable has been relocated further south on the site and re-configured.

Considering the application, the Society does not see a need to change the land use. The holding (within the blue line) excluding the previously defined residential curtilage is assumed to be grazing. The revised siting and design of the proposed stable appears reasonable. The relocation of the stable brings it closer to the listed building, but the distance appears adequate to limit any impact.

Considering the changes in view of the stables Green Belt location the Society would suggest conditions are imposed to control any residential use, and in view of the proximity of the listed building no development should be permitted between the stable and Tudor Cottage. Consideration should also be given to withdrawing the permitted development rights since any significant changes could impact the setting of the listed building.

Internal Consultees

Gravesham Environmental Protection

2/10/2025

There is no objection to this application. The plans show the muck storage area but there are no details regarding disposal. In addition, details will be needed regarding how run off/liquid waste will be addressed to ensure adequate drainage arrangements and to prevent the risk of polluting run-off entering either ground or surface waters

Both of these can be addressed by way of the following conditions:

- Stables - Storage of manure/waste - Prior to the commencement of the development, details of where and how manure/waste is to be stored and ultimately disposed of shall be submitted to and approved in writing by the Local Planning Authority. Once the use commences, this shall be carried out in accordance with the approved details. No manure or waste materials shall be burned upon the land within the application site.
- Stables/Equestrian use (Run-off) - No development approved by this permission shall be commenced until a scheme for the disposal of run-off from the stable, hardstanding's, manure heaps, stable washings and hay soaking areas has been submitted to and approved by the Local Planning Authority and these works shall be completed in accordance with the approved details before the first use of the building(s) or land.
- Stables Use - The proposed stable herein approved shall be used for the stabling of horses and storage of feed and agricultural equipment by the residents of Tudor Cottage and for no other purpose and shall not be used as a livery.

Commented [RH1]: Have these all been included as conditions?

26/01/2026

The revised plans are noted. Nothing further to add to the consultation response dated 2nd October 2025.

Local Ward Councillors – No comment.

Neighbouring properties

A notice was displayed on site 09 October 2025.

In addition, two surrounding properties were consulted and no representations were received.

The consultation period expired 9th February 2026.

Officer's Analysis

Site Description

The application site is part of the curtilage of a residential property, located on the northern side of Nash Street. The site contains a Grade II listed building (Tudor Cottage) and an ancillary outbuilding to the front (which is currently in use as a stable). The application site is an area of land to the west of the dwelling.



Figure 1 – Case Officers Site Photos (taken 11/03/26)

The application site is located within the Green Belt and the Meopham Downs Landscape Character Area.

Development Proposal

This application seeks a change of use of land and the erection of a purpose-built stable block for the sole use of the occupants of Tudor Cottage.

The building would be located along the western boundary of the applicants' land ownership. It would be L shaped measuring approx. 19.6m in length and 7.3m in width (reducing to 4.5m width), with an eaves height of 2.6m and a ridge height of 4.6m.



Principle of Development

The application site is approximately 205m² in area, this application seeks permission to change the use from agricultural to equestrian and for the erection of a stable block for the keeping of the applicant's own horses. If the horses are simply grazing on the land, they will fall within the legal definition of "agriculture" and a change of use does not occur. However, this application goes beyond simply grazing as it involves the erection of a stable building.

Policy CS02 of Gravesham Core Strategy states development in the Green Belt will be supported where it is compatible with national policies for protecting Green Belt. The NPPF (2024) states that within the Green Belt inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. This goes on to state that the construction of new buildings should be regarded as inappropriate development unless they are for a specified range of uses/activities.

One of the exceptions are paragraph 154 (b) of the NPPF (2024) which allows "provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve

the openness of the Green Belt and do not conflict with the purposes of including land within it". It is considered that the keeping of horses can fall within the category of outdoor recreation. Therefore, the principle of stables in this location can be acceptable subject to an assessment of the impact that the development has on the openness of the Green Belt in terms of its scale, siting and design and impact on the setting on the listed Tudor Cottage to the east.

Green Belt

As established above, the principle of the proposed change of use of the land and erection of a new stable building, would meet the general test of exception para 154(b) of the NPPF (2024), as a building for outdoor recreation purposes subject to the facilities preserving the openness of the Green Belt and not conflicting with the purposes:

The stated fundamental aim of Green Belt policy that is to prevent urban sprawl by keeping land permanently open (paragraph 142), and the essential characteristics of Green Belts are their openness and permanence. The openness of the Green Belt has both spatial and visual aspects, and any new built form of development is harmful to its open character. The Courts have identified a number of factors to be taken into account when assessing the impact of a proposed development on the openness of the Green Belt (PPG Paragraph: 001 Reference ID: 64-001-20190722), which include both spatial and visual consideration, as well as duration and remediability of the development, and the degree of activity likely to be generated, such as traffic movement.

Saved Policy C17 of the Gravesham Local Plan 1994 states that proposals for the recreational use of land in the countryside for horse-riding, riding schools and the erection of stables will only be permitted if they are compatible with the agricultural, landscape and transport policies of the plan. It goes on to say that stables and horse shelters should be properly designed and constructed of sound materials appropriate to the countryside and be in an acceptable location within the site.

The scheme has been amended, and the stable building has been moved further south within the site. The siting and scale of the stable building would ensure that it has a limited impact on the openness of the Green Belt. The building is to be located to the front of the site close to the western boundary and close to the curtilage of the residential dwelling. The siting of the stable building would mitigate any potential encroachment into the countryside, by ensuring that it remains somewhat visually contained within the established built environment. The building would be modest in size, and would be constructed from and clad in wood, and would have a black corrugated roof. It is considered that the stable building would be constructed of 'sound materials' which would be appropriate for the equestrian use in this rural area.

The siting of the stable building will ensure that all buildings within the site are kept to the front of the site and not spilling outside into the open landscape to the north, which the northern part of the site also contributes to. As such it is considered that the proposed development would not have a significant adverse impact on the openness of the Green Belt, according with the contents of Policy CS02 of Gravesham Core Strategy (2014), Policy C17 of the Gravesham Local Plan 1994 and Section 13 of the NPPF (2024).

Design, Character and Appearance

Saved Policy C17 of the Gravesham Local Plan First Review (1994) states that proposals for the recreational use of land in the countryside for horse-riding, riding schools and the erection of stables will only be permitted if they are compatible with the agricultural, landscape and transport policies of the plan. Where the proposals are accepted in principle, the Council will expect stables and horse shelters to be properly designed and constructed of sound materials appropriate to the countryside and to be in an acceptable location within the site.

In addition to being within the Green Belt, as set out previously the site contains a Grade II listed building and is located within the Meopham Downs Landscape Character Area, which are key constraints.

Impact on the Listed Building

Development Plan policy places considerable emphasis on the importance of achieving high quality, beautiful and sustainable buildings and places. Paragraph 135(c) of the NPPF (2024) seeks to ensure that development will add to the quality of an area, be visually attractive, and sympathetic to local character and history. Policy CS19 (LPCS) reflects these aims and requires that new development is well designed and respects the character and appearance of the surrounding area.

The NPPF (2024) also places great significance on the desirability of sustaining and enhancing heritage assets, and on new development making a positive contribution to local character and distinctiveness (paragraph 210). This is echoed in Policy CS20 (LPCS), which states that the significance of the Borough's heritage assets and their setting should always be preserved or enhanced. Saved Policy TC2 of the Local Plan 1994 sets out that for development affecting the setting of listed buildings, the primary consideration is the maintenance of the integrity of the original listed building, and whether the character or appearance of the listed building will suffer as a result. Proposals must be sympathetic in terms of their appearance and materials.

Whilst it is recognised that development which makes effective use of land should be supported (paragraph 124 of the NPPF (2024)), this comes with the proviso that it should safeguard and improve the environment and not conflict with other policies in the NPPF (2024). Relevant to this proposal, paragraph 129 of the NPPF (2024) which states that developments that makes efficient use of land should be supported, taking into account the identified need for different types of housing, the desirability of maintaining an area's prevailing character and setting, and the importance of securing well-designed places.

From a historic building/conservation point of view, the application site is within the curtilage of a Grade II Listed Building (Tudor Cottage), adjacent to Nash Street Farmhouse (Grade II Listed). The Historic England Listing entries are set out below:

- Tudor Cottage (list no. 1054085) - 18th century or earlier. Two-storey timber-framed house with curved braces. Red brick infilling. Hipped tiled roof. Four casements. Diamond paned windows. Flat hood on shaped wooden brackets over door. Substantial central brick chimney stack.
- Nash Street Farmhouse (list no. 1350212) - Early C19. Red brick walls, slated roof. Two storey; 2 casement windows with pointed Gothic panes 3 similar windows on first floor. Flat hood over front door. Modillion eaves cornice. Gable ended roof with parapets. (Similar rear elevation gain with windows intact).

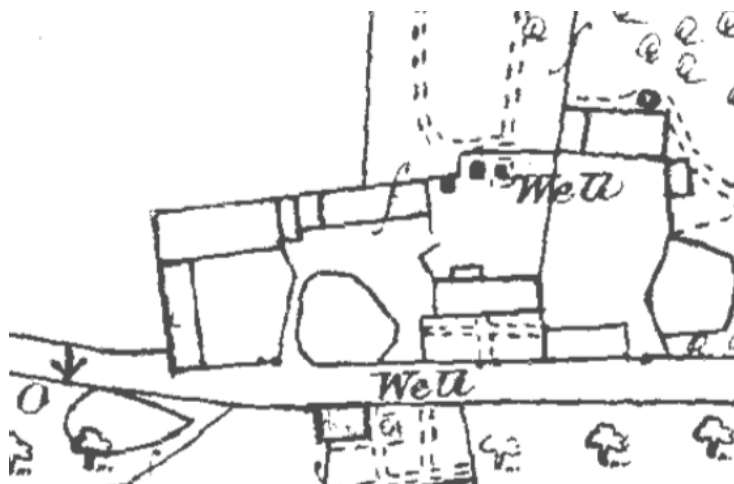


Figure 2 – Historic Tudor Cottage Map (1871-1890)

The proposed stable building would be sited approximately 21m to the west of the listed Tudor Cottage, the stable would be set behind the front elevation of the listed building. Figure 2 above shows the original layout of the farmstead which originally included buildings to the west of the listed building. The scale of the building would ensure that it does not dominate the listed building, the siting would be in keeping with original layout of the farmstead, and is therefore considered to be acceptable.

The use of timber would be in keeping with original buildings that would have made up the farmstead and the existing curtilage listed outbuilding to the front of the dwelling. It is considered that the proposed stable building would be acceptable in regards to its impact on the setting of the listed Tudor Cottage.

It is also noted that the applicant has submitted this application alongside applications 20250944 and 20250945, which are a full planning application and a listed building consent application. These applications seek to convert the existing curtilage listed outbuilding to the front of the main dwelling from its current use as a stable building into a residential annexe. As shown in figure 1 above, the outbuilding is dilapidated, the proposed stable building would allow for the outbuilding to be renovated, improving its condition which would benefit the listed building.

Nash Street would provide visual separation between the listed Nash Street Farmhouse and the proposed Stable Building. In any case, the modest scale, siting and design of the stable building would ensure that there is no harmful impact to the Listed Nash Street Farmhouse. It is therefore considered that the proposed development would be compliant with Policy CS20 and Saved Policy TC2 with regard to its impact on Heritage Assets.

Impact on the Landscape

Paragraph 187 of the NPPF (2024) aims for development to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.

The application site is located in the Meopham Downs Landscape Character Area (LCA) and as such, Policy CS12 (LPCS) is relevant. This policy states that the overall landscape character of the Borough will be conserved, restored and enhanced and that the Gravesham Landscape Character Assessment will be taken into account in determining applications.

Whilst the Meopham Downs LCA is not a nationally designated landscape and may not be considered as 'valued' as those set out in paragraph 189 of the NPPF (2024), it remains part of countryside and is not considered valueless or immaterial in the decision-making process.

The Gravesham Landscape Character Assessment states that within the Meopham Downs LCA 'the dominant land use is agricultural, with a mixture of grazed pasture and arable use. Small clumps of woodland, neglected orchards and commercial horticulture exist in parts. There is a presence of horse related activity scattered throughout the landscape.' As noted in the LCA, there is a presence of horse related activity, this is considered to include buildings which support this activity, the proposal would introduce a modestly sized stable building to the LCA. Given the modest scale of the building and its siting to the front of the site, it is considered not to have a harmful effect on the character of the landscape and would be an acceptable addition.

Neighbouring Amenity

The proposed stable building would not exceed 4.6m in height, due to the isolated nature of the site, the stable building being located away from neighbouring properties and the fact this is not a commercial use, there will be no significant impact on the amenities of the surrounding properties. As such, the proposal therefore accords with policy CS19 (LPCS) and para. 135f of the NPPF (2024).

Parking and Highways

The proposed stables are for private use with no commercial activity, given the private use, traffic generation would not be a concern. There would also appear to be adequate visibility, it is therefore considered that there would be no adverse parking or highways impacts from the proposal, and it would therefore comply with saved Policy P3 of the Gravesham Local Plan 1994 and Policy CS19 of the Gravesham Core Strategy 2014. Appropriate conditions will be included to ensure no commercial activities take place on site.

Any Other Material Planning Considerations

Biodiversity Net Gain

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The application has been supported by a BNG metric and accompanying reports produced by Native Ecology LLP, which demonstrates onsite net gains of +0.1 habitat units (+15.52). KCC Ecology have reviewed the BNG documents and are satisfied that these gains are achievable. The gains would be achieved by providing three trees within the site. It is considered that the proposed tree habitats would constitute significant on-site gains. Government guidance states the following;

The maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage.7"

Due to the amount of habitat created (0.04 units), and ease with which it can be created and maintained, it is not considered proportionate to implement LPA oversight through the collection of monitoring fees and the submission and approval of monitoring reports to the LPA. In the event of approval a condition would be placed on the decision requiring the submission and approval of a Habitat Management and Monitoring Plan (HMMP). It is considered that subject to condition biodiversity net gain can be provided within as a part of the development.

Grazing

It is noted that the area within the redline plan does not provide sufficient space for the grazing of the stabled horses. The applicant has provided photograph below showing additional land in the applicants ownership which surrounds the site. This agricultural land is currently used by the applicant for the grazing of the horses, which are currently stabled in an existing outbuilding within the site. The applicant has confirmed that this arrangement will continue should planning permission be granted. As this land will be used for grazing purposes only, there would be no material change of use from the existing agricultural use.



Secured by Design

Kent Police's Designing Out Crime Officer has been consulted and has provided comments on this application. Should the application be supported a designing out crime informative will be placed on the decision.

Conclusion

It is considered that the proposed change of use and erection of a stable would comply with local and national planning policies subject to conditions, the proposal would be acceptable.

Recommendation

For detailed conditions and informatives, see draft Decision

Case Officer:	Mr Ade Lawal	Team Leader:	Richard Hart
Signed:	<i>Ade Lawal</i>	Signed:	<i>R Hart</i>
Dated:	24 th April 2026	Dated:	24 th April 2026

Appendix 1

SUMMARY

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

However, we wish to bring to attention to the following point that may require addressing if the proposed works to the adjacent eastern hedgerow are to fall under this planning permission as it is currently outside the redline boundary.

Hedgerows

Adjacent to the eastern side of the redline boundary is potentially a hedgerow that is proposed to have a gate put in it. Figure 1 in the Appendix shows that a hedgerow was present after 30 January 2020, but it is unclear from subsequent aerial photography if it has been removed (Figure 2). The Proposed Stables plans states that a “Proposed post and rail fence with wooden field gate and reinstated native hedgerow to mark boundary of residential curtilage.” This implies that the hedgerow has been removed and it is proposed to replace it. Regardless of the hedgerow being in place or removed, works are proposed to take place to it, either to replant or alter it to fit a gate.

As it is currently outside the redline boundary, we are satisfied that the hedgerow does not need to be included in the metric calculations. However, **if these proposed works are to be included within this planning permission**, we advise that the redline boundary is altered to include the affected area and that the hedgerow baseline is included in the metric calculation prior to determination.

If there is no need to alter the redline boundary, then the following advice applies:

A summary of our review of the submitted biodiversity net gain information is provided below. Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Table 1: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain Reported for Area Habitats	Net Gain Proposed:
10%	15.52%	1 – all on-site

Precautionary Measures

We are satisfied that the proposed mitigation set out in section 11 of the Preliminary Ecological Appraisal (PEA) for badgers, hedgehogs, and reptiles, identified as having potential to be on site, are sufficient.

We advise that the applicant follow the precautionary mitigations set out in section 11 of the PEA and advise that if planning permission is granted, a **condition is included to secure those precautionary measures in a Construction Environmental Management Plan (CEMP)**. We have not provided suggested condition wording as we feel Gravesham Borough Council would be best placed to write that condition. We suggest that the following bullet point is included in the condition wording:

- *Inclusion of section 11 of the Preliminary Ecological Appraisal (Native Ecology, 22 July 2025), which covers the precautionary measures for badgers, hedgehogs, and reptiles.*

As part of this, we highlight that the current management of the site must continue so as not to develop suitable habitat which may encourage the presence of protected species

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning

applications¹ for development (unless exempt^{2,3},) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development. We consider there is no local policy biodiversity net gain requirement above 10% for this development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 2: To show whether the applicant has met the minimum validation requirements

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Yes	A site visit was carried out by a suitably qualified ecologist on 12/06/2025. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	Yes	
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.	Yes	The site is 325 square metres (0.0325 hectares) in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool does not match the reported red line boundary site area as per the application form. However, updated plans have been proposed since the application form was submitted, therefore we are satisfied that there is a discrepancy in this case. We are content with the baseline habitat classifications. We highlight to Gravesham Borough Council that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS was published after

A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation').

A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application

Yes

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the 'relevant date'. As the LNRS was published after the relevant date, the 'pre-development' biodiversity value does not need to be updated.

As the publication of the LNRS has occurred whilst the planning application is live, and as its publication alters the strategic significance score, the strategic significance scores in the biodiversity metric calculation tool for the post-development habitats will need to be reviewed in advance of the deemed condition discharge5.

The strategic significance score can be determined through use of the Local Habitat Map, available here: [Local Nature Recovery Strategy mapping portal | Making Space For Nature Kent](#), with guidance on its use available here: [How to use the online mapping tool | Kent and Medway Local Nature Recovery Strategy](#). A guidance document on how to apply strategic significance is available here: [The-role-of-Kent-Medways-Local-Nature-Recovery- Strategy-in-Biodiversity-Net-Gain-Strategic- Significance-.pdf](#).

We consider that the proposed habitat creation and proposed uplift of 15.52% BNG is achievable and realistic.

None reported or visible on aerial imagery dated 6 August 2025 (Google Earth Pro, accessed 9 March 2026 date)

None reported.

relates, that exists on the date of application, (or an earlier date).

Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable). Yes

The habitat baseline must be correct prior to determination, but full details of how the proposals will deliver biodiversity gains are not strictly required until submission of the pre-commencement Biodiversity Gain Plan. However, it is advisable to seek an indication prior to determination as, it gives an indication of how the biodiversity gain hierarchy will be applied, and if granted consent, the project cannot commence until this information has been submitted to and approved by the local planning authority. This information will also provide sufficient indication as to how conditions need to be applied should planning permission be granted for this application.

The government's standing advice on BNG states (under paragraph 002 Reference ID: 74- 002-20240214): *"[BNG] is not just a post-permission matter. To ensure the biodiversity gain objective is met and the condition can be discharged successfully, it is important biodiversity net gain is considered throughout the planning process."*

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions should be applied should planning consent be granted.

Submission of Biodiversity Gain Plan

We advise that the following information should be submitted as part of the 'deemed condition' discharge as appropriate:

- How the biodiversity gain hierarchy has been applied;
- The relevant date for the habitat baseline and reason for choosing an earlier date (if relevant);
- The completed biodiversity metric calculation tool(s) based on final detailed designs;
- Pre-development and post-development plans;
- A description of any irreplaceable habitat present on the relevant date;
- Information concerning any relevant habitat degradation;
- Any registered off-site biodiversity gain, evidence of its value and evidence that it has been allocated to the development;
- Evidence of the purchase of any biodiversity credits;
- Name and address of the person completing/submitting the Plan;
- A description of the development and planning permission reference number to which the Plan relates;
- A description of the arrangements for maintenance and monitoring of the habitat enhancement where applicable.

We advise the local planning authority that there may be conditions attached to the decision notice should planning permission be granted that are linked to the biodiversity gain plan. Wording should be included in such conditions to ensure that it is clear that any documents/plans are produced in accordance with the 'approved biodiversity gain plan'. Relevant conditions where this is likely to be

appropriate include soft and hard landscaping conditions, and any other ecology/biodiversity conditions. Other relevant conditions may include drainage conditions.

Significant on-site gains

Significant on-site gains are areas of habitat creation or enhancement which contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development. Retention of existing habitat cannot count as an on-site significant gain.

Non-significant enhancements are those whose loss will not significantly decrease the development's biodiversity value e.g., private gardens or container planting. These types of enhancements do not normally require maintenance provisions and so no Habitat Management and Monitoring Plan, legal agreement or commitment to maintain them is required.

We consider the creation of urban tree habitats to constitute significant⁶ on-site gains. Government guidance states: "*The maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage.*"⁷

However, due to the amount of habitat created (0.04 units), and ease with which it can be created and maintained, it is not considered proportionate to implement LPA oversight through the collection of monitoring fees and the submission and approval of monitoring reports to the LPA. It is appropriate to recommend a Habitat Management and Monitoring Plan (HMMP) be included on the decision notice if planning permission is granted. The HMMP will still include monitoring by an ecologist/management company where LPA oversight is not considered necessary.

The suggested conditions below show how on-site biodiversity net gain can be secured by condition; it may be used with a planning obligation securing any monitoring contributions.

Suggested Condition Wording:

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within the Biodiversity net gain assessment: design stage, for Tudor Cottage, Meopham, dated 16 December 2025 and prepared by Native Ecology.

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application, in accordance with [insert relevant policy].

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

This is not a statutory requirement; imposing this may give additional certainty that the Biodiversity Gain Objective for the development will be met. It also provides flexibility for subsequent approvals of an overall gain plan.

Habitat Management and Monitoring Plan

The below condition is recommended as the scheme must set out the actions needed to create and enhance habitat on-site as well as maintain it for 30 years from the "completion of development"⁸ (Paragraph 9(3) of Schedule 7A of the Town and Country Planning Act 1990).

Neither the statutory definition of the biodiversity gain plan⁹ nor the current DEFRA biodiversity gain

plan template require management and maintenance measures to be specified¹⁰. As a result, the statutory condition does not on its own secure compliance with the approved biodiversity gain plan (including the implementation of any habitat creation and enhancement works or their maintenance for a 30-year period). The delivery of the gain envisaged by the HMMP needs to be secured by condition or, where necessary, legal agreement.

The suggested condition wording below also includes reference to habitat retention. Retention of existing habitat cannot count as on-site significant habitat. Only created and enhanced habitats can count as on-site significant habitats. However, the retained habitats are recommended to be secured as well as the created and enhanced habitats as without the retained habitats the 10% biodiversity net gain would not be achieved. Furthermore, there are national and local policies in place to conserve biodiversity.

Suggested Condition Wording:

The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan (submitted as part of the deemed condition discharge application), and based on the most up-to-date and/or relevant ecology surveys as determined by a suitably qualified ecologist, has been submitted to, and approved in writing by, the local planning authority. The Plan shall include:

- a) *a non-technical summary;*
- b) *the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- c) *the planned habitat retention, creation and enhancement works (including detailed landscaping plan(s) and planting schedule(s)) to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
- d) *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- e) *the monitoring methodology and frequency in respect of the retained, created or enhanced habitat.*

The retained, created and/or enhanced habitat specified in the approved HMMP shall be implemented, managed, maintained and monitored in accordance with the approved HMMP.#

Reason: To ensure the development delivers the required biodiversity net gain on site in accordance with [local policy reference] and Schedule 7A of the Town and Country Planning Act 1990.

Ecological Enhancements

Paragraph 187(d) of the NPPF 2024 states: “Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.” The updated NPPF encourages habitat features. These are in addition to the requirements of mandatory 10% biodiversity net gain.

Suggested biodiversity enhancements include the provision of durable bird/bat boxes (for house sparrows, starlings, swifts or as appropriate to the development and preferably integrated into new structures), the creation of artificial refugia for reptiles/amphibians, and/or creation of bug hotels/bee bricks for invertebrates. Where placed on buildings, bat and bird boxes should be clearly visible on elevations plans.

Suggested Condition Wording:

Prior to any works above slab level, a Biodiversity Enhancement Plan (BEP) shall be submitted to and approved in writing by the local planning authority. The Plan shall include:

- Provision of suitably placed bat and/or bird boxes, with the exact locations, make and model and height from ground level shown on scaled plans suitable for construction. In the case of building mounted boxes, scaled elevation plans shall be provided. Boxes for breeding birds shall be targeted at S41 priority species and/or red/amber listed species as listed within the latest British Trust for Ornithology Birds of Conservation Concern report. Boxes shall be building integrated and/or constructed of woodcrete to ensure durability;
- The provision of bee bricks and/or the provision of log piles/artificial refugia for reptiles and amphibians. The exact locations, make and model, height from ground level, size and construction materials shall be shown on scaled plans suitable for construction.

The Plan shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

If you have any queries regarding our comments, please do not hesitate to get in touch.