



F.A.O Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
DA12 1AU.

20th August 2021.

Our Ref: JH/DRB/15558.

Dear Sir or Madam.

SCHEDULE 2 PART 6 CLASS A OF THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND) ORDER 2015 AS AMENDED.

PROPOSED ERECTION OF 783m² AGRICULTURAL BARN FOR THE STORAGE OF STRAW, HAY, EQUIPMENT AND MACHINERY AS WELL AS THE CREATION OF 205m² HARDSTANDING AT LOMER FARM, WROTHAM ROAD, MEOPHAM, GRAVESEND, KENT, DA13 0AN.

I write in respect of the above matter and notify the Council of the proposed 783m² agricultural building to be erected at Lomer Farm, which will be used for the storage of straw, hay, equipment and machinery, as well as the additional creation of 205m² of external hardstanding.

The following documents are provided as part of this Prior Notification Application:

Reference	Document
-	Application Form (completed online).
JH/DRB/15558.	Planning Statement (DHA).
15558-H-05 Rev P3.	Site Location Plan.
15558-H-06 Rev P6.	Proposed Site Layout Plan.
15558-H-07 Rev P6.	Proposed Roof Plan.
15558-H-08 Rev P6.	Proposed Elevation Plan.

In accordance with the Town and Country Planning (General Permitted Development) (England) Order (AS AMENDED), information is provided in line with Schedule 2 Part 6.

Site Description

Site Location

The site is over 5 hectares (ha) and lies to the west of Wrotham Road (A227), which provides a route to Meopham village centre and Meopham Green.

planning transport design environment infrastructure

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URS is a member of Register of Standards (UKAS) Ltd.

The site is bound by agricultural fields to the north, south and west as well as existing buildings to the east. The site is located north of the Meopham Green Conservation area.

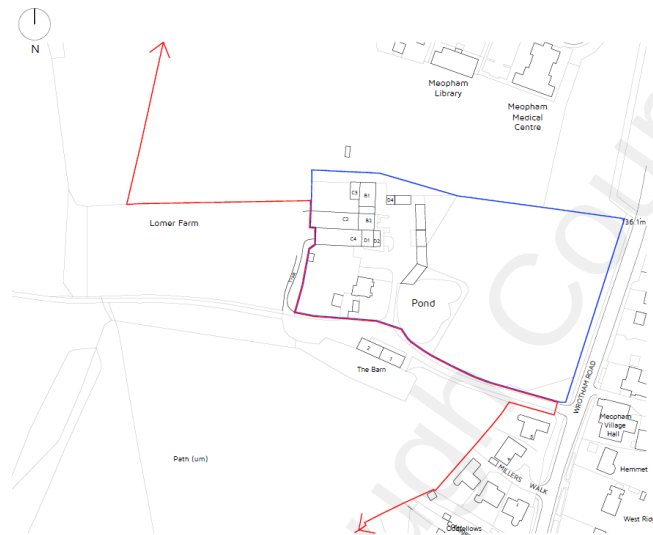


Figure 1: Site location outlined in red (Courtesy of DHA Urban Design).

Site Surroundings

Wrotham Road (A227) provides links in a northerly direction towards Watling Street (A2) and Gravesend. The A2 provides connections to west Kent and the M2 which serves east Kent. The A227 also runs in a southerly direction towards Wrotham.

The site is located in the Metropolitan Greenbelt but is not subject to any ecological constraints and is located in Flood Zone 1 (least likely to flood). In addition, the site is not located within a Conservation Area and there are no Listed Buildings situated within a 250 metre (m) radius.

We respectfully remind the Council that Green Belt matters should not be considered when determining applications made under Schedule 2, Part 6, Class A of the GDPO.

Additional Site Information

Whilst there are some 'original' agricultural buildings in this location, some are no longer suited to modern day farming methods and have in relatively recent times been used for residential and commercial purposes.

The agricultural holding is substantial and as a consequence, a building to serve the modern-day agricultural needs of the holding is fairly justified.

Planning History

According to the Gravesham Borough Council planning history database, the site has been the subject to a number of planning applications. The most relevant applications within the past ten years are tabulated below:

Reference	Subject of the application	Proposal	Decision
20191208	Barn 2, Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Application for approval of condition 2 of planning permission reference number 20180733 relating to details of the soft landscaping scheme.	Approval of details (06/01/2020).
20180733	JVA Electrical Ltd, Barn 2, Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Application for the continued use of the land west of No. 2 The Barn for parking and the use of an external movement sensor located on the western flank wall of No. 2 the Barn.	Application Permitted (18/10/2019).
20180093	Barn 1, Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Application for Lawful Development Certificate for the continued use of no. 1 The Barn as a residential dwelling.	Certificate Granted (14/10/2019).
20171382	Barns 1 And 2, Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Application for Lawful Development Certificate for the continued use of the area of land to the rear of No.1 and No.2 The Barn as domestic garden land.	Certificate Granted (14/10/2019).
20170999	Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Conversion of existing commercial buildings and other existing buildings and stables to 10 no. commercial units in a flexible B1/B8 use and 4 no. residential dwellings with associated access and parking arrangements.	Application Permitted (22/02/2019).
20160884	Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Conversion of existing stables to 2 no. residential dwellings with associated parking.	Application Withdrawn (23/05/2017).
20150843	Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Prior notification for the proposed change of use of units D1 (upper and lower), D2 And B2 (lower) to form 3no. residential dwellings under Class O, Part 3 of the Town and Country Planning (General Permitted Development) Order 2015.	MB Refusal (09/10/2015).

20110352	Lomer Farm Estate, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.	Erection of infill extension and conversion of existing light industrial and agricultural units to form 978 square metres B1 commercial space with ancillary B8; three live/work units and one residential unit; conversion of stables into two residential units; internal and external alterations to Lomer Farm Barn and alterations to parking and access arrangements.	Application Permitted (23/10/2013).
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Proposed Development

As aforementioned, the applicant seeks Planning Permission for:

'Proposed erection of a 783m² agricultural barn for the storage of straw, hay, equipment and machinery as well as the creation of 205m² hardstanding at Lomer Farm, Wrotham Road, Meopham, Gravesend, Kent, DA13 0AN.'

Proposal

The agricultural barn will be sited on the north eastern side of the site and will be connected to the existing road/track via concrete hardstanding.

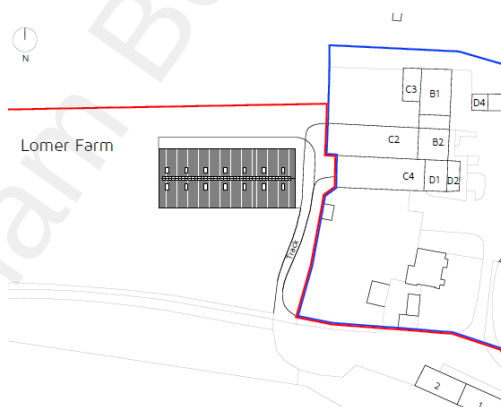


Figure 2: Site Plan (Courtesy of DHA Urban Design).

The agricultural barn has been designed to specifications required for the effective maintenance of land at the site as well as the storage of straw, hay, equipment and machinery. As such and illustrated below, the barn will be 6.88m to eaves level, 42.3m in width and 18.5m in length, with 3no. roller shutter doors each comprising a 'man door' along the front elevation. Due to the prevailing weather coming from the south west, the openings have been orientated to face north to protect the cereals and straw from any water ingress/damage.

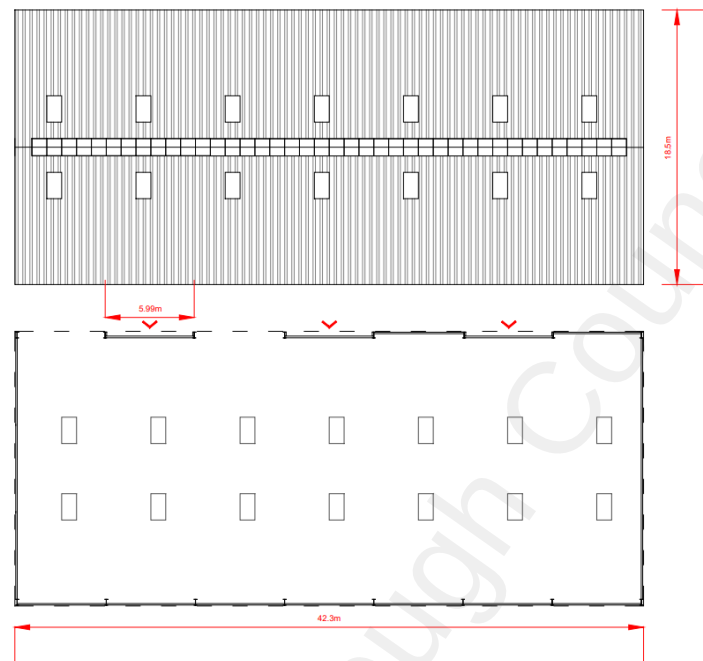


Figure 3: Roof Plan (Courtesy of DHA Urban Design).

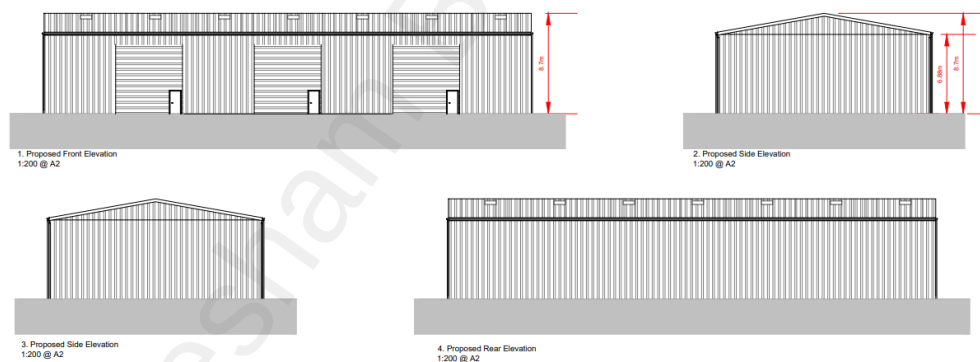


Figure 4: Elevations (Courtesy of DHA Urban Design).

The agricultural building will also comprise ventilation necessary for the successful storage of crops. In addition, a rainwater harvesting downpipe system will be installed to direct run-off from the barn into a barrel. Collected rainwater provides an environmentally friendly, waste-free facility to water crops at the site.

In terms of material and colour, the barn will be constructed using 0.7mm box profile PVC cladding in Moorland Green, metal profile sheeting in Moorland Green, steel roller shutter

doors in Moorland Green, and 100mm thick pre-stressed concrete wall panels which will be taken up to 3m from ground level. Moreover, rainwater goods will be PVC with colour chosen to suit the locality, and purlins will be galvanised steel.

Case for the Applicant

This PNA is submitted for the erection of a 783m² agricultural building and 205m² hardstanding.

It is considered that the following must be addressed as part of this proposal:

- Need for an agricultural barn;
- Justification for the size of the proposed agricultural barn;
- Confirmation that the proposal complies with GDPO; and
- Highways.

Need for an agricultural barn

Lomer Farm currently comprises a holding over 134.4ha which is broken down as follows:

Cropping (2020)	Hectares
Arable (Spring Barley)	28
Arable (Spring Wheat)	9.4
Arable (Winter Wheat)	28.6
Arable (Hay)	19
Pasture	25.7
Woodland	23.7
Total	134.4

There are currently no modern/fit for purpose agricultural buildings serving the 134.4 ha holding.

At present, straw and hay is either taken off site or stored under tarpaulin, with any machinery being kept outside when required to be on site.

Providing purpose built, modern agricultural accommodation on site will help improve farm efficiencies and reduce traffic movements.



Figure 5: Hay stored in open on site (Courtesy of Google Earth).

Therefore, there is a clear need for an agricultural barn at Lomer Farm for keeping secure and storing farm machinery and equipment required for the maintenance of the land. In addition, an agricultural barn is required for the secure storage of straw and hay. Importantly, there are currently no appropriate buildings on site to complete such functions and therefore the creation of a well-sized agricultural barn is appropriate in planning terms.

As well as the need for an agricultural barn, the applicant has also given careful consideration to the siting and position of the proposed barn in order to minimise any visual impact on surrounding residential properties. Therefore, the proposed size and scale of the barn are modest and by virtue of the use of appropriate construction materials, any views of the barn from its immediate setting would respect the rural character and appearance of the locality.

Justification for the Size of the Proposed Agricultural Barn

Amount of storage

Storage is only calculated to the eaves height as the bales will not be able to be stored above this level due to the pitch in the roof.

With respect to the wheat and barley harvest for summer 2021, our client anticipates harvesting circa 800-900 4ft round straw (wheat and barley) bales from the site, the majority of which will be stored on site, with some being sold direct to market.

With respect to the hay harvest, our client anticipates they will produce between 6,000-8,000 standard bales on a one cut policy, which of course is subject to yearly yield changes. The majority will be sold directly to market, with the rest stored and transported off site as and when required.

Volume of building

The proposed agricultural barn has a height of 6.8m to eaves level, a width of 42.3m and length of 18.5m, bringing the overall volume to 5321m³ (if the height of the building is measured to eaves level).

Amount of Wheat and Barley Bales

Our client anticipates being able to harvest a maximum of 900 wheat and barley bales.

Based on the bales being 4ft round, the bales will have a cubic volume of 1.36m³. Assuming 900 bales are harvested, this would mean at least 1,224m³ of wheat and barley bales will be harvested.

The majority of these bales will be stored on site, with some being sold direct to market.

Assuming that 600 of the bales harvested will be stored within the agricultural building, this would mean that 816m³ of the agricultural building will be taken up by wheat and barley bales.

Amount of Hay Bales

Our client anticipates being able to harvest a maximum of 8,000 hay bales.

Based on the bales being 4ft round, the bales will have a cubic volume of 1.36m³. Assuming 8,000 bales are harvested, this would mean at least 10,880m³ of hay bales will be harvested.

A reasonable quantity of these bales will be stored on site, with the rest will be sold directly to market and transported off site as and when required.

Assuming that 2,500 of the bales harvested will be stored within the agricultural building, this would mean that 3,400m³ of the agricultural building will be taken up by hay bales.

Justification of Volume of Building

As demonstrated above, the applicant has extensive land that needs to be harvested and as a result, requires storage for both wheat and barley as well as hay bales.

Whilst most of the bales will be sold off at the time of harvest and therefore not require storage, some of the bales will need to be safely stored throughout the course of the year.

As harvest periods will be staggered, we consider that this agricultural barn is the absolute minimum size our client needs in order to operate the agricultural holding effectively.

It is therefore considered that the agricultural barn pertinent to this application is entirely appropriate in terms of size, and a barn of a smaller size would hinder agricultural operations and not allow flexibility for changes in yields, machinery and other farming requirements.

Confirmation that the proposal complies with GDPO

Schedule 2, Part 6, Class A of the General Permitted Development Order (GDPO) 2015 (AS AMENDED) outlines what constitutes Permitted Development and what does not for agricultural development on units of 5 hectares or more. It is considered Permitted Development if:

- 'A. *The carrying out on agricultural land comprised in an agricultural unit of 5 hectares or more in area of -*
 - (a) *works for the erection, extension or alteration of a building; or*
 - (b) *any excavation or engineering operations, which are reasonably necessary for the purposes of agriculture within that unit'.*

As the proposed development is for the erection of a 783m² agricultural barn needed to store hay, equipment and machinery as well as the creation of 205m² hardstanding (totalling 988m²) on an area of land that is greater than 5 hectares, it is considered that the proposed development meets the criteria for Permitted Development.

Therefore, consideration must now be given to Schedule 2, Part 6, Class A.1 of the GDPO and address why it is considered that there are no reasons for the proposed development to not be considered as anything but Lawful Permitted Development.

In the following text subparagraphs (a) - (k) of Class A.1, Part 6 of Schedule 2 of the GDPO, which describe development that is not Permitted by Class A will be referenced, with an explanation to each subparagraph outlining why the application in discussion does not meet the criterion.

'A.1 *Development is not permitted by Class A if -*

- (a) *the development would be carried out on a separate parcel of land forming part of the unit which is less than 1 hectare in area'.*

As noted above, the development will not be carried out on a parcel of land which is less than 1 ha.

- '(b) it would consist of the erection or extension of any agricultural building on an established agricultural unit (as defined in paragraph X of Part 3 of this Schedule) where development under Class Q or S of Part 3 (changes of use) of this Schedule has been carried out within a period of 10 years ending with the date on which development under Class A(a) begins';*

Paragraph X of Part 3 of Schedule 2 defines established agricultural unit as 'agricultural land occupied as a unit for the purposes of agriculture'. It is noted that no development under Class Q or S of Part 3 (Change of Use) of Schedule 2 has been carried out by the applicant within a period of 10 years, nor will any development of that nature take place before the proposed development begins.

- '(c) it would consist of, or include, the erection, extension or alteration of a dwelling';*

The proposal does not consist of or indeed include the erection, extension or alteration of a dwelling.

- '(d) it would involve the provision of a building, structure or works not designed for agricultural purposes';*

The 783m² agricultural barn will only be used to support and enable the proper maintenance of and agricultural operations undertaken at Lomer Farm. As has been outlined above, safe and secured covered space is needed to provide storage for equipment and machinery used for maintaining the agricultural land and for hay and straw bales harvested from the farm holding.

The volumetric calculations above show that the proposal is entirely appropriate and is the **lowest possible area** needed to support the applicant's agricultural operations.

- '(e) the ground area which would be covered by -*
- (i) any works or structure (other than a fence) for accommodating livestock or any plant or machinery arising from engineering operations; or*
 - (ii) any building erected or extended or altered by virtue of Class A, would exceed 465 square metres, calculated as described in paragraph D.1(2)(a) of this Part'.*

The agricultural building will not be used for accommodating livestock or any plant or machinery arising from engineering operations.

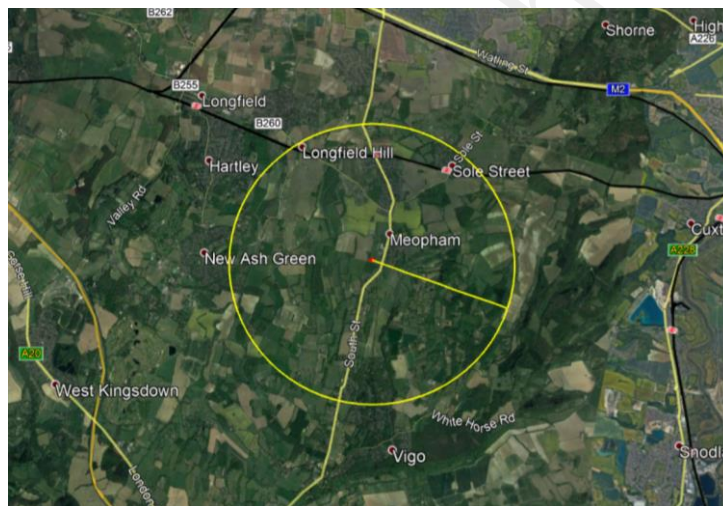
We note that the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2018 amends Class A of Part 6 of Schedule 2, substituting the

previously permitted 465m² figure to now allow buildings up to 1,000m². The proposal therefore meets this criteria, even when including the hardstanding (988m² in total).

It should be noted that the wording of Schedule 2, Part 6, Class A is somewhat vague, and it is not entirely clear whether hardstanding should be accounted for within the total calculation. However, this PNA has included hardstanding for completeness.

- '(f) the height of any part of any building, structure or works within 3 kilometres of the perimeter of an aerodrome would exceed 3 metres';*

The buildings height at ridge level will be 8.7m, however the structure will not be within 3km of an Aerodrome. The below figure shows a 3km radius from the application site in relation to nearby Aerodromes.



- '(i) it would consist of, or include, the erection or construction of, or the carrying out of any works to, a building, structure or an excavation used or to be used for the accommodation of livestock or for the storage of slurry or sewage sludge where the building, structure or excavation is, or would be, within 400 metres of the curtilage of a protected building';*

The Agricultural barn will be used for the storage of hay, machinery and equipment. No structure on the site will be used to accommodate the uses under (i) and therefore this provision does not bite.

- '(j) it would involve excavations or engineering operations on or over article 2(4) land which are connected with fish farming; or'*

At no point has or will the land been used in connection with fish farming.

- '(k) any building for storing fuel for or waste from a biomass boiler or an anaerobic digestion system—*
- (i) would be used for storing waste not produced by that boiler or system or for storing fuel not produced on land within the unit; or*
- (ii) is or would be within 400 metres of the curtilage of a protected building'.*

This Prior Notification is not for the storage of fuel or waste from a biomass boiler or an anaerobic digestion system, therefore it is considered that subparagraphs (i) and (ii) do not apply to this application.

Highways

The proposed agricultural barn will have little impact on the local highway network, indeed because more on site storage will be available the intensity of trips on the highway network and the ability to securely secure machine will reduce overall trips.

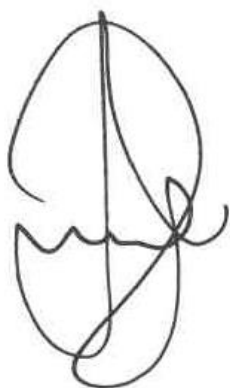
Conclusion

This Prior Notification Application has been prepared by DHA Planning on behalf of the applicant for the erection of a 783m² agricultural barn for the storage of straw, hay, equipment and machinery as well as the creation of 205m² hardstanding.

We reiterate that Green Belt, AONB and landscape character are not a reason for refusing applications that are made under Schedule 2, Part 6, Class A of the GDPO. The application must solely be determined by the criteria of The Order, and anything else is deemed as unreasonable.

It is therefore respectfully requested that Gravesham Borough Council acknowledge that Prior Approval is not required, and that the application conforms with the aforementioned Permitted Development Order.

Any queries please do contact jack.harley@dhaplanning.co.uk or dan.blake@dhaplanning.co.uk

A handwritten signature in black ink, appearing to be 'Jack Harley', written over a faint, large, diagonal watermark that reads 'Gravesham Borough Council'.

Jack Harley BA (Hons) MSc.
Planner