



Delegated Report

Householder Planning Application

Planning Application No: 20220183

Location: 1 Southfield Shaw Park Homes Harvel Road Meopham Gravesend

Description: Erection of single storey side extension to form entryway/utility room.

Applicant: Mr Markus Blythe

Site Visit Date: 25 May 2022

Submitted Documents/Plans

Householder Planning Application form;
Red line site boundary plan;
Existing western and eastern elevations;
Existing southern elevation;
Existing layout;
Existing Northern Elevation;
Proposed block plan;
Proposed western and eastern elevations;
Proposed southern elevation;
Proposed layout; and
Planning Statement 01 February 2022.

Relevant Planning History

Reference	Description	Decision	Decision Date
20180981	Retention of extension to existing home for storage, outbuilding used as storage and games room.	Permitted	12.04.2019
19950744	Removal of condition (i) granted planning permission under Ref No. GR/88/1003 from temporary use to permanent use of the site.	Permitted	22.03.1996
19881003	Continued use of land for a residential caravan site for a further period of 15 years.	Permitted	25.01.1989
19750514	Details of residential caravan site at former Vigo sewage disposal works.	Permitted	01.10.1978
19740626	Use of land for residential caravan site.	Permitted	14.01.1975

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development

- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 - Development & Design Principles
- CS20 – Heritage and the Historic Environment

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards
- T1 – Impact of Development on Highway Network
- TC7 – Other Archaeological Sites
- C13 – Extensions to dwellings in the countryside

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving Sustainable Development
- 13 – Protecting Green Belt land
- 12 – Achieving sustainable development and well-designed places
- 15 – Conserving and enhancing the natural environment
- 16 – Conserving and enhancing the historic environment

Supplementary Planning Guidance

- 2 - Residential layout guidelines including Housing Standards Policy Statement October 2015 Adopted 1996 – amended June 2020;
- Technical Housing Standards – nationally described space standard (2015);
- Householder Extensions/Alterations Design Guide (2021); and
- Gravesham Landscape Character Assessment (2009)

Consultations, Publicity and Representations

GBC - Highways Officer

I have no objection to the proposed extension, but it may be worth requesting a parking plan to ensure that the area set aside for car parking is clearly defined and protected by condition, in case of any other suggested alterations to this property.

Two parking spaces would be required for a three bedroom property each measuring 2.5 metres wide by 5 metres deep

GBC - Service Manager (Property & Regulatory Services)

Applications relating to Southfield Shaw need to be sent to Housing.

GBC - Service Manager (Housing Landlord Services)

No response received.

Biodiversity Officer

No ecological information has been submitted with this application. As a result of reviewing the data we have available to us (including aerial photos and biological records) and the information submitted with the

planning application, we advise that the proposed development has limited potential to result in ecological impacts and as such we are satisfied that there is no requirement for an ecological survey to be carried out.

We have taken this view because photos provided by the planning officer demonstrate that the development footprint is short grassland/hard standing and therefore not providing optimal habitat for protected/notable species. The photos of the dwelling indicate that it is in good condition and do not provide cracks or crevasses which may be used by roosting bats.

KCC - Heritage

No response received.

Meopham Parish Council

No objection.

Neighbouring properties

The application was publicised by a site notice and to two neighbouring properties by letter. No representations have been received.

Officer's Analysis

The application site is located in the Green Belt and as such, Policy CS02 of the Gravesham Local Plan Core Strategy September 2014 is relevant. Policy CS02 prioritises development in the urban area as a sustainable location for development. In the rural area it states that development will be supported within rural settlements that are inset from the Green Belt and defined on the Policies Map. Development outside those settlements (which is the case here), will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy.

The principle issues in the determination of this application are;

- Is the proposed development appropriate in the Green Belt?
- Effect on the openness of the Green Belt
- Effect on the character and appearance of the area - including landscape character
- Other matters
- Very special circumstances

Is the proposed development appropriate in the Green Belt?

Paragraph 137 of the National Planning Policy Framework (NPPF 2021) sets out that the essential characteristics of Green Belts are their openness and permanence and paragraph 138 lists the five purposes that the Green Belt serves. At the application site, the Green Belt assists in safeguarding the countryside from encroachment. Paragraph 147 of the NPPF 2021 states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 149 of the NPPF 2021 states that the construction of new buildings should be regarded as inappropriate development in the Green Belt, but lists certain exceptions. These exceptions are set out in sub-paragraphs 149(a) to 149(g).

However, as a caravan, the application property is not a building, it is a use of the land and therefore it does not meet any of these exceptions.

The definition of a caravan is set out in the Caravan Sites and Control of Development Act 1960, as supplemented by the Caravan Sites Act 1968 and is summarised as follows;

Any structure designed or adapted for human habitation which is capable of being moved from one place to another, whether by being towed or by being transported on a motor vehicle or trailer, and any other motor vehicle so designed or adapted, subject to certain exceptions. Units of not more than two

sections, constructed or designed to be assembled on site by means of bolts, clamps or other devices and not exceeding 20 metres by 6.8 metres externally and internally 3.05 metres when measured from internal floor to ceiling.

As a result of the proposed development, the width of the application property would increase from 5.8m to 8.1m and as such, it would exceed the above dimensions and would no longer meet the definition of a caravan.

It should be noted that the application property has already been subject to a number of physical alterations, including the erection of an extension on the north eastern elevation, raised decking on the south eastern elevation and a brick surround at the base. The extension has planning permission (reference 20180981) but it is noted that the current use and layout of the structure is not consistent with that approval. There have been no planning permissions for the raised decking or brick surround. In the absence of planning permission and due to the discrepancy with the use and layout of the existing extension, these works have been referred to GBC Planning Enforcement for investigation.

The existing extension is a relatively small construction, which has not undermined the status of the property as a caravan. Indeed a previous appeal decision in Southfield Shaw (reference APP/K2230/D/18/3207576 attached as Appendix 1) has provided clarification on the impact of extensions to caravans within Southfield Shaw and states;

“However, and contrary to the concerns expressed by the Council, I also do not consider that the addition of the proposed small porch, given its small scale in relation to the main structure, would be sufficient, on its own, to change the caravan to a permanent building.”

Although the existing extension at the application site is slightly larger than the development referred to by the inspector, it is considered that it is not sufficient to change the caravan into a permanent building. It is especially noted that the extension did not increase the length of the caravan beyond the above dimensions.

The other existing physical alterations to the application property would also not undermine the status of the property as a caravan. This is because the raised decking is easily detachable and the caravan could easily be lifted off the brick surround. Therefore for the purposes of determining this application, the existing property is a caravan, which is a use of the land.

Paragraph 150 of the NPPF 2021 identifies forms of development which are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within in it. One such form of development are material changes in the use of land, examples of which include uses for outdoor sport or recreation, or for cemeteries and burial grounds. However, the proposed development would comprise of operational development, not a use of the land and therefore it would not be in line with paragraph 150 of the NPPF 2021.

The proposed development would be a permanent and substantial construction, which if granted would increase the scale and mass of the structure and would alter the nature of the property from a caravan to a building (by virtue of the cumulative impact of all the physical alterations to the property permanently attaching the caravan to the land). Such an alteration would set an unacceptable precedent at the Southfield Shaw Caravan Park, by facilitating the creation of a permanent new dwelling in the Green Belt. This precedent could be repeated across Southfield Shaw (where there are 60 caravan plots), leading to a significant encroachment over the countryside and substantial harm to the openness of the Green Belt.

Overall, it is considered that the proposal would be inappropriate development in the Green Belt, which would be contrary to Policy CS02 of the Gravesham Local Plan Core Strategy (September 2014) and to paragraphs 149 and 150 of the NPPF 2021.

Effect on the openness of the Green Belt

Paragraph 137 of the NPPF 2021 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The proposed development, by its nature as an additional form of built development at the property, would erode the openness of the Green Belt.

The application site is located within the area known as Southfield Shaw Caravan Park, where caravans are located on small plots and arranged in rows. The application property is in a very prominent position at the park entrance, located immediately adjacent to the main access road that runs through the site. It is therefore highly visible to passers-by, both within the park and on Harvel Road.



January 2021 Google Earth Image

The proposal would be a sizable addition to the caravan, which would increase the scale and mass of the structure and which would make it a permanent feature rather than a use of the land. As a result, in both visual and spatial terms, the openness of the Green Belt would be reduced and the proposal would be harmful.

Effect on the character and appearance of the area

Policy CS19 of the Gravesham Local Plan Core Strategy September 2014 requires new development to be visually attractive, fit for purpose and locally distinctive. It should conserve and enhance the character of the local built, historic and natural environment and integrate well with the surrounding local area. In particular the design of new development should be derived from a robust analysis of local context and character and make a positive contribution to the street scene and the character of the area.

The application site is located in the Harvel Wooded Downs Landscape Character Area (LCA) and as such, Policy CS12 of the Gravesham Local Plan Core Strategy September 2014 is also 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.

The Harvel Wooded Downs Landscape Character Area is characterised by varied topography with steep valley sides and plateaux. Ancient woodland, chestnut coppice and small paddocks and pastures can be found. Views both within and out of the character area are limited because of the combined effect of topography and the heavily wooded character of the landscape.

The application site would be visible within the wider landscape from the south, by virtue of its location close to the junction with Harvel Road. Although it is noted that screening by mature vegetation exists on the boundaries of the Southfield Shaw Site that screens it from view in any other direction.

Within the Southfield Shaw site, the extension would be visually prominent (by virtue of its location adjacent to the access road and entrance). However it would be visually in keeping with the residential nature of surrounding caravan plots. Therefore there would be no significant adverse impacts to landscape character.

In terms of design, the proposed development would be subservient to the existing property by virtue of its size and location and having a flat roof and the proposed materials and would match with existing.

Overall it is considered that the proposed development would not be detrimental to the character or appearance of the surrounding area and would be in line with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Other matters

Amenity of Future Occupiers

The proposed development would provide a good standard of living for future occupiers and sufficient garden would be retained. As such, the proposal would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy (September 2014).

Neighbouring Amenity

The closest residential properties to the application site are no. 2 Southfield Shaw (located to the north) and Hilltop, Southfield Shaw (located to the north west).

Due to the design of the proposal and the layout and orientation of the surrounding properties, it is considered that there would be no adverse overlooking, overshadowing or overbearing impacts to the occupiers of any surrounding residential property. Therefore the proposed development would be in line with Policy CS19 of the Gravesham Local Plan Core Strategy September 2014.

Parking and highways issues

The proposed development would not affect the existing on-site parking area, which would be retained and the proposal would not alter the amount of bedrooms within the caravan. As such, the proposed development would have no adverse highways impacts and would be in line with Policy CS11 of the Gravesham Local Plan Core Strategy (September 2014) and Saved Policies T1 and P3 of the Gravesham Local Plan First Review November 1994.

The GBC Highways Officer suggests that a parking plan should be requested to ensure that the area set aside for car parking is clearly defined and protected by condition, in case of any other suggested alterations to this property. However it is considered that this request would be unreasonable in the context of the current application, as there would be no impact on the existing parking provision.

Biodiversity

The application site is located in a rural area, adjacent to an area of ancient woodland. The Biodiversity Officer has advised that the proposed development has limited potential to result in ecological impacts and as such, there is no requirement for an ecological survey to be carried out. Therefore the proposed development would have no adverse impacts on biodiversity and would be in line with Policy CS12 of the Gravesham Local Plan Core Strategy (September 2014).

Any Other Material Planning Considerations

The application site is located within an area of multi-period archaeological potential. However, as the proposed development would be within the confines of an existing residential plot with relatively few groundworks, then it is considered that there would be no adverse impacts to archaeology.

It is noted that Meopham Parish Council have not raised an objection to the proposed development.

Very Special Circumstances

No argument has been put forward by the applicant in relation to the assessment of 'very special circumstances'. However the following issues are relevant to consider.

It is noted that if the application property were considered to be a building, sub-paragraph 149(c) of the NPPF 2021 would be relevant. This paragraph sets out that 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, is appropriate development in the Green Belt.

Saved Policy C13 of the Gravesham Local Plan First Review (November 1994) relates to extensions to dwellings in the countryside. It sets out a number of criteria that should be met when considering proposals for domestic extensions. As the policy pre-dates the NPPF, the weight attached to the policy must be considered carefully; with greater weight being given where the approach is consistent with paragraph 149 the NPPF 2021.

In particular Saved Policy C13 places an overall limit on extensions of one third of the gross floor area of the original dwelling unless the increased floor space has no overall effect on the existing bulk and appearance of the dwelling (criteria (ii)). It also requires the massing, scale and form of any extension to be appropriate to the existing dwelling and the Green Belt setting (criteria (vi)). It is considered that these factors are relevant in determining whether the size of an extension is proportionate and as such, these aspects of the policy are broadly in line with the NPPF and should be afforded weight.

According to the submitted details, the application property has an original floor area of 81 square metres (this does not include the existing extension, as it is clearly not an original part of the structure or the bay windows, which do not reach ground level). The proposed extension would add 16.5 square metres of floor area and the existing extension has added 8.3 square metres of floor area. Cumulatively as a result of the proposed development, the total additions to the application property would be 24.8 square metres or 31% above the original.

As such, the proposed development itself would not result in disproportionate additions above the floor area of the original property. However as set out above, the application property is a caravan and not a building and therefore, despite this size consideration, the proposal would be substantially harmful to the openness of the Green Belt and would lead to a permanent encroachment over the countryside, by virtue of allowing the application property, a caravan, to become a permanent building.

It is also noted that there are a number of existing porches and other extensions to caravans within Southfield Shaw Caravan Park. These alterations, where subject to a planning application, would have been assessed in line with Green Belt and other development plan policy. It is likely that where the larger examples of existing extensions were allowed, the original caravans were relatively small. However in this instance, the existing caravan has a large floor area and the proposed extension would be relatively large when compared to any existing extension in Southfield Shaw. Therefore the existence of other extensions in the surrounding area would not provide a justification for overriding the established Green Belt approach in this case.

Conclusion & Recommendation

The above discussion sets out that the proposed development, by virtue of it altering the application property from a caravan to a building, would be harmful to the openness of the Green Belt and would lead to a permanent encroachment over the countryside. Furthermore it would set a precedent that could be repeated across similar plots within Southfield Shaw Caravan Park, causing substantial harm to the openness of the Green Belt. As such, the proposal would be inappropriate development in the Green Belt.

Arguments in favour of the proposal include that there would be no adverse impacts to the character and appearance of the existing building or surrounding area, to residential amenity, to highway safety or to biodiversity.

However it is concluded that the definitional and actual harm to the openness of the Green Belt and to the

purpose of including land within it, would not be outweighed by the benefits arising from the proposed development. Therefore there are no very special circumstances that would justify an exception to the established Green Belt policy approach and planning permission should be refused.

The application site should be referred to GBC Planning Enforcement for further investigation.

(For detailed reasons for refusal and informatives, see draft Decision)

Case Officer:	Mrs Kelly Joyce	Team Leader:	Richard Hart
Signed:	<i>K Joyce</i>	Signed:	<i>R Hart</i>
Dated:	23rd June 2022	Dated:	23rd June 2022