

planning transport design environment infrastructure

Planning Statement prepared on behalf of the Applicant, Meopham Veterinary Hospital, in respect of a Full Planning Application for an extension to the existing building and change of use of land to form an extended carpark with associated works and landscaping at Meopham Veterinary Hospital, Wrotham Road, Meopham, DA13 0QG.

May 2022 - JAC/DRB/16731



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Appendix 1 – 5no. letters of support (incl. Professor Chris Proudman of University of Surrey, Sian Rosser of University of Surrey, Red House Kennels, Two Gates Boarding Kennels, and Ward Security).

1 Introduction

1.1 Purpose of Statement

1.1.1 This statement has been prepared by DHA Planning on behalf of the Applicant, Meopham Veterinary Hospital (known as 'Meopham Vets'), in respect of an application relating to Meopham Veterinary Hospital ('MVH'), Wrotham Road, Meopham, DA13 0QG (known as 'the Site').

1.1.2 Full planning permission is sought for:

'a 368m² extension to an existing veterinary hospital, comprising a euthanasia room, hospital pharmacy, clinical storage/ medical records room, surgical instrument preparation and autoclaves room, endoscopy and ethylene oxide room, library and clinical offices and meeting space, kitchen, staff restroom and dining area, and on-call bedroom with ensuite and disabled toilet facilities, as well as the change of use of land to form an extended carpark with EV charging comprising 10no. additional parking spaces on the adjoining parcel of land.'

1.1.3 This statement provides an overview of the site, its context and the relevant planning history, as well as a review of the applicable development plan, the National Planning Policy Framework (NPPF or 'the Framework') and other relevant guidance.

1.1.4 This statement concludes that the proposal is an acceptable form of development in line with national Green Belt policy and would enhance the existing capacity of the veterinary hospital to support the training of veterinary professionals and to deliver specialist veterinary care. As a result, planning permission should be granted without hesitation. Should Gravesham Borough Council (hereafter 'Gravesham BC') not agree with this conclusion, there is a compelling case of Very Special Circumstances.

1.1.5 This application is also supported by 5no. letters of support which are attached as **Appendix 1**.

1.2 Background of Meopham Veterinary Hospital

1.2.1 Meopham Veterinary Hospital opened in September 1996 as a veterinary practice employing 1no. veterinary surgeon and 2no. additional members of staff. It has now grown to employ 10no. veterinary surgeons, 26no. nurses as well as 10no. administrative and support staff. The practice employs a further 6no. veterinary surgeons, 10no. nurses as well as 2no. administrative and support staff in practices based in Swanscombe, Sevenoaks and Tonbridge.

1.2.2 The specialist facility provides essential care, including specialist orthopaedic and surgical care, as well as rehabilitation for pets. Meopham Vets has one of only three CT scanners in Kent and is one of a very limited number of locations able to undertake complex orthopaedic and soft tissue surgery in the area. This leads to more prompt diagnoses and more rapid onward medical or surgical care, whilst also reducing the carbon footprint that clients would otherwise emit travelling to veterinary hospitals in London or outside the county. It is therefore evident that the practice provides essential care and is a vital community service.

- 1.2.3 It should also be noted that Meopham Vets are the first practice in the UK to have taken in a Ukrainian veterinary surgeon and partner. This demonstrates the resilience of the practice and its drive to help the local and wider community in its work.

1.3 Context of Application

- 1.3.1 Prior to this Application being submitted and in line with Paragraph 39 of the Framework, a Parish Council meeting was requested by John Collins (Director at DHA Planning) on 26th April 2022 to outline the intentions of the proposal as well as to share existing and proposed plans. It was however confirmed on 27th April 2022 by Shaun Fishenden (Clerk and Responsible Finance Officer at Meopham Parish Council) that the Chairman of the Parish Council preferred not to have a discussion prior to submission of a formal application.
- 1.3.2 Mr Fishenden confirmed that once the Application has been submitted, the Parish would be open to allowing the applicants to speak at the relevant 'Planning Applications Working Group meeting', which is now intended.
- 1.3.3 At this meeting and throughout this statement it will be explained that at present the site is no longer able to fully and properly support the level of demand arising, due to:
- pet ownership rising significantly during lockdown (enquiries increased by more than 253% during this period¹ and 3.2m UK homes have a pandemic pet²);
 - insufficient parking at the site for clients and staff (46no. staff with 33no. available parking spaces);
 - insufficient space for storage of clinical equipment and medical records;
 - insufficient sterilisation and surgical instrument preparation facilities;
 - Inadequate pharmacy space for safe storage for medicines and controlled drugs;
 - insufficient rest and WC facilities for staff and clients;
 - Inadequate space for medical library, clinical offices and learning space;
 - no suitable space for physiotherapy services; and
 - no suitable space for dedicated euthanasia space.

¹ Increased pet ownership/ enquiries during lockdown (PFMA, 2021)- <https://www.pfma.org.uk/news/pfma-confirms-dramatic-rise-in-pet-acquisition-among-millennials-#:~:text=%E2%80%9CDemand%20for%20pets%20over%20the,of%20which%20were%20for%20dogs>

² Number of pandemic pets (PFMA, 2021)- <https://www.pfma.org.uk/news/pfma-releases-latest-pet-population-data>

- 1.3.4 As a result, an extension to the existing veterinary hospital is required to meet this increased need and to ensure appropriate care can be provided to animals within the community.
- 1.3.5 We note in this respect that Kent has seen a substantial increase in housing over the last 15 years, particularly in the West Kent, Ebbsfleet and the Medway area. This is particularly owed to population growth within Gravesham, Dartford, Medway and Sevenoaks, as well as projected population growth within these areas. The table below has been included in this report to clearly demonstrate how local populations are increasing. It also demonstrates that access to a well-developed Royal College of Veterinary Surgeons (RCVS) accredited veterinary hospital in Meopham is therefore key to provide care for pets of rising local populations, whilst also creating local jobs and supporting the local economy.

Area	Previous Population	Current Population (2019-2022)	Projected Population
Gravesham	101,076 (2010) ³	106,900 ⁴	114,000 (2026) ⁵
Dartford	102,010 (2014) ⁶	114,100 ⁷	126,700 (2028) ⁸
Medway	268,130 (2012) ⁹	279,142 ¹⁰	284,300 (2028) ¹¹
Sevenoaks	109,305 (2010) ¹²	121,400 ¹³	125,200 (2028) ¹⁴

- 1.3.6 In addition to the growing 'need' for an extended veterinary hospital, Meopham Vets is an approved Veterinary Hospital certified by the RCVS which engages heavily in veterinary training. This includes:
- Intra Mural Rotation (IMR). This is a rotating block placement throughout the year with the University of Surrey, in which groups of 2no. final year veterinary students are trained at the hospital for a 4 week period.

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

⁴ https://www.kent.gov.uk/_data/assets/pdf_file/0018/14724/Mid-year-population-estimates-total-population-of-Kent-bulletin.pdf

⁵ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

⁷ https://www.kent.gov.uk/_data/assets/pdf_file/0018/14724/Mid-year-population-estimates-total-population-of-Kent-bulletin.pdf

⁸ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

⁹ https://www.medway.gov.uk/download/downloads/id/5388/demography_population_2020.docx

¹⁰ https://www.medway.gov.uk/download/downloads/id/5388/demography_population_2020.docx

¹¹ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

¹² file:///C:/Users/Dan.Blake/Downloads/Sevenoaks_Population_and_Social_Profile_May_2010.pdf

¹³ https://www.kent.gov.uk/_data/assets/pdf_file/0019/14725/Mid-year-population-estimates-age-and-gender.pdf

¹⁴ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

- Extra mural studies, which involves observing and on the job training during years 3 and 4 of the university veterinary course. Students attend throughout the year from all of the UK veterinary courses.
 - Student nurse placements, for nurses studying degrees in veterinary nursing - the practice currently has three students on block placements;
 - School age work experience for local school children interested in careers involving medical sciences, science, administration and work based accounts.
- 1.3.7 As is explained below, this element of the operation and activity at the site is crucial in trying to help address the current significant shortage in available veterinary experts in the UK, which is evidenced by the profession being listed on the Government's 'Skilled Worker visa: shortage occupations'¹⁵.
- 1.3.8 Vets are also trained at Meopham, in particular post graduate areas of expertise. Nursing staff are also supported to achieve Royal College accredited Nursing qualifications. Advanced qualifications include ophthalmology, surgery, diagnostic imaging, medicine, as well as emergency and critical care.
- 1.3.9 In this context, it is important to note that this proposal seeks to enable Meopham Vets to boost the pool of veterinary professionals due to major employment problems in veterinary medicine with 20-30% less vets than required to meet needs in the UK.
- 1.3.10 Workforce shortages are a key challenge facing the veterinary profession. While this is not a new phenomenon, the issue has been exacerbated significantly by recent events, including the additional pressures on the profession brought by the Covid-19 pandemic, changes to the situation of EU vets caused by Brexit, and an increase in demand for vets driven by a surge in pet ownership in the UK.¹⁶
- 1.3.11 The proposal therefore seeks to support the existing 46no. staff in delivering a high quality veterinary service for the local community and pet owning population of North Kent. The proposal also supports the veterinary practice to address the chronic shortage of suitably qualified and skilled veterinary professionals.
- 1.3.12 We acknowledge that the site lies in the Green Belt and that there are sensitive matters to be balanced. However, the proposals are well-informed and we firmly consider the proposed extension aligns with Paragraph 148 (c) of the Framework. In addition, the circumstances of the case present a coherent set of 'Very Special Circumstances' which support development in the Green Belt, including:
- The site is a certified RCVS veterinary hospital (one of only eight in the country);
 - The veterinary hospital is a significant employer;

¹⁵ Skilled Worker visa: shortage occupations- <https://www.gov.uk/government/publications/skilled-worker-visa-shortage-occupations/skilled-worker-visa-shortage-occupations>

¹⁶ 'Recruitment, retention and return in the veterinary profession' (RVCS Workforce Summit 2021)- <file:///C:/Users/Dan.Blake/Downloads/retention-recruitment-and-return-in-the-veterinary-profession-preliminary-report.pdf>

- The site has specialist equipment and facilities essential to meet needs in the Gravesham BC area;
 - The site is a training centre for veterinary professionals and provides an essential role for both students and specialists. This ongoing training will also help to address the chronic shortage of suitably qualified and skilled veterinary professionals;
 - The proposal meets current needs arising from the operation of the hospital (a matter exacerbated by the Covid-19 pandemic, changes to the situation of EU vets caused by Brexit, and an increase in demand for vets driven by a surge in pet ownership in the UK) in response to a RCVS inspection such that the works are 'required';
 - The veterinary profession is currently listed on the Government's 'Skilled Worker visa: shortage occupation (updated February 2022);
 - The site provides an essential 'community service' and constitutes 'community infrastructure' necessary to provide sustainable communities;
 - The provision of specialist services that are not available at other local veterinary practices, such that failure to expand the facility will simply result in additional 'patient miles', which would not present a sustainable approach to development; and
 - The current parking is inadequate and usage levels could result in backing up on the highway unless additional provision is made.
- 1.3.13 Overall, the proposal has been sensitively designed to maintain the openness of the Green Belt and will help to address the significant undersupply of veterinary professionals, as well as to provide the space necessary to carry out essential veterinary work.

1.4 Application Documents

- 1.4.1 This statement should be read in conjunction with the following documents which form the Application:

Reference	Information Provided
-	Application Form (completed online)
	Reports (DHA Planning)
JAC/DRB/16731	This Planning Statement
	Plans (Metson Architects)
2118-TP-00	Location Plan and Existing Site Plan
2118-TP-01	Proposed Site Plan

2118-TP02	Proposed Ground Floor Plan
2118-TP03	Proposed Elevations and Cross-Section

Table 1 – Application Documents.

Gravesham Borough Council

2 Site and Surroundings

2.1 Site Location and Description

- 2.1.1 The application site measures approximately 0.41 ha and is situated to the west of Wrotham Road (A227), which provides access to the site. The site lies to the south of the settlement confines of Meopham Green, so is considered countryside in planning terms.

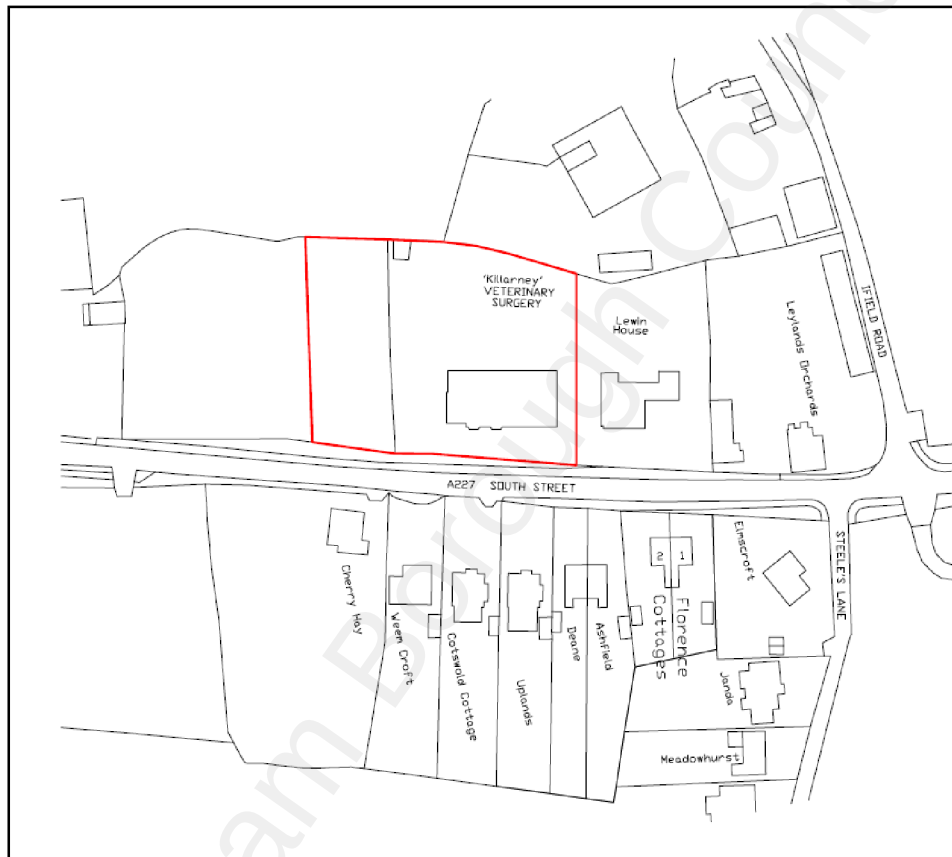


Figure 1: Existing Site Location Plan (Courtesy of Metson Architects).

- 2.1.2 The site currently comprises the Meopham Veterinary Hospital, an ancillary car park with provision for 33no. vehicles, and an outbuilding. An acoustic fence borders the site to the rear and boundary vegetation is located around the periphery. As stated, there is a currently a parking issue at the site which is evidenced by the following photographs.



Figure 2: Evidence of Parking Problems (Courtesy of Martin Hobbs, Principal at Meopham Veterinary Hospital),



Figure 3: Evidence of Parking Problems (Courtesy of Martin Hobbs, Principal at Meopham Veterinary Hospital),



Figure 4: Evidence of Parking Problems (Courtesy of Martin Hobbs, Principal at Meopham Veterinary Hospital),

- 2.1.3 The existing property at Meopham Veterinary Hospital presents a one and a half storey building which has been converted historically from a dwelling to a nursing home, and then to a veterinary practice. The property has a pitched roof with gable end features and bay windows to the south of the building. It has historically been extended to the north and western side to provide improved facilities for the veterinary hospital, including for CT scanners and other specialist equipment.
- 2.1.4 To ensure that the community role of the veterinary hospital is fully understood it is essential to set out the specialisms provided at the facility. These are;
- CT Scanner – there are only 3 in Kent in total and MVH takes referrals from 20 other veterinary practices.
 - Surgery, orthopaedic, soft tissue and laparoscopic surgery. MVH is one of a very limited number of sites in Kent, accepting referrals from practices within the county.
 - Ophthalmology – MVH has post graduate level expertise, accepting referrals from London, Kent and Sussex.
 - MVH is an Approved Veterinary Hospital, (RCVS), one of only 8 in the county.
 - The practice provides an emergency service 24hour a day, 365 days a year, limiting the distance animals need to travel to get emergency and critical care help.

- 2.1.5 Set out later in this statement is the requirements of the Royal College of Veterinary Surgeons, following a site visit in October 2021.
- 2.1.6 It is important to note that the entirety of the site sits within the London Area Green Belt and a Special Landscape Area.
- 2.1.7 The site does not however form part of an Area of Outstanding Natural Beauty (AONB). It should also be noted that there are no Listed Buildings within the immediate area (Leylands Barn lies approximately 60m to the north and is physically screened by Lewin House such that there is no intervisibility between the proposal and the Listed Building) nor are there any Sites of Special Scientific Interest (SSSI) or Public Rights of Way (PRoW) that would be materially impacted by the proposal. In addition, the site is located in Flood Zone 1 (least likely to flood).

2.2 Surrounding Location

- 2.2.1 The immediate locality of Wrotham Road is characterised by linear development comprising detached residential dwellings and agricultural land.
- 2.2.2 There are a number of services and facilities within a short walking distance of the site, including but not limited to: Happyfish Books (book shop), Steeles Wood Farm (equestrian centre), West Lodge Farm, White Finch Bakery, Meopham Green Baptist Church, Meopham Cricket Club, The Cricketers Inn, Meopham School of Driving, Meopham Valley Vineyard and Meopham Secondary School.
- 2.2.3 In terms of accessibility, the site links via Wrotham Road to the A2 which provides access towards London and east Kent via the M2. In addition, 2no. bus stops are located within 100m of the site and provide regular services between Gravesend, Sevenoaks, Vigo Village, Borough Green, Tonbridge, Willmington, Swanscombe, New Ash Green, Instead Rise, Bluewater and Denton via service number 223, 305, 306, 308, 408, 418, D13 and VIGO1. Meopham Train Station also lies 3km north of the site and offers services between Gillingham (Kent), Dover Priory and London Victoria.
- 2.2.4 In this respect and in respect of the existing veterinary hospital at the site, we submit that the site is sustainably located for the proposed development, lying close to amenities, services and strategic road networks. This is extremely important as the range of specialisms provided at the Hospital are such that the facility serves a wide area.
- 2.2.5 To put this in context, the nearest comparable Hospital facility heading north west is in Sidcup, to the east in Canterbury, to the south east in Ashford and Maidstone. Thus, the hospital serves the whole of the Medway Estuary conurbation as well as the towns and villages within a 10-15 mile radius. The mapping below demonstrates this clearly.



Figure 5: Veterinary Hospitals in the South East with 10km radius around Site (Courtesy of Google Earth).

2.3 Planning History

2.3.1 According to the Gravesham Borough Council planning history database, the site has been subject to the following planning applications:

Application Ref.	Description	Decision
20200865	Engineering works and change of use of paddock land to create 20 parking spaces including landscaping, access and associated works.	Refused- 27 October 2020.
20190698	Application for the approval of condition 4 of planning permission reference number 20181229 relating to a noise impact assessment due to animals in veterinary kennels.	Permitted- 02 Sep 2019
20181229	Erection of a single storey rear extension existing building to provide 14no. additional kennels.	Permitted- 22 January 2019.
20150525	Display of two internally illuminated fascia signs and a double-sided, internally illuminated, projecting box sign on the front elevation, a free-standing, externally illuminated totem sign at the front and two non-illuminated wall signs.	Permitted- 21 July 2015.
20140694	Erection of single storey side and rear extension with enlarged rear gables and two dormer windows to form enlarged veterinary hospital and re-modelling of car park to form additional parking facilities with improved landscaping.	Permitted- 22 December 2014.
20090066	Application for approval of condition 1 of planning application reference number 20050002 allowed on	Permitted- 27 February 2009.

	Appeal reference number APP/K2230/A/05/1177669 relating to the revised details of parking and turning area for horse boxes and trailers.	
20081080	Application for approval of condition 2 of planning permission reference number 20080822 relating to the environmental noise assessment.	Permitted- 12 January 2009.
20081093	Application for approval of condition 6 of planning permission reference number 20080822 relating to the landscaping scheme.	Permitted- 06 January 2009.
20080822	Erection of single storey rear extension in substitution to that previously permitted under planning permission reference number 20080195 for revised internal layout of the rooms.	Permitted- 04 November 2008.
20080195	Erection of single storey rear extension to form sterilisation/sluice room, ophthalmic room and surgical instrument store.	Permitted- 28 April 2008.
20060819	Erection of storage shed to replace existing greenhouse.	Permitted- 23 November 2006.
20050864	Alterations to the rear roof to provide a gable end to south west wing and conversion of additional roof space into overnight veterinary accommodation and an enlarged office.	Permitted- 02 December 2005.
20050002	Application for variation of condition 17 of planning permission reference number GR/2002/159 which prevents horse boxes being kept or parked on the site at any time, to allow horse boxes and trailers to be parked in the car park.	Refused- 17 February 2005.
20030666	Display of an externally illuminated free-standing 'v' shaped signboard in the front garden.	Approved- 23 September 2003.
20020159	Change of use of dwelling/former nursing home into a veterinary surgery with associated offices, overnight accommodation and the laying out of 18 no. car parking spaces.	Permitted- 08 July 2002.

3 Proposed Development

3.1 Introduction

- 3.1.1 As aforementioned, this application seeks detailed planning permission for:

'a 368m² extension to an existing veterinary hospital, comprising a euthanasia room, hospital pharmacy, clinical storage/ medical records room, surgical instrument preparation and autoclaves room, endoscopy and ethylene oxide room, library and clinical offices and meeting space, kitchen, staff restroom and dining area, and on-call bedroom with ensuite and disabled toilet facilities, as well as the change of use of land to form an extended carpark with EV charging comprising 10no. additional parking spaces on the adjoining parcel of land.'

3.2 Overview

- 3.2.1 The proposed single storey extension will provide 368m² of additional floor space and will project approximately 12m to the west of the existing veterinary practice, with a width of approximately 30.3m.
- 3.2.2 The need for the facilities follows an inspection by the Royal College of Veterinary Surgeons in October 2021 and a realisation that there is simply not enough space within the premises to meet patient needs, or indeed the needs of staff and customers, including car parking. This became a particular concern during the pandemic, but the situation persists.
- 3.2.3 The site needs a pharmacy area, proper physio facilities, secure storage, proper sterilisation space, an endoscopy room, euthanasia room, improved office space and library, and welfare facilities.
- 3.2.4 As aforementioned, the extension will provide a euthanasia room, hospital pharmacy, clinical storage/ medical records room, surgical instrument preparation and autoclaves room, endoscopy and ethylene oxide room, library and clinical offices and meeting space, kitchen, staff restroom and dining area, and on-call bedroom with ensuite and disabled toilet facilities.
- 3.2.5 It is important to note that vets are required to sleep onsite due to the ongoing needs of pets and at present, the practice does not currently have an on-call bedroom with a "put you up" in the office. This is a highly unsatisfactory arrangement.
- 3.2.6 As such, the proposal seeks to resolve the currently cramped and inadequate arrangement of the building. In addition, the autoclaves and other activities are currently undertaken in corridor spaces which is also highly unsuitable. There are 10no. vets and 26no. nurses and only 4no. desks. This leads to inefficiency and wasted time which at a time of ever-increasing demands on the Hospital, is very unhelpful.
- 3.2.7 Accordingly, the extension will create additional capacity with regard to the facilities available as well as the number of staff and trainees who can work and access the facilities. This will ensure the long-term success of the hospital with regard to staff-wellbeing, will ensure the site can make a significant ongoing

contribution to student veterinary and nurse training, as well as in specialist care. In addition, the health and wellbeing of animals will benefit.

- 3.2.8 The proposal also seeks to provide 10no. additional parking spaces on the adjoining paddock, including 4no. disabled bays, to take the total parking provision to 43no. spaces. Experience during the recent pandemic has been that the site can no longer adequately accommodate staff, vets in training and customers. The opportunity is therefore to be taken to provide replacement and additional parking as a change of use of the adjacent parcel of land. It is proposed that substantial additional native planting will take place to minimise the visual impact of such works. We have supplied photographic evidence of the problems currently arising and have a concern that unless the situation is resolved, there will inevitably be issues with vehicles finding it difficult to enter the site. Backing up onto the highway could be expected to result in highway hazards.
- 3.2.9 These additional parking spaces will be supported by 6no. Electric Vehicle charging points. This demonstrates how the proposal will support the transition away from traditional vehicles, as for example - new conventional petrol and diesel cars and vans will be banned from sale in the UK from 2030²⁷.

²⁷ Shift towards electric vehicles by 2030 - <https://www.autoexpress.co.uk/news/108960/2030-petrol-and-diesel-ban-what-it-and-which-cars-are-affected#:~:text=New%20conventional%20petrol%20and%20diesel,everything%20you%20need%20to%20k,now&text=All%20new%20conventional%20petrol%20and,banned%20from%20sale%20in%202030.>

4 Planning Policy Framework

4.1 Overview

- 4.1.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the determination of development proposals should be made in accordance with the relevant policy provisions of the statutory Development Plan, unless material considerations indicate otherwise.
- 4.1.2 For the purposes of this application, the Development Plan for Gravesham comprises:
- Gravesham Local Plan Core Strategy (September 2014); and
 - Remaining Saved Policies of the Local Plan First Review (1994).
- 4.1.3 There are several other planning policy documents which are of relevance to the consideration of planning applications and are material considerations, including the National Planning Policy Framework (NPPF), the National Planning Practice Guidance (NPPG) and supplementary planning guidance
- 4.1.4 This section of the statement therefore highlights the aspects of the Development Plan and NPPF that are relevant to this application, as well as any other key material considerations.

4.2 Gravesham Local Plan Core Strategy (September 2014)

- 4.2.1 The Core Strategy sets out the Council's spatial vision and strategic objectives for the Borough to 2028 and the policies which will deliver them. It identifies the main areas where major change is likely to take place and allocates sites which are key to achieving the strategy.
- 4.2.2 The application site is shown as being within the countryside, the settlement confines of Meopham Green.
- 4.2.3 The most relevant policies from the adopted Core Strategy in relation to this development are as follows:

Policy Reference	Description
CS01	Sustainable Development
CS02	Scale and Distribution of Development
CS07	Economy, Employment and Skills
CS10	Physical and Social Infrastructure
CS11	Transport
CS18	Climate Change
CS19	Development and Design Principles

4.3 Gravesham Local Plan First Review 1994

- 4.3.1 The Gravesham Local Plan First Review was originally adopted in November 1994.
- 4.3.2 A substantial number of policies of the Gravesham Local Plan First Review were saved by a Direction dated 25 September 2007 of the Secretary of State under

paragraph 1 (3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 as transitional arrangements pending adoption of the Core Strategy.

- 4.3.3 Saved policies contained in the Gravesham Local Plan First Review should still be accorded significant weight, albeit that the weight accorded should be greater where policies are consistent with the National Planning Policy Framework (NPPF, paragraph 215).
- 4.3.4 The following remaining saved policies are relevant to the consideration of this application:

Policy Reference	Description
T1	Impact of Development on the Highway Network
P3	Vehicle Parking Standards

4.4 National Planning Policy Framework

- 4.4.1 The NPPF was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied.

Achieving Sustainable Development (Section 2)

- 4.4.2 **Paragraph 7** states:

'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.'

- 4.4.3 The overarching principle of the NPPF is a clear presumption in favour of sustainable development. **Paragraph 8** states the three dimensions which are interdependent and need to be pursued in mutually supportive ways:

- a) *'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe built places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) *an environmental objective – to contribute to protecting and enhance our natural, built and historic environment; including making effective use of*

land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'

4.4.4 **Paragraph 10** states:

*'So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**.'*

4.4.5 It is noted in **paragraph 9** that:

*'Planning policies and decisions should play an active role in guiding development towards sustainable solutions, **but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.***

4.4.6 **Paragraph 11** states: (edited)

'Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - I. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - II. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'**

Decision-making (Section 4)

4.4.7 **Paragraph 38** describes how Local Planning Authorities should approach decisions on proposed development in a positive and creative way:

'They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.'

4.4.8 **Paragraph 47** states that:

'Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material

considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.'

4.4.9 **Paragraph 55** outlines that Local Planning Authorities should consider:

'whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.'

'Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.'

Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification.'
(**Paragraph 56**).

Building a strong, competitive economy (Section 6)

4.4.10 **Paragraph 81** states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.'

4.4.11 With regard to supporting a prosperous rural economy, **Paragraph 84** states:

'Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.'

4.4.12 **Paragraph 111** states:

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

Making an effective use of land (Section 11)

4.4.13 **Paragraph 119** states:

'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'

4.4.14 **Paragraph 120** states:

'Planning policies and decisions should:

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.'

Achieving well-designed places (Section 12)

4.4.15 **Paragraph 126** states:

'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'

4.4.16 **Paragraph 130** states:

'Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

4.4.17 **Paragraph 134** states:

'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'

Protecting Green Belt Land (Section 13)

4.4.18 **Paragraph 147** states:

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

4.4.19 **Paragraph 148** states:

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

4.4.20 **Paragraph 149** states:

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

c) 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.'

4.5 National Planning Practice Guidance (NPPG)

4.5.1 On the 6th of March 2014 a new web-based resource for Planning Practice Guidance was launched. It supports and clarifies areas in the NPPG and replaces a substantial list of guidance documents published from 1978-2013.

4.5.2 It contains guidance on assessing housing need; design; public consultation; open space provision in new development; travel plans, transport assessments and statements in decision-taking; health and wellbeing; water supply, wastewater and water quality; light pollution; determining a planning application; the use of planning conditions and viability, amongst other things.

4.6 Supplementary Planning Guidance

- 4.6.1 The Council has adopted a number of Supplementary Planning Guidance documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

5 Planning Assessment

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

5.1.2 It is considered that the following issues are important to consider as part of the proposal:

- The Principle of Development and the issue of Green Belt Policy;
- Sustainability;
- Design and Visual Impact;
- Access, Parking and Highways; and
- Noise.

5.1.3 In the event that the Council consider the proposal to be 'inappropriate development in the Green Belt', consideration of:

- Very Special Circumstances.

5.2 The Principle of Development and the issue of Green Belt Policy

5.2.1 As established, the site currently hosts Meopham Veterinary Hospital; a leading RCVS Veterinary Hospital in the region. Extending the building and car park at the site would respond to the needs of the growing local and regional population, as outlined below.

5.2.2 We note that Kent has seen a substantial increase in housing over the last 15 years, particularly in the West Kent, Ebbsfleet and the Medway area. This is particularly owed to population growth within Gravesham, Dartford, Medway and Sevenoaks, as well as projected population growth within these areas. The table below has been included in this report to clearly demonstrate how local populations are increasing. It also demonstrates that access to a well-developed veterinary hospital in Meopham is therefore key to provide care for pets of rising local populations, whilst also creating local jobs and supporting the local economy.

Area	Previous Population	Current Population (2019-2022)	Projected Population
Gravesham	101,076 (2010) ¹⁸	106,900 ¹⁹	114,000 (2026) ²⁰

¹⁸ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

¹⁹ https://www.kent.gov.uk/_data/assets/pdf_file/0018/14724/Mid-year-population-estimates-total-population-of-Kent-bulletin.pdf

²⁰ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

Dartford	102,010 (2014) ²¹	114,100 ²²	126,700 (2028) ²³
Medway	268,130 (2012) ²⁴	279,142 ²⁵	284,300 (2028) ²⁶
Sevenoaks	109,305 (2010) ²⁷	121,400 ²⁸	125,200 (2028) ²⁹

5.2.3 In this regard it is also important to note that the surgery is an important local employer, with 46no. staff at present. However, there is a major employment problem in veterinary medicine with 20-30% less vets than required to meet needs in the UK. The proposal therefore seeks to support the veterinary hospital to help it continue to take a role in addressing the chronic shortage of suitably qualified and skilled veterinary professionals.

5.2.4 Located in the Green Belt, the site provides a vital service to communities in and around Gravesham. The extension of the existing building and carpark will contribute to the local and rural economy through appropriate development in the Green Belt, which in the absence of local policy is governed by Paragraph 149 (c) of the Framework:

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

c) The extension... of a building provided that it does not result in disproportionate additions over and above the size of the original building.'

5.2.5 To be precise, the existing building comprises 480m² floor space and the extension seeks to provide less than half of this at 368m². It is therefore considered that the proposal is acceptable in principle with regard to national Green Belt policy and will create a positive contribution to the local area in terms of access to veterinary care, as well as a stimulation of the local economy in terms of training and employment opportunities.

5.3 Sustainability

5.3.1 As highlighted in the Gravesham BC Core Strategy and the Framework, sustainable development should be a crucial part of any development proposal, especially when there are no policies that are relevant to the application or relevant policies are out of date at the time of making the decision

²¹ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

²² https://www.kent.gov.uk/_data/assets/pdf_file/0018/14724/Mid-year-population-estimates-total-population-of-Kent-bulletin.pdf

²³ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

²⁴ https://www.medway.gov.uk/download/downloads/id/5388/demography_population_2020.docx

²⁵ https://www.medway.gov.uk/download/downloads/id/5388/demography_population_2020.docx

²⁶ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

²⁷ file:///C:/Users/Dan.Blake/Downloads/Sevenoaks_Population_and_Social_Profile_May_2010.pdf

²⁸ https://www.kent.gov.uk/_data/assets/pdf_file/0019/14725/Mid-year-population-estimates-age-and-gender.pdf

²⁹ https://www.kent.gov.uk/_data/assets/pdf_file/0011/59807/Subnational-population-projections.pdf

- 5.3.2 In light of this, the proposal complies with all three of the sustainable development principles outlined in the Framework; environmental, social and economic.
- 5.3.3 The extension of the building will provide a betterment of facilities by utilising modern construction techniques and materials to ensure the extension performs better environmentally.
- 5.3.4 Socially, the extension of Meopham Veterinary Hospital will ensure the continuation of specialised and essential treatment for animals, thereby ensuring that an important community facility is retained within the locality and indeed, that it is enabled to respond to increasing demands placed locally by the increasing population.
- 5.3.5 The veterinary hospital also provides employment for approximately 46no. staff and therefore should be considered a significant local employer and economic hub. The extension of the hospital will provide potential for further employment as well as the retention of existing jobs and the continuation of veterinary training, which will allow the facility to continue operating as a crucial community service provider.
- 5.3.6 In addition, the proposal seeks to retain and expand an existing community facility and therefore aligns with Paragraph 84 of the Framework with regard to 'supporting a prosperous rural economy':

'Planning policies and decisions should enable:

*a) the **sustainable growth** and **expansion** of all types of business in rural areas, both through **conversion of existing buildings** and **well-designed new buildings**;*

*d) the **retention** and development of accessible local services and **community facilities**, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.'*

- 5.3.7 As stated, the proposal also makes a very significant contribution to the training of veterinary professionals. This is much needed due to current under-resourcing, both locally and nationally.

5.4 Design and Visual Impact

- 5.4.1 The proposed development seeks to erect a single storey extension on the western elevation of the existing veterinary building. In this regard, it should again be noted that the extension will not result in disproportionate additions over and above the size of the original building in line with national Green Belt policy.
- 5.4.2 As the extension will be to the rear of the veterinary hospital, it will not be visible from Wrotham Road. The development will also be single storey and therefore, will have limited visual impact on neighbouring properties. This is especially the case as there is already an acoustic screen in place of similar height. We note that if the property was still a residential dwelling, it could have benefitted from an 8m extension. In that context, we do not consider the proposal 'disproportionate' to what might otherwise normally take place.

- 5.4.3 The proposed scale and design are considered entirely acceptable in context of surrounding development, particularly with regards to the adjacent neighbouring dwelling. The proposed scale is such that it is proportionate with the existing building and surrounding development. The proposed roof will also retain the character of the veterinary hospital, being a pitched roof to match with the existing building.
- 5.4.4 Overall, it is therefore considered that there will be minimal visual impact on the immediate and surrounding amenity.

5.5 Access, Parking and Highways

- 5.5.1 The existing safe and suitable access from Wrotham Road will be retained by the proposal, with a new vehicular link provided within the site to access the new parking arrangement. This is depicted clearly within the Proposed Site Plan.
- 5.5.2 Although the proposal will increase vehicular parking by 10no. spaces, it is submitted that trips on the local network will not be materially impacted and this increase in parking spaces will prevent people from parking on the surrounding local roads due to being unable to park at the hospital. This has become a persistent problem which the veterinary hospital seeks to resolve via this proposal.
- 5.5.3 Additionally, the level of congestion has become such that visitors are sometimes having to wait on the highway to enter the site. The provision of additional parking will ensure this no longer takes place.
- 5.5.4 The proposed extension will also reduce the carbon footprint of clients who wish to visit the veterinary hospital, removing the need to travel to Surrey or further afield for the same services.

5.6 Noise

- 5.6.1 It is important to note that the proposal does not seek to change the use of the site and only seeks to provide additional rooms for storage, staff welfare and training purposes, as well as the improvement of existing facilities. It is not therefore foreseen that the proposal will result in any material increase in the coming and going of vehicles as well as noise.
- 5.6.2 In any event, the building itself will act as attenuation and the site is well-screened and already has an acoustic fence to limit the impact of noise on neighbouring dwellings.
- 5.6.3 With parking moved away from the nearest neighbour, there will clearly be some amenity benefit. As such, it is submitted that noise levels will not substantially increase, which will in turn protect the amenity of the locality.

5.7 Very Special Circumstances

- 5.7.1 Should the Council feel that the proposal as a whole does not fall within the remit of Paragraph 149 (c) of the Framework due to the proposed extension being 'disproportionate' (considered in line with Permitted Development for other buildings), a case of Very Special Circumstances is outlined below in accordance with Paragraph 148 of the Framework:

- The site is a certified RCVS veterinary hospital (one of only eight in the country);
- The veterinary hospital is a significant employer;
- The site has specialist equipment and facilities essential to meet needs in the Gravesham BC area;
- The site is a training centre for veterinary professionals and provides an essential role for both students and specialists. This ongoing training will also help to address the chronic shortage of suitably qualified and skilled veterinary professionals;
- The proposal meets current needs arising from the operation of the hospital (a matter exacerbated by the Covid-19 pandemic, changes to the situation of EU vets caused by Brexit, and an increase in demand for vets driven by a surge in pet ownership in the UK) in response to a RCVS inspection such that the works are 'required';
- The veterinary profession is currently listed on the Government's 'Skilled Worker visa: shortage occupation (updated February 2022);
- The site provides an essential 'community service' and constitutes 'community infrastructure' necessary to provide sustainable communities;
- The provision of specialist services that are not available at other local veterinary practices, such that failure to expand the facility will simply result in additional 'patient miles', which would not present a sustainable approach to development; and
- The current parking is inadequate and usage levels could result in backing up on the highway unless additional provision is made.

6 Conclusion

6.1 Summary

- 6.1.1 This Statement has been prepared by DHA Planning in support of a full planning application submitted on behalf of the Applicant, Meopham Veterinary Hospital, for:

'a 368m² extension to an existing veterinary hospital, comprising a euthanasia room, hospital pharmacy, clinical storage/ medical records room, surgical instrument preparation and autoclaves room, endoscopy and ethylene oxide room, library and clinical offices and meeting space, kitchen, staff restroom and dining area, and on-call bedroom with ensuite and disabled toilet facilities, as well as the change of use of land to form an extended carpark with EV charging comprising 10no. additional parking spaces on the adjoining parcel of land.'

- 6.1.2 Meopham Veterinary Hospital is a leading facility in the locality providing specialist veterinary care and leading veterinary training. The facility is an important employer and provides a positive impact on the local economy. The proposal seeks to erect an extension to provide further space for the veterinary hospital to ensure the improvement of services and the training of future vets.

- 6.1.3 It has been demonstrated that the proposed extension is acceptable in with Paragraph 149 (c). In addition, the Very Special Circumstances of the case are outlined below:

- The site is a certified RCVS veterinary hospital (one of only eight in the country);
- The veterinary hospital is a significant employer;
- The site has specialist equipment and facilities essential to meet needs in the Gravesham BC area;
- The site is a training centre for veterinary professionals and provides an essential role for both students and specialists. This ongoing training will also help to address the chronic shortage of suitably qualified and skilled veterinary professionals;
- The proposal meets current needs arising from the operation of the hospital (a matter exacerbated by the Covid-19 pandemic, changes to the situation of EU vets caused by Brexit, and an increase in demand for vets driven by a surge in pet ownership in the UK) in response to a RCVS inspection such that the works are 'required';
- The veterinary profession is currently listed on the Government's 'Skilled Worker visa: shortage occupation (updated February 2022);
- The site provides an essential 'community service' and constitutes 'community infrastructure' necessary to provide sustainable communities;

- The provision of specialist services that are not available at other local veterinary practices, such that failure to expand the facility will simply result in additional 'patient miles', which would not present a sustainable approach to development; and
- The current parking is inadequate and usage levels could result in backing up on the highway unless additional provision is made.

6.1.4 The proposal is also considered sustainable with regards to the Framework by ensuring the continuation of specialised and essential treatment for animals by improving facilities, securing existing and new employment, as well as enhancing training facilities.

6.1.5 In addition, the placement of the extension and carpark will ensure that visual impact and noise will be minimal, therefore protecting the amenity of neighbouring dwellings. The proposal also remains entirely acceptable in design terms.

6.2 Conclusion

6.2.1 Taking all the above into account, we respectfully request planning permission be granted subject to appropriate Conditions.

6.2.2 Any queries please do contact john.collins@dhaplanning and dan.blake@dhaplanning.co.uk