

Land to the rear of Flint Cottage, Northfleet
Green, Gravesend, Kent, DA13 9PN

Planning Statement

CLIENT: BERTIE SHOTTON

DHA/33114

December/2024



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CONTENTS

1	INTRODUCTION.....	4
1.1	OVERVIEW	4
1.2	SUPPORTING DOCUMENTS	4
2	SITE CONTEXT	6
2.1	SITE OVERVIEW	6
2.2	PLANNING DESIGNATIONS	7
2.3	ACCESSIBILITY	8
2.4	PLANNING HISTORY	8
2.5	PRE-APPLICATION ADVICE	8
2.6	RELEVANT DEVELOPMENT IN PROXIMITY TO THE SITE	9
3	PROPOSED DEVELOPMENT.....	11
3.1	SUMMARY	11
3.2	USE, AMOUNT AND LAYOUT	11
3.3	APPEARANCE	11
3.4	DEMOLITION WORKS.....	12
4	PLANNING POLICY FRAMEWORK	13
4.1	OVERVIEW	13
4.2	GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)	13
4.3	GRAVESHAM LOCAL PLAN FIRST REVIEW SAVED POLICIES (ORIGINALLY ADOPTED 1994, SAVED AND DELETED POLICIES 2014)	16
4.4	NATIONAL PLANNING POLICY	17
	National Planning Policy Framework (NPPF) (2024).....	17
	Planning Practice Guidance.....	24
4.5	OTHER MATERIAL CONSIDERATIONS	24
	Residential Layout Guidelines (Adopted 1996 – Amended 2020) SPG2	24
	The Gravesham Landscape Character Assessment.....	24
	Kent Vehicle Parking Standards (2006) KCC SPG4	24
	Emerging Local Plan (Local Plan Update)	25
	Five Year Housing Land Supply.....	25
5	PLANNING CONSIDERATIONS.....	26
5.1	INTRODUCTION	26
5.2	THE PRINCIPLE OF DEVELOPMENT	26
5.3	SUSTAINABILITY	29
5.4	NEARBY PRECEDENTS AND CONSIDERATION OF DECISION CONSISTENCY	31
5.5	IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA	32
5.6	DESIGN.....	33
5.7	AMENITY	33
5.8	ECOLOGY AND BIODIVERSITY NET GAIN	34
5.9	HIGHWAYS, PARKING AND ACCESS	35

5.10	CONTAMINATION.....	36
6	SUMMARY AND CONCLUSION	37
6.1	SUMMARY	37
6.2	CONCLUSION.....	37

1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1 This Planning Statement has been prepared by DHA Planning on behalf of our client, Mr Robert Shotton ("The Applicant"), in relation to the proposed redevelopment of land to the rear of Flint Cottage, Northfleet Green, Gravesend, DA13 9PN.
- 1.1.2 The full description of the development is as follows:
- 'Demolition of an existing commercial building (and retention of rear wall), demolition of remnants of barn and conversion of roundel to create a 4-bedroom dwelling with associated parking, amenity space, landscaping and access.'*
- 1.1.3 This Statement provides a detailed overview of the Site and proposals, it assesses the planning merits of the scheme with regard to any relevant planning history, and the applicable planning policy framework, and subsequently concludes that the proposal is acceptable in planning terms and therefore planning permission should be granted.

1.2 SUPPORTING DOCUMENTS

- 1.2.1 This application is supported by the following documents and plans:

REFERENCE	INFORMATION PROVIDED
PP-12935868	Application Form (completed online)
Reports	
DHA/MG/JJH/33114	Planning Statement (DHA Planning)
2024/02/22	Preliminary Ecological Appraisal (KB Ecology)
2024/02/22	Bat Survey (KB Ecology)
-	BNG Statement (KB Ecology)
-	The Statutory Biodiversity Metric Calculation (KB Ecology)
21397/PIR Rev1.0	Preliminary Contamination Investigation Report (Soils Limited)
Plans (DHA Urban Design)	
DHA/31937/01	Location Plan
DHA/31937/02	Existing Site Layout Plan

DHA/31937/03	Existing Floor Plans
DHA/31937/04	Existing Elevations
DHA/31937/05	Existing Plans and Elevations Roundel
DHA/31937/06	Proposed Site Layout Plan
DHA/31937/07	Proposed Floor Plans
DHA/31937/08	Proposed Elevations

[SUPPORTING PLANS AND DOCUMENTS](#)

2 SITE CONTEXT

2.1 SITE OVERVIEW

- 2.1.1 The Site is located within Northfleet Green and is set back from the east of Northfleet Green Road. The site is located to the rear of Flint Cottage.
- 2.1.2 The Site lies approximately 3.5km to the south west of Gravesend town centre and 1.5km to the northwest of Istead Rise.
- 2.1.3 The site is in commercial use and comprises the remnants of a former roundel and remains of adjacent building, an area of hardstanding and a commercial barn which is currently redundant and surplus to requirements. Several abandoned cars and storage containers in connection with the commercial enterprise are present on site.
- 2.1.4 To the north, south and west of the site are residential properties adjacent to Northfleet Green Road. Agricultural land adjoins the eastern boundary of the site.



FIGURE 2.1 SITE LOCATION (DHA URBAN DESIGN)

2.2 PLANNING DESIGNATIONS

- 2.2.1 According to the Gravesham Borough Council ('GBC', 'the Council') or online planning proposals map, the Site is outside any defined settlement boundaries and is therefore considered as being within the countryside. The Site is designated as falling within the Metropolitan Green Belt and Istead Arable Farmlands Landscape Character Area (LCA).
- 2.2.2 The 'NU28' Public Footpath and 'NU24' Public Bridleway are in proximity to the site as demonstrated by Figure 2.2 below.

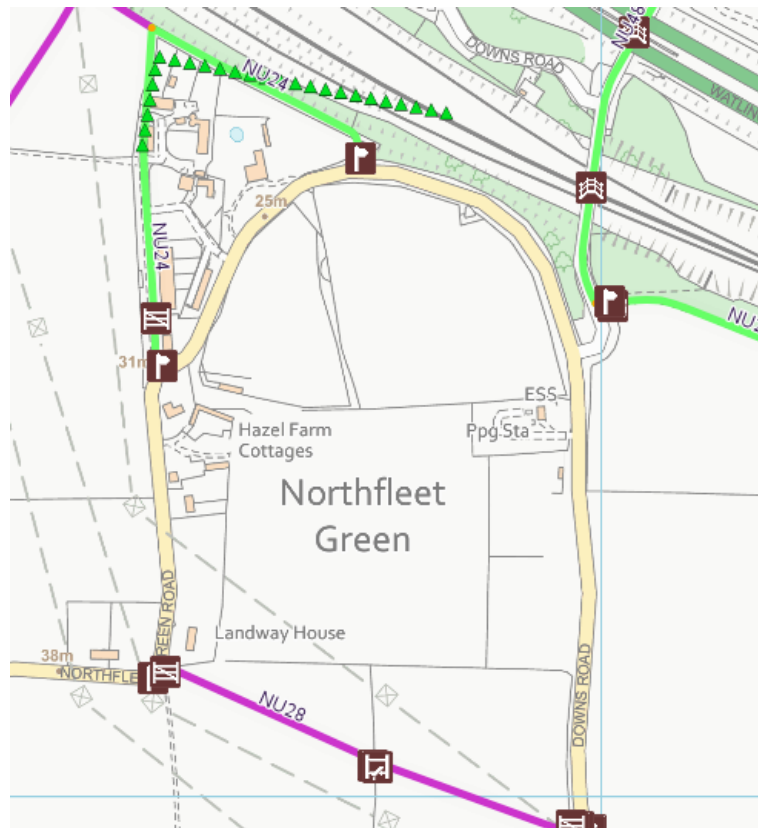


FIGURE 2.2 PUBLIC RIGHTS OF WAY MAP (KENT COUNTY COUNCIL)

- 2.2.3 The Site is identified in the Environment Agency's flood risk maps as being located entirely within Flood Zone 1 and is therefore at the lowest level risk of flooding.
- 2.2.4 According to Historic England's Listed Building Map Search, there are no nearby Listed Buildings or heritage assets that are within the setting of the site.

2.3 ACCESSIBILITY

- 2.3.1 The In terms of accessibility, it is noted that Northfleet Green Road provides a connection to New Barn Road, where onward travel to the A2 and Gravesend in the north and Dartford to the west are possible.
- 2.3.2 The site is well connected to modes of transport other than the private car. The nearest bus stops are 800 metres to the south west of the site with frequent services to New Ash Green and Gravesend. Ebbsfleet International railway station is located approximately 3.5km to the north of the site with services to London station and numerous Kent stations when travelling east. There is also an existing cycle trail which connects Northfleet green to Gravesend along the A227
- 2.3.3 The site lies approximately 3.5km to the south west of Gravesend town centre and 1.5km to the northwest of Istead Rise, a Second Tier Settlement, only less sustainable than the urban area of Gravesend/Northfleet/Ebbsfleet as outlined in the Local Plan Core Strategy.
- 2.3.4 Istead Rise offers numerous services/facilities such as, but not limited to, Istead Rise Community Centre, a pre-school, a primary school, a kindergarten, a church, a dentist, a pharmacy, two stores, a restaurant and a butcher shop.

2.4 PLANNING HISTORY

- 2.4.1 A desk-based search of the planning history for the site on Gravehsam's Public Access System shows that the site has been subject to the following historic planning applications (excluding conditions discharge applications):

REFERENCE	PROPOSAL	DECISION
20110903	Change of use of residential garden to additional land for the storage of motor vehicles.	Refused 19 th December 2011
20100859	Continued use of the agricultural building as a storage unit and to allow the hardstanding opposite to be used in conjunction with building.	Approved 12 th November 2010

2.5 PRE-APPLICATION ADVICE

- 2.5.1 The National Planning Policy Framework (NPPF) (2023) encourages the take up of pre-application services (Paragraph 39). Early engagement has significant potential to improve the efficiency and effectiveness of the planning application for all parties. Good quality pre-application discussion enables better coordination

between public and private resources and improved outcomes for the community (Paragraph 39).

2.5.2 A pre-application meeting was held in December 2023 with Gravesham Borough Council. A summary of the pre-application advice provided by the Council is provided below:

- Acknowledgement that the Council can't currently demonstrate a deliverable five-year supply of housing land as required by NPPF Paragraph 74.
- The development is considered to be previously developed land and an exception under paragraph 154(g) of the NPPF (2023).
- The Council posit that the proposal has failed to demonstrate that the development will not have a greater impact on the openness of the Green Belt than the existing built form on the existing brownfield site.
- A justification of the site's sustainability credentials must be established.
- Close attention should be given to Gravesham's Residential Layout Guidelines in relation to the room sizes within the dwelling, to ensure that satisfactory living conditions are provided for future occupiers.
- There is not considered to be any detrimental impact on the amenity of surrounding properties.
- The plans show a hardstanding to the front of the dwelling, with space for three vehicles which is in accordance with Gravesham's adopted parking standards (SPG4) (2006) for a four-bedroom dwelling.
- Due to the proposal seeking to remove the barn, a Preliminary Ecological Appraisal of the site would be required to ensure that no protected species are roosting/nesting within the building. Moreover, consideration would be required to improving/enhancing biodiversity on site in accordance with local and national policy.

2.5.3 Although the proposed scheme has changed slightly, in that the proposals now include the demolition of the old barn and the conversion of the roundel, the points received from the pre-application feedback were used to guide the evolution of the design, layout, and other features of the proposed development.

2.6 RELEVANT DEVELOPMENT IN PROXIMITY TO THE SITE

2.6.1 The Hazells Farm development, approximately 150m north of the site, was approved in April 2015 under reference '20141132'. The proposal was for the *'Demolition of the existing potato store building and the erection of a detached*

building to provide 7, four-bedroom residential units and erection of an open-fronted barn to provide 12 car parking spaces and cycle store.'

- 2.6.2 The approval detailed above, although a larger scheme than the proposals at hand, holds similarities in that the development resulted in the demolition of under-utilised built form and its replacement with residential development. The approval sets development precedent in the locality and, importantly, for the proposals at hand.

3 PROPOSED DEVELOPMENT

3.1 SUMMARY

3.1.1 Full The proposed development comprises the erection of a 24-bed dwelling on land to the rear of Flint Cottage, Northfleet Green.

3.1.2 The description of the proposed development is as follows:

'Planning application for the Demolition of an existing commercial building (and retention of rear wall), demolition of remnants of barn and conversion of roundel to create a 4-bedroom dwelling with associated parking, amenity space, landscaping and access'.

3.2 USE, AMOUNT AND LAYOUT

3.2.1 Entry to the site will be taken via the existing access from Northfleet Green Road.

3.2.2 The dwelling would be situated in the northern portion of the site. The primary frontage of the dwelling will face westwards overlooking the associated private garden. The existing and proposed site layouts are shown in figures 3.1 and 3.2.

3.2.3 The ground floor of the dwelling would consist of a hall, living room, an open plan living room kitchen/dining/family room, study, utility room, and toilet. The first floor comprises four bedrooms, two with an en-suite, a family bathroom and a dressing area. The Gross Internal Area (GIA) area would be approximately 183.5m².

3.2.4 The proposed formal parking area (2.no spaces) is sited to the south of the proposed amenity area.

3.3 APPEARANCE

3.3.1 The proposed design has been informed by the former roundel building on site, with the roundel being reinstated. The original footprint of the roundel and old barn has been used to constrain the proposed dwelling in terms of its siting and width.

3.3.2 A contemporary style has been applied to the design in keeping with the modern development in the immediate area, yet traditional materials are also used to pay homage to the local character of the neighbouring Flint Cottage and the historic roundel. Parts of the wall has flint applied with most of the walls being built with brick to match the existing roundel.

- 3.3.3 Following demolition of the commercial barn, the remaining wall (at the southern extent of the site) has been retained to provide a clear demarcation of the extent of the boundaries of the property and is considered to be a characterful part of the site.

3.4 DEMOLITION WORKS

- 3.4.1 The dilapidated commercial barn and old barn adjacent to the roundel will be demolished as part of the proposals.

4 PLANNING POLICY FRAMEWORK

4.1 OVERVIEW

- 4.1.1 Under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the Development Plan in force unless material considerations indicate otherwise.
- 4.1.2 This section sets out the relevant policies of the statutory Development Plan and refers to any other material considerations that should be taken into account in determining this application.
- 4.1.3 In this case, the following documents are relevant to the application:
- The Gravesham Local Plan Core Strategy (2014);
 - The Saves Policies in the Gravesham Local Plan First Review (1994); and
 - The National Planning Policy Framework (December 2023).

4.2 GRAVESHAM LOCAL PLAN CORE STRATEGY (2014)

- 4.2.1 The following Policies within the Gravesham Local Plan Core Strategy are deemed relevant to the proposed development:
- 4.2.2 **Policy CS01** outlines planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

- Specific policies in that Framework indicate that development should be restricted.

- 4.2.3 **Policy CS02** sets out the scale and distribution of development in line with sustainable development principles. It seeks to make the most efficient use of previously developed land, focus development in the most sustainable locations and preserve the openness and maintain the national and local planning purposes of the Green Belt, protecting it from inappropriate development. It sets out that at least 6,170 new dwellings will need to be delivered through the plan period to meet the Borough's objectively assessed need and that Higham is in the second tier of the sustainable settlement hierarchy directly under Gravesend and other major urban areas. It also states that in the rural area, development will be supported within rural settlements inset from the Green Belt as defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan.
- 4.2.4 **Policy CS11** states that sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.
- 4.2.5 **Policy CS12** regards green infrastructure in the borough. There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development. Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant.

- 4.2.6 **Policy CS14** outlines the Council's approach to housing type and size. The Council will protect the mix of housing in the existing housing stock and will resist the conversion of family sized residential units to smaller properties. The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.
- 4.2.7 **Policy CS15** states development will be developed at a variety of densities, depending on their location and accessibility to public transport. The form and

density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas.

All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration:

- Within the urban area, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. In suitable locations close to the transport hubs of Gravesend Town Centre and Ebbsfleet, higher densities will be sought;
- In the rural area, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.

Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused planning permission.

4.2.8 Policy CS18 relates to climate change over the longer term, including factors such as flood risk, coastal change and water supply. It also seeks to reduce the overall carbon footprint of the Borough.

4.2.9 Policy CS19 states that new development should be visually attractive, fit for purpose and locally distinctive. It requires that it will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. The design and construction of new development will incorporate sustainable construction standards and techniques, be adaptable to reflect changing lifestyles, and be resilient to the effects of climate change. This will be achieved through criteria as set out.

New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles;

New development will be located, designed and constructed to:

- (1) safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land;
- (2) avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination; and

- (3) not pose an unacceptable risk or harm to the water environment, including the quality and/or quantity of ground waters, surface waters, wetlands and coastal water systems;
- (4) The design and layout of new residential development, including conversions, will accord with the adopted Residential Layout Guidelines;
- (5) New development will be designed in an inclusive way to be accessible to all members of the community;
- (6) New development will provide appropriate levels of private and public amenity space;
- (7) New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and will ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure;
- (8) Car parking will be well related to the development it serves;
- (9) New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;
- (10) New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users;
- (11) The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use;
- (12) New development will incorporate appropriate facilities for the storage and recycling of waste; and
- (13) The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.

4.3 GRAVESHAM LOCAL PLAN FIRST REVIEW SAVED POLICIES (ORIGINALLY ADOPTED 1994, SAVED AND DELETED POLICIES 2014)

- 4.3.1 The following policies within the Gravesham Local Plan First Review Saved Policies are deemed relevant to the proposed development:
- 4.3.2 **Policy T1** states the Local Planning and Highway Authorities will consider the impact on the transport system and on the environment of traffic generated by

new development and will wish to ensure that all proposed developments are adequately served by the highway network identified on the Proposals Map.

- 4.3.3 **Policy T4** confirms The Local Planning and Highway Authorities will not normally permit any proposed development outside the confines of the built up area that generates significant vehicular or pedestrian traffic.
- 4.3.4 **Policy P3** relates to parking provision and states that the Borough Council will expect development to make provision for vehicle parking, in accordance with the Kent County Council Vehicle Parking Standards, as interpreted by Gravesham Borough Council, unless justified as an exception. All vehicle parking provision should normally be made on the development site.
- 4.3.5 **Policy P5** outlines that when considering an application for the change of use of buildings, the sub-division of existing dwellings or minor extensions, the Borough Council will seek to ensure that the Vehicle Parking Standards are met. However, where this would probably be prejudicial to the townscape or likely to lead to the building being unused or underused, the Borough Council may be prepared to consider a relaxation of the standards, provided this does not unduly exacerbate on-street parking problems in the area.

4.4 NATIONAL PLANNING POLICY

National Planning Policy Framework (NPPF) (2024)

- 4.4.1 The NPPF was originally published in March 2012 to provide a single overarching national policy document. A revised NPPF was published in December 2024 and is a material consideration when determining planning applications.
- 4.4.2 Those sections of the NPPF which are relevant to the determination of this application include:
- 4.4.3 **Paragraph 2** of the NPPF states that the Framework must be taken in to account in preparing the development plan and is a material consideration in planning decisions.
- 4.4.4 **Paragraph 7** states that 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.
- 4.4.5 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supported ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- 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 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 the present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future generations; and by fostering a well-design and safe built environment, 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 enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigation and adapting to climate change, including moving to a low carbon economy.

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

4.4.7 The NPPF set out at **Paragraph 11** that Plans and decisions should apply a presumption in favour of sustainable development.

4.4.8 For plan-making 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 strong 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

4.4.9 The term 'out of date' includes applications involving the provision of housing, situations where: (a) the local planning authority cannot demonstrate a five year

supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

- 4.4.10 As set out within paragraph 14, in situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:
- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
 - b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).
- 4.4.11 In terms of decision making, **Paragraph 39** states local planning authorities should approach decisions on proposed development in a positive and creative way.
- 4.4.12 **Paragraph 61** states to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.
- 4.4.13 **Paragraph 73** outlines that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilder to deliver new homes, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:
- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;
 - b) use tools such as area-wide design assessments and local development orders to help bring small and medium sized sites forward;
 - c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and
 - d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.
- 4.4.14 Paragraph 78 states that Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development

for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies³⁸, or against their local housing need where the strategic policies are more than five years old³⁹. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply; or
- c) From 1 July 2026, for the purposes of decision-making only, 20% where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of this Framework, and whose annual average housing requirement is 80% or less of the most up to date local housing need figure calculated using the standard method set out in national planning practice guidance.

4.4.15 **Paragraph 79** outlines that to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, the following policy consequences should apply:

- a) where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years;
- b) where delivery falls below 85% of the requirement over the previous three years, the authority should include a buffer of 20% to their identified supply of specific deliverable sites as set out in paragraph 78 of this framework, in addition to the requirement for an action plan;
- c) where delivery falls below 75% of the requirement over the previous three years, the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer.

4.4.16 **Paragraph 83** states that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Furthermore, it is recognised that where there are groups of smaller settlements, development in one village may support services in a village nearby. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

- 4.4.17 **Paragraph 84** outlines that Planning policies and decisions should avoid the development of isolated homes in the countryside unless certain circumstances apply. One such circumstance is if the development would re-use redundant or disused buildings and enhance its immediate setting.
- 4.4.18 **Paragraph 109** states that the planning system should actively manage patterns of growth and significant development should be focused on locations which are or can be made sustainable. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 4.4.19 **Paragraph 115** states that in assessing applications for development, it should be ensured that:
- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴; and
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach
- 4.4.20 **Paragraph 116** confirms that 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, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 4.4.21 **Paragraph 124** highlights that planning policies and decision should make effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.4.22 **Paragraph 131** outlines that the creation of high-quality 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.
- 4.4.23 **Paragraph 135** states that 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.

4.4.24 **Paragraph 137** sets out how design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

4.4.25 The NPPF states that the Government attaches great importance to Green Belts as fundamental in preventing urban sprawl by keeping land permanently open. Further to this, the NPPF states that the Green Belt serves five purposes within **Paragraph 143**:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.4.26 **Paragraph 153** states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

'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.

4.4.27 **Paragraph 154** outlines that development in the Green Belt is inappropriate unless one of the following exceptions applies:

a) buildings for agriculture and forestry;

b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

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;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;

e) limited infilling in villages;

f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and

g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

i. mineral extraction;

ii. engineering operations;

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;

v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

- vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

Planning Practice Guidance

- 4.4.28 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance. The PPG is a 'living document' and is constantly being updated / reviewed.
- 4.4.29 As well as providing technical guidance the PPG sets out the importance of good design. It advocates the need for quality of design which it considers is an integral part of achieving the fundamental objective of sustainable development. The relevant sections of the PPG are listed below:
- Design: Process and Tools;
 - Effective Use of Land;
 - Green Belt;
 - Housing: Optional Technical Standards;
 - Housing Supply and Delivery; and
 - Natural Environment.

4.5 OTHER MATERIAL CONSIDERATIONS

Residential Layout Guidelines (Adopted 1996 – Amended 2020) SPG2

- 4.5.1 All planning applications for new dwellings, extensions to existing dwellings, flats, maisonettes, and bedsitters (new build or conversion), must comply with the Borough Council's adopted Residential Layout Guidelines.

The Gravesham Landscape Character Assessment

- 4.5.2 The Gravesham Landscape Character Assessment defines and describes the different types and character areas of the landscape in the Gravesham Borough, and evaluates each area in terms of the condition of the landscape and its sensitivity. The Assessment is used in the consideration of planning applications to supplement planning policies.

Kent Vehicle Parking Standards (2006) KCC SPG4

- 4.5.3 This SPG supplements Policy TP3: 'Transport and the Location of Development' and Policy TP19: 'Vehicle Parking Standards' from the Kent and Medway Structure Plan 2006.

Emerging Local Plan (Local Plan Update)

- 4.5.4 The Council undertook a Regulation 18 Stage 1 consultation on the Site Allocations: Issues and Options and Development Management Policies between April and July 2018. This, alongside additional technical work, informed the Regulation 18 Stage 2 between October and December 2020.
- 4.5.5 As of November 2023, no further details have been made available on the Council's website since the Report to Cabinet held on Tuesday 3rd January 2023, whereby it was proposed under the revised Local Development Schedule that the Public Consultation (Regulation 19) would take place between September and October 2023, with submission for independent examination (Regulation 22) in February 2024. At the time of writing, details are awaited from the Council over the Regulation 19 consultation.
- 4.5.6 As the Development Management Policies Document is at an early stage, the Council have confirmed in recent planning committee reports, that the policies therein should at this stage be given very limited weight.

Five Year Housing Land Supply

- 4.5.7 National Planning Policy Framework (NPPF) Paragraph 78 is clear that Local Planning Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.
- 4.5.8 As noted above, the Council's Core Strategy was adopted in September 2014, in this regard, the Council are required to demonstrate a five-year supply of deliverable housing sites against their local housing need.
- 4.5.9 The published Housing Land Supply for the Council as of March 2023 sets out a 2.9 years' supply of housing. Further to this, the Housing Delivery Test (HDT) 2023 results were published in December 2023, demonstrating that over the last three years (i.e., 2020 – 21, 2021 – 22, 2022 – 23), the Council has achieved a delivery rate of 59% when compared to the required number of houses over this period, and therefore the presumption in favour of sustainable development applies.
- 4.5.10 Notwithstanding the above, where opportunities exist to deliver new homes that make more efficient use of previously developed land should be appropriately maximised. Further to this, given the status of the Emerging Local Plan, and in addition to the Council's significant and long-term housing shortfall, it is vital that the Development Management system intervenes to take a permissive stance to development and deliver the homes that are urgently needed in the short term.

5 PLANNING CONSIDERATIONS

5.1 INTRODUCTION

- 5.1.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is necessary to consider whether the application proposal accords with the statutory development plan and if not, whether any material considerations indicate, that planning permission should nevertheless be granted.
- 5.1.2 In determining whether the proposal accords with the development plan, the following planning policy considerations are assessed in this section in relation to the proposal:
- The Principle of Development;
 - Sustainability;
 - Impact on the Character and Appearance of the Area;
 - Design;
 - Residential Amenity;
 - Ecology and Biodiversity Net Gain;
 - Highways, Access, and Parking; and
 - Contamination.

5.2 THE PRINCIPLE OF DEVELOPMENT

- 5.2.1 Paragraph 11 of the NPPF highlights that a presumption in favour of sustainable development is at the heart of the NPPF. There are three dimensions to this sustainable development; economic, social and environmental. This principle is reflected by policy CS01 of the Core Strategy.
- 5.2.2 The roundel and commercial barn building as well as the associated commercial paraphernalia (vehicles and storage containers) have been redundant for some years and a beneficial consent is sought to provide benefits to the area. The buildings currently serve no active purpose, but the use is lawful and therefore a more intensive commercial activity on the site could be undertaken to the detriment of neighbouring uses and the area in general.
- 5.2.3 As a result of Core Strategy policy CS01, it is noted that the site would not normally be considered as an appropriate location for new development. This is partly due to its location outside of urban confines as outlined within this policy. Therefore,

it is acknowledged that the site sits within the open countryside and Green Belt where policies generally seek to resist new development.

- 5.2.4 Local Plan Policy CS01 is clear that when considering proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development as contained within the NPPF, therefore they will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development improves the economic, social, and environmental conditions in the area.
- 5.2.5 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decisions then the Council will grant permission unless material considerations indicate otherwise, taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF when taken as a whole or if specific policies in the Framework indicate that development should be restricted.
- 5.2.6 Paragraph 154 of the NPPF states outlines various forms of development within the Green Belt which are not considered inappropriate. One such exception includes limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause **substantial** harm to the openness of the Green Belt.
- 5.2.7 In respect of the above, the existing volume of built form on site amounts to 713.4 cubic metres, whereas the volume of the proposed new dwelling would be 625.86 cubic metres (12.27% reduction). In footprint terms, there would be a net reduction of 66.1 sqm (36%). Clearly, the proposed development would provide benefit to the spatial openness of the Green Belt through the reduction in built form. As such, it is submitted that the proposals would not cause **substantial** harm to the openness of the Green belt.
- 5.2.8 In terms of visual openness, it is acknowledged that the barn to be demolished is single storey in height and the proposed dwelling will be 1 and a half storeys in height. However, the marked reduction in built form would offset the slight increase in height. Moreover, the lawful commercial use on site has the potential to stack vehicles well above 1 and a half storeys in height, and spread commercial paraphernalia around the site. Finally, neighbouring residential development is, in the main, two storeys in height and the proposed one and a half storey dwelling would seamlessly blend in within the locality.
- 5.2.9 Therefore, it is submitted that the proposed development would lead to a betterment of visual openness to the Green Belt. Moreover, the proposed development would 'tidy' the site through the creation of a sensitive development, that would assimilate well with the area and markedly enhance the visual appearance of the site.

- 5.2.10 Paragraph 154 (h) of the NPPF is also relevant to the proposals at hand, outlining that 'the re-use of buildings provided that the buildings are of a permanent and substantial construction', would not be inappropriate development within the Green Belt.
- 5.2.11 Therefore, the conversion of existing buildings which are of permanent and substantial construction, would preserve the openness of the Green Belt and not conflict with the purposes of including land within it, would not be considered inappropriate development for the purposes of applying Green Belt policy.
- 5.2.12 The proposal is for the re-use of the existing roundel to provide a 4-bedroom dwelling. Given the development would not increase the built form on site (as detailed in paragraph 5.2.7), the proposal would not conflict with the purposes of Green Belt policy.

Very Special Circumstances

- 5.2.13 Without prejudice to the above, 'very special circumstances (VSCs)' apply to support these proposals. Whether VSCs exist is a matter of planning judgment. The relevant principles are those laid down in *Wychavon District Council v Secretary of State for Communities and Local Government* [2009] PTSR 19, at [21] – [24]:

(1) First, circumstances may be 'very special' even though they are commonplace. It requires a qualitative analysis based upon the facts of the particular proposed development within the Green Belt. It may be the case that a series of ordinary or everyday factors may amount to very special circumstances.

(2) Second, the consideration of very special circumstances can, and often will, involve a balancing exercise, weighing the specific circumstances of the case against the public interest in the protection of the Green Belt together with any other factors that may be relevant.

- 5.2.14 Having regard to these parameters, the benefits of the proposal include:

- (1) The ability to remove old, inefficient and decaying buildings and commercial development, and replace with a modern, energy efficient and highly sustainable new family home;
- (2) A net reduction in footprint and volume to the benefit of openness;
- (3) The ability to deliver a new home in an area of acute unmet need;
- (4) The introduction of ecological enhancements and measures as recommended in the supporting documentation.

- 5.2.15 Whilst these benefits may be commonplace, they need to be weighed against a complete absence of real world harm. In this context, it is clear that a sound VSC case exists.
- 5.2.16 On this basis, we say that the proposal represents appropriate development in line with the parameters of the NPPF, but we also consider that VSCs apply.

5.3 SUSTAINABILITY

- 5.3.1 At the heart of the NPPF is the presumption in favour 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.
- 5.3.2 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). These being 'economic, social and environmental objectives'.

Economic

- 5.3.3 An economic role includes contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. In this respect, the site is suitable, sustainable, available and deliverable for development.
- 5.3.4 Moreover, household expenditure generated by future residents will help to support economic activity locally and help to sustain the jobs and services within the local area. The new dwelling will also contribute to the public purse in respect of developer contributions and Council Tax.

Social

- 5.3.5 A social objective includes supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.
- 5.3.6 The proposed development seeks to provide for a high-quality residential development to meet the needs of the local population and will contribute to the social vitality of the community. The proposed development would provide 1no. property in an accessible location close to services and facilities to meet this supply and therefore can positively contribute towards the social role identified in the NPPF. Socially, in the context of the identified housing shortage, an additional

house provide a contribution to help to meet the 5-year housing supply. The proposal will provide much needed housing in the Borough.

Environmental

- 5.3.7 The environmental objective includes protecting and enhancing the 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.
- 5.3.8 From an environmental perspective, the proposed development would make effective use of an underutilised plot of land, in addition to being sensitively designed to conserve the landscape quality, neighbouring amenity, and to provide ecological enhancements on Site. It is also noted that there are a number of significant environmental benefits associated with the re-use of underutilised buildings which should be considered. Namely, the reduced carbon footprint of using an existing building compared to the complete construction of a new building in terms of embodied carbon, the reduction in required building materials and energy consumption associated with the construction process.
- 5.3.9 The site is located in a sustainable location, with good pedestrian, cycle and vehicle accessibility. For a rural location the site has excellent connectivity to local transport links, buses, trains and local facilities and community services. The Site lies approximately 3.5km to the south west of Gravesend town centre and 1.5km to the northwest of Istead Rise, a Second Tier Settlement, only less sustainable than the urban area of Gravesend/Northfleet/Ebbsfleet as outlined in the Local Plan Core Strategy.
- 5.3.10 Without prejudice to the above, paragraph 109 of the Framework is relevant, which states that: “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”
- 5.3.11 Clearly, the development of a single four-bedroom dwelling could not reasonably be described as significant and would not result in a substantial number of private vehicle trips, indeed these are likely to be much lower than a more intensive use of the site for its lawful use, such that the negative environmental impacts would weigh significantly against the proposal. Irrespective, the Framework makes a clear distinction between urban and rural areas, acknowledging that more limited opportunities exist in rural locations to maximise sustainable transport solutions.
- 5.3.12 Moreover, as we know, the site is brownfield land in B8 use, and daily trips associated with that use, when in full operation would likely outweigh that of a single dwelling.

- 5.3.13 Finally, it is noted that paragraph 84 of the NPPF outlines that policies and decisions should avoid the development of homes in the countryside unless one or more certain circumstances apply. One such exception is the re-use of redundant or disused buildings.

5.4 NEARBY PRECEDENTS AND CONSIDERATION OF DECISION CONSISTENCY

- 5.4.1 As has already been stated, there is an example in the immediate area of a permission for residential development outside of settlement confines and the Green Belt.
- 5.4.2 The following application (20141132) is deemed highly relevant to the case at hand given their siting in relation to Lower Rainham Road and distance to confines.

Partial demolition of and conversion of an existing redundant potato store to 7, four bedroom residential units and erection of an open-fronted barn to provide 12 car parking spaces and cycle store- Hazells Farm, Northfleet Green, Gravesend Kent

- 5.4.3 The above site received consent for 7no. 4 bedroom houses and is located approximately 100m north of the application site.



FIGURE 5.1: HAZELLS FARM DEVELOPMENT IN RELATION TO APPLICATION SITE

- 5.4.4 That site was also located outside urban confines, and therefore designated within the countryside and Green Belt.
- 5.4.5 It is noted that the delegated report found the proposals to comply with local policy (which has not changed since) and significant to the application at hand, the Council raised no concerns regarding sustainability.

5.5 IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

- 5.5.1 Paragraph 182 of the NPPF states that great weight should be given to conserving and enhancing landscape and Policy CS12 (LPCS) seeks to protect the Green infrastructure within the Borough and states that the overall landscape character and valued landscapes will be conserved, restored and enhanced.
- 5.5.2 The site lies within the Istead Arable Farmlands LCA. In the main, the area is characterised by gently undulating topography with open arable fields, native woodland clumps, occasional hedgerows, clusters of properties and farmsteads and Istead Rise modern housing development.
- 5.5.3 The proposals seek to remove a utilitarian low-grade barn, a further dilapidated barn, storage containers and abandoned cars, all of which detract from immediate setting and character of the site. The potential for considerable spread of further associated commercial paraphernalia and stored materials will also be removed from the site, resulting in an overall improvement to the character of the countryside, hereabouts.
- 5.5.4 It is considered that a dwelling in this location could be considered to be part of the 'cluster' of dwellings within the immediate area and is considered to be 'infill' development given that residential dwellings lie to the north, south and west of the application site. As such, it would not appear a foreign development in the landscape.
- 5.5.5 The site is considered to be in a secluded position and would not be visible from wider public vantage points. The removal of the abandoned shipping containers and cars offers the opportunity to introduce landscaping to the benefit of flora and fauna in the locality. As set out previously within this statement, the dwelling has design features that would be expected to be found in the countryside. The materials used will ensure the proposal is congruous with the local landscape and appropriate for the countryside location.
- 5.5.6 Overall, the high-quality design of the proposed development and the removal of the existing commercial barn and associated commercial paraphernalia (vehicles and storage containers) will provide a betterment to the landscape and appearance of the countryside. Therefore, there would be no significant adverse visual impact to the rural locality or LCA from the proposals.

5.6 DESIGN

- 5.6.1 NPPF Paragraph 131 is clear that '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'.
- 5.6.2 Policy CS19 states that new development should be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area and meet anti-crime standards. Account should be taken of scale, height, building lines, layout, materials and other architectural features of adjoining buildings. Development should also accord with the adopted Residential Layout Guidelines, and should be designed to be inclusive and adaptable.
- 5.6.3 The core design concept has been to retain the integrity of the roundel, utilising its original structure to create an open and attractive living space that would result in an enhancement to the immediate setting of the area.
- 5.6.4 The materiality has been carefully selected to compliment the rural working landscape and has been designed to ensure the proposals appear sympathetic and unobtrusive within the setting. The design results in an enhancement to the immediate low-quality setting as existing, through the tidying and landscaping of the site and the delivery of new a new home of contemporary sustainable architecture.
- 5.6.5 The dwelling has been designed to ensure that the internal spaces are appropriate and fit for purpose. It is noted that the proposed dwelling is entirely in accordance with the requirements set out under the Nationally Described Space Standards in addition to being provide with adequate internal storage, recycling storage space, and access to useable private amenity space.

5.7 AMENITY

- 5.7.1 Paragraph 135 of the NPPF is clear that planning policies and decisions should ensure that developments create places that are safe, inclusive, and accessible and which offer a high standard of amenity for existing and future users.
- 5.7.2 Policy CS19 states that the development should meet the minimum Nationally Described Space Standards to ensure that the development provides suitable and adequate floorspace for a variety of users. The proposals accord and exceed the relevant standards.
- 5.7.3 The proposed layout ensures that the dwelling is provided with a good standard of private amenity space.

- 5.7.4 Moreover, given the distance between the proposals and neighbouring development it isn't considered that the development would have any detrimental impact on other residents.
- 5.7.5 Therefore, there are no issues of overlooking or loss of amenities related to the proposed development and the scheme would therefore comply with both national and local planning policy.

5.8 ECOLOGY AND BIODIVERSITY NET GAIN

- 5.8.1 By virtue of the development as proposed, a Preliminary Ecological Appraisal has been prepared by KB Ecology.
- 5.8.2 The PEA demonstrates that the site is not part of, nor directly adjacent to, any statutory designated sites and there are none located within 1km of the site.
- 5.8.3 A data search carried out with Krag revealed that the closest recorded Great Crested Newt is a historical record located at Ebbsfleet Valley, 2.5km to the north. No ponds are present on site or within 250m, therefore due to the paucity of ponds in the general area and the distance to the nearest pond, it is judged unlikely that great crested newts would be present on site.
- 5.8.4 In terms of reptiles, the closest recorded reptile was a viviparous lizard (according to Krag) located 1.27km to the northwest. The likelihood of reptiles to be present in the overall area is judged as below average.
- 5.8.5 In terms of birds, no signs of barn owl were found during the survey, however, the site has potential to support breeding birds within the ivy and buildings.
- 5.8.6 In regard of the hazel dormouse, it is considered that the site has no potential to support the hazel dormouse due to lack of suitable habitat on site.
- 5.8.7 In regard to badgers, no setts or signs of badgers were identified during the survey.
- 5.8.8 The PEA demonstrates that no bats or signs of bats were found during the internal / external inspection of the outbuilding and roundel.
- 5.8.9 The outbuilding is an open structure made of timber and tin, judged as offering negligible suitability for roosting bats, being of single skin construction with no suitable cavities. The roundel is a brick building with a flat roof, some small cavities were present in the internal brick work and between timbers and brick, providing a small number of Potential Roosting Features; the roundel is judged as offering low suitability for roosting bats. That said, the surrounding area is likely to be used by foraging and commuting bats.
- 5.8.10 Following the PEA identifying the roundel as offering low suitability for roosting bats, KB Ecology were commissioned to undertake night-time bat survey and

provide a suitable mitigation strategy. In light of this, an emergence survey was undertaken in August 2024.

- 5.8.11 No bats were seen emerging from the building during the survey. Only a low number of common pipistrelle, serotine, noctule and *Myotis* bats were seen and heard commuting and foraging. The roundel is thus not considered as being used as a bat roost and no mitigation or licence is expected to be needed prior to its conversion.

Biodiversity Net Gain

- 5.8.12 NPPF Paragraph 180(d) is clear that new development should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 5.8.13 For developments in England, Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). As a result of this, developers must deliver a BNG of 10%, ensuring that development will result in more or better-quality natural habitat than there was prior to the development.
- 5.8.14 As a result of this, a BNG Assessment has been prepared and submitted as part of the Application (KB Ecology, November 2024). The BNG Assessment provides an assessment and calculation of biodiversity units pre- and post-development.
- 5.8.15 The assessment is clear that the proposed development will result in a loss of 0.12 habitat units, equating to a -51% loss in habitat units.
- 5.8.16 As a net loss is predicted from the base proposals, it is recommended that off-site habitat creation or habitat units are purchased.
- 5.8.17 In view of the above, it is considered that the development as proposed is entirely in accordance with all relevant National and Local Policy relating to landscaping, trees, ecology, and Biodiversity Net Gain

5.9 HIGHWAYS, PARKING AND ACCESS

- 5.9.1 Vehicular access to the Site exists via the established access track from Northfleet Green Road. The access is to remain in its existing format, with no intensification of the access proposed.
- 5.9.2 By virtue of the scale of the development, it is not expected that the proposals would generate significant additional vehicle trips and therefore would not demonstrably impact on Local Highway capacity, amenity, or operation, nor would it have any severe impact on the Local Highway Network in line with NPPF Paragraph 111.

- 5.9.3 The proposals will provide provides two car parking spaces in accordance with the KCC Interim Guidance Note 3 (IGN3) vehicle access parking standards for residential development in rural locations.

5.10 CONTAMINATION

- 5.10.1 A contamination assessment has been prepared by Soils Limited and accompanies this application.
- 5.10.2 The Assessment identified a potential for a low to moderate/low risk of contamination on site.
- 5.10.3 The Assessment found that the site is at high risk of unexploded ordinances and outlined that a specialist UXO risk assessment is undertaken to determine the risk to the proposed development. It is considered that an UXO risk assessment can be secured by way of a suitably worded planning condition.

6 SUMMARY AND CONCLUSION

6.1 SUMMARY

- 6.1.1 This Statement has been prepared on behalf of Mr. R. Shotton in respect of a full planning application for the Demolition of an existing commercial building (and retention of rear wall), demolition of remnants of barn and conversion of roundel to create a 4-bedroom dwelling with associated parking, amenity space, landscaping and access.
- 6.1.2 The Site is situated within the Metropolitan Green Belt ('the Green Belt') and so careful consideration has been given to the design approach to ensure the development would not result in any adverse impacts to openness. It is also highlighted that the in-principle re-use of an existing building is an 'appropriate' form of development within the Countryside as defined by the NPPF.
- 6.1.3 The importance of the ability to deliver new homes in the short-term is reiterated given the extent of the housing land supply shortage in the Borough. Indeed, based on the Government's standard methodology for calculating housing need, Gravesham's annual requirement is 707 dwellings, which is nearly double the current 363 houses per year target contained within the out-of-date Core Strategy. Furthermore, the latest Housing Delivery Test results require the Council automatically apply the presumption in favour of sustainable development owing to recent under delivery. National Planning Policy reflects the importance of housing need and supply, which requires Local Authorities to provide a five-year housing land supply, where Authorities unable to do so, circumstances significantly tilt decision making in favour of the grant of permission.

6.2 CONCLUSION

- 6.2.1 In considering the above context, the development comprises a well-informed, high-quality, sensitive, and well-planned re-development proposal.
- 6.2.2 It is considered that the proposal accords with the development plan, additionally, wider material considerations support the proposed development and therefore it is respectfully requested that Planning Permission be granted.