
GSP PROJECT REF: [3599.PN](#)

DESIGN, ACCESS AND PLANNING STATEMENT

**WHITE HORSE RIDING CENTRE, WHITE HORSE LANE, MEOPHAM,
GRAVESEND, DA13 0UE**

APRIL 2022

1.0 INTRODUCTION

- 1.1 This Statement is prepared in support of a retrospective application for use of land for the siting of a caravan for use by the head groom and his partner who is also a groom, at White Horse Riding Centre.
- 1.2 The applicants took over a business in July 2015 known as Drayhorse Shires who are based near Ashford and this added 12 carriage horses and 10 carriages to their hire fleet for weddings, funerals and special events. It has also increased the number of staff to 7 full time.
- 1.3 This application follows previous temporary permissions but this time is for the permanent provision of on-site living accommodation for staff who previously lived at the site near Ashford when they were employed by Drayhorse Shires. Their position at White Horse Riding Centre is dependent on the provision of living accommodation at the site.

2.0 SITE CONTEXT

- 2.1 The application site forms part of some 15 hectares of land used as the riding centre and is located on the east side of White Horse Lane just to the east of Harvel Village within the existing complex of buildings that comprise former farm buildings that have been adapted for equestrian purposes together with the original relocated indoor arena and a storage barn.
- 2.2 To the north of the complex of buildings is Harvel Green separated from the site by a well established hedge. To the west, the complex has a frontage to White Horse Lane where the main access to the site is located. To the south is a further dwelling together with outbuildings also owned by the applicant. To the east, the complex adjoins fields forming part of the site with a boundary to a bridle path.

3.0 RELEVANT HISTORY

- [Continued use of land for siting of a caravan.](#)

Ref. No: 20150962 | Status: Application Permitted subject to a single condition restricting occupation of the caravan to groom(s) employed at White Horse Riding Centre and limited to a period expiring on 20 November 2020.

4.0 PROPOSED DEVELOPMENT AND NEED

- 4.1 The use is to continue to site a caravan to provide living accommodation for essential staff members who need to reside on-site. The grooms need to start work early in the morning on an event day, between 3:00-4:00 am to prepare the horses including feeding/watering, washing, brushing loading into the lorry. This is a time consuming activity that can take up to 3 hours. The horses then have to be ready to leave the site for a summary of 2-4 hours depending on the distance to the venue on arrival the horses need to be cleaned and brushed and harnessed into the carriage, the grooms

need to change into their livery. This can take at least 2 hours. The team is then ready for the job which will often commence at 10:00 am.

- 4.2 The grooms also need to be available on-site to look after the horses including feeding and to provide attention if they are sick or injured. These are special horses that are distinct from the horses used and kept elsewhere on the site for riding purposes.
- 4.3 The working hours are long and anti-social and it would not be possible to recruit staff without the availability of on-site living accommodation. The provision of off-site accommodation could not meet the functional need to care for the horses, which remains the case in 2022.
- 4.4 The size and scale of the caravan is 11.4m by 3.9m and conforms to the definition of a Caravan in the Caravan Sites Control of Development Act.
- 4.5 The caravan is located to the east of the original indoor school and to the west of the open frontage storage shed within the yard. It is an ideal location within sight and sound of the horses where the occupants of the caravan can be aware of problems with the horses if they occur overnight.
- 4.6 In this location, the caravan is well screened from the surrounding countryside. This is shown in the photographs attached to this Statement.
- 4.7 The caravan is connected to an existing cesspool for drainage, it is connected to the mains water and electricity supplies.
- 4.8 The access to the caravan is through the existing yard at the riding centre. The caravan in this location could only realistically be occupied by staff employed at the site. Car parking is available within the dedicated car parking area serving the site. Pedestrian access is through the yard.

5.0 POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The Court of Appeal has clarified that for a decision maker this means establishing whether a proposal is in accordance with the development plan as a whole. The question of compliance with one policy should not dictate the outcome of a proposal in the absence of considering compliance with all other relevant policies. Decision makers are therefore tasked with identifying and understanding all relevant policies and material considerations in order to reach a properly informed planning judgment on a proposal, and to avoid an irrational or vulnerable decision that may be subject to criticism in a public law challenge.
- 5.2 Paragraph 2 of the National Planning Policy Framework ('the Framework') reiterates what is said in Section 38(6), whilst paragraph 12 of the Framework is clear that the development plan is the starting point for decision making. Proposed development

that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.

- 5.3 Paragraph 38 of the Framework encourages local planning authorities to approach decisions on proposed development in a positive and creative way. It also encourages working proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area, adding that decisionmakers should seek to approve applications for sustainable development where possible.
- 5.4 Annex 1 of the Framework confirms that for the purposes of decision-taking, the policies in the plan should not be considered out-of-date simply because they were adopted prior to the publication of the Framework. It adds that due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework, with greater weight being given to those policies that are closer to the policies in the Framework.

Development Plan

- 5.5 It is understood that the Development Plan for the area within which the application site is located comprises the Gravesham Local Plan Core Strategy (CS) (adopted September 2014) and the Saved Policies of the Gravesham Local Plan First Review (LPFR) (adopted November 1994). There are also a number of supplementary policy documents to consider, including the Vehicle Parking Standards (July 1996). It is also necessary to have regard to the guidance in the Framework.
- 5.6 Relevant CS policies appear to include:
- CS01: Sustainable Development;
 - CS02: Scale and Distribution of Development (Green Belt);
 - CS12: Green Infrastructure (AONB, Landscape Character);
 - CS14: Housing Type and Size;
 - CS15: Housing Density;
 - CS18: Climate Change;
 - CS19: Development and Design Principles.
- 5.7 Relevant LPFR policies appear to include:
- T1: Development outside the Built-up Area;
 - P3: Vehicle Parking Standards.
- 5.8 A relevant extract from page 14 of the CS policies map is as follows:



- 5.9 The above indicates that the site is within the Green Belt (CS02), the North Downs Area of Outstanding Natural Beauty (CS12) and the Harvel Wooded Downs Landscape Character Area. The site is also close, but not within, a Local Wildlife Site to the SE, whilst nearby to the NW is the Harvel Conservation Area.

Other Material Considerations

The Framework

- 5.10 Paragraph 84 seeks to support a prosperous rural economy and particularly seeks to promote the development and diversification of agricultural and other land based rural businesses.
- 5.11 Paragraph 149 of the Framework sets out a number of exceptions where certain forms of development, excluding the construction of new buildings, are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include (amongst others): (e) material changes in the use of land.
- 5.12 Paragraph 174 indicates that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things, protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils. Paragraph 176 adds that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty.
- 5.13 The following are also material considerations:
- Nationally Described Space Standards (NDSS) (March 2015);
 - National Design Guide (NDG) (October 2019);
 - Kent County Council Parking Standards SPG4 (2006);

- Gravesham Landscape Character Assessment (May 2009) (a technical document which underpins policy CS12) (Harvel Wooded Downs);
- Kent Downs AONB Management Plan.

6.0 PLANNING CONTEXT

- 6.1 In accordance with paragraph 84 of the Framework, the accommodation is needed to enable the continuation of the business which has expanded in the past as a result of taking over another business operating in the same sector.
- 6.2 The development is sustainable because the staff are able to live on-site and this avoids the necessity for them to travel to and from work. It has an economic benefit in enabling the expansion of this rural business; it has a social role by providing accommodation at the work place thereby enabling the head groom and his partner to be together whilst fulfilling their functional role in looking after horses at this site. In terms of the environmental role, the accommodation is provided within the site where there are already existing buildings and, in this location, it will minimise impact on the surrounding countryside.
- 6.3 The Framework, at paragraph 80, recognises the need to avoid isolated homes in the countryside, unless there is (amongst others) an essential need for a rural worker to live permanently at or near their place of work in the countryside. Although this envisages a permanent form of accommodation, the subject proposal involves a mobile form of accommodation, is of a modest-scale, sited entirely within its working environment, and will ultimately meet a particular requirement at the premises.
- 6.4 Regarding the site's location in the Green Belt, paragraph 150 permits certain forms of development including the material change in the use of the land, subject to preserving the openness of the Green Belt and not conflicting with the purposes of including land within it. In respect of the former, no operational development is proposed and it will allow the siting of a single caravan on existing lawful hardstanding that is to be positioned against existing, and much larger permanent built form. It is not considered that, in the context of the lawful use of the wider site, the caravan is materially affecting openness, nor harming the visual amenities of the area. On the latter point, judged against the five purposes of including land in the Green Belt, as the caravan is to remain tucked between built form on an existing previously developed site it is considered that no conflict with the purposes can be demonstrated.
- 6.5 The Framework also recognises the importance of protecting and enhancing the natural environment. At paragraph 174 it states that planning permission should be refused for major developments in designated areas except in exceptional circumstances. However, this proposal represents only a minor form of development that facilitates the continued use of the premises for business purposes thereby maintaining a rural business within this protected area.
- 6.6 Whilst it is acknowledged that there is other living accommodation within the wider site, this was provided to enable the equestrian manager to live on-site to supervise the equestrian business and riding on-site. This additional accommodation is to meet

different requirements specifically for the grooms dealing with the shire horses and carriage hire business. This job requires different skills, particularly as the applicants are instigating a programme to breed shire horses which involve an on-site presence during cooling down. As previously successfully demonstrated, there is a continued functional need for accommodation to meet the specific circumstances on the site. This need cannot be met by the existing lawful living accommodation on-site because that was provided for a different role.

- 6.7 There are no available houses close enough to the site to meet the functional needs of this business for on-site living accommodation.

Appropriateness of Permanent Permission

- 6.8 Planning Practice Guidance states that it will rarely be justifiable to grant multiple temporary permissions, with a presumption that further applications normally would be required to be granted permanently or refused, if there is clear justification for doing so.
- 6.9 The need still exists to accommodate horse groomer(s) within the wider application site as their working environment, and as the application does not entail any permanent built form development, subject to a condition requiring its removal as and when it is no longer used for, or required for, this use, it is not considered that a permanent permission would result in any harm over and above a further temporary permission. Such a suggested condition is as per Rural Planning Limited's consultation response in connection with the previous application.
- 6.10 It is on this basis that the applicant believes such a permanent permission should be acceptable to GBC.

7.0 CONCLUSIONS

- 7.1 For all these reasons, the Council are respectfully requested to grant planning permission for this caravan to be sited within the application site.