

9 July 2021

Planning Services
Sevenoaks Council
Council Offices
Argyle Road
Sevenoaks
Kent
TN13 1HG

Dear Sirs

**Change of Use of Existing Agricultural Barn to Storage Use
Barn 3 Sundridge Place Farm, Church Road, Sundridge, Sevenoaks, Kent**

This Planning Statement forms part of an application for the proposed change of use of an existing agricultural barn for storage use (Class B8). The site forms part of Sundridge Place Farm, Sundridge, Kent.

The application is submitted on behalf of our client, Mr D Gregory, who owns the farm on which the site is located and who resides at the adjacent farmhouse.

This application comprises the following documents:

1. This Planning Statement
2. Application Forms and Certificate
3. Site location plan
4. The relevant fee

Summary

Barn 3 was constructed in 2011 as a replacement agricultural barn to serve the needs of the farm for improved hay storage. It replaced a series of three old barns on the same footprint, which were subdivided with internal posts and beams and were no longer fit for use. The permission (SE/11/00850/FUL) did not increase the floor area, but created a single span storage barn within the same location and footprint, which was suitable for the storage of the larger, modern hay bales. At that time, the farm was being managed for hay and this was stored in the barn and sold over the rest of the farming year.

Since then however, although still managed for hay, agricultural practice has changed and hay is now sold and loaded directly from the field each year, as soon as it is cut and baled, removing double handling and the need to store it on site. Demand for hay is such that this is the most economic option.

Hence, the barn has ceased to be used for hay storage and has become variously used to store a range of materials, vehicles and equipment owned by the applicant, some of which comprise agricultural farm equipment and some of which comprise building materials and reclaimed architectural materials and artefacts.

The remaining storage of agricultural machinery and equipment does not effectively utilise the barn and in the absence of the application proposal, the barn would revert to low level agricultural use for the storage of some farm equipment, but would be of limited economic value. It is therefore, proposed to change the use of the barn for storage purposes by the applicant.

This application is part retrospective in relation to the existing storage of vehicles, architectural salvage materials and building materials and part prospective, as the application proposes the complete change of use of the barn from agriculture to storage (within Class B8), so that it can be used for the storage of vehicles, architectural salvage, materials and equipment. It is proposed that the remaining farm vehicles, machinery and equipment are also relocated within this barn (from barn 2 to the north – see separate application) as it is already partly used for this purpose.

No external changes are proposed to the building which in all other respects remains as it was constructed in 2011. No additional activity is proposed above the current low level storage activity undertaken by the applicant.

Site Location and Description

The application site comprises a single, modern agricultural barn located at Sundridge Place Farm, Church Road, Sundridge. Access is gained via a private drive off Church Road, around 550m south of the junction with the A25 principal road network, approximately 1.4km west of the junction with the A21 and M25. The barn lies due south of the farmhouse and is shown in Figure 1.

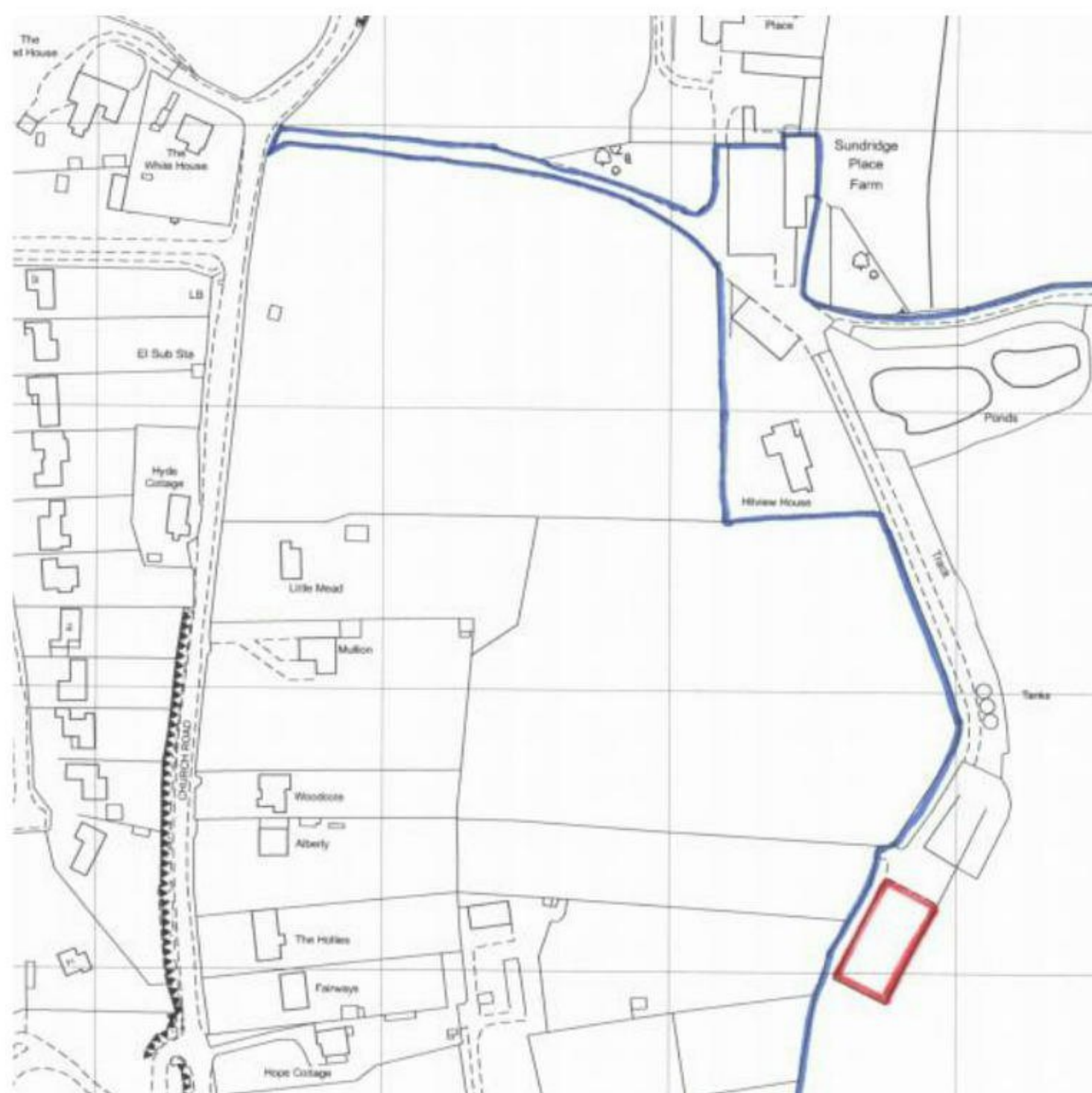


Figure 1 Site Location

A public bridleway SR225 runs roughly east-west a short distance to the north, along the access and the northern yard area and a public footpath SR222 runs roughly north west-south east across the farm fields a short distance to the east.

The site is part of a farm extending to approximately 47ha (116 acres) that has formerly been managed for livestock and in more recent years for hay under the former and present ownership. There are three areas of barns and ancillary buildings, with a complex of old, former cattle barns and buildings in the northern part of the site (Barn 1), the modern central barn (Barn 2) and a larger barn in the southern part of the farm (Barn 3) which is the subject of this application.

The barn was constructed in early 2011 under permission SE/11/00850/FUL. Hence, the application barn is structurally sound, of a modern steel framed construction clad in profiled metal cladding to the roof and walls with rooflights and a roller shutter door to the northern elevation. It sits on a concrete base which also forms a yard area to the northern elevation. Immediately north of this is an area of old silage clamps that have been used for many years for the storage of reclaimed materials. The site is served by the main site access which extends north through the farm and then west to the access onto Church Road.

The site is generally flat and the surrounding gently undulating farmland rises gradually to the east and south.

Policy

Although dated, the Development Plan currently comprises the Sevenoaks Core Strategy adopted in 2011 and the Allocations and Development Management Plan adopted in 2015. While there is a review of the local plan underway, this has been found to be unsound and hence cannot be accorded any weight at this time.

Within the existing development plan, the site is subject to the following planning constraints which also affect the majority of the Borough outside the urban areas:

1. Green Belt
2. Area of outstanding natural beauty (AONB)

The site is outside of, though near to, a Biodiversity Opportunity Area and a public right of way, runs a short distance to the north of the site, alongside the adjoining field.

Core Strategy (CS):

The Core Strategy predated the NPPF in 2012 and current 2019 NPPF and does not therefore, contain a presumption in favour of sustainable development or reflect some of the policies set out in the NPPF as they apply now. However, the Spatial Vision for the Core Strategy references the reuse of rural buildings and comments that:

“An active and vibrant rural economy providing a range of jobs and services in rural areas will be supported primarily based on the re-use of existing buildings.”

Sundridge is identified as a ‘Service Village’ on the Key diagram which provides a range of services for the surrounding area.

Policy L01 Distribution of Development - focuses major new development on the main towns and rural settlements. Outside of this, in the rural areas, it seeks to protect the rural character of the District and supports development where this is compatible with policies for protecting the Green Belt and the High Weald and Kent Downs Areas of Outstanding Natural Beauty and is outside areas of flood risk.

Policy L08 The Countryside and the Rural Economy - maintains the extent of the Green Belt and seeks to conserve the wider countryside and its distinctive features that contribute to the special character of its landscape and biodiversity, including the Kent and High Weald AONB. All development should conserve and enhance local landscape character and provide appropriate mitigation where damage to local character cannot be avoided.

The policy provides for development that supports the maintenance and diversification of the rural economy, including development for agriculture, forestry, small scale business development and rural tourism projects and the vitality of local communities.

Policy SP8 Economic Development and Land for Business – seeks to maintain and enhance the District’s economy which will be supported by the retention, intensification and regeneration of existing business areas primarily and, among other things, giving priority to business uses or tourist uses in the conversion of buildings in the rural area.

SP11 Biodiversity – seeks to ensure that in new buildings and development conserve the biodiversity of the District and seeks opportunities for enhancement to ensure no net loss of biodiversity.

Allocations and Development Management Plan (ADMP):

The ADMP was prepared under the former 2012 NPPF and at Policy SC1 sets out a Presumption in Favour of Sustainable Development. This provides that:

‘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. The Council 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. Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise.’

Policy GB7 Re-use of a Building in the Green Belt – provides that the conversion of buildings in the Green Belt will be supported providing the proposal meets the criteria set out. It states:

‘Proposals for the re-use of a building in the Green Belt which would meet the following criteria will be permitted:

- a) the proposed new use, along with any associated use of land surrounding the building, will not have a materially greater impact than the present use on the openness of the Green Belt or harm the existing character of the area; and*
- b) the applicant can demonstrate through a detailed structural survey and method statement that the buildings are of permanent and substantial construction and are capable of conversion without major or complete re-construction that would detract from their original character.*

Where a proposal seeks the re-use of an agricultural building constructed within the last 10 years, it will be necessary for the applicant to demonstrate that there is no longer an agricultural need for the building, or that the building is no longer fit for its agricultural purpose.

Where it is accepted that there is no future agricultural need for the building, the Council will resist future proposals for new agricultural buildings, unless it is apparent that they are of a different type and nature than that previously identified as being surplus to requirements.'

This is the key policy against which this application should be assessed.

The supporting text provides that conversion of buildings that require substantial rebuilding in order to make them suitable for re-use will not be permitted. It supports conversions where they will have no greater impact than the present use on the openness of the Green Belt or harm the visual amenity of the area.

It notes that to avoid increasing impact, conversions that involve disproportionate extensions will not be considered acceptable.

Paragraph 7.44 advises that where the proposed conversion relates to an agricultural building, the applicant should demonstrate that the building is no longer required for agricultural purposes. Where it is accepted that there is no longer an agricultural need for the building, the Council will not permit the future construction of new agricultural buildings of the same type and nature unless it is satisfied that circumstances have significantly changed that would warrant allowing the proposal.

Policy EMP5 - Non-allocated Employment Sites supports employment uses subject to the impact of the proposals on the environment, local economy and the local community.

Policy EN5 Landscape – seeks to protect areas of designated landscape from inappropriate development that would harm their character but provides also that new development proposals will be permitted where they would conserve the character of the landscape.

Development in the Green Belt SPD

A number of supplementary planning documents will also sit alongside the development plan to give additional guidance to the implementation of policies in the ADMP and Core Strategy. These are a material consideration in planning decisions. To support the policies for development in the Green Belt, the Council prepared an SPD to provide advice on the way the Council consider applications and how best to prepare Green Belt schemes. The SPD repeats the relevant tests in policy GB7 set out above.

NPPF 2019

National planning policy is a material consideration in the determination of planning applications. Where development plan policies were adopted prior to the introduction of the NPPF, weight should be accorded to them to the degree that they are consistent with the policies of the Framework.

The NPPF sets out the primary objective of the planning system, being the achievement of sustainable development (paragraphs 7-10). At paragraph 11, the Government set out the positive presumption in favour of sustainable development and requires that applications that accord with an up-to-date development plan should be approved without delay.

The NPPF sets out the Government's policies for the protection of the Green Belt and seeks to prevent the construction of new buildings which are considered inappropriate development other than for a number of specified uses where these preserve the openness of the Green Belt and are consistent with

its purposes. The reuse of existing buildings within the Green Belt is one form of development that is considered acceptable.

Paragraph 146 of the NPPF states that the reuse of buildings within the Green Belt are not to be considered inappropriate development providing the building is of permanent and substantial construction. The application is therefore, consistent with this policy.

Planning Assessment

The application proposes the reuse of an existing agricultural building for use as a workshop and storage ancillary to the domestic occupation and use of Sundridge Place Farm. The proposals do not involve any modifications, extensions or alterations to the barn and specifically involve no alterations to the exterior of the barn or its surrounding environment. There has been no material change in the character or appearance of the barn in this time.

As a matter of principle, the reuse of existing buildings that are of sound and permanent construction is sustainable development, since it makes effective use of existing infrastructure and avoids the need for additional buildings elsewhere. It also avoids any additional impacts associated with new development and, in this case, also reduces the need for the applicant to travel to other locations to access the vehicles and other equipment stored.

Part R of the Town and Country Planning (General Permitted Development) (England) Order 2015 grants permission for development consisting of a change of use of a building and any land within its curtilage from a use as an agricultural building to a flexible use falling within a range of flexible use classes, including Class E and B8. This is subject to criteria that requires the building was in agricultural use at July 2012 and limits the change to 500sqm. While this would allow the majority of the barn to be used for general storage use, the barn exceeds the floorspace criteria and hence this application is required. However, the emphasis of the Government's introduction of this prior approval permitted development class is clear, to allow the flexible use of agricultural buildings for other flexible employment use. Hence, such use should only be restricted where this raises clear planning concerns.

Although the barn was constructed as a hay store in 2011, hay storage has since ceased and is sold directly from the field, which is in line with modern agricultural practice. This is also more efficient and avoids double handing. Hence this barn is no longer required for hay storage and has been variously used to store items of farm machinery, equipment and other materials and equipment since that time.

This application proposes the use of the barn wholly as ancillary domestic storage and workshop associated with the occupation of Sundridge Place Farm.

The proposals do not involve any new development or building and as such are wholly consistent with policies for the conservation of the landscape and AONB. The barn is not near any domestic building (other than the applicant's farmhouse) and would have no impact on nature conservation or other interests.

Policy GB7 of the ADMP provides specifically for the 'Re-use of a Building in the Green Belt' and states that such proposals will be permitted, subject to them meeting 4 criteria.

In this regard the application meets these criteria, as summarised below:

1. the proposed use as storage proposes no physical changes to the building. As such it has no materially greater impact than the present use on the openness of the Green Belt nor would it harm the existing character of the area;
2. the applicant has demonstrated through a structural survey set out in Appendix 1 that the building is of permanent and substantial construction (which can be readily seen in any site visit) and is capable of reuse without any works and especially any works that would alter their original character;
3. the agricultural building was constructed in 2011, some 10 years ago and hence accord with policy. However, there is now no ongoing agricultural need for hay storage, as this is now sold directly from the fields, once cut and baled. As such the only agricultural need is for the storage of some farm machinery and equipment which is consistent with the proposed storage use.
4. there is no additional requirement for agricultural buildings as a replacement for this building or additional to that in this application.

In the last few years it has proven more economic to sell hay straight from the field rather than store hay on the farm and this is now undertaken by contractors. Hence there is no longer any need for this building in agricultural terms. While the agricultural use of the barn has not wholly or permanently ceased, the remaining storage of agricultural equipment does not fully utilise the barn and in the absence of these proposals, the barn would revert to low level agricultural use for the partial storage of farm machinery and equipment, but this would be of limited value and would be clearly under-utilised.

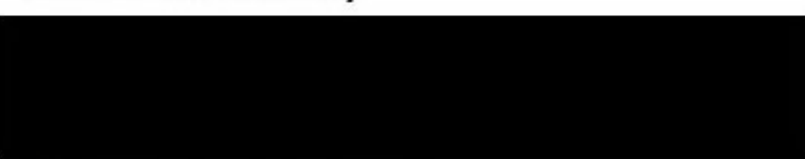
The use for storage is consistent with the previous use for the storage of hay and does not alter the character of the use or the impacts associated with it. the nature and type of machinery used and the movements associated with it are entirely comparable. There would no additional or adverse impacts associated with the proposed use.

As such, the application is supported by policy GB7 of the ADMP and accords with its requirements and with paragraph 146 of the NPPF. Hence, the application is also supported by the positive presumption in favour of the grant of planning permission set out in Policy SC1 and in paragraph 11 of the NPPF.

The proposal is also consistent with policies L01, L08 and SP11 of the ADMP in that they reuse an existing building within the rural area and involve no changes to its external appearance or associated impact. The proposal accords with SP8 in supporting the restoration and maintenance of historic vehicles that require specialist trades in the area involved in their maintenance and refurbishment. There are no other policies within the development plan that would suggest an alternative conclusion is reached.

In light of the above and in accordance with the policies of the development plan and other material considerations, we respectfully request that the application be granted. Should you have any queries in relation to any of the material submitted, please do let us know.

Yours sincerely



Steven Fidgett
Director
Enc.

Appendix 1 Structural Survey

A visual inspection was undertaken of the visible, exposed and accessible parts of the fabric of the building. This showed the building to be used for the storage of tractors and fork lifts, scaffold, felled timber, fencing and scaffold, bricks, a 4x4 vehicle and the owner's own camper van. The interior was dry and bright and suitable for storage purposes.

The building is of modern steel framed, single span construction, with profiled, coated, metal cladding to the walls and roof. It measures approximately 39m long by 21m wide and is set partially into the adjoining rising ground. All of the structure appeared to be in good condition and suitable for the intended use.

The building is on a modern concrete base in good condition and which extends to the front of the building to create an agricultural yard area for parking of service vehicles/loading and unloading.

The building benefits from a roller shutter door to eaves height on the northern elevation and a separate pedestrian access door.

The overall structure and dimensions of the building are shown in the attached plans.

The building benefits from modern lighting, natural light via a series of rooflights, potable water, drainage and three phase electrical supply.

The interior of the building is painted and is fitted out with racking and other equipment.

There were no apparent defects that would prevent the reuse of the building and no works are proposed to the building to enable its beneficial reuse as proposed.

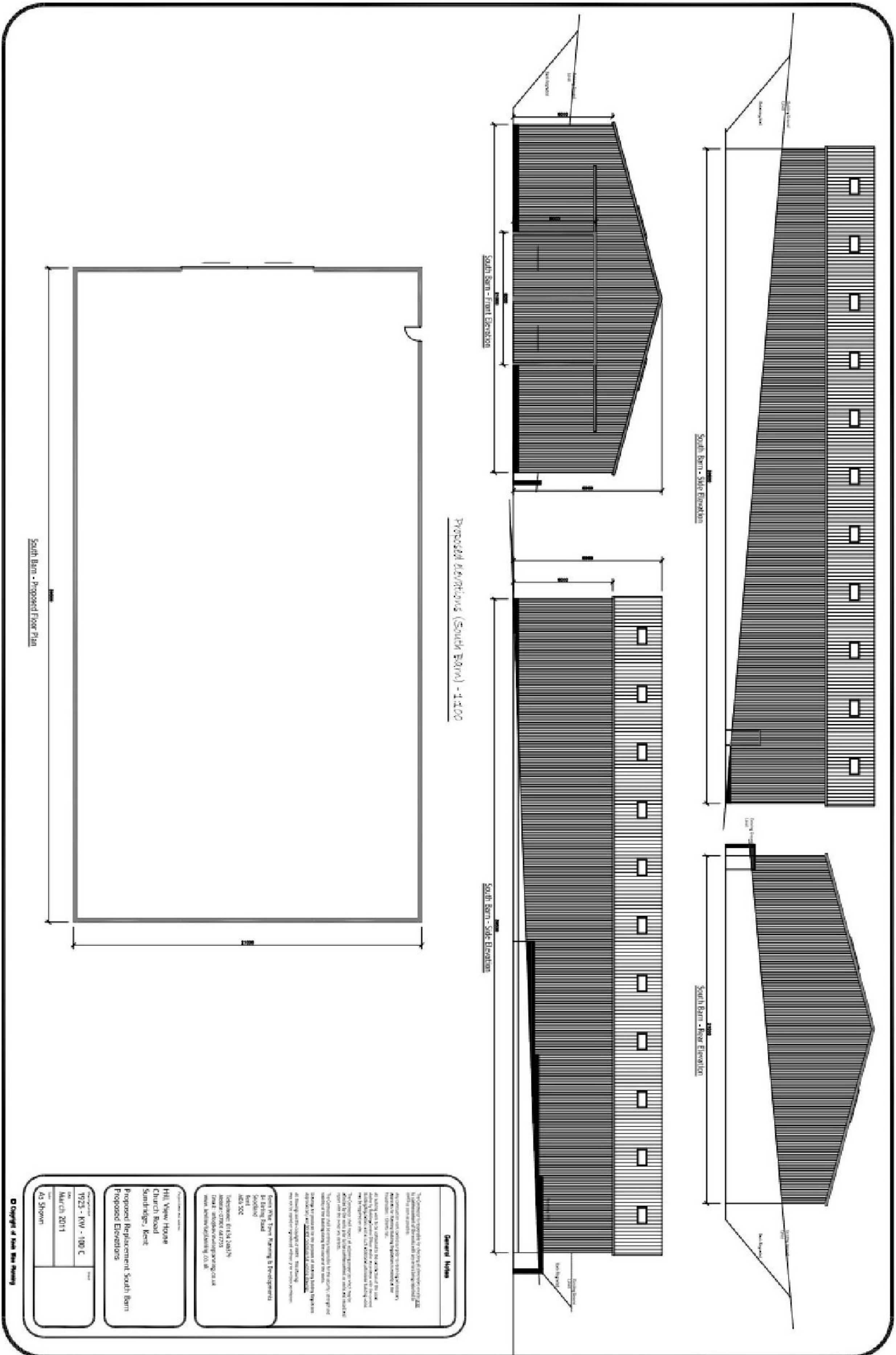


Building exterior



Building interior

Approved Plans and dimensions (Following Page)



General Notes

The Client has approved the design of the proposed building. All dimensions are given in millimetres unless otherwise stated. All dimensions are to the face of the work unless otherwise stated. All dimensions are to be taken from the finished ground level unless otherwise stated. All dimensions are to be taken from the finished ground level unless otherwise stated. All dimensions are to be taken from the finished ground level unless otherwise stated.

Client: Hill View House, Church Road, Sundridge, Kent

Project: Proposed Replacement South Barn Proposed Elevations

Drawn by: 1925 - RW - 100 C

Date: March 2011

As Shown:

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