



Planning, Design and Access Statement

**Construction of new agricultural workers
accommodation at Shinglebank Farm,
Dengemarsh Road, Romney Marsh, TN29 9JH**

Prepared for E T Butcher Ltd

**September 2017
Our Ref: DCH/DI/12491**

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement has been prepared by DHA Planning to support a detailed planning application submitted by BTL Design on behalf of their client E T Butcher Ltd seeking permission for:

"The construction of a four bedroom detached unit providing workers accommodation with associated parking, access and infrastructure works at Shinglebank Farm, Dengemarsh Road."

- 1.1.2 This statement provides an overview of the site, its context and the relevant planning history and a review of all applicable development plan and emerging policies as well as the NPPF and other relevant guidance.
- 1.1.3 The report also includes commentary on the circumstances of the business and justification as to why workers accommodation is required on the site.
- 1.1.4 The report concludes that the proposal is sustainably located, appropriate in planning terms and accordingly requests that planning permission be granted.

1.2 Application documents

- 1.2.1 This Planning Statement should be read in conjunction with the other reports and plans, which have been submitted and form part of this planning application. This includes the following:

Reference:	Document:	Author:
	Application form	Submitted online via the Planning Portal
DCH/DI/12491	Planning, Design and Access Statement	DHA Planning
P103 PL-01B	Site Location Plan	BTL Design
P103 PL-02C	Proposed Plans	BTL Design
P103 PL-03C	Proposed Elevations	BTL Design
P103 PL-04	Existing Plans and Elevations	BTL Design

2 Site and surroundings

2.1 General location

- 2.1.1 The application site is located approximately 1.7 miles south of the centre of Lydd, to the south of Dengemarsh Road



Fig. 1 Aerial view of the application site and Shinglebank Farm (Courtesy of Google Earth 2017)

- 2.1.2 The application site forms part of Shinglebank Farm. The land was first established as a poultry farm in the early 1970's. The Applicant, Mr Butcher, currently rears approximately 350,000 to 400,000 turkeys annually on seven farms, five of which he owns (including Shinglebank) and two which are rented.
- 2.1.3 The Grade II listed, Manor Farmhouse is located approximately 60 metres north west of the existing structure, although it is well separated from the site by adjacent structures and landscaping which lies between. According to Historic England, the listing description is as follows:
- "DENGEMARSH ROAD 1. 1355 Manor Farmhouse TR 01 NE 6/52 II 2. Marked on the map as Dengemarsh Farm, the westernmost one of that name. Probably C17. L-shaped building, 2 storeys and attics red brick. Hipped tiled roof with 2 hipped dormers. 4 windows, 2 of them sashes with glazing bars intact, the others casement windows."*
- 2.1.4 According to the Government's Flood Risk Map, the site falls within Flood Zone 3 and has a high probability of flooding.
- 2.1.5 The site is bound to the east by a restricted byway, which makes up part of the coastal pathway and Dungeness Nature Reserve.

2.2 The application site

- 2.2.1 The application site comprises a steel framed structure. Google Earth aerial view images demonstrate that between 2008 and 2013, the roof of the building was significantly damaged, such that the building now only consists of its frame. Significant investment would be required in order to bring the building back into a suitable standard.



Fig. 2 Aerial view image of the site in 2008
(Courtesy of Google Earth 2017)



Fig. 3 Aerial view of the site in 2013
(Courtesy of Google Earth 2017)



Fig. 4 Existing structure on the site

- 2.2.2 According to the Council's Local Plan Proposal Map, the site falls within a 'Site of Special Scientific Interest' and outside of the settlement boundary of Lydd and therefore considered open countryside in planning terms. The site is otherwise surrounded by 'Ramsar' sites and Local Landscape and Special Landscape Areas.
- 2.2.3 The Romney Marsh is also characterised as a 'District Character Area' under policy SS1 of the Core Strategy (2013) which states that:

"The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many

special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding.”

2.3 Planning History

- 2.3.1 According to the Council’s online planning history database, there is no planning application history relevant to the site.

3 Proposal

3.1 Overview

3.1.1 The application seeks permission for:

"The construction of a four bedroom detached unit providing workers accommodation with associated parking, access and infrastructure works at Shinglebank Farm, Dengemarsh Road."

3.2 Siting and layout

3.2.1 The rationale for the form of development has been influenced by the siting of the existing steel framed structure and the intention to remain consistent with the existing built form on the site. The proposed unit will be constructed within the same footprint as the existing structure, measuring 14.3 metres in length and 7.4 metres in width.

3.2.2 The site will be landscaped to provide a timber decked area immediately surrounding the building with stepped access to the garden area. The site boundary will be established by 1.2 metre high post and rail fencing and a native species hedgerow.

3.2.3 The existing access will be retained off Dengemarsh Lane with two parking spaces provided immediately north of the building and surfaced using a porous gravel material.

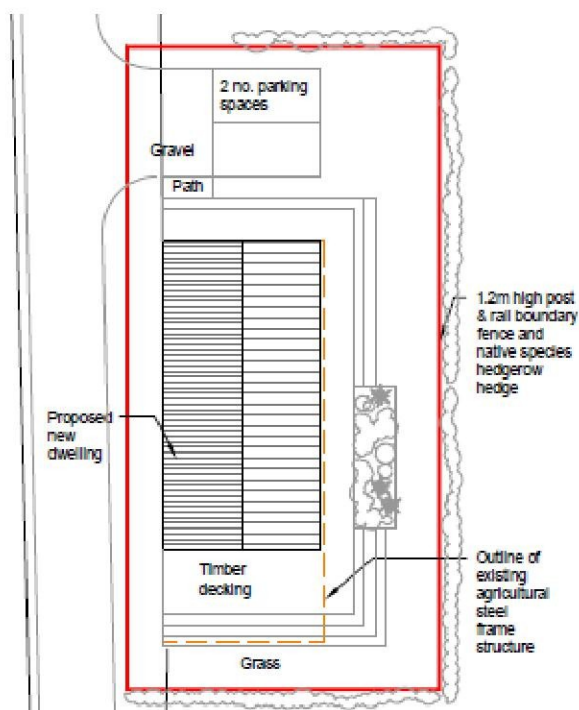


Fig. 5 Proposed site layout

- 3.2.4 The dwelling will provide an open plan kitchen and dining area at ground floor level, with separate sitting room, boot room and utility room. At first floor level, the unit will provide three double bedrooms and one single bedroom, the master bedroom with En-suite facilities and a separate bathroom serving the remaining bedrooms.

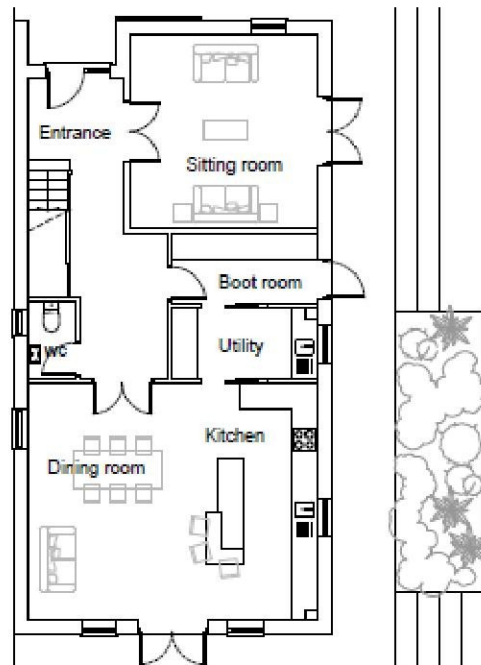


Fig. 6 Proposed ground floor accommodation

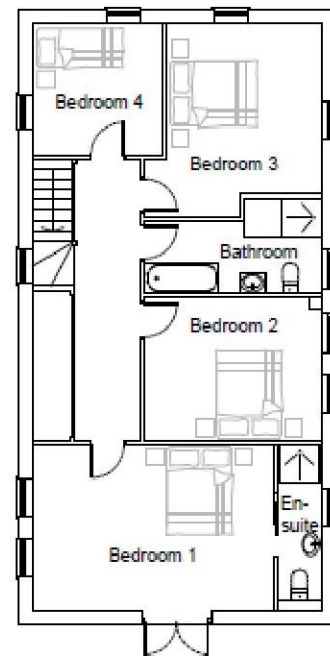


Fig. 7 Proposed first floor accommodation

3.3 Appearance

- 3.3.1 In designing the proposed dwelling, the Architect has sought to retain and reinforce the agricultural appearance of the original building through the use of appropriate features and materials in accordance with the requirements set out in policy BE1 of the Saved Local Plan Review (2006).
- 3.3.2 The building will be clad with vertical timber cladding with low-level fairfaced block work. Other agricultural features throughout the building include profiled metal roofing, grey UPVC windows and aluminium fascias and soffits. The design of the building seeks to reinstate the original appearance of the site so that it is in-keeping with the rural character of the surrounding area and to represent a converted agricultural barn in character.



Fig. 6 Proposed elevations

4 Planning Policy Framework

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. 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.

4.1.2 The development plan for this application comprises of the Shepway District Council Local Plan Review (2006) and the Core Strategy (2013).

4.2 Local Plan Review (2006)

4.2.1 **Policy SD1** states that development proposals should take account of the broad aim of sustainable development, ensuring that development contributes towards ensuring a better quality of life for everyone. This involves meeting economic and social objectives whilst respect the environmental criteria outlined under this policy.

4.2.2 Development proposals that would significantly conflict with one or more environmental criteria will only be permitted where it can be shown that:

- There is an overriding economic or social need;
- Negative impacts are minimised as far as possible; and
- Measures will be taken to compensate for the adverse environmental effect.

4.2.3 Paragraph 3.21 of the Local Plan refers to the building rate in the Marsh area being much slower than the rest of the district.

4.2.4 **Policy BE1** states that a high standard of layout, design and choice of materials will be expected for all new development. Materials should be sympathetic to those predominating locally in type, colour and texture. Development should accord with existing development within the locality, where the site and surrounding development are physically and visually interrelated in respect of building form, mass, height and elevational details.

4.2.5 **Policy BE16** states that the local authority will require development proposals to retain important existing landscape features and make appropriate provision for new planting using locally native species of plants wherever possible.

4.2.6 **Policy TR12** states that new development will only be permitted if it makes provision for off street parking on or near the site in accordance with the current maximum vehicle parking standards.

4.2.7 **Policy CO1** seeks to protect the countryside, stating that development will only be permitted where proposals:

- Maintain or enhance features of landscape, wildlife, historic, geological and agricultural importance and in particular quality and character of the countryside;

- Demonstrate that they cannot be practicably located within an existing settlement and essentially require a countryside location;
- Are of a high standard of design and sympathetic in scale and appearance to their setting;
- Are acceptable in highway and infrastructure terms; and
- Preserve or enhance the amenity, character and functioning of rural towns and villages.

4.2.8 Development which conflict with the above criteria will be permitted where it can be shown that:

- There is an overriding social or economic need;
- Negative impacts are minimised as far as possible; or
- Adequate measures will be taken to compensate for any the adverse environmental effect.

4.2.9 **Policy CO5** states that the Romney Marsh is defined as a Local Landscape Area where proposals should protect or enhance the landscape character and functioning of the area. The District Planning Authority will not permit development proposals that are inconsistent with this objective unless the need to secure economic and social well-being outweighs the need to protect the area's local landscape importance.

4.2.10 **Policy CO16** states that planning permission will be granted for the diversification of farm business subject to the following criteria being met:

- The proposal is compatible with surrounding buildings and the location in a rural area in terms of scale and design;
- There would be no detrimental impact on local amenity or the character, appearance or nature conservation value of the rural landscape. This criterion will be given additional weight in the Kent Downs Area of Outstanding Natural Beauty, and Special Landscape Areas and nature conservation designations;
- Adequate provision can be made to meet access, servicing and parking requirements;
- The proposal would not prejudice the agricultural working of the farm unit; and
- Where practicable, the proposal re-uses an existing agricultural building.

4.2.11 **Policy CO18** states that the local authority will permit new agricultural buildings where the proposal meets the following criteria:

- The development is necessary for the purposes of agriculture and the operational needs of the agricultural unit; and

- The siting, scale, materials and colour are in keeping with the surroundings and, as far as possible, the new buildings would be integrated within existing groups, make use of natural screening, minimise the impact on the skyline, and blend with any neighbouring buildings.

4.3 Core Strategy (2013)

- 4.3.1 The Romney Marsh makes up coastal communities including New Romney, Lydd, small inland villages and the Dungeness Peninsula. Paragraph 1.42 of the Core Strategy describes the Romney Marsh as follows:

"Romney Marsh is a unique environment reclaimed from the sea over many centuries. The wide expanses of rich agricultural land are crossed by a network of drainage channels and native hedgerows, with parts punctuated by small pockets of wooded scrub. The Marsh contains two small towns, some coastal resorts expanded by post-war development, and a scattering of small inland villages. The A259 and the Romney, Hythe and Dymchurch Railway follow the coast south from the Urban Area through several Marsh settlements, with the A2070/A259 national route and Ashford branch-line railway to the west."

- 4.3.2 The report further makes reference to the fact that the jobs at Dungeness Nuclear Power Station are in decline, with very few large employers except some tourism enterprises (para 1.49).

- 4.3.3 **Policy SS1** sets out strategic priorities for the three character areas of the district including the Romney Marsh, stating that:

"The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding."

- 4.3.4 Paragraph 4.127 states that communication networks are at the heart of Shepway's future growth and transport infrastructure. This applies most notably along the coastal route of the Romney Marsh.

- 4.3.5 Paragraph 5.116 further states that the Romney Marsh is one of Shepway's priority areas for investment and a suitable long-term development strategy is essential given the impact of its isolation on economic performance. Any major investment in the Romney Marsh area should prioritise using the best of its assets sustainably and reinvigorating the rural small business economy (para 5.118).

- 4.3.6 **Policy CSD3** states that development in rural or coastal locations will only be acceptable in principle for certain forms of development including:

- Agricultural, forestry or equine development;
- Sustainable rural diversification and tourism enterprises; and
- Replacement buildings (on a like for like basis).

- 4.3.7 Rural economic development must be consistent with green infrastructure and coast/water environment principles.

4.4 Other material considerations

National Planning Policy Framework (2012)

- 4.4.1 The NPPF was published on the 27th March 2012. Paragraph 2 of the NPPF states that it is a material consideration in planning decisions and Appendix 1 (Para 215) states that after March 2013 the amount of weight to be attributed to relevant policies in existing plans will be defined according to their degree of consistency with the NPPF with limited weight to be afforded where local policies do not accord with the Framework.
- 4.4.2 The NPPF sets out, at **paragraphs 14 and 15**, a “presumption in favour of sustainable development” whereby proposals for development which accord with the development plan should be approved without delay.
- 4.4.3 **Paragraph 17** sets out 12 core land-use planning principles which should underpin both plan-making and decision taking. Of particular reference is point 3 which states that planning should, “proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.

Delivering a wide choice of quality homes

- 4.4.4 **Paragraph 55** 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. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local Planning authorities should avoid new isolated homes in the countryside unless there are special circumstances as:
- The essential need for a rural worker to live permanently at or near their place of work in the countryside.

Supporting a prosperous rural economy

- 4.4.5 **Paragraph 28** states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy Local Plans should:
- Support the sustainable growth and expansion of all types of business and enterprise in rural area, both through conversion of existing buildings and well-designed new buildings; and

- Promote the development and diversification of agricultural and other land-based rural business.

Natural Environment

4.4.6 **Paragraph 118** states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- If significant harm resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission should be refused;
- Proposed development on land within or out a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.
- The following wildlife sites should be given the same protection as European sites:
 - Potential Special Protection Areas and possible Special Areas of Conservation;
 - Listed or proposed Ramsar sites;
 - Sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

4.4.7 A Site of Special Scientific Interest is designated by Natural England under the Wildlife and Countryside Act 1981.

Landscape Character Assessment of Kent (2014)

4.4.8 This is a character-based study that seeks to ensure that decisions on the rural landscape are underpinned by a robust and widely accepted assessment of the landscape character. The challenge is to find ways of identifying important characteristics of the landscape that assist the process of accommodating change, where this is both desirable and practicable.

4.4.9 According to this report, the application site falls within land characterised as Dungeness Shingle. This is described as follows:

"Landform and landscape elements are strongly unified in this unique coastal landscape. However, there are many visual detractors of large-scale gravel extraction, security fencing, transmission towers and the power station. The unique and diverse semi-natural habitats of shingle, tidal, salt and freshwater areas provide almost total coverage of the area. The condition of heritage features is variable - stunted hollies and willow carr are unique, but the hollies are mature and felt to be vulnerable. Built form includes localised structures such

as the lighthouse and fishermen's huts, and also large corporate buildings and small scale temporary buildings. These have an overall negative impact on the large scale landscape."

4.4.10 The report sets out that the land is in a moderate condition due to the condition of heritage features and the impact of visual detractors. The following actions are recommended:

- Conserve the unique features and restore open views where possible;
- Reduce small scale landscape clutter such as fencing, signs and temporary buildings; and
- Restore the minimal impact of highways and access roads by using sensitive highway details and materials.

5 Appraisal

5.1 Proposal

- 5.1.1 The Applicant is seeking full planning permission for a single agricultural worker unit to serve the poultry business at Shinglebank Farm. The proposed location of the development is outside of the settlement boundary of Lydd and therefore a countryside location.

5.2 Planning appraisal

- 5.2.1 The principle of the proposed development is addressed in policy CSD3 of the Council's Core Strategy which confirms that development in rural locations will be acceptable for certain forms of development including agricultural purposes.
- 5.2.2 In addition to this, paragraph 55 of the NPPF reinforces this by stating that development within the countryside will be supported where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside. Paragraph 28 further encourages planning policies to support economic growth in rural areas by taking a positive approach towards sustainable new development.
- 5.2.3 This is reinforced in the Council's save Local Plan under policy CO18 which permits new agricultural buildings where the development is necessary for the purposes and the operation needs of the agricultural unit. This criteria has been assessed in further detail in the sections below.

5.3 Essential need and functional test

- 5.3.1 Policy CO18 states that an agricultural building will only be permitted where:
- The development is necessary for the purposes of agriculture and the operational needs of the agricultural unit.
- 5.3.2 The owner of the farm owns a number of poultry farms, all of which have farm manager facilities:
- Grange Farm, Kenardington, TN26 2LZ: 15,000 bird capacity (has farm workers accommodation);
 - Little Odiam Farm, Stone, TN30 7JH: 12,000 bird capacity (has farm workers accommodation)
 - Horsemarsh Farm, Kenardington, TN26 2LZ: 18,000 bird capacity (has planning permission to build workers accommodation)
- 5.3.3 Shinglebank current has a capacity of 10,000 birds and given that the other farms are of a similar size the welfare requirements and work pressures are similar. This is a requirement classed as essential by the farm assurance schemes.

Ongoing and daily tasks

- 5.3.4 Farm managers and workers are required to start work on site by 6am in order to undertake the essential daily welfare and environmental checks on the poultry houses and flocks. However frequently, such as at present, their daily work begins much earlier in order to administer vaccinations where there is a heightened risk of disease to poultry, particularly with the increased risk of Avian Flu in England.
- 5.3.5 Feed and gas deliveries are made on a regular basis which often take place in the early morning and require a farm worker to be on site to ensure that the correct biosecurity procedures are following by spraying wheels with disinfectant to prevent the spread of disease.
- 5.3.6 Farm managers and stock staff are required to be pro-active and all environmental and welfare issues are required to be addressed on the day of discovery or preferably immediately where possible day or night.
- 5.3.7 Each poultry house is checked for general maintenance and each flock is walked through carefully checking for signs of disease, ill birds and abnormal behaviour. All feed equipment, ventilation systems and watering systems are subsequently checked.
- 5.3.8 in addition, the following duties are often required:
- As the livestock grows, staff are required to spread wood shavings and straw across the shed;
 - Foot dip baths are changed every week;
 - Vermin checks must be carried out regularly;
 - The site is prone to power failures and although there is an alarm system and generator on the farm, it takes time for staff to respond to the alarm and reach the site, in which time turkeys can become extremely stressed;
 - As aforementioned, Avian Flu was found in several flocks this year and it is predicted that it will establish itself permanently in the future. All farms producing poultry will need to make provision for increased biosecurity and security in general.

Implications

- 5.3.9 The farm is located next to the Coastal Pathway, which encourages people to walk alongside the farm. Whilst security measures are currently in place, it is difficult to prevent people climbing the gates and entering the farm, even with CCTV in place.
- 5.3.10 With the increased risk of disease associated with Avian Flu, security and biosecurity is paramount to the operation of the farm. E T Butcher Ltd operate on a number of farms, all of which are audited by Quality British Turkeys (QBT), Tesco supermarkets and Freedom Food (RSPCA) farm insurance schemes to ensure that biosecurity and bird welfare have the highest priority. E T Butchers Ltd are seeking to maintain their high standards of care, so it is of the

utmost importance that they have sufficient resources on site to be able to devote the time required, whenever needed.

- 5.3.11 ET Butchers Ltd therefore considers it essential to provide workers accommodation on site to ensure the existing farm manager can carry out his duties, which are required to ensure the proper functioning of the farm. It is not considered that these weekend, early morning and late evening working patterns can be carried out satisfactorily by an off-site worker in the long term and the existing farm manager alone would subsequently become overrun managing the increased capacity of the farm if not able to reside on the site.

5.4 Existing accommodation

- 5.4.1 Policy CO16 states that planning permission will be granted for the diversification of farm business where the proposal re-uses an existing agricultural building. ET Butchers Ltd have confirmed that there is no suitable accommodation/or building within the vicinity of the farm that could be utilised to provide the workers accommodation.
- 5.4.2 That being the case, the proposed workers accommodation will be constructed within the footprint of the existing building which now comprises only the steel frame.
- 5.4.3 Whilst it is arguable whether this structure is capable of conversion. It does remain a permanent structure and its demolition and replacement with a new structure will reduce the quantum of development on the site, whilst significantly improving the appearance of the site and its contribution to the character of the immediately surrounding area.
- 5.4.4 Whilst the settlement of Lydd is 1.2 miles north of the site, this is not considered a suitable location for the workers accommodation, given that the business requires 24/7 security and management. This is particularly essential given the site's proximity to the Coastal Path, a well-established and regularly used public right of way.

5.5 Size and scale

- 5.5.1 Policy CO18 requires new agricultural buildings to meet the following criteria:
- The siting, scale, materials and colour are in keeping with the surroundings and, as far as possible, the new buildings would be integrated within existing groups, make use of natural screening, minimise the impact on the skyline, and blend with any neighbouring buildings.
- 5.5.2 As discussed within section 3 of this statement, the proposed dwelling will be constructed within the footprint of the existing structure and provide a two-storey property of a modest size and scale appropriate to its setting and required use. The building has been designed so that it reinforces the appearance of an agricultural building, similar to that which is currently located on the site.
- 5.5.3 Although the landscape is relatively flat and open in this location, the proposed building is significantly smaller in scale and is considered to be a vast improvement in the appearance of the existing structure. The development includes the provision of landscaping in the form of post and rail fencing and native tree species in order to reduce any impacts of the building within the landscape.

5.6 Conditions

- In all cases, the granting of planning permission will be subject to conditions restricting the occupancy of the dwelling.

5.6.1 An appropriate condition can be applied to control the occupation of the agricultural dwelling.

5.7 Summary

5.7.1 The application seeks permission for the provision of new agricultural workers accommodation which is entirely in accordance with rural development permitted under policy CSD3 of Shepway's Core Strategy and paragraph 55 of the NPPF. The provision of workers accommodation on the site is essential to the operation, security and safety of Shinglebank Farm as set out within this report.

5.7.2 It is therefore requested that planning permission be granted subject to appropriate conditions, including controls regarding the occupancy of the building.