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29443/A3/JW/GW  
12<sup>th</sup> September 2018

Dear Sir/Madam,

**REPRESENTATIONS TO SEVENOAKS DISTRICT COUNCIL LOCAL PLAN 2035  
CALL FOR SITES CONSULTATION  
LAND SOUTH OF CLEVES ROAD AND THE RECEREATION GROUND, KEMSING**

We write in relation to the above site (as identified within the accompanying feasibility study) on behalf of the land owners Alan K Haslam, Iris B Haslam, M Haslam and Joyce E Stockley ('our client'). We have been instructed to submit representations to Sevenoaks District Council (SDC) 'Call for Sites' consultation.

This representation promotes the development potential and future allocation of land to the south of Cleves Road and the recreation ground, Kemsing ('the Site') for residential development and a medical/community facility.

In accordance with the Council's requirements, we enclose the following:

- i. Duly completed Sevenoaks District Council – Draft Local Plan questionnaire (which should be read in conjunction with this letter); and
- ii. Feasibility Study (Cryer & Coe architects), including Site Location Plan and Proposed Illustrative Layout demonstrating ability to accommodate a health & community facility and a residential scheme comprising circa 149 units with associated access and comprehensive landscape/open space.

**Policy Context**

The emerging Sevenoaks Local Plan will cover the period of 2015-2035 and will need to play its part in addressing the housing crisis and meeting the Government objective of significantly boosting the supply of homes, notwithstanding the predominant Green Belt setting of the District.

As part of the evidence base to support the new Local Plan, the Site's development potential was considered by the Council in context of housing needs and the Green Belt Review. These representations and enclosures respond to the conclusions of the Council, in response to the Site's previous promotion through the 'Call for Sites' process. Specifically, the Site was assessed as part of the Draft Local Plan Site Appraisals Red Category (July 2018) site no HO112, Strategic Housing and Economic Land Availability Assessment -July 2018 (SHELAA) and the Green Belt Review (January 2017) parcel no 72.



## Housing Requirements

A key objective of the new Local Plan is to provide for the housing needs of the Sevenoaks District communities, that meets the range of size, type and affordability the area needs.

The objectively assessed housing need (OAN) for the District was calculated as 12,400 dwellings over 2015-2035, or 620 per annum. This need however is increased to 13,960 or 698 dwellings per annum when using Central Governments standard methodology for calculating OAN. This represents a significant uplift from the previous Local Plan target of 165 dwellings per annum. Although SDC has performed strongly in meeting previous housing targets a step change in delivery will be required to meet the latest OAN.

The Council's SHELAA suggest that it can identify the potential for 4,460 residential units to be developable, representing a significant shortfall against housing targets. Even with the inclusion of all the Exceptional Circumstances sites being considered, this would still result in an unmet need.

We agree that any development strategy should first seek to make efficient use of existing previously developed land and promote regeneration. This is entirely consistent with the NPPF and Planning Practice Guidance. However, in providing a wide choice of housing and locations, such aspirations need to be balanced with greenfield release in sustainable locations otherwise there would be a preponderance to urban living and flatted development that not everyone desires or requires.

In these terms, it is considered that the Council should pursue a strategy that considered both urban intensification and green belt release to meet its requirements.

## Site Assessment

The enclosed feasibility Study identifies the location of the Site to the east of Sevenoaks Road and west of Childsbridge Lane. The Site is bound by Castle Drive to the north within the settlement of Kemsing. The southern boundary comprises the M26. The Site is clearly definable and extends to 6.3 hectares. An additional land parcel to the south of the M26 is also within the control of our client as illustrated within the enclosed ownership plan.

The Site is characteristically of an even gradient and comprises of predominantly arable land. The woodland on the Site was recently cleared, due to Health and Safety reasons, other than the belt of trees along the northern and south eastern boundary, subject to a group Tree Preservation Order (TPO).

The Site is controlled under two collaborate ownerships and as such is immediately available to contribute towards the identified housing need. Furthermore, the Site represents a viable and deliverable option which can be brought forward within the short term (0-5) years.

The surrounding area is predominantly characterised by 2 storey detached residential dwellings (C3) along Castle Drive, woodland and open countryside utilised as arable land. The Site is screened from the M26 by a belt of mature trees.

The adopted Local Plan Proposals Map (2015) identifies the Site as designed Metropolitan Green Belt land. The Site is located within Flood Risk Zone 1. The Site is situated within the Upper Darent Valley East landscape character area.

The Site is considered to represent a viable smaller site for housing delivery to meet the shortfall in housing provision. The release of the Site is justified on the basis of the following exceptional circumstances;

- 1) It would deliver much needed housing;

- 2) It would deliver a much-improved community and health facility.

Further detail in this regard is provided below.

The NPPF sets out a presumption in favour of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. The planning system is expected to contribute towards building a strong, responsive and competitive economy, support strong, vibrant and healthy communities and contribute to protecting and enhancing the natural, built and historic environment.

The site has a potential site capacity of circa 149 units with associated strategic landscaping. A new vehicular access point is proposed from Castle Drive. Given the Site's location within close proximity to the M26, the development would be set back, and a belt of mature trees retained to mitigate noise and air quality impacts. Residential development would take place on Zone 1 with sustainable drainage attenuation included within any scheme.

The Site is readily accessible to services including existing schools and employment opportunities located both within Kemsing and Otford. Regular bus services operate from Childsbridge Lane, located in close proximity to the site. It is also readily accessible to the M26 linking the Site to the wider transport network.

The settlement boundary of Kemsing incorporates land located opposite the Site to the north. The inclusion of the Site for development would therefore represent a natural extension to the existing settlement pattern. The enduring boundaries of the Site including the M26 to the south, Childsbridge Lane to the east and woodland to the west prevent urban sprawl and provide a logical augmentation of the settlement boundary.

The existing trees and hedgerows to the south of the Site are identified to be retained with further enhanced planting to maintain screening from the M26. Improved public open space and landscaping across the Site will protect and enhance existing biodiversity delivering a net gain. The proposed enhancements will also contribute to the existing landscape character retaining key views across the Site.

The proposals provide an opportunity to contribute to the landscape character of the area and allow public access. Please refer to the supporting Feasibility Study for further detail, including the location of proposed landscape buffers. The Landscape Sensitivity Assessment (May 2017) concludes that the Site is located in an area with medium sensitivity to residential development. It is considered there would only be limited visual effects following development through a careful masterplanned approach.

As set out above the Site represents a deliverable and suitable opportunity to deliver residential development on a smaller site, within a sustainable location, meeting the objectives and commitments of the Development Plan. Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development and that 'local planning authorities should positively seek opportunities to meet the development needs of the area' in the plan making process. The Site should therefore be brought forward as part of the emerging Local Plan process, for residential development, to positively contribute to housing delivery.

### **Exceptional Circumstances**

- 1) Housing Requirements

The National Planning Policy Framework (NPPF) is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (Paragraph 11).

It also confirms at Paragraph 136, that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation of or review of the Local Plan. Prior to concluding exceptional circumstances exist to justify changes to the Green Belt boundaries a sequential approach must have been applied in seeking to meet identified housing needs, including:

- a) Making as much use as possible of suitable brownfield sites and underutilised land;
- b) Optimising density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) Informed discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

To this end, on the basis that the draft Local Plan identifies around 6,500 homes through urban intensification/brownfield sites and there is no agreement that neighbouring authorities will accommodate the shortfall, exceptional circumstances to release Green Belt land exists.

## 2) Health Facility & Community Hub

In addition to delivering much needed housing in the District, the development of land south of Cleves Road will facilitate the opportunity to deliver both a health facility and community facility.

It is understood that there is a need for enhanced medical facilities in the local area. The Site is uniquely located in order to meet this need, serving both the Kemsing and Otford area. Given the site constraints of the existing facilities, expansion is unlikely to be deliverable and therefore the Site can provide much needed capacity.

The proposals include the provision of a new integrated social centre, providing community facilities and services for the greater health and wellbeing and the inclusive social and cultural needs of Kemsing. This facility can be adapted to meet the specific requirements of the community. The provision of such a facility will assist in preventing anti-social behaviour known to occur on Kemsing Parish Council land (the recreation ground) as well as our clients Site. The delivery of these facilities on the Site are considered to represent a significant offer in meeting identified needs.

## 3) Housing Tenure and Mix

Our clients intend to develop a range of housing on the site, but a large proportion will be 2 and 3 bed homes, which the District has an acute need for. The proposals will therefore specifically meet the housing needs identified.

The proposals are being worked up on the basis that they will deliver 44% affordable housing, exceeding the policy requirement. This is expected to be the case but will be subject to further viability testing as the detail of the scheme advances.

## **Contribute to Green Belt Value**

In addition to the exceptional circumstances identified above, the site performs weakly in meeting the purposes of the Green Belt.

The Council's Green Belt Review (2017) currently considers a larger parcel of land, known as parcel no 72, when considering Green Belt Value. It concludes that in its entirety the land is performing strongly against Green Belt objectives.

It is considered that the sub-division of the larger parcel should have been assessed to allow for the release of the southern part of the land parcel for development, given its clear differing characteristics to the land to the north and the west, where different conclusions would have been reached. The land to the north of the site comprises of the existing built up settlement of Kemsing and the boundary would be defined by the physical and enduring boundary of the M26 to the south. The eastern boundary is defined by Childsbridge Lane and to the west the existing green belt would be retained to prohibit the sprawl of Kemsing into Otford. This provides a clear defensible boundary between the built limits of the Settlement and the Green Belt.

The development of the southern area would present a sustainable location for growth (as discussed above) and would essentially square off the settlement edge between Kemsing and the M26. It would not further encroach into the wider ribbon of Green Belt between the settlements of Otford and Kemsing.

If the land parcel was assessed as two parts (the Site and land to the north and west), we conclude that the assessment of the Site would be:

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas.	The land parcel is at the edge of the large built up area of Kemsing.	<b>Pass</b>
	(b) Prevents the outward sprawl of a large built up area of open land, and serves as a barrier at the edge of a large built up area in the absence of another durable boundary.	The land parcel immediately abuts the large built up area of Kemsing at Castle Drive. The Site contains a number of buildings, including private residences at the former Kennels. There is no significant boundary between the residential properties on Castle Drive and the Site.  The boundary between the rear of the properties on Castle Drive and the M26 is more definable.	<b>2</b>
<b>Purpose 1: Total Score</b>			<b>2</b>

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	<p>The parcel is enclosed on three sides by existing residential properties on Castle Drive to the north, Chilsdbridge Lane to the east and the M26 to the south. It performs a limited role in context of the gap between Otford and Kemsing.</p> <p>Existing woodland to the west of the site would continue to prevent the merging of Otford and Kemsing.</p> <p>Development in this area would square off the settlement limits providing a more durable boundary to the built area/Green Belt land and not prejudice the wider gap that prevents the coalescence of these settlements.</p>	
<b>Purpose 2: Total Score</b>			<b>2</b>
(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	The Site is covered by development along the eastern boundary. Given the proximity of the settlement of Kemsing and the M26 the site has an urban edge character.	
<b>Purpose 3: Total Score</b>			<b>2</b>

In accordance with these findings, we consider the land to the south of Cleves Road performs weakly in meeting the purposes of the Green Belt and should be considered further for release.

## Summary

The Local Plan confirms that SDC has a significant shortfall in housing supply. We are aware that the Council has undertaken detailed urban capacity work and had discussions with neighbouring authorities to accommodate this requirement. In order to fully address the housing need, there is a requirement for to couple high density development within 'urbanised areas' with the release of Green Belt Land. To this end, the sequential approach has been undertaken, and exceptional circumstances exist to justify changes to the Green Belt.

The proposed development on land south of Cleves Road will make a significant and meaningful contribution to meeting housing needs within the District, through the provision of circa 149 units in a sustainable location. Without the allocation of sites such as land at Cleves Road SDC will be unable to meet its housing targets and provide an adequate basis for a sound Local Plan.

The emerging Local Plan identifies the need to accommodate 13,960 additional homes over the plan period through the balance of higher density development and the release of Green Belt land, where exceptional circumstances exist. This approach follows the consideration of urban capacity and neighbouring authorities ability to accommodate growth and is therefore fully consistent with the aims and objectives of the NPPF.

It is considered that land to the south of Cleves Road is suitable for Green Belt release to realise its development potential, which would provide an opportunity for the delivery of significant benefits including much needed housing, a new health and community facility and the delivery of affordable and family housing.

If you would like to discuss this information further or require any additional detail, please do not hesitate to contact Jamie Wallace at this office.

Yours sincerely,



**JAMIE WALLACE**

Associate

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