

Representations to Sevenoaks Local Plan Consultation: Preferred Options (Reg 18)

Representations by Berkeley Strategic

Land at Ash Place Farm, New Ash Green

EXECUTIVE SUMMARY

- The Council have set a Local Plan housing target of 13,960 dwellings for the Plan period.
- Despite the Council proposing a number of exceptional circumstance sites within the Plan there is still a shortfall of 563 homes. The housing supply totals 13,398 homes.
- There is a need for more sustainable urban extensions to be allocated in this plan review to meet the OAN and maintain the rolling five year land supply.
- In order to deliver sustainable growth and meet the Districts OAN, further land will need to be released from the Green Belt.
- A significant proportion of the identified housing sites lie within the 4 main towns of Sevenoaks, Swanley, Edenbridge and Westerham. A greater distribution of housing growth is needed throughout the District in order to meet the identified housing need.
- A higher proportion of housing needs should be distributed to the next tier of the hierarchy being the local service centres of New Ash Green, Otford and Hartley.
- Berkeley are promoting a site at Ash Place Farm on the south side of New Ash Green for residential development.
- New Ash Green is the only local service centre that lies within the north east part of the District. The town has a number of local services and facilities and does not lie within the AONB. Therefore, this site represents a sustainable location for growth.
- The Land at Ash Place Farm, New Ash Green is a suitable site that is deliverable within five years and can deliver circa 580 homes with mix of both private and affordable housing in a rural part of the District.
- Berkeley believe that the site meets the exceptional circumstances test. We believe that the exceptional circumstances relating to Ash Place Farm include;
 - A mix of both private and affordable homes
 - A two-form entry primary school that can offer 66% of school places to children not generated by the site
 - A community building
 - An extension to the existing cemetery, which has been identified in the Neighbourhood Plan.
- The land at Ash Place Farm should be allocated in the Emerging Local Plan for Sevenoaks.

1.0 Introduction

- 1.1 These representations are submitted by Berkeley Strategic Land Limited (“Berkeley”) in response to the Sevenoaks District Local Plan Regulation 18 Preferred Options (“the plan”) consultation.
- 1.2 Berkeley welcome the continued opportunity to become involved in the plan making process and provide comments on the Draft Plan having already commented on the Issues and Options Plan. Berkeley always seek to remain involved in the plan-making process as from start to finish and as a Group we value continuous engagement with the Local Authority.
- 1.3 Berkeley have control of the land at Ash Place Farm, New Ash Green (“the site”). The land lies to the south of the town off Ash Road and totals an area of 116 acres.
- 1.4 The red line site plan has been included with this submission and is attached at Appendix 1.
- 1.5 The previous representations to the Issues & Options Plan are at Appendix 2.
- 1.6 The site has been included in the SHELAA under ref: MX4. The SHELAA summary is at Appendix 3.

2.0 Policy 1 – A Balanced Strategy for Growth in a Constrained District Policy 2 – Housing and Mixed Use Site Allocations

- 2.1 The District of Sevenoaks has seen a vast amount of change over the past number of years and as the District begins to produce a new Local Plan that will guide development throughout the plan period of 2015-2035 it is vital that the new Local Plan provides for the development needs of the District.
- 2.2 Most notably the demand for housing across Sevenoaks is going to be a key issue going forward. The Council have recognised this within the Plan by outlining ‘promoting housing choice for all’ as their first objective of the Plan.
- 2.3 In order to achieve this objective the Council will need to plan to meet their identified housing need.
- 2.4 The identified housing need for the District is 698 homes per annum, which amounts to 13,960 homes over the plan period.
- 2.5 This is a challenging target for the District in that the Issues & Options Plan outlined housing need on the basis of objectively assessed need, which was 620 homes per annum or 12,400 homes over the plan period. The latest local housing need results in an additional 1,500 homes over the plan period.
- 2.6 The local housing need is also now over four times the target or the previous Core Strategy, which was 165 per annum, which further illustrates the increased housing pressures for Sevenoaks.
- 2.7 Paragraph 65 of the National Planning Policy Framework (NPPF) outlines the importance of meeting housing need, which states that;

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period”

2.8 Within Policy 1 the Council state how development will be distributed across the District in order to how best to meet identified development needs including;

- Within boundaries of existing settlements
- Re-use of brownfield land
- Green-Belt development where exceptional circumstances exist

2.9 The focus for growth will be based on the settlement hierarchy;

“Sevenoaks, Swanley, Edenbridge and Westerham, will be the initial focus for development, with more moderate development within the settlements further down the Settlement Hierarchy”.

2.10 New Ash Green forms part of three local service centres the others being Hartley and Otford, which are second tier settlements after the four main towns.

2.11 Paragraph (para) 1.3 states how;

“meeting development needs, particularly housing needs, within a constrained environment is clearly a defining factor”.

All greenfield land within the District is designated as Green Belt, which amounts to 93% of the District, while a 60% of the District is also part of the Kent Downs Area of Outstanding Natural Beauty. It has already been accepted that in order to meet the housing need target it is necessary to release suitable sites from the Green Belt that meet the exceptional circumstances test. Development should be directed to exceptional circumstances sites within the Green Belt over sites that are within the AONB.

2.12 The exceptional circumstance table sets out the sites included in the Plan for housing by settlement. A full list of the housing supply is appended to the plan as stated in para. 1.17. Each of the sites proposed are either located within the existing 4 largest towns identified in the settlement hierarchy (Sevenoaks, Swanley, Edenbridge or Westerham) or are large strategic sites that are in effect new settlements.

2.13 Despite the local plan stating that moderate development within the settlements further down the Settlement Hierarchy such as New Ash Green will occur this is not the case. There is only one site of scale, which is at a strategic site located in Hartley at Corinthians Golf Club proposed for development within the rural service centres.

2.14 Some minor development is proposed in the other local service centres such as a single site in Otford that is yet to confirm its capacity and two sites in New Ash Green one for 14 homes and one employment site. It is clear that the housing need of New Ash Green is not being met and a greater distribution to the rural area is needed.

2.15 Appendix 1 of the Local Plan outlines that the total housing supply could provide for 13,398 homes, which is 562 homes below the 13,960 home target. As such this Plan is not meeting the Districts identified housing need. Meeting the identified housing need is critical in plan making as referred to in the NPPF para 65. Not meeting the housing need and in the absence of a justifiable reason would likely result in the

entire Local Plan failing the test of soundness, meaning the Local Plan preparation would have to start over.

- 2.16 It is clear from the above that the council cannot meet their identified housing need. The District will need to release a number of additional housing sites for development within the new Local Plan and in order to meet their housing needs.
- 2.17 Further growth should be directed to rural service centres, which are sustainable and warrant growth.
- 2.18 New Ash Green is a sustainable rural service centre in what is predominantly a rural part of the District.
- 2.19 The land at Ash Place Farm is in a sustainable location that is suitable, available and achievable.
- 2.20 The site is Green Belt but does not fall within the AONB.
- 2.21 The site offers a deliverable site to help bolster the District's housing supply and at 580 homes will ensure that the full housing need of the District is met.
- 2.22 The land at Ash Place Farm should thus be allocated within the Emerging Local Plan.

3.0 Policy 3 - Landscape and Areas of Outstanding Natural Beauty

- 3.1 Berkeley agree that the District's AONB, landscape character and the countryside, including areas of tranquillity, should be be conserved and the distinctive features that contribute to the special character be protected and enhanced where possible.
- 3.2 Land that is outside of the AONB is not as protected or sensitive to change and thus should be released first ahead of land that is within the AONB and sensitive in landscape terms.

4.0 Policy 4 – Development in the Green Belt

- 4.1 The District is highly constrained in terms of Green Belt with 93% of the District area being within the Green Belt
- 4.2 As allowed for in the NPPF Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The need to significantly boost the supply of housing and meet the housing needs of the District represents an 'exceptional circumstance'.
- 4.3 As evidenced within the Local Plan Green Belt boundaries need to be amended in order for the District to meet its housing needs.
- 4.4 The strength of the Green Belt varies greatly across the District as is evidenced within the Green Belt Study that was produced by the Council in January 2017.
- 4.5 Of the 101 parcels assessed 77 were found to be strongly meeting the Green Belt purposes, 21 moderately and just 3 as weak. The Green Belt Study then recommended 31 pieces of land for further assessment. Under stage two the

recommended areas were assessed against landscape sensitivity and on-site constraints.

- 4.6 The land at Ash Place Farm has not been included as a recommended area. The land forms part of the vastly wide parcel 81, which is categorised as strongly meeting the purposes of the Green Belt. Berkeley believe that this parcel is oversized and the assessment of the parcel as a whole does not give a true representation of the extent to which individual sites within this parcel met the Green Belt purposes. Parcel 81 is over double the size of Sevenoaks town itself and due to the variance in landscapes and topography it is largely inappropriate to apply a broad brush score to the entirety of the parcel. The study found that the parcel most strongly meets the purpose 2 of the Green Belt, which relates to the merging of settlements.
- 4.7 We have made our own assessment of Ash Place Farm against the purposes of the Green Belt, which is provided for below. We believe that this gives a more accurate picture of how the land performs against the purposes of the Green Belt.

<u>Green Belt Review Criteria</u>	<u>Assessment</u>
Check unrestricted sprawl of large built up areas	Existing built development and sports fields lie to the north of the site and along the western boundary that abuts Ash Road. Ash Place Farm and its accompanying buildings along with St. Peter and St. Paul Church provide for partial development along the southern boundary of the site. The strong boundary vegetation that lies to the north, west and part of the south-eastern part of the site will be retained and enhanced providing strong defensible boundaries to the south, east and west of the site, which will allow the development of the land to consolidate the existing built form of the settlement and as such would not constitute unrestricted urban sprawl.
Prevent neighbouring towns from merging into one another	As the site is bounded by existing built development, we believe that the site would act as a natural extension to New Ash Green. Although the village of Ash lies to the south of the site, part of the land on the western part of the site will be left undeveloped and used as a landscape buffer to Ash. This space will function as a green wedge and allow for the appropriate separation between New Ash Green and Ash to be maintained.
Assist in safeguarding countryside from encroachment	As already mentioned the surrounding area already includes a number of urban elements including the Church, existing residential dwellings and the local sports club. Encroachment is prevented by the well contained nature of the site provided by the sites existing built and natural features and their ability to provide long-term well defined and defensible boundaries. The

	impact of the development would be negligible due to the existing strong boundary vegetation and through a well-planned and designed scheme.
Preserve setting and special character of historic towns	It is our opinion that New Ash Green is not a historic town and therefore this purpose is not relevant.
Assist in urban regeneration	The availability of land within Sevenoaks, including brownfield land, is limited and in order to meet the local housing need Green Belt land will be required to be released for development.

It can be concluded from the above assessment that the Ash Place Farm site performs weekly in relation to the purposes of the Green Belt. The site serves a much lower function in comparison to the wider parcel and to the rest of the District, a large proportion of, which is environmentally constrained by the AONB. It is Berkeley’s assessment that the land at Ash Place Farm is warranted for removal from the Green Belt and suitable for allocation for residential development.

5.0 Policy 6 – Safeguarding Places for Wildlife and Nature

- 5.1 Berkeley agree with policy 6, which proposes that in addition to national designations, local areas of importance for biodiversity will be protected from any development which may cause a loss in biodiversity value or habitats.
- 5.2 Berkeley as a group has made a commitment to achieve a net biodiversity gain on all its new developments. Put simply, this means there will be more nature on every site afterwards than before. To do this we have developed a toolkit to determine the baseline biodiversity value on sites, identify the measures required to achieve a net biodiversity gain to be implemented through the delivery of the development and make recommendations for future ongoing management.
- 5.3 A net-biodiversity gain would be achieved on Ash Place Farm if the site were to come forward.

**6.0 Policy 8 – Market and affordable mix
Policy 9 – Affordable housing**

- 6.1 Berkeley agree that the District should continue to seek 40% affordable housing, subject to viability subject to viability, which will provide for the wider needs of the District while also combatting the affordability issues that exist in Sevenoaks.
- 6.2 Berkeley also agree that new forms of affordable housing should be explored by the District but be judged on a case by case basis.
- 6.3 A range of house types and tenures will meet the wider demands of the local housing

needs, while also helping to combat the District's affordability issues.

- 6.4 Berkeley will supply a wide range and mix of house types on site, which would be catered towards the local housing demand of New Ash Green. Our site at Ash Place Farm will assist in meeting both the private and affordable housing needs of the local area and the District as a whole.

7.0 Site Suitability

- 7.1 New Ash Green is a village strategically located in the north east of Sevenoaks District. As a local service centre the village serves the local hinterland and is an important focal point in a rural part of the district.
- 7.2 The site extends to approximately 116 acres and can be seen outlined in red on the site plan at Appendix 1. The site could provide for circa 580 homes comprising both private and affordable housing. The site masterplan is appended to this document.
- 7.3 In addition the site could provide for a new two-form entry primary school on site for the children of New Ash Green. Although the proposed development would not generate a full two-form entry school the existing primary school of New Ash Green is unable to expand and Ash Place Farm is the most suitable alternative location. The other potential sites within New Ash Green would either not be of scale to generate the need for a primary school or are not as sustainably located as Ash Place Farm.
- 7.4 The scheme also provides a community building, which could be run and owned by the local residents.
- 7.5 Furthermore, an extension to the cemetery can be accommodated on site, which is a need outlined within the Ash-Cum-Ridley Neighbourhood Plan.
- 7.6 In addition, investment into the local village centre could be provided. Berkeley would work with local stakeholders in order to establish the most appropriate areas for investment.

Access

- 7.7 A suitable highway access road can be delivered from the western boundary off Ash Road. Initial highway advice has concluded a technically compliant access with required visibility splays can be provided to serve the site.
- 7.8 An emergency access can be provided for off Hartley Bottom Road.
- 7.9 An initial highways assessment has been carried out and concludes that a suitable highway access is achievable. The proposed access drawing is appended to this document.

Landscape

- 7.10 The site is designated as Green Belt but unlike 60% of the District the site falls outside AONB

- 7.11 The site is bounded by some existing dwellings to the north and west, while Ash Place Farm and its associated buildings along with the St Paul and Peter Church make up part of the southern boundary, which will allow the development of the land to consolidate the existing built form of the settlement.
- 7.12 The land is predominantly flat with a slight fall from north to south. The eastern edge of the site has a steeper footing. Mature hedgerows run along the northern and western boundaries of the site, which provides sense of both physical and visual containment.
- 7.13 Landscape advice has concluded that with a sensitive design and appropriate landscape buffers/mitigation the development of the site would result in negligible impact on the landscape and wider area.
- 7.14 The site is sufficiently large to allow for mitigation measures to be introduced as an integral part of any prospective development such as open space and new tree and shrub planting. The latter would provide the opportunity to reinforce and enhance the existing retained landscape resource on the site.
- 7.15 The LIA is appended to this document.

Ecology

- 7.16 The site is not subject to any statutory or non-statutory nature designations such as Sites of Special Scientific Interest (SSSI) or Local Nature Reserves (LNR).
- 7.17 A section of ancient woodland exists on the north eastern and south western boundary of the site. This ancient woodland will not form part of the developable area and an appropriate landscape buffer has been incorporated into the design of the scheme to ensure appropriate separation is provided to the woodland.
- 7.18 The phase 1 habitat survey has not identified any evidence of protected species or habitats, however further surveys will be carried out to fully understand any ecological constraints that the site is subject to.
- 7.19 Furthermore, well planned development of the site presents an opportunity to deliver valuable biodiversity enhancements, including bringing ancient woodland areas under favourable management.
- 7.20 The phase 1 habitat survey is at appended to this document.

Air Quality

- 7.21 The site is not located in an Air Quality Management Area (AQMA).
- 7.22 No sources of air pollution have been identified in close proximity to the site.

Odour

- 7.23 No sources of odour potential have been identified in the vicinity of the site.

Noise and Vibration

- 7.24 The site is surrounded by quiet rural roads. Noise and vibration impact from the immediate surrounding areas on any proposed residential development are likely to be minimal.
- 7.25 Brands Hatch motor racing circuit is located approximately 2km to the west of the site. A Noise Management Plan agreed by the track operator and Kent County Council places certain requirements on the operation of the circuit such as the number of track days, race times and noise levels. It is not considered that noise from the track will cause any significant nuisance to residential development on the site due to the limited number of days a year that track events are held.

Flooding

- 7.26 The Environment Agency Flood Maps show the site to be entirely within Flood Zone 1 meaning it is at the lowest risk of flooding.

Archaeology

- 7.27 There are no archaeological features or finds within the site according to the Historic Environment Records maintained by Kent and East Sussex County Councils.

Heritage

- 7.28 There are no designated or non-designated heritage assets within the site. Furthermore, the site does not lie within or around a conservation area.
- 7.29 The Church of St. Peter and Paul borders the site on the southern boundary and is a Grade 1 listed building.
- 7.30 A heritage appraisal has been undertaken for the site. The appraisal concludes that there will be no direct, material harm to any built heritage assets due to the proposed development. Any possible harm was found to be in the change to the setting of these heritage assets. This was found to be a moderate level of harm, within the spectrum of less than substantial harm. This is reduced to a minor level of harm due to the significant mitigation measures proposed, including leaving the entirety of the Vineyard field to the west of the site undeveloped and instigating a very carefully considered design concept, layout and landscaping within the context in which the proposed development would be located.
- 7.31 The appraisal is appended to this document.

Arboriculture

- 7.32 There are a number of hedgerows within and along the boundary of the site, however there are no trees that are subject to any tree preservation orders within the site.
- 7.33 As part of any development, the existing arboriculture will be maintained to their full extent where possible and incorporated into any potential scheme.

SHELAA

- 7.34 The site was submitted into the councils Strategic Housing and Employment Land Availability Assessment, which was published earlier this year. It was concluded that

the site is unsuitable on the basis that development would result in encroachment into the countryside.

- 7.35 It has been made clear within our Green Belt assessment that the site does not meet the purposes of the Green Belt and will be carefully designed to ensure appropriate buffers, separation and landscape mitigation is provided for.
- 7.36 Furthermore, as evidenced above there are no technical constraints that would make the site unsuitable for development.
- 7.37 The land at Ash Place Farm is located in a sustainable town in a high tier settlement and can deliver circa 580 homes, a primary school, community building and investment into the village centre within the Plan period.
- 7.38 The site is available, in a suitable location and deliverable within the early part of the plan period, which will assist in maintaining the Districts five year supply of housing land. We believe that the site represents an exceptional circumstance case where the development of the site can contribute to the village's objectives of regeneration of the village centre and village as a whole.
- 7.39 Critically, the site offers a suitable solution to meeting the District's planned shortfall to their housing need by 580 homes
- 7.40 Furthermore, the land is in single landownership with a housebuilder interest, which therefore makes the site capable of early delivery..
- 7.41 We believe that the land at Ash Place Farm should be allocated for residential development within the Emerging Local Plan.