

Sevenoaks District Council
Green Belt Assessment
Report: Methodology and
Assessment

251351-4-05-01

Issue | January 2017

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 251351-00

Ove Arup & Partners Ltd
13 Fitzroy Street
London
W1T 4BQ
United Kingdom
www.arup.com

ARUP

Contents

	Page
1 Introduction	3
1.1 Background	3
1.2 Purpose of Assessment	3
1.3 Report Structure	3
2 Sevenoaks Green Belt	5
2.1 Designation of the Green Belt in Sevenoaks	5
2.2 Previous Green Belt Reviews	5
3 Policy, Guidance and Context	8
3.1 National Context	8
3.2 Local Context	13
3.3 Relevant Guidance to Green Belt Assessment	15
3.4 Implications for the Assessment	19
4 Methodology	22
4.1 Duty to Cooperate	24
4.2 Identification of Green Belt Parcels for Assessment	24
4.3 Assessment Against NPPF Purposes	28
4.4 Identification of Recommended Areas for Further Assessment	42
4.5 Further Assessment	43
4.6 Historic Boundary Anomalies	50
5 Assessment against NPPF Purposes	51
5.1 Key Findings	51
5.2 Initial Recommendations	69
6 Assessment Against Local Considerations	111
6.1 District Overview	112
6.2 Recommended Area Assessment	118
6.3 Summary	144
7 Landscape Assessment	145
7.1 Summary of Findings	145
8 Boundary Assessment	155
9 Historical Boundary Anomalies	157
10 Conclusions	158

Appendices

Appendix A

Glossary of Terms

Appendix B

Summary of matters raised during Duty to Cooperate Workshop on proposed methodology

Appendix C

Draft Pro-Forma for NPPF Purposes Assessment

Appendix D

Draft Pro-Forma for Landscape Assessment

Appendix E

Approaches to Green Belt in neighbouring authorities

1 Introduction

1.1 Background

Ove Arup & Partners Ltd (Arup) has been appointed by Sevenoaks District Council to undertake a Green Belt Assessment as part of the evidence base to inform the production of a new Local Plan for the District. The Green Belt Assessment assesses the Sevenoaks Green Belt against the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF) and other local considerations.

1.2 Purpose of Assessment

The purpose of a Green Belt Assessment is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy; the planning authority may then take this into account in its plan-making process, including any consequential changes to Green Belt boundaries, alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Assessment may conclude that no changes are appropriate and it can provide robust evidence for protecting strongly performing Green Belt.

The Green Belt Assessment provides an independent and objective appraisal of all existing Green Belt land in Sevenoaks. This report has been undertaken in accordance with the agreed methodology, which sets out the main aims of the Study as follows:

- Review national and local policy context of the Green Belt, best practice in Green Belt assessments and existing Green Belt assessments undertaken by neighbouring local authorities in order to identify and agree detailed methodology for the Study;
- Review the existing Green Belt in the District against the five aims and purposes set out in the NPPF;
- Review the existing Green Belt against statutory natural and historic environmental considerations (Local Considerations Assessment); and
- Consider sensitivity to change with regard to landscape character of identified zones.

1.3 Report Structure

The report is structured as follows:

- Chapter 2 sets out the context at the national and local level;
- Chapter 3 provides the policy context at the national and local level, together with a summary of Green Belt Assessments undertaken by neighbouring authorities;
- Chapter 4 sets out the methodology for the Study;

- Chapter 5 sets out the key findings and recommendations of the assessment against NPPF purposes;
- Chapter 6 sets out the findings from the assessment against local considerations;
- Chapter 7 sets out the key findings from the landscape assessment;
- Chapter 8 sets out the boundary assessment;
- Chapter 9 provides a summary of historical boundary anomalies which are recommended for correction;
- Chapter 10 sets out the overall conclusions of the Study;
- Annex Report 1 contains the detailed pro-formas for the assessment against NPPF purposes;
- Annex Report 2 contains mapping for the assessment against local considerations;
- Annex Report 3 contains the detailed pro-formas for the landscape assessment;
- Annex Report 4 contains mapping for the identified historical boundary anomalies.

2 Sevenoaks Green Belt

2.1 Designation of the Green Belt in Sevenoaks

The 1958 Kent Development Plan and County Map provided the first designation of Green Belt in Sevenoaks District. The 1958 Plan and Map defined the Green Belt settlement boundary for Sevenoaks, Swanley and Hextable but did not extend into the southern and eastern parts of the District. The second iteration of the Plan and Map (1967) extended the Green Belt boundary to include all of Sevenoaks District and defined settlement boundaries for Hartley and West Kingsdown for the first time, as well as minor changes to the boundaries of Swanley, Sevenoaks and Hextable.

The extension of the Green Belt throughout the District preceded minor changes to inner Green Belt settlement boundaries for Swanley, Sevenoaks and Hextable, while new boundaries were designated for Hartley and West Kingsdown.¹

In 1972, a North West Kent Town Map consolidated town maps for Hartley-Longfield and Meopham, West Kingsdown, Swanley Junction and Hextable, and illustrated the extent of the revised Green Belt and detailed inner Green Belt settlement boundaries in Sevenoaks. A 1978 revision to the Map resulted in minor amendments to the boundaries of Swanley, Hartley and New Ash Green.

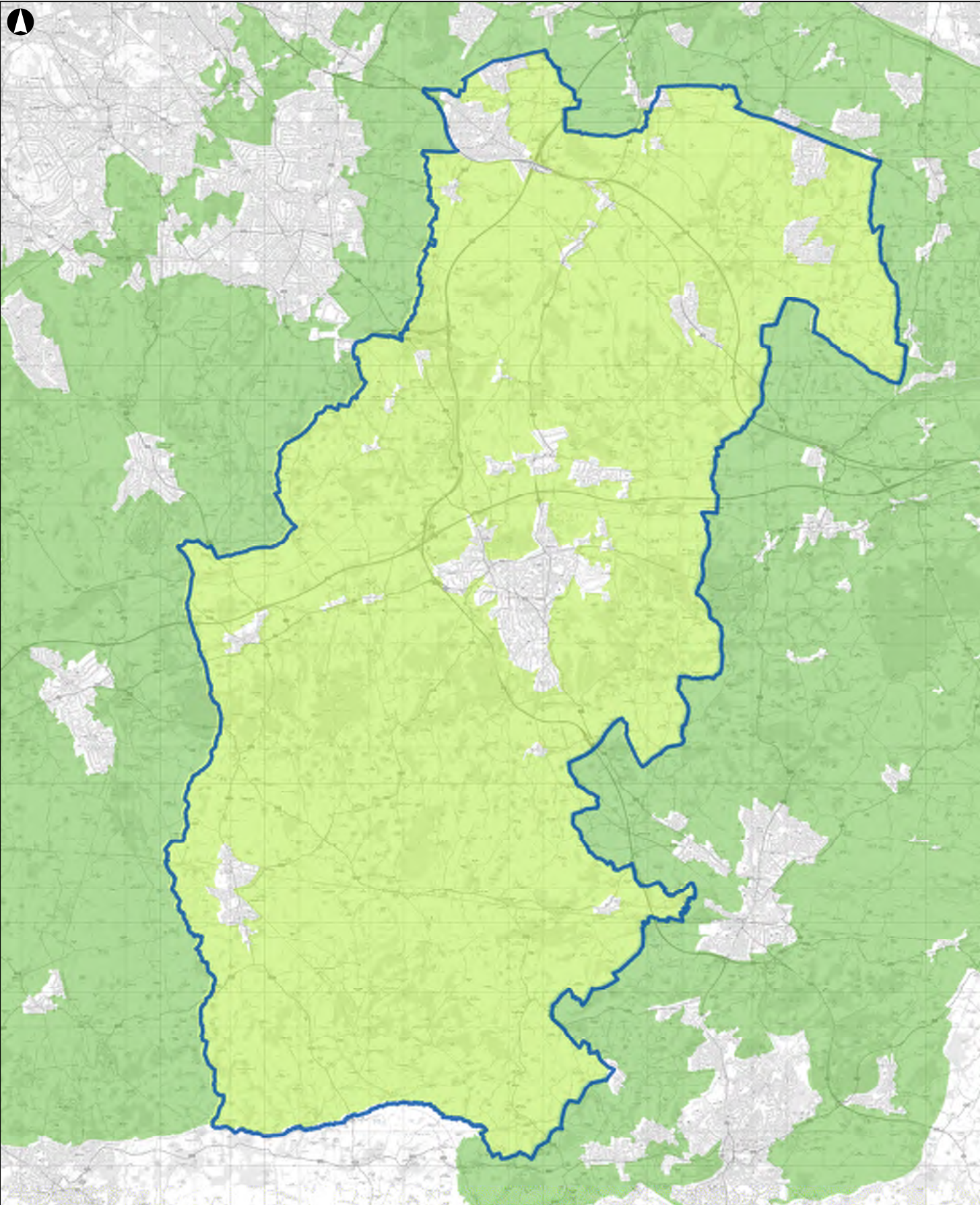
Sevenoaks, and the wider County of Kent, were covered by the Regional Planning Guidance for the South East (RPG9) (2001) which reiterated the importance of the Green Belt in preventing sprawl from built-up areas. Policy E3 (Green Belts) stated that *'there is no regional case for reviewing Green Belt boundaries in light of this strategy'* and that local authorities should frame policies in accordance with advice in PPG2. The Policy went on to state that selective Green Belt reviews may be required *'in the Metropolitan Green Belt to the north east of Guildford, and possibly to the south of Woking'* and *'smaller scale local reviews are likely to be required in other locations, including around Redhill-Reigate'*; however Sevenoaks was not mentioned as a suitable location for a review.

At present, 93% of the District (approximately 34,400 hectares) is designated as Green Belt (Map 4.1).

2.2 Previous Green Belt Reviews

Sevenoaks District Council produced a topic paper on the Green Belt of Sevenoaks in 2013. The topic paper recognised the remit of the NPPF and set out how the consistent and long term application of Green Belt policy remains appropriate for the Local Development Framework (LDF) / Local Plan as had been established in the adopted Core Strategy (2011). The topic paper assessed the permanence of the Green Belt in the District and set out the case for three small scale adjustments and the reasons for rejecting other proposed changes.

¹ https://www.sevenoaks.gov.uk/__data/assets/pdf_file/0020/109901/Green-Belt-Topic-Paper-vFinal.pdf



- Legend**
- Sevenoaks District Boundary
 - Neighbouring Green Belt
 - Sevenoaks Green Belt

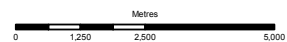
© Crown copyright and database rights 2016 OS EUL 100017428

P1	18-08-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council
 Job Title
Sevenoaks Green Belt Assessment



Map 4.1 Sevenoaks Green Belt

Scale at A3
1:103,347

Job No 000000-00	Drawing Status Draft	Issue P1
Drawing No 001		

The topic paper concluded that the District's LDF / Local Plan reaffirmed the long-standing general extent of the Green Belt as stated in the adopted Core Strategy and stated that it was not appropriate for the Allocations and Development Management Plan (ADMP) to propose anything other than minor amendments to the Green Belt where exceptional circumstances merit change. It was confirmed that exceptional cases were not justified for other sites which still fulfil Green Belt purposes and that no further amendments to the Green Belt boundary in the ADMP were considered appropriate.

The topic paper recommended the return of 0.3 hectares at Billings Hill Shaw (Hartley) to the Green Belt to correct an historic anomaly where previous Green Belt land had been removed without satisfactory justification. The topic paper further recommended the removal of two previously developed sites from the Green Belt:

- Warren Court, Halstead (0.59 ha); and
- Land at College Road and Crawfords, Hextable (0.36 ha).

3 Policy, Guidance and Context

This section provides a summary of relevant Green Belt policy and guidance at the national level (NPPF, Planning Practice Guidance, ministerial statements, and legal cases) and local level, together with a review of other relevant guidance.

3.1 National Context

At the national level, the NPPF, national Planning Practice Guidance (PPG) and ministerial letters provide the policy and guidance context for the role and function of the Green Belt. The following sections summarise the current position.

3.1.1 National Policy

The NPPF sets out the Government's planning framework for England and how it is expected to be applied. Central to the NPPF is the '*presumption in favour of sustainable development*' which, for plan-making means that local planning authorities should positively seek opportunities to meet development needs and meet objectively assessed needs unless specific policies of the NPPF (such as Green Belt policy) indicate that development should be restricted.

Protection of Green Belt around urban areas is a core principle of the NPPF, as detailed in section 9 of the Framework which emphasises the importance that the Government attaches to Green Belts.

It advocates openness and permanence as essential characteristics of the Green Belt stating that '*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open*' (paragraph 79). The NPPF details five purposes of the Green Belt, three of which are consistent with early Green Belt policy²:

1. '*To check against unrestricted sprawl of large built-up areas;*
2. '*To prevent neighbouring towns merging into one another;*
3. '*To assist in safeguarding the countryside from encroachment;*
4. '*To preserve the setting and special character of historic towns; and*
5. '*To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*'. (paragraph 80)

For ease of reference in this Assessment, these purposes are subsequently referred to as NPPF Purposes 1 to 5, with the assigned number corresponding to the order in which they appear in the NPPF, as above.

In addition to the purposes of the Green Belt, Paragraph 81 states that '*local planning authorities are required to plan positively to enhance the beneficial use*

² Circular 42/55 highlighted the importance of checking unrestricted sprawl of built-up areas and of safeguarding countryside from encroachment. It sets out three main functions of Green Belt which are now upheld in the NPPF: to check the growth of a large built-up area; to prevent neighbouring settlements from merging into one another; and to preserve the special character of a town.

of the Green Belt' once Green Belt boundaries have been defined including looking for opportunities to:

- *'Provide access;*
- *Provide opportunities for outdoor sport and recreation;*
- *Retain and enhance landscapes, visual amenity and biodiversity; or*
- *Improve damaged and derelict land'.*

Paragraph 83 states that *'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans'* and that *'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'*. Importantly, the NPPF acknowledges the permanence of Green Belt boundaries and the need for them to endure beyond the plan period (paragraph 83). The need to promote sustainable patterns of development when reviewing the Green Belt boundaries is also acknowledged (paragraph 84).

The NPPF seeks to align Green Belt boundary review with sustainable patterns of development (paragraph 84). Local planning authorities are encouraged to *'consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*.

Paragraph 85 states that *'when defining boundaries, local planning authorities should:*

- *Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary identify in their plans areas of "safeguarded land" between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

3.1.2 National Guidance

The national PPG provides guidance on the requirements of the planning system. The current PPG reiterates the importance of the Green Belt and acknowledges

that Green Belt may restrain the ability to meet housing need. The following paragraphs are considered relevant to this Green Belt Assessment:

- **‘Paragraph 044 Do housing and economic needs override constraints on the use of land, such as Green Belt?’** – *The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework 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 when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted’ (as it is with land designated as Green Belt). ‘The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’*
- **‘Paragraph 045 Do local planning authorities have to meet in full housing needs identified in needs assessments?’** - *Assessing need is just the first stage in developing a local plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.’*

The PPG does not provide any specific guidance on conducting a Green Belt Assessment *per se*.

3.1.3 Ministerial Statements

Letters and general statements from ministers of the Department for Communities and Local Government (DCLG) to the Planning Inspectorate (PINS) or local government officers have clarified or re-affirmed aspects of Green Belt policy. During his time as Planning Minister (November 2012 to August 2014), Nick Boles issued a series of Ministerial Statements on the Green Belt which, in general, continued to emphasise the protection of the Green Belt.

Perhaps the most significant statement came in March 2014 when correspondence with PINS reaffirmed the importance and permanence of the Green Belt and that Green Belt may only be altered in ‘exceptional circumstances’ through the preparation or review of local plans.³ The correspondence recognised the special role of the Green Belt in the framing of the presumption in favour of sustainable development, which sets out that local authorities should meet objectively assessed needs unless specific policies in the Framework indicate development should be restricted, with the Green Belt identified as one such policy.

³ Nick Boles / DCLG (2014) Inspectors’ Reports on Local Plans, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292648/Scan-to-Me_from_ela-mfd-f6-zc1.link.local_2014-03-03_180547.pdf

This position was reaffirmed in October 2014 when the national Planning Practice Guidance was amended (see section 3.1.2).

3.1.4 Legal Cases – ‘Exceptional Circumstances’ and ‘Very Special Circumstances’

As set out above (sections 3.1.1 and 3.1.3), ‘exceptional circumstances’ relates to plan-making in the context of Green Belt boundaries. There is no definition of ‘exceptional circumstances’ provided in the NPPF, and there is limited case history relating to decisions about the setting or change of Green Belt boundaries in local plans and the definition of ‘exceptional circumstances’. However, there are two recent relevant examples of note.

The first is the Solihull Local Plan (Solihull Metropolitan District Council). In this case, a developer’s sites in Tidbury Green were placed into the Green Belt by the Solihull Local Plan (SLP) adopted in December 2013. The developer challenged the SLP on three grounds: (i) that it was not supported by an objectively assessed figure for housing need; (ii) the Council has failed in its Duty to Cooperate; and (iii) the Council adopted a plan without regard to the proper test for revising Green Belt boundaries. The claim succeeded at the High Court.

Solihull appealed against the decision, but the appeal was dismissed by the Court of Appeal. The Court held that the Inspector and Solihull had failed to identify a figure for the objective assessment of housing need as a separate and prior exercise, and that was an error of law. In addition, the Judge dismissed the Inspector’s reasons for returning the developer’s sites to the Green Belt, saying that:

‘The fact that a particular site within a council’s area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question’.

In the April 2015 High Court case of Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council, this position was upheld. In this case, the Parish Council applied to the High Court to quash parts of the Aligned Code Strategies of the three authorities, arguing that: (i) it had failed to consider whether housing numbers should be reduced to prevent the release of Green Belt land; and (ii) it had failed to apply national policy in considering its release. However, the Claim was rejected.

In Paragraph 42 of the decision, referring to the earlier Solihull decision, the Judge stated:

‘In the case where the issue is the converse, i.e. subtraction, the fact that Green Belt reasons may continue to exist cannot preclude the existence of countervailing exceptional circumstance – otherwise, it would be close to impossible to revise the boundary. These circumstances, if found to exist, must be logically capable of trumping the purposes of the Green Belt; but whether they should not in any given case must depend on the correct identification of the circumstances said to be exceptional, and the strength of the Green Belt purposes’.

While supporting the earlier Solihull case, the judgement also confirms that ‘exceptional circumstances’ may override the purposes set out in the NPPF, depending on the strength of these purposes. In determining what is exceptional, an authority should balance:

- The ‘*acuteness/intensity of the housing need*’;
- The ‘*constraints on the supply/availability of land...suitable for development*’;
- The ‘*difficulties in achieving sustainability without impinging on the green belt*’;
- The ‘*nature and extent of the harm to this green belt*’; and
- How far the impacts on Green Belt purposes could be reduced.

In his decision, the Judge believed the Inspector had taken a ‘*sensible and appropriate*’ approach to adjudging the weight of exceptional circumstances versus the strength of the Green Belt purposes by weighing up the advantages and disadvantages of different alternative options for meeting housing need, including those which would not have involved Green Belt adjustments.

The need for a robust Green Belt Assessment is thus a necessity in order to identify weaker performing Green Belt, with this work feeding into the broader task of identifying what might constitute ‘exceptional circumstances’ within Sevenoaks.

The NPPF sets out that ‘*very special circumstances*’ relates to the consideration of planning applications in the context of existing Green Belt. Paragraph 87 states that ‘*As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*’. Paragraph 88 goes on to state that ‘*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations*’. Paragraph 89 identifies those type of development within the Green Belt which may be considered as acceptable in the context of ‘*very special circumstances*’:

- ‘*Buildings for agricultural and forestry;*
- ‘*Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- ‘*The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- ‘*The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- ‘*Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or*

- *Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.'*

Paragraph 90 expands on the above list by identifying other forms of development that are also not appropriate provided they '*preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt*' namely:

- *'Mineral extraction;*
- *Engineering operations;*
- *Local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- *The re-use of buildings provided that the buildings are of permanent and substantial construction; and*
- *Development brought forward under a Community Right to Build Order'.*

3.2 Local Context

Planning policy in Sevenoaks is currently made up of the NPPF, the Core Strategy DPD (2011), the ADMP (2015) and saved policies from the following documents:

- Kent Minerals Subject Plan: Brickheath Written Statement (1986);
- Kent Minerals Local Plan: Construction Aggregates (1993);
- Kent Minerals Local Plan: Chalk and Clay (1997);
- Kent Minerals Local Plan: Oil and Gas (1997);
- Kent Waste Local Plan (1998).

Sevenoaks is currently producing a new Local Plan for the District which will cover the period 2015-2035. It is anticipated that this will go out to Issues and Options Consultation in spring / summer 2017, Draft Local Plan Consultation in spring 2018, Pre-submission Publication in summer 2018, Submission in autumn 2018 and Adoption in summer 2019.

3.2.1 Sevenoaks Core Strategy DPD (2011)

In relation to the Green Belt, the Core Strategy deals with Green Belt at the strategic level and states:

'There is no need to amend the Green Belt to meet development needs. The case for any small scale adjustments to cater for situations where land no longer contributes to the Green Belt can be considered through the Allocations and Development Management DPD' (paragraph 4.1.17).

The Spatial Vision of the Core Strategy sets out that the District will provide for future development requirements by making effective use of urban land within existing settlements, while protecting the environment.

3.2.2 Allocations and Development Management Plan (ADMP) DPD (2015)

The purpose and requirements of the Green Belt are stated in the ADMP as follows:

‘The particular function of the Green Belt in Kent is to preserve the open countryside between the edge of Greater London and the urban areas of the Medway towns, Maidstone, Tonbridge and Tunbridge Wells.

The approved Green Belt in West Kent extends to about 12-15 miles from the built-up edge of Greater London. Within West Kent, the Green Belt has an important role in preserving the identity of the separate communities and in curbing urban pressures by restraining the growth of towns and other settlements’.

The ADMP sets out the following policies applying to development in the Green Belt:

- Policy GB1 - Limited Extension to Dwellings in the Green Belt;
- Policy GB2 - Basements within Residential Developments in the Green Belt;
- Policy GB3 – Residential Outbuildings in the Green Belt;
- Policy GB4 – Replacement Dwellings in the Green Belt;
- Policy GB5 – Dwellings Permitted under Very Special Circumstances or as Rural Exceptions in the Green Belt;
- Policy GB6 – Siting of Caravans and Mobile Homes in the Green Belt;
- Policy GB7 – Re-use of a Building within the Green Belt;
- Policy GB8 – Limited Extension to Non-residential Buildings in the Green Belt;
- Policy GB9 – Replacement of a Non-residential Building in the Green Belt.

The ADMP was adopted in February 2015 with the purpose of delivering the Core Strategy development requirements for the period to 2026. One of the main modifications required by the Inspector in finding the ADMP sound and capable of adoption is the undertaking of an early review of the Core Strategy within the next five years, which Sevenoaks District Council has committed to, in order to ensure that it has an up-to-date suite of policies and proposals in place to deliver sustainable growth in accordance with the NPPF.

Sevenoaks District Council is currently producing an up-to-date evidence base to support the development of a new Local Plan. The Strategic Housing Market Assessment (SHMA) published in September 2015 identifies an objectively assessed housing need for Sevenoaks of 12,400 new homes (2012-2033). The publication of the SHMA was followed by a “call for sites” in October 2015 and

the Strategic Housing Land Availability Assessment suitability assessments are expected to be completed in Spring 2017.

This Assessment forms part of the evidence base for the new Local Plan which, when brought together with Duty to Cooperate discussions and balanced against the objectively assessed need, will determine a housing target for the District.

3.3 Relevant Guidance to Green Belt Assessment

3.3.1 PAS Guidance

The most relevant non-policy guidance in relation to Green Belt Assessment is that published by the Planning Advisory Service (PAS) in 2015⁴ in the context of the need to accommodate strategic housing (and employment) requirements. The guidance highlights that *‘the purpose of a review is for the identification of the most appropriate land to be used for development, through the local plan. Always being mindful of all the other planning matters to be taken into account and most importantly, as part of an overall spatial strategy’*.

Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

The guidance outlines considerations to be given in relation to the five purposes:

- **Purpose 1 – to check the unrestricted sprawl of large built up areas:** consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- **Purpose 2 – to prevent neighbouring towns from merging into one another:** the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A ‘scale rule’ approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- **Purpose 3 – to assist in safeguarding the countryside from encroachment:** seemingly, all Green Belt does this so distinguishing between the contributions of different areas to this purpose is difficult. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.

4

<http://www.pas.gov.uk/documents/332612/1099321/Planning+on+the+doorstep+green+issues+Mar+15/7bdeb666-8058-49b2-a614-2a3cc993a204>

- **Purpose 4 – to preserve the setting and special character of historic towns:** it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.
- **Purpose 5 – to assist in urban regeneration by encouraging the recycling of derelict and other urban land:** the amount of potentially developable land within urban areas must have already been factored in before Green Belt land is identified. All Green Belt would achieve this purpose to the same extent, if it does achieve the purpose, and the value of land parcels is unlikely to be distinguishable on the basis of this purpose.

The PAS guidance additionally recognises the relevance of Duty to Cooperate, as set out in the Localism Act 2011, and soundness tests of the NPPF to Green Belt assessment. The NPPF requires local planning authorities to ‘*work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans*’ (paragraph 179). Additionally the level of housing that a local authority is required to for is also determined by whether there is an ‘*unmet requirement*’ from a neighbouring authority (paragraph 182).

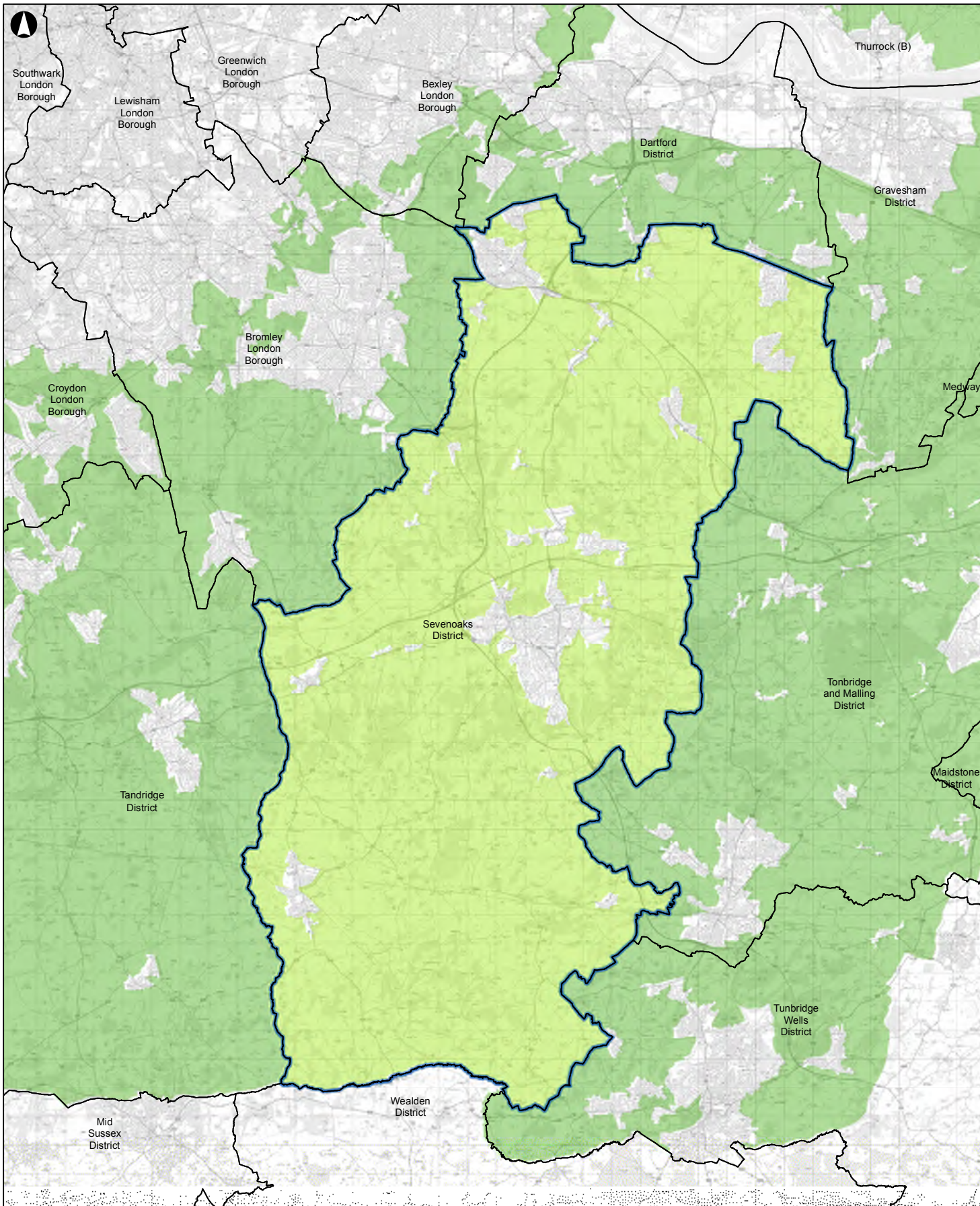
The guidance recognises that Green Belt is a strategic policy and hence a strategic issue in terms of Duty to Cooperate. Areas of Green Belt should therefore be assessed collectively by local authorities. This is important particularly for areas of Green Belt land that fall into different administrative areas, and the significance attached to that land.

3.3.2 Neighbouring Local Authorities Experience

Local planning authorities now hold the responsibility for strategic planning following the revocation of regional strategies in the Localism Act 2011. The national Planning Practice Guidance outlines the Duty to Cooperate as:

‘...a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.’

Understanding how each of the neighbouring local authorities are approaching Green Belt issues is pertinent. Where Green Belt Assessments have been completed, understanding the methodology employed is important to ensure a level of consistency where possible. Additionally, it is helpful to understand how neighbouring authorities identified ‘parcels’ of Green Belt for assessment. It is notable that Green Belt in adjoining districts (Map 3.1) may achieve the purpose of checking unrestricted sprawl from the urban areas both within and outside Sevenoaks. It may also play a role in protecting strategic gaps between urban areas and settlements both within and outside Sevenoaks. The potential release of any Green Belt land within or outside Sevenoaks may impact on settlement patterns and the role of the wider Green Belt.



Legend

- District boundaries
- Sevenoaks District Boundary
- Neighbouring Green Belt
- Sevenoaks Green Belt

© Crown copyright and database rights 2016 OS EUL 100017428

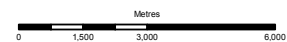
P1	18-08-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 3.1 Sevenoaks and Neighbouring Authorities' Green Belt

Scale at A3
1:125,000

Job No 000000-00	Drawing Status Draft
Drawing No 001	Issue P1

The approaches to Green Belt Reviews taken in neighbouring authorities have been summarised in Table 3.1 and described in further detail in Appendix E.

Table 3.1 Green Belt approaches in neighbouring authorities

Local Authority	Green Belt Assessment	Date Completed
London Borough of Bexley	N/A	N/A
London Borough of Bromley	N/A	N/A
Dartford Borough Council	N/A	N/A
Gravesham Borough Council	In progress	TBC
Wealden District Council	N/A	N/A
Tandridge District Council	Tandridge District Council Green Belt Assessment (Stage 1) (2015)	2015
Tonbridge and Malling Borough Council	Tonbridge and Malling Borough Council Green Belt Study (September 2016)	2016
Tunbridge Wells Borough Council	In progress	TBC

3.3.3 Other Local Authorities Experience

A brief examination of a selection of Green Belt Assessments carried out elsewhere in the country revealed the following key lessons in terms of methodology:

- A two stage process has typically been used to firstly identify those Green Belt areas least sensitive to change and where development would be least damaging in principle, before moving onto a second stage to consider technical site constraints.
- For the purposes of the assessment, authorities have primarily divided the Green Belt into land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Only those purposes deemed relevant to the local context have been used in assessments rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms (both within the purposes themselves and criteria applied) is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures. The approach to scoring in

assessments varies from simplistic traffic light systems to more complex approaches to scoring.

3.3.4 Other Local Authorities Experience

A brief examination of a selection of Green Belt Assessments carried out elsewhere in the country revealed the following key lessons in terms of methodology:

- A two stage process has typically been used to firstly identify those Green Belt areas least sensitive to change and where development would be least damaging in principle, before moving onto a second stage to consider technical site constraints.
- For the purposes of the assessment, authorities have primarily divided the Green Belt into land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Only those purposes deemed relevant to the local context have been used in assessments rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms (both within the purposes themselves and criteria applied) is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures. The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches to scoring.

3.4 Implications for the Assessment

National policy, as set out in the NPPF, emphasises the importance and permanence of Green Belt. The NPPF sets out clearly the five purposes that the Green Belt is intended to serve, highlights that the Local Plan process offers the only opportunity for the Green Belt boundaries to be reviewed and stresses that boundaries should be defined using permanent and recognisable physical features. Neither the NPPF, nor the supporting national Planning Practice Guidance, provide guidance on how to conduct a Green Belt Assessment *per se*. The implied emphasis is thus on each authority to develop a methodology which is appropriate to the local context.

Crucial to the development of such a methodology is the establishment of satisfactory definitions for the key terms used in the NPPF purposes (yet not explicitly defined) – different interpretations of such terms would significantly alter how the Assessment is carried out. While a number of Green Belt

Assessments do not articulate clearly how terms have been defined, the Green Belt Boundary Review for Dacorum, St Albans and Welwyn Hatfield provided definitions based on a combination of legitimate sources (for example, the Oxford English Dictionary) as well as the known aspirations sought through national and local policy.

Some key definitions which were considered for this methodology include:

- *Large built-up areas* (Purpose 1): This originally referred to London for Metropolitan Green Belt, but the scope of how this is interpreted has shifted over time to include other large settlements. The Dacorum, St Albans and Welwyn Hatfield review applied the term to London, Luton/Dunstable and Stevenage. The Central Bedfordshire Green Belt Assessment applied the definition more broadly, considering any area deemed ‘urban’. When defining this term, the methodology for Sevenoaks was developed to consider the settlement structure across the District and adjoining districts.
- *Sprawl* (Purpose 1): The definition of this term varies significantly. The PAS guidance queries whether development that is masterplanned and promoted positively through a development plan would constitute sprawl, but this does not provide a specific and measurable definition which could be applied in a Green Belt Assessment. Other Green Belt Assessments, for example the Guildford Green Belt and Countryside Study, have adopted a more spatial definition, considering sprawl as the ‘*creeping advancement of development beyond a clear physical boundary of a settlement*’. Given sprawl is a multi-faceted concept, it was deemed prudent to consider both of these spheres in the definition adopted for this Study.
- *Neighbouring towns* (Purpose 2): The interpretation of ‘towns’ varies across previous Green Belt Assessments. While it tends to be aligned to the defined settlement hierarchy, as set out in the relevant development plan, some authorities have chosen to apply a more local purpose. For example, in Runnymede, the threat of coalescence between many smaller settlements led to the Green Belt Review considering all settlements equally, including those ‘washed over’ in the Green Belt. By contrast, the joint Dacorum/St Albans/Welwyn Green Belt study utilised an additional ‘local’ purpose (*‘To broadly maintain the existing settlement pattern’*). In defining the ‘towns’ for assessment in Sevenoaks, the methodology accounts for the particular role that the Green Belt plays in the local context. Given that in Sevenoaks the Green Belt boundaries are, for the most part, closely abutting the edge of settlements in Sevenoaks, it was considered appropriate to define all non-Green Belt areas as the ‘towns’ in the assessment.
- *Countryside* (Purpose 3): The Dacorum, St Albans and Welwyn Hatfield Review adopted a ‘functional’ as opposed to ‘political economy’ definition of this term, centred on pastoral and primary land uses, while others adopted broader definitions which took countryside to mean any open land. Evidently, this interpretation is not appropriate in areas which are entirely semi-urban, where Green Belt may have been applied to areas which are open but not genuinely of a ‘countryside’ character. Given the contrast between urban and rural areas seen in and around Kent, in a similar fashion to other areas at the

fringe of London (for example, in Buckinghamshire and Essex), a similar ‘functional’ definition was adopted in this assessment.

- *Historic Towns* (Purpose 4): While many towns in the metropolitan Green Belt have a long history in terms of their foundation, or even retain historic architectural features or layouts in their cores, in most cases their historic centres have been enveloped by modern development. In some cases, this results in a limited relationship between the Green Belt and the historic areas of settlements. The West Midlands Joint Green Belt Review defined its historic towns by identifying settlements with conservation areas in their centres and considering the inter-visibility between these and the Green Belt. Others have utilised wider policy instruments to identify relevant settlements. For example, the Epping Forest Stage 1 Green Belt Review drew on a county-wide SPG, Essex Historic Towns, which clearly defined the district’s historic towns. In this assessment, relevant policy and evidence was drawn upon to define the relevant settlements for this assessment in the Sevenoaks context.

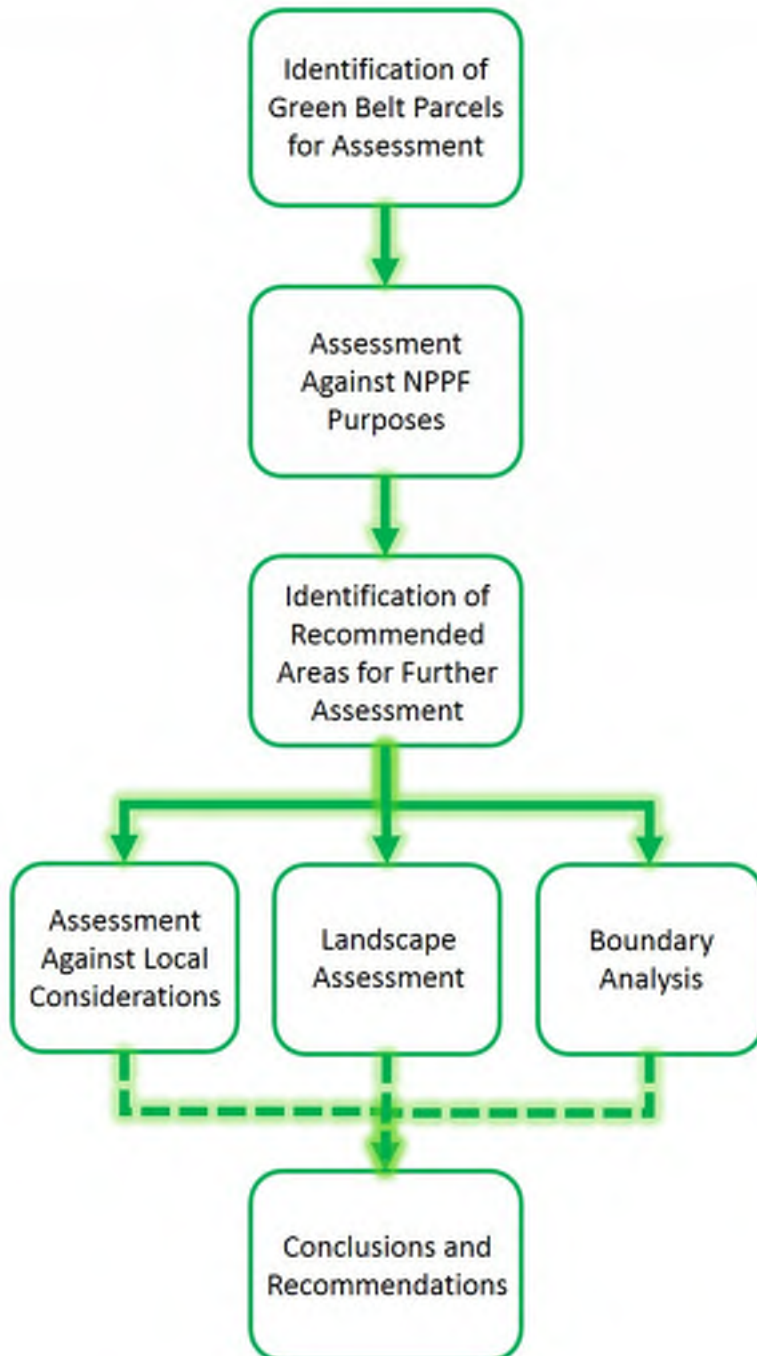
In addition, the PAS guidance is particularly helpful in setting out key parameters to consider when developing a Green Belt Assessment methodology. Key points to note are:

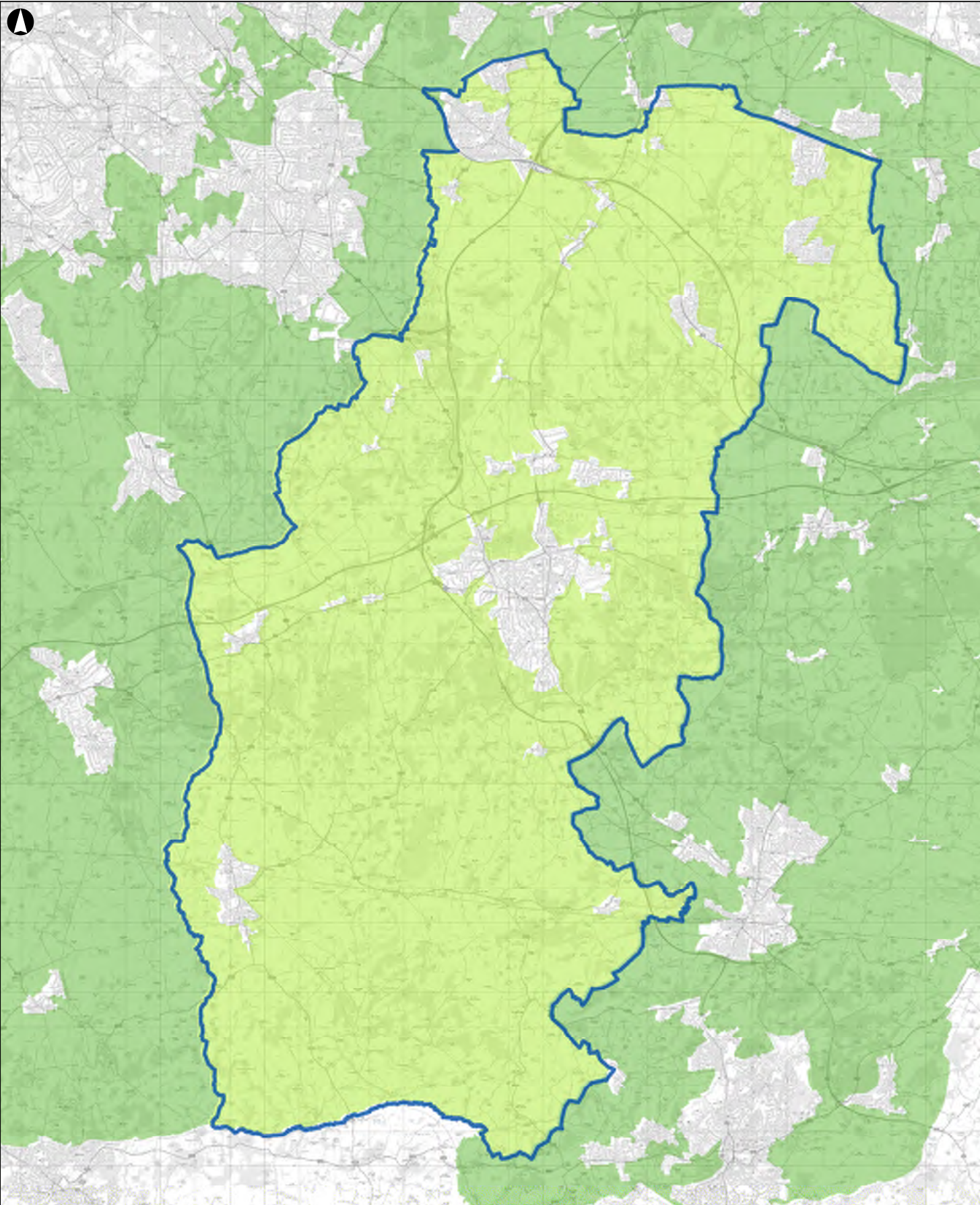
- A Green Belt Assessment is not an assessment of landscape quality, though elements of landscape assessment assist in assessing the Green Belt (for example, in identifying potential new boundaries or differentiating between areas of unspoilt countryside or semi-rural areas).
- The label ‘historic towns’ applies to a select number of settlements and it is therefore accepted that the Purpose 4 assessment will only be relevant in very few instances. As set out in section 4.3.4 of this report, Purpose 4 was only considered to be relevant to the Sevenoaks Green Belt Assessment in very limited locations.
- Purpose 5 is not helpful in terms of assessing relative value of land parcels. However, the overarching importance of Purpose 5 at the regional level is acknowledged.
- Green Belt is a strategic issue and should be considered collaboratively with neighbouring authorities under Duty to Cooperate, thus emphasising the importance of ongoing consultation with neighbouring stakeholders.

4 Methodology

The following section sets out the methodology that was used to undertake the Sevenoaks Green Belt Assessment. This encompasses an assessment of the whole of the Green Belt within Sevenoaks (as shown in Map 4.1). Figure 4. 1 provides an overview of the adopted methodology and further details of each stage is provided in the subsequent sections.

Figure 4. 1 Methodology Diagram





- Legend**
- Sevenoaks District Boundary
 - Neighbouring Green Belt
 - Sevenoaks Green Belt

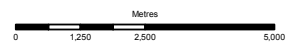
© Crown copyright and database rights 2016 OS EUL 100017428

P1	18-08-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council
 Job Title
Sevenoaks Green Belt Assessment



Map 4.1 Sevenoaks Green Belt

Scale at A3
1:103,347

Job No 000000-00	Drawing Status Draft	Issue P1
Drawing No 001		

4.1 Duty to Cooperate

Since the introduction of the Localism Act (2011), local authorities hold the responsibility for strategic planning and a clear Duty to Cooperate on strategic issues, such as Green Belt. The potential release of any Green Belt land within Sevenoaks may also impact on the role of the Green Belt in adjoining authority areas as part of the wider London Green Belt. As a result it is important to engage with neighbouring authorities on the methodology for the Green Belt Assessment.

A workshop was held with neighbouring authorities on 30 August 2016⁵ to discuss the methodology and to seek a level of consistency with neighbouring Green Belt studies, where this was possible / relevant. A summary of the key points raised and discussed is provided in Appendix B.

The methodology was published on the Council's website for consultation prior to the commencement of the Assessment described below.

4.2 Identification of Green Belt Parcels for Assessment

4.2.1 Green Belt Parcels

Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features were selected as the basis of criteria for the identification of the Green Belt Parcels. In particular, the boundaries of the Parcels are based on the following features (Map 4.2):

- Motorways;
- A and B Roads;
- Railway lines; and
- Rivers, brooks, and waterbodies.

Given the varying character of Sevenoaks, from the semi-urban fringes of Sevenoaks, Swanley and Edenbridge to the relatively unspoilt countryside throughout the remainder of the District, a flexible approach to the identification of Parcels was adopted. This was achieved through consideration of Parcel boundaries during the site visits, in particular in and around the non-Green Belt settlements, and using additional durable boundary features, such as:

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;
- Prominent physical features (e.g. ridgelines);

⁵ Attendees comprised: representatives of Dartford Borough Council, Gravesham Borough Council, Tandridge District Council and Tunbridge Wells Borough Council.

- Existing development with strongly established, regular and consistent boundaries; and
- Established areas of woodland and/or hedgerows.

This process of Parcel boundary refinement accounted for the local context and involved an element of professional judgement.

In some cases, boundary features are located close together, for example where roads, rivers, and/or railway lines run parallel to each other. Where appropriate, these features have been taken together to form one boundary rather than being considered separately which would have led to small slithers of Green Belt land which would not form logical Parcels for assessment.

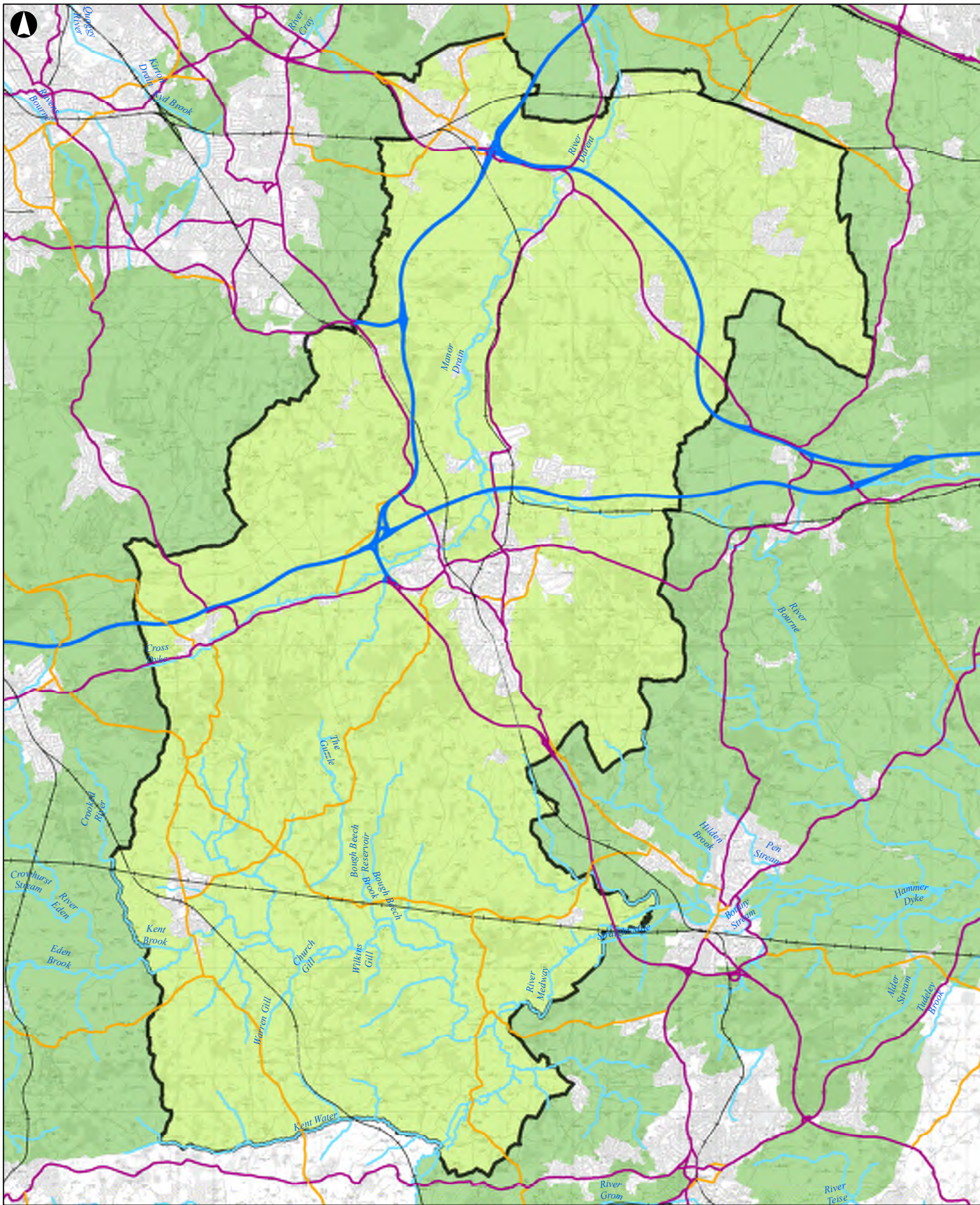
To ensure consistency with the approach to Green Belt assessment in neighbouring local authority areas, the identified Parcels do not extend beyond the Sevenoaks District boundary even where this boundary does not coincide with permanent and durable boundary features.









The Parcels that were used for the Assessment are provided in Map 4.3.

4.2.2 Non-Green Belt

Green Belt boundary revisions can take the form of an expansion as well as a contraction. For that reason, consideration of land that is not allocated as Green Belt for possible inclusion in the Green Belt is required. Based on previous experience of conducting Green Belt Reviews, the starting point for identifying non-Green Belt land was open land outside of the defined settlement limits set out in local plans but not included in the Green Belt.

Discussion with the Council concluded that existing Green Belt boundaries are drawn sufficiently tightly to the built environment to negate the need for any additional investigation within existing settlement limits.



- Legend**
-  Motorway
 -  Railway Line
 -  A Road
 -  B Road
 -  River
 -  Sevenoaks Green Belt
 -  Neighbouring Green Belt
 -  Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

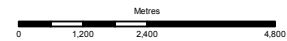
P1	18-08-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7638 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

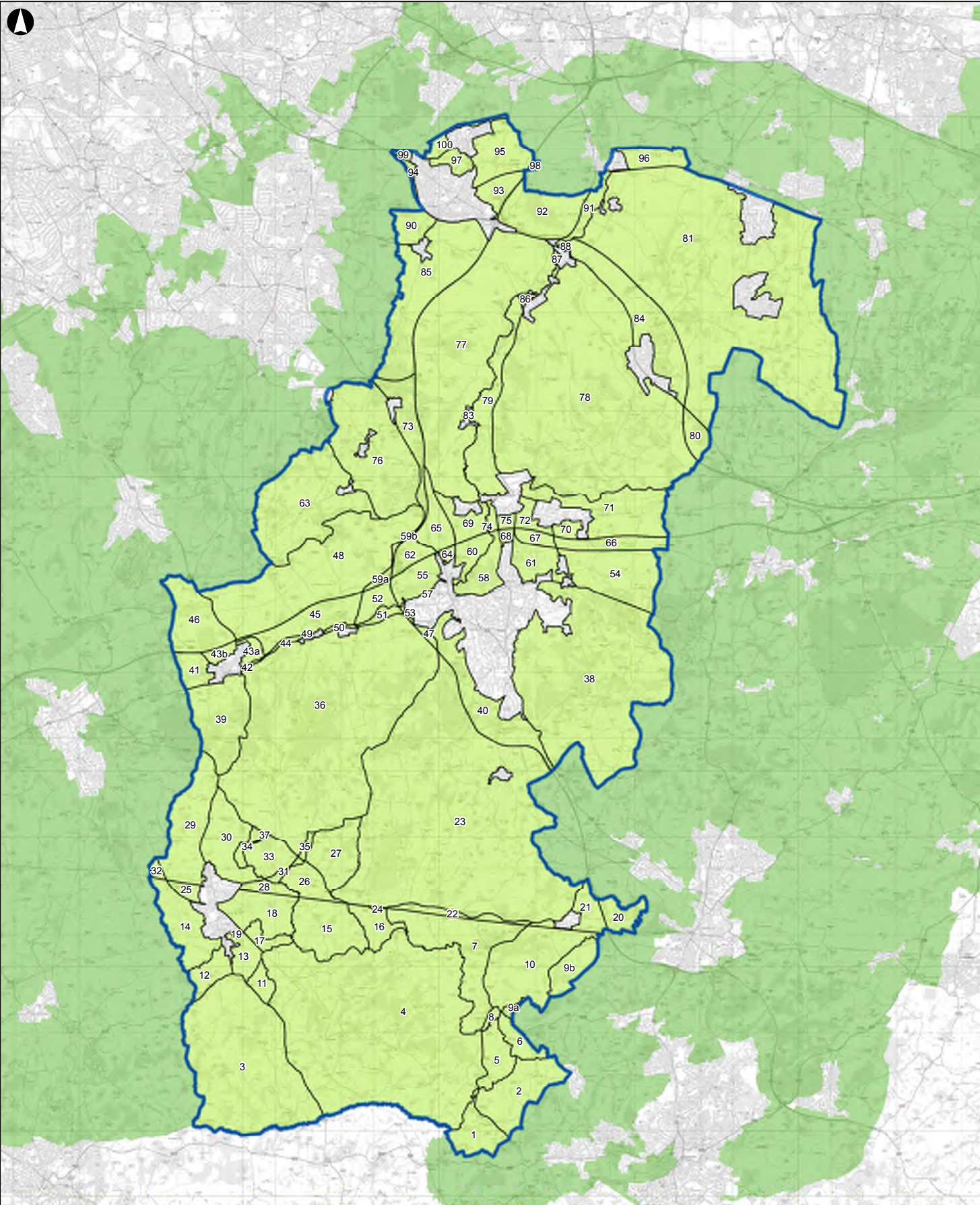
Job Title
Sevenoaks Green Belt Assessment



Map 4.2 Defining Features for Green Belt Parcels

Scale at A3
1:100,000

Job No 251351-00	Drawing Status Draft
Drawing No 4.2	Issue P1



- Legend**
- Green Belt Parcel
 - Sevenoaks District Boundary
 - Sevenoaks Green Belt
 - Neighbouring Green Belt

© Crown copyright and database rights 2016 OS EUL 100017428

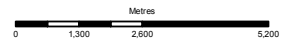
Issue	Date	By	Chkd	Appd
P1	14-09-16	CG	ML	AB

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 4.3 Green Belt Parcels

Scale at A3
1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No 4.3	Issue P1

4.3 Assessment Against NPPF Purposes

Each of the Green Belt Parcels identified in section 4.2.1 and Map 4.3 were assessed against the purposes of Green Belt, as set out in the NPPF. No national guidance exists which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterates the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised. The purpose of the assessment is to establish any differentiation in terms of how the Parcels function and fulfil the purposes of the Green Belt.

For each purpose, one or more criteria have been developed using both qualitative and quantitative measures. A score out of five is attributed for each criterion (Figure 4.2). If a Parcel is considered to make no contribution to a specific purpose, in addition to the detailed analysis undertaken, a statement is added to the pro-forma to this effect and no score is attributed.

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes is undertaken. As such, a composite judgement is necessary to determine whether, overall, Green Belt Parcels are meeting Green Belt purposes strongly or weakly. The assessment also considers whether there are any smaller scale sub-areas within Parcels which might be less sensitive and thus able to accommodate change. In these cases, the potential for Green Belt boundaries to be adjusted without significantly reducing the ability of the wider parcel's ability to meet NPPF purposes is considered. A Parcel fulfilling the criteria relatively weakly, weakly or very weakly (1 or 2) across all purposes is deemed to be weaker Green Belt. These recommendations will be taken forward to inform any recommendations on amending the Green Belt boundaries following further assessment work (see chapters 6 and 7).

Figure 4.2 Criterion Scores

Overall Strength of Green Belt Parcel against Criterion	Score	Equivalent Wording
	0	Does not meet Criterion
	1	Meets Criterion Weakly or Very Weakly
	2	Meets Criterion Relatively Weakly
	3	Meets Criterion
	4	Meets Criterion Relatively Strongly
	5	Meets Criterion Strongly or Very Strongly

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally; and set out the criteria and associated scoring applied.

4.3.1 Purpose 1

Purpose 1: To check unrestricted sprawl of large built-up areas

The original strategic purpose of the Green Belt was to check the sprawl of London. However, as discussed in section 3.4, it is recognised that the wider Green Belt also plays a role in preventing the unrestricted growth of other large settlements. This assessment therefore considers the role of Green Belt Parcels in preventing the sprawl of London, but also in restricting the sprawl of large built-up areas across the District and within neighbouring local authorities. Within Sevenoaks, large built-up areas for the purpose of this Assessment were defined to correspond to the Tier 1 and 2 settlements identified in the settlement hierarchy set out in the Sevenoaks District Settlement Hierarchy 2015 Update for the AMR (2015)⁶. Large built-up areas within neighbouring authority areas were identified using relevant settlement hierarchies (see Map 4.4; Figure 4.3).

Figure 4.3 Large Built-Up Areas considered in Purpose 1 Assessment

Sevenoaks	Neighbouring Local Authorities
Sevenoaks Urban Area (as defined by the settlement boundary) Swanley	Greater London built-up area (including Orpington and Sidcup) Dartford / Gravesend built-up area (Dartford Borough Council / Gravesham Borough Council) Tonbridge (Tonbridge and Malling Borough Council) Royal Tunbridge Wells / Southborough (Tunbridge Wells Borough Council) Oxted (Tandridge District Council)

Although ‘sprawl’ is a multi-faceted concept and thus has a variety of different definitions, this Assessment has adopted a simple definition, considering sprawl as ‘*the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way*’. In order to appraise the extent to which the Green Belt keeps this in check, it is necessary to consider:

- Whether the Green Belt Parcel falls at the edge of one or more distinct large built-up area(s);
- The degree to which the Green Belt Parcel is contained by built-form, and the nature of this physical containment, as well as the linkage to the wider Green Belt; and
- The extent to which the edge of the built-up area has a strongly defined, regular or consistent boundary.

There are two stages in this assessment:

Assessment 1(a)

Firstly, a Parcel must be at the edge of one or more distinct large built-up area(s) in order to prevent development which would constitute sprawl. This criterion

⁶ <http://cds.sevenoaks.gov.uk/ieListDocuments.aspx?CIId=326&MIId=1975&Ver=4>

must therefore be met for Purpose 1 to be fulfilled and is applied on a Yes/No basis.

Assessment 1(b)

As stated at Assessment 1(a), Green Belt should function to protect open land at the edge of large built-up area(s) (Figure 4.3). However, the extent to which a Parcel prevents sprawl is dependent on its relationship with the respective built-up area(s).

Assessment 1(b) initially focusses on the degree to which Green Belt abuts or is contained by the built-up area(s), the nature of this relationship and links to the wider Green Belt. The following criteria were used for assessment:

- A Parcel predominantly surrounded or enclosed by two or more distinct areas of built form and that also retains a strong link to the wider Green Belt, would play a particularly important role in preventing sprawl. For the purpose of this assessment, this is referred to as *'contiguous'*.
- A Parcel displaying a low level of containment by a large-built area, such as if it was simply abutting a large-built area, may prevent sprawl but to a lesser extent. This assessment refers to such areas as *'connected'* with a large built-up area.
- A Parcel almost entirely contained or surrounded by built development which forms part of a single built-up area and has limited connections to the wider Green Belt, would only prevent sprawl to a limited extent (rather, potential development would likely be classified as infill), is referred to here as *'enclosed'* by a single built-up area.

This initial assessment is supplemented by additional analysis on the role of Green Belt in preventing sprawl which would not otherwise be restricted by another barrier. The NPPF states that local authorities should *'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'* (paragraph 85). Boundary identification reflected this, based on the following definitions:

- Examples of durable features (likely to be permanent):
 - Infrastructure: motorway; public and man-made road; railway line; river.
 - Landform: stream, canal or other watercourse; prominent physical feature (e.g. ridgeline); protected woodland/hedge; existing development with strongly established, regular or consistent boundaries.
- Examples of features lacking in durability (soft boundaries):
 - Infrastructure: private/unmade road; bridleway/footpath; power line.
 - Natural: field boundary; tree line.

Where sprawl would not otherwise have been restricted by a durable boundary feature, the extent to which the existing built form had strongly established or recognisable boundaries is assessed based on the following definitions:

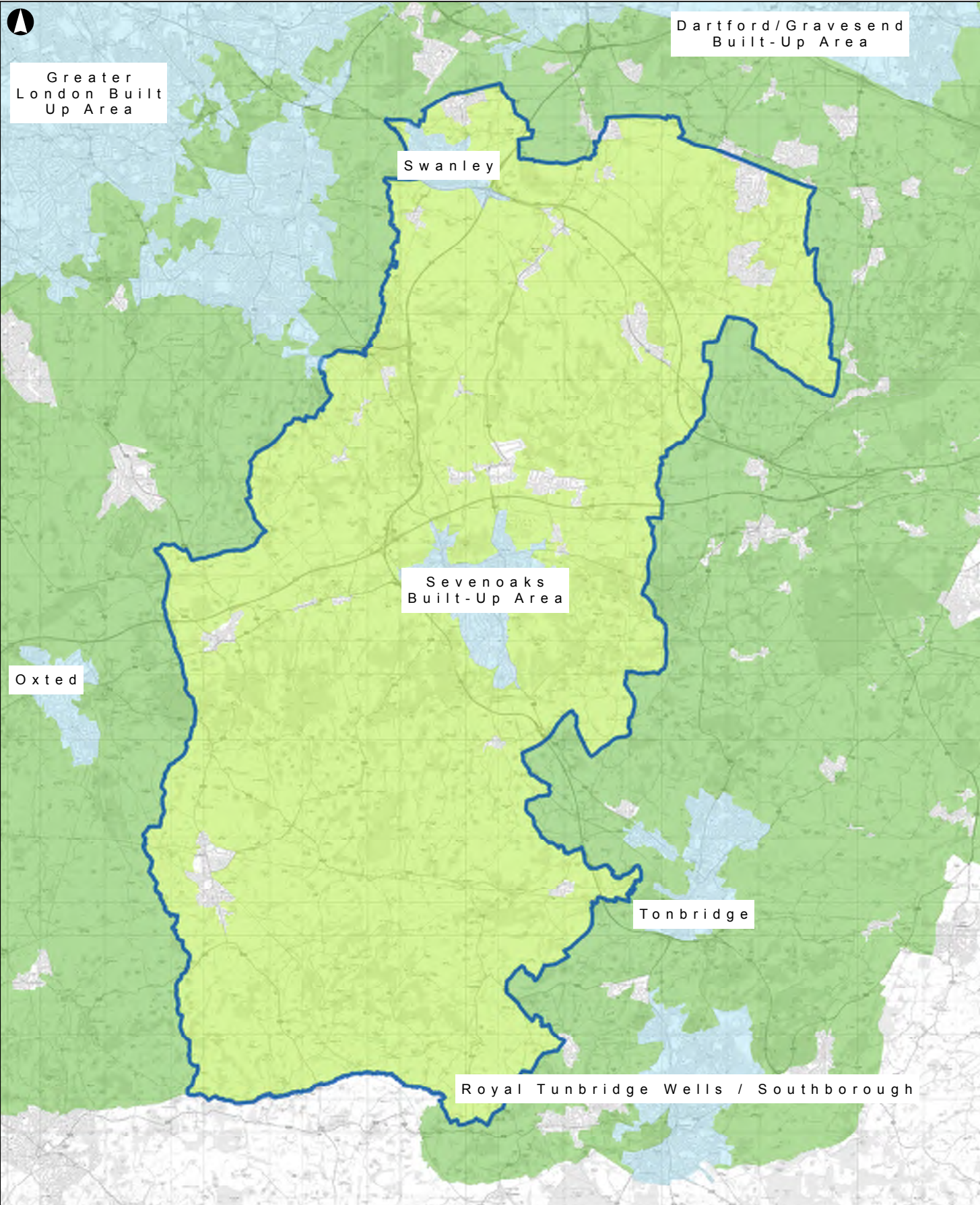
- ‘Regular’ or ‘Consistent’ built form comprising well-defined or rectilinear built-form edges, which would restrict development in the Green Belt.
- ‘Irregular’ or ‘Inconsistent’ built-form comprising imprecise or softer edges, which would not restrict growth within the Green Belt.

Purpose 1 Assessment Criteria

The criteria used to assess the Parcels against Purpose 1 are set out below. Ordnance Survey base maps and aerial photography, together with observations during the site visits, were used to undertake this assessment.

Figure 4.4 Purpose 1 Assessment Criteria

Purpose	Criteria	Score
To check the unrestricted sprawl of large built-up areas	a) Parcel is at the edge of one or more large built-up areas	YES: Green Belt Parcel meets Purpose 1. NO: Green Belt Parcel does not meet Purpose 1 and will score 0 for Criteria (b).
	b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	5+: Green Belt Parcel is contiguous with two or more large built-up areas which are predominantly bordered by features lacking in durability or permanence. 5: Green Belt Parcel is contiguous with two or more large built-up areas which are predominantly bordered by prominent, permanent and consistent boundary features. 3+: Green Belt Parcel is connected to one or more large built-up area(s) which is/are predominantly bordered by features lacking in durability or permanence. 3: Green Belt Parcel is connected to one or more large built-up area(s) which is/are predominantly bordered by prominent, permanent and consistent boundary features. 1+: Green Belt Parcel is enclosed by one large built-up area which is predominantly bordered by features lacking in durability or permanence. 1: Green Belt Parcel is enclosed by one large built-up area which is predominantly bordered by prominent, permanent and consistent boundary features.
Score		xx/5



Legend

- Large Built-Up Area
- Sevenoaks Green Belt
- Neighbouring Green Belt
- Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

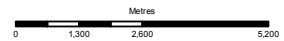
P1	13-09-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 4.4 Large Built-Up Areas considered in Purpose 1 Assessment

Scale at A3
1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No 4.4	Issue P1

4.3.2 Purpose 2

Purpose 2: To prevent neighbouring towns merging into one another.

In addition to the clear function of this purpose in preventing towns from merging and therefore protecting existing gaps between towns, it also forms the basis for maintaining the existing settlement pattern. National policy provides no guidance over what might constitute ‘towns’ and whether this purpose should also take into consideration the gaps between smaller settlements.

Given Sevenoaks’ predominantly nucleated settlement pattern, and that the Green Belt boundaries are in most cases drawn tightly to the defined settlements, the assessment of Parcels considers gaps between all non-Green Belt settlements in the District, as well as non-Green Belt settlements in surrounding local authorities adjacent to the edge of the District. Settlements in Sevenoaks were identified through the settlement hierarchy, while those in neighbouring authorities were identified using adopted Local Plans (Map 4.5; Figure 4.5).

Figure 4.5 Settlements considered in Purpose 2 Assessment

Sevenoaks	Neighbouring Local Authorities
Sevenoaks Urban Area (as defined by the settlement boundary)	Greater London built-up area (including Orpington and Sidcup, and Pratt’s Bottom (within Sevenoaks District))
Swanley	
Edenbridge (including Marlpit Hill)	Dartford / Gravesend built-up area (Dartford Borough Council / Gravesham Borough Council)
Westerham	
Otford	Bean (Dartford Borough Council)
New Ash Green	Betsham (Dartford Borough Council)
Hartley (including Longfield and New Barn (Gravesham Borough Council))	Darenth (Dartford Borough Council)
West Kingsdown	Hawley (Dartford Borough Council)
Seal	Joydens Wood (Dartford Borough Council)
Kemsing	Longfield (Dartford Borough Council)
South Darenth (including area within Dartford Borough Council)	Longfield Hill (Dartford Borough Council)
Hextable	New Barn (Dartford Borough Council)
Brasted	Southfleet (Dartford Borough Council)
Crockenhill	Wilmington (Dartford Borough Council)
Eynsford	Culverstone Green (Gravesham Borough Council)
Halstead	Hook Green (Gravesham Borough Council)
Farningham	Istead Rise (Gravesham Borough Council)
Knockholt & Knockholt Pound	Meopham Green (Gravesham Borough Council)
Sevenoaks Weald	Vigo Village (Gravesham Borough Council)
Leigh	Borough Green (Tonbridge and Malling Borough Council)
Shoreham	
Horton Kirby	Hildenborough (Tonbridge and Malling Borough Council)
Sundridge	
Badgers Mount	Ightham (Tonbridge and Malling Borough Council)
Pratt’s Bottom	

Sevenoaks	Neighbouring Local Authorities
	Plaxtol (Tonbridge and Malling Borough Council) Tonbridge (Tonbridge and Malling Borough Council) Wrotham (Tonbridge and Malling Borough Council) Bidborough (Tunbridge Wells Borough Council) Langton Green (Tunbridge Wells Borough Council) Royal Tunbridge Wells / Southborough (Tunbridge Wells Borough Council) Speldhurst (Tunbridge Wells Borough Council) Lingfield (Tandridge District Council) Oxted (Tandridge District Council) Biggin Hill (LB Bromley)

The extent to which an area of Green Belt protects a land gap is assessed using the following definitions:

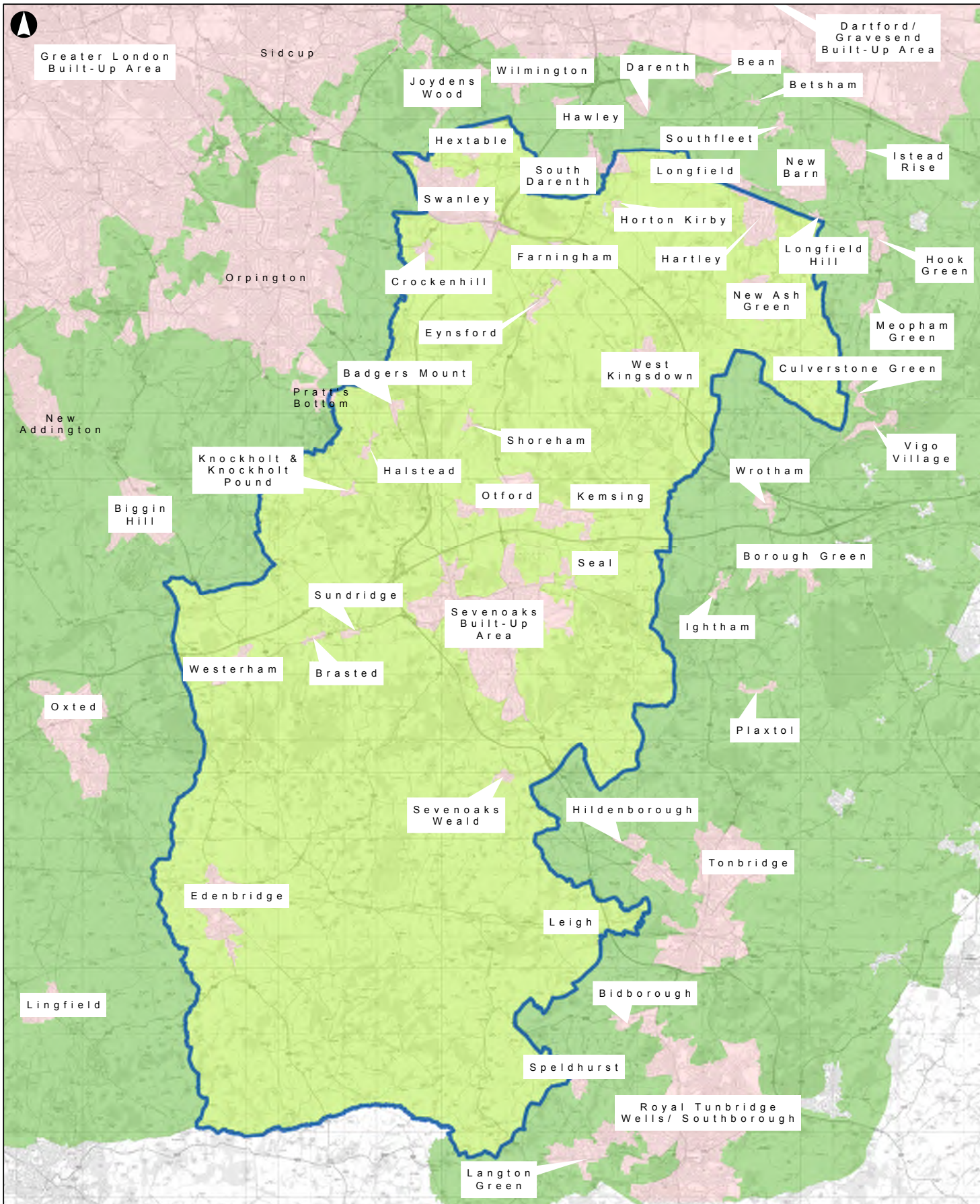
- ‘*Essential gaps*’, where development would significantly reduce the perceived or actual distance between settlements.
- ‘*Wider gaps*’, which may be less important for preventing coalescence.
- ‘*Less essential gaps*’, where development is likely to be possible without any risk of coalescence of settlements.

Purpose 2 Assessment Criteria

The criteria used to assess the Parcels against Purpose 2 are set out below.

Figure 4.6 Purpose 2 Assessment Criteria

Purpose	Criteria	Score
<p>To prevent neighbouring towns from merging</p>	<p>Prevents development that would result in merging of, or significant erosion of, gap(s) between neighbouring settlements, including ribbon development along transport corridors that link settlements.</p>	<p>5: An essential gap between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them.</p>
		<p>3: A wider gap between non-Green Belt settlements where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging.</p>
		<p>1: A less essential gap between non-Green Belt settlements, which is of sufficient scale and character that development is unlikely to cause merging of settlements.</p>
		<p>0: Green Belt Parcel does not provide a gap between any settlements and makes no discernable contribution to separation.</p>
		<p>Score</p>



- Legend**
- Settlement
 - Sevenoaks Green Belt
 - Neighbouring Green Belt
 - Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

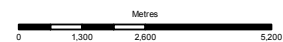
P1	13-09-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 4.5 Settlements Considered in Purpose 2 Assessment

Scale at A3

1:110,000

Job No
251351-00

Drawing Status
Draft

Drawing No
4.5

Issue
P1

4.3.3 Purpose 3

Purpose 3: To assist in safeguarding the countryside from encroachment.

This purpose seeks to safeguard the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change. The assessment considered openness and the extent to which the Green Belt can be characterised as ‘*countryside*’, thus resisting encroachment from development. Openness refers to the extent to which Green Belt land could be considered open from an absence of built development rather than from a landscape character perspective, where openness might be characterised through topography and presence or otherwise of woodland and hedgerow cover.

Historic open land uses associated with the urban fringe and urban characteristics as well as the countryside exist in the Sevenoaks Green Belt and include but are not limited to farmland, commons, caravan parks, a racing track, nature and wildlife reserves, a deer park, country houses and grounds and golf courses. Some of the semi-urban uses listed above have an impact on the ‘openness’ of the Green Belt as identified in the assessment.

Purpose 3 Assessment Criteria

The criteria used to assess the Parcels against Purpose 3 are set out below. Ordnance Survey base maps and aerial photography were reviewed in order to undertake the openness assessment.

The percentage of built form within a Green Belt Parcel were calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. The data includes buildings, some surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.

The score attributed to a Parcel is initially determined on the basis of the percentage built form. Scores were then considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate. This assessment considers, in particular, the extent to which a Parcel might be reasonably identified as ‘*countryside*’ / ‘*rural*’ (in line with the NPPF). In order to differentiate between different areas, broad categorisation has been developed encompassing assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:

- ‘*Strong unspoilt rural character*’ is defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
- ‘*Largely rural character*’ is defined as land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
- ‘*Semi-urban character*’ is defined as land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before

giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).

- ‘*Urban character*’ is defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

Figure 4.7 Purpose 3 Assessment Criteria

Purpose	Criterion	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	5: Contains less than 3% built form and possesses a strong unspoilt rural character.
		4: Contains less than 5% built form and/or possesses a strong unspoilt rural character.
		3: Contains less than 10% built form and/or possesses a largely rural character.
		2: Contains less than 15% built form and/or possesses a semi-urban character.
		1: Contains more than 15% built form and/or possesses an urban character.
		0: Contains more than 20% built form and possesses an urban character.
Total score		xx/5

4.3.4 Purpose 4

Purpose 4: To preserve the setting and special character of historic towns.

This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic centres. As outlined in the advice note published by PAS, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today.

In developing the methodology for this purpose, it was noted that a high level Green Belt Assessment prepared by Oxford City Council identified traits of the surrounding countryside which contributed to the city’s special character and historic setting. This relationship between the fringes of settlements and the surrounding Green Belt is a key factor in considering the contribution of a Parcel to this purpose.

Appropriate ‘historic towns’, both within Sevenoaks District and neighbouring authorities, were identified through English Heritage’s Extensive Urban Survey for Kent (2006)⁷ and Surrey (2006)⁸ (Map 4.6; Figure 4.7). In addition, New Ash Green was considered in the assessment due to its unique historical identity (largely intact) as a prototype for a new way of living from the 1960s onwards. The neighbourhoods in New Ash Green are designed along ‘Radburn’ lines, separating roads from pedestrian paths. As well as housing, the village’s public and county buildings include a shopping centre, offices, community centre, church, library, clinic and primary school.

Figure 4.8 Historic Areas considered in Purpose 4 Assessment

Sevenoaks	Neighbouring Local Authorities
Sevenoaks	Old Oxted (Tandridge District Council)
Westerham	Wrotham (Tonbridge and Malling Borough Council)
Edenbridge	Ightham Tonbridge and Malling Borough Council)
New Ash Green	Tonbridge (Tonbridge and Malling Borough Council)
Otford	Tunbridge Wells (Tunbridge Wells Borough Council)

Purpose 4 Assessment Criteria

Two aspects are of particular importance with regard to assessment of the Parcels against Purpose 4:

- The role of the Parcel in providing immediate context for the historic settlement (along the boundary between the settlement and the Green Belt); and
- Contribution to views or vistas between the historic settlement and the surrounding countryside, looking both inwards and outwards where public viewpoints exist.

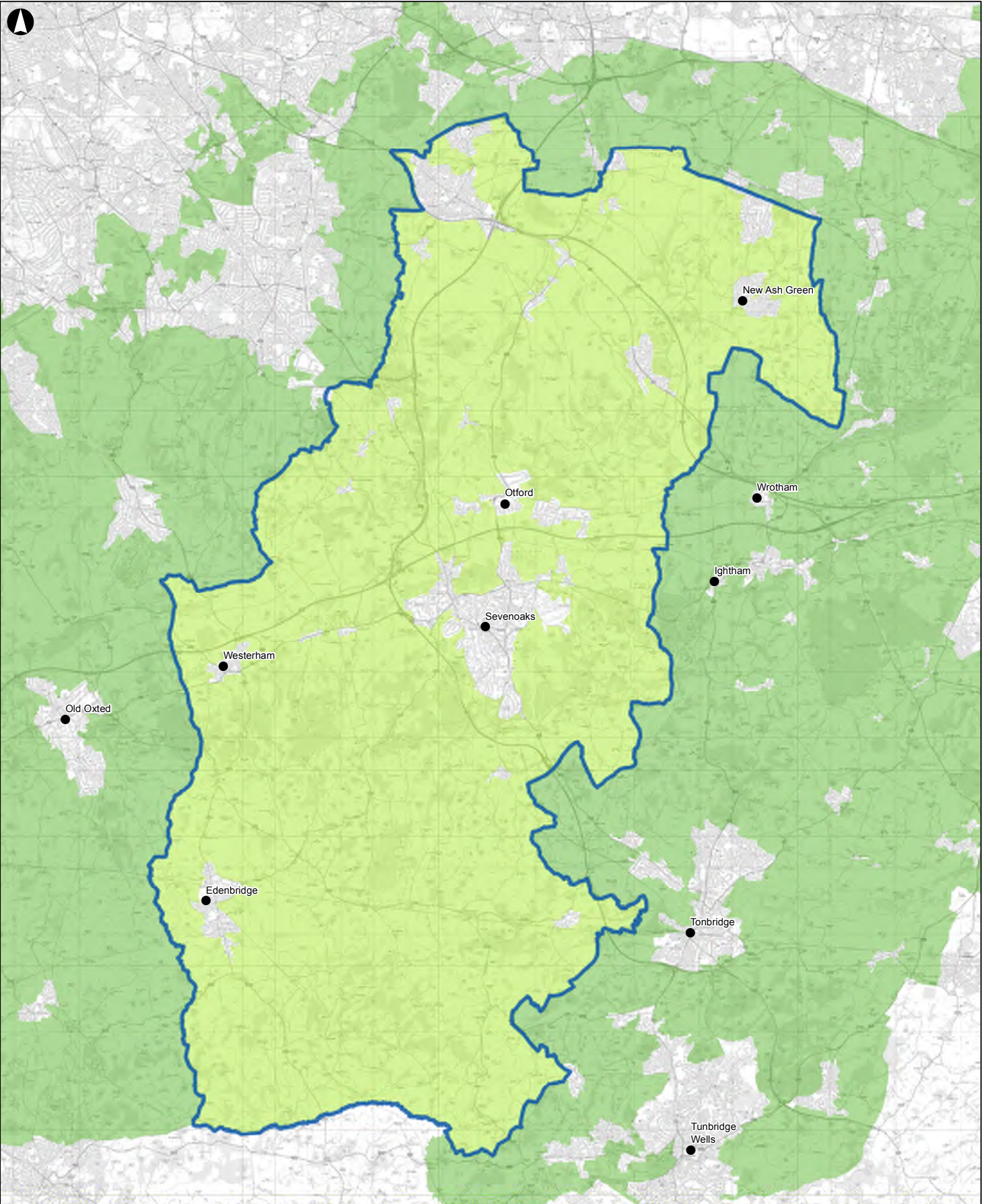
The relative importance of particular landforms or landscape features to the setting and special character of a historic town were adjudged using available documentation (for example, Conservation Area Appraisals). Potential vistas were also identified using Ordnance Survey contour maps and sense checked on site visits.

⁷ http://archaeologydataservice.ac.uk/archives/view/kent_eus_2006/index.cfm

⁸ http://archaeologydataservice.ac.uk/archives/view/surrey_eus_2006/

Figure 4.9 Purpose 4 Assessment Criteria

Purpose	Criterion	Score
<p>To preserve the setting and special character of historic towns</p>	<p>Protects land which provides immediate and wider context for a historic settlement, including views and vistas between the settlement and the surrounding countryside.</p>	<p>5: Green Belt Parcel plays an important role in maintaining the unique setting of a historic settlement by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, and protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.</p> <hr/> <p>3: Green Belt Parcel plays an important role in maintaining the unique setting of a historic settlement by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, or protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.</p> <hr/> <p>1: Green Belt Parcel makes limited contribution to the broader setting of a historic town by providing a countryside setting for a historic core which is inward facing, and has a weak relationship with the surrounding countryside.</p> <hr/> <p>0: Green Belt Parcel does not abut an identified historic settlement core.</p>
<p>Total score</p>		<p>xx/5</p>



- Legend**
- Settlement
 - Sevenoaks Green Belt
 - Neighbouring Green Belt
 - Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

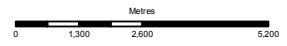
P1	14-09-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 4.6 Historic Areas Considered in Purpose 4 Assessment

Scale at A3
1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No 4.6	Issue P1

4.3.5 Purpose 5

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. As outlined in chapter 3, the advice note issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between Green Belt Parcels as all Green Belt achieves the purpose to the same extent.

It is noted that Swanley town is the key regeneration priority in the district and a draft vision document exists for the Swanley and Hextable area (July 2016)⁹ which highlights the potential constraints to such regeneration created by current Green Belt designation. However, given this is a particularly unique issue relating to a single geographical area and not the wider district, it was considered that a district-wide assessment of Parcels against Purpose 5 would add little value to the Study.

4.3.6 Pro-Forma

A pro-forma template for the assessment against the NPPF purposes is provided in Appendix C.

4.4 Identification of Recommended Areas for Further Assessment

Following completion of the assessment against the NPPF purposes, a summary of the overarching performance of the Green Belt is provided across each of the purposes. From this, an initial series of conclusions and recommendations are made which can be split into the following categories:

- Parcels scoring weakly overall against all NPPF purposes which could be considered further for release from the Green Belt.
- Whole parcels or clusters of parcels which, although medium or strongly scoring against the NPPF purposes, have particular characteristics or synergies with neighbouring weaker parcels, which might lend themselves to further consideration. These specific characteristics are set out clearly for each recommended area.
- Medium or strongly scoring Parcels where there is clear scope for sub-division to identify weakly performing sub-areas, including the presence of boundary features which have the potential to be permanent and readily recognisable, which could be afforded further consideration in accordance with the above provisions.

⁹ <http://cds.sevenoaks.gov.uk/documents/s28619/06%20Appendix%20A.pdf>

4.5 Further Assessment

Those areas (either whole Parcels or sub-areas) recommended for further consideration at this stage are then subject to three further separate and concurrent assessments as set out in the following sections:

- Assessment Against Local Considerations;
- Landscape Assessment; and
- Boundary Analysis.

4.5.1 Assessment Against Local Considerations

This Assessment involved consideration of the Recommended Areas (as identified through the assessment against the NPPF purposes) against statutory natural and historic environmental constraints (e.g. 'local considerations'). This was undertaken at two levels:

- **Absolute Constraints** are possible 'show-stoppers' to potential future land use changes thus, regardless of fulfilment of the Green Belt purposes, there may be limited value in de-designating. This category of constraints encompassed:
 - Sites of Special Scientific Interest (SSSI);
 - Special Areas of Conservation (SAC);
 - Ramsar;
 - Special Protection Areas (SPA);
 - Flood Plain (Zone 3b);
 - Scheduled Monuments;
 - Nationally Registered Park or Garden;
 - Ancient Woodland.
- **Non-absolute Constraints** which would make a change of land-use less preferable, but would not preclude it completely. These included:
 - Areas of Outstanding Natural Beauty (AONB);
 - Agricultural Land Classification (Grades 1, 2, 3);
 - Flood Plain (Zone 3a);
 - Conservation Areas;
 - Local Wildlife Sites;
 - Local Nature Reserves;
 - Areas of Archaeological Significance (designated locally);

- Open Space Designations.

The constraints analysis was desk-based. Using GIS, a series of maps were produced which overlay the various constraints on the Green Belt Parcels to illustrate the extent of areas covered by absolute and non-absolute constraints and land with no constraints. This was accompanied by a descriptive narrative for each constraint and an overall summary for both constraint categories.

Areas of Outstanding Natural Beauty

While it is recognised that major development may be appropriate in AONB in ‘exceptional circumstances’ (paragraph 116 of the NPPF), thus precluding the designation from being an absolute constraint to a change in land-use, the particularly special status of the designation is also noted. The NPPF states:

‘Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty...’ (paragraph 115).

It goes on to state that, when considering whether major development might be appropriate, *‘the cost of, and scope for, developing elsewhere outside the designated area’* should be assessed. Given that a proportion of the Green Belt in Sevenoaks falls outside of the two AONBs, it is therefore appropriate to afford additional weight to areas which are designated as AONB when determining which to exclude from possible release from the Green Belt. The test here will be the extent to which Green Belt release would materially affect the identified special qualities underpinning the AONB designation (as stated in the relevant AONB Management Plan) and whether it would therefore affect the integrity of the designation in material terms. Consideration is given to the representation of special qualities as they relate to character in the individual Recommended Area landscape assessment pro-formas (see Annex Report 3).

The concept of setting with regard to AONBs is not always clearly defined, but it can and should consider many factors beyond only visual character, views and intervisibility. The representation of landscape characteristics which reflect AONB special qualities in the wider landscape is an important indicator (as are key views, advertised views and the visual contribution made prominent features of the AONB, such as scarp landforms and wooded ridges). Such elements are considered in the landscape assessment.

4.5.2 Landscape Assessment

This Assessment involved consideration of the sensitivity to change of the Recommended Areas (as identified through the assessment against the NPPF purposes) with regard to local landscape character should they be considered for release from the Green Belt. The task was undertaken in two stages.

Stage 1: High level assessment of areas of opportunity and constraint:

Relevant spatially referenced GIS data were overlaid (LCA/designated landscape interests, Historic Landscape Characterisation or HLC) and a review undertaken of key landscape characteristics (plus condition and quality information in the existing Landscape Character Assessment and the emerging findings from the new Landscape Character and Sensitivity Study). The relevant special qualities/significances set out in the management plans¹⁰ for the High Weald AONB and the Kent Downs AONB were also reviewed. The primary focus in this exercise was to understand the degree to which wider landscape characteristics and qualities were reflected in the Recommended Areas.

The purpose of this exercise was to understand areas of constraint and potential to inform the Green Belt Assessment.

Stage 2: Fine grain landscape and visual sensitivity analysis of the locations

This stage considered the landscape sensitivity of the Recommended Areas in terms of their ability to accommodate change in land use without fundamentally and adversely changing wider landscape character if released from the Green Belt.

It is important to note that the assessment undertaken is not a full Landscape and Visual Impact Assessment (LVIA), although the approach was based on the baseline part of the LVIA guidance¹¹. The methodology drew upon the information contained within the District Landscape Character Assessment (LCA)¹² and approaches to landscape sensitivity developed in recent years by Landscape East¹³ and in the most recent iteration of the national guidance on landscape characterisation¹⁴. Information was used from the existing LCA on condition, intactness and visual character to provide additional background information for the assessment. The methodology was also reviewed against the initial findings of the emerging District-wide Landscape Character and Sensitivity Study, so that these strategic scale assessment criteria were reflected appropriately in this finer grain assessment in relation to the Recommended Areas.

Field surveys were used to verify all collated information and included a comprehensive photographic record to illustrate each Recommended Area. Detailed pro-formas were completed for each identified area, capturing information and evidence in relation to a defined series of landscape attributes, culminating in an assessment of landscape value, susceptibility and sensitivity for

¹⁰ High Weald Joint Advisory Committee (2014) *The High Weald Area of Outstanding Natural Beauty Management Plan 2014-2019*; Kent Downs AONB Partnership (2014), *Kent Downs Area of Outstanding Natural Beauty Management Plan 2014-2019*.

¹¹ Landscape Institute and Institute of Environmental Management and Assessment, *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition, 2013. Often referred to as 'GLVIA3'

¹² Sevenoaks District Council, 2011, *Sevenoaks Countryside Assessment Supplementary Planning Document*

¹³ Landscape East, 2011, *Guidance on Assessing the Sensitivity of the Landscape of the East of England*

¹⁴ Natural England, 2014, *An Approach to Landscape Character Assessment*

each site. Where land use change could potentially be accommodated within a smaller, refined part of the identified Recommended Area, without compromising surrounding Green Belt and where alternative permanent, robust and defensible boundaries were identified, this was also noted.

The approach to the landscape appraisal is detailed below.

Assessment Approach

Landscape Value

In order to carry out the landscape appraisal, account was first taken of landscape value¹⁵ in relation to the Recommended Areas, considering the following aspects:

- Presence of designated landscape interests, specifically representation of relevant AONB Special Qualities / scenic qualities (drawing from the AONB Management Plans);
- Rarity and representativeness of character and elements (with reference to published information such as landscape character assessments);
- Quality, condition and intactness (drawing from the existing LCA and the field survey undertaken for this work);
- Evidence of recreational value (whether formal/informal, Public Rights of Way / Open Access Land / common land)
- Associations, whether artistic, literary or historic (drawing from AONB Management Plans, LCA or Conservation Area Appraisals as appropriate).

The Recommended Areas were then assigned a value from national-regional-district-local/communal, according to their representation or otherwise of designated interests and special qualities, rarity, representativeness and quality, or their associative significance as captured in published texts and other works, as described above.

Landscape Susceptibility

An assessment of the susceptibility (or the vulnerability) of the landscape to the given change scenario (in this case larger scale residential and mixed use development) was next undertaken, considering the following, drawing from the existing LCA, emerging Landscape Character and Sensitivity Study, and AONB Management Plans in particular.

A series of attributes denoting higher or lower susceptibility to change arising from the scenario were defined for testing and assessment in the field, to understand what was important about the landscape character of each Recommended Area and the degree to which they represented wider landscape character. Professional judgement was used to assign and calibrate susceptibility

¹⁵ With reference to the European Landscape Convention or ELC (Council of Europe, 2000), all landscapes are of value to somebody, irrespective of their designation and / or quality, and all modern landscape assessment methodologies seek to take account of this.

ratings in relation to each criterion, using a five point scale ranging from High through Moderate-High, Moderate, Moderate-Low to Low).

The assessment criteria drew from information in the AONB special qualities and key landscape characteristics in the existing LCA. The criteria were also designed to take account of the approach in the emerging district wide Landscape Character and Sensitivity Study, and are set out in Table 4.1 below, with supporting definitions.

Table 4.1 Landscape attribute susceptibility to change

Characteristic / Attribute	Discussion / rationale / guidance notes for the assessment
Physical character (Landform, landscape pattern and scale)	Landscapes with a high degree of landform intricacy and / or intimate spatial scale and complex / intact landscape pattern would typically have a higher susceptibility to change resulting from residential and mixed use development than would landscapes defined by simple landforms and expansive, simple landscape patterns. This is by virtue of the potential effect of such development footprints upon their legibility.
Visual character (Skylines and sense of enclosure / openness)¹⁶	<p>‘Natural’ or undeveloped skylines would be more susceptible to change resulting from residential and mixed use development than would those already characterised by development, as would very open and / or dramatic skylines characterised by prominent topographic / landscape features, the scale and dominance of which could be adversely affected by development.</p> <p>Very open and exposed landscapes with a high degree of ‘intervisibility’ would have a higher susceptibility to change in visual terms than would landscapes with a strong sense of enclosure (whether this provided by intervening vegetation, topography or settlement).</p>
Perception and experiential quality	Landscapes with a strong sense of tranquillity and / or remoteness and characterised by few intrusive / overtly modern human or development influences would have a higher susceptibility than would landscapes where tranquillity is weak or eroded or where there are many intrusive development influences.
Cultural and historic character	Landscapes with a strong sense of time depth (e.g. presence of recognisable historic features and layers such ridge and furrow / fossilised field systems / holloways and green lanes and / or sense of historic landscape planning and management, for example parklands / estates etc) would have a higher susceptibility to change resulting from residential and mixed use development than would landscapes with less obvious cultural pattern / where this has been eroded. This is due to the potential for adverse effect on landscape value, legibility and the significance which may be ascribed to such features through designation.
Settlement setting	Landscapes which form a buffer between settlement / development, or which form a positive gateway / sense of arrival to the settlement, or which display a range of high quality landscape features in proximity to the settlement edge,

¹⁶ These criteria should not ‘cancel one another out’. It is a question of professional judgement in each case as to what is most important to character, and this is carried forward in the assessment.

Characteristic / Attribute	Discussion / rationale / guidance notes for the assessment
	would have a higher susceptibility to change than landscapes which do not form a strong element of the setting whether by virtue of condition / management, or landscapes which detract from the settlement setting for these reasons.
Settlement edge and form	Well integrated, defined and defensible settlement edges (by vegetation / topography / age of development etc) would have a higher susceptibility to change resulting from residential and mixed use development than would expanded / poor / exposed / eroded settlement edges which may offer considerable mitigation potential through well-designed new development.

Sensitivity analysis and definitions

After making judgements as to landscape value and landscape susceptibility for each Recommended Area, a judgement was made on overall landscape sensitivity to residential and mixed use development, taking these judgements into account. For this Study, landscape sensitivity has been defined on a five point scale, as described below (with the intermediate Moderate-High and Moderate-Low categories intended to provide calibration and to capture a wider range of ratings in situations where clear cut judgements could not always be made).

Where variations in landscape sensitivity occurred across or within Recommended Areas these were noted by the field surveyors using the pro-formas in Annex Report 3 and specific detail was brought out in the assessment, as appropriate.

High

Key characteristics of the Recommended Area's landscape are highly sensitive to change arising from residential and mixed use development, with such change highly likely to result in a significant change to valued characteristics. A very high degree of care will be needed in considering the location, design and siting of any change within the landscape.

Moderate-High

Many of the key characteristics of the Recommended Area's landscape are likely to be vulnerable to change arising from residential and mixed use development, with such change likely to result in a potentially significant change to valued characteristics. A high degree of care will be needed in considering the location, design and siting of any change within the landscape.

Moderate

Some of the key characteristics of the Recommended Area's landscape may be vulnerable to change arising from residential and mixed use development. Although the landscape may have some ability to absorb change, some alteration in character may result. Considerable care may still be needed in locating and designing change within the landscape.

Moderate-Low

Relatively few of the key characteristics of the Recommended Area's landscape are likely to be vulnerable to change arising from residential and mixed use development. The landscape is likely to have more ability to absorb change with low levels of alteration to existing character, and may offer more opportunity for mitigation, enhancement and restoration potential. Sensitive design is still needed to accommodate change.

Low

Key characteristics of the Recommended Area's landscape are less likely to be adversely affected by change arising from residential and mixed use development. Change can potentially be more easily accommodated without significantly altering the existing character and there may be considerable opportunities to positively create new character, as well as to restore, enhance and mitigate. Sensitive design is still needed to accommodate change.

Field survey

Field survey was undertaken in November 2016 by a landscape architect experienced in landscape appraisal and a town planner to ensure bench marking with the assessment against Green Belt purposes where appropriate. At a number of the sites the surveyors were also accompanied by an experienced Chartered Landscape Architect (Chartered Member of the Landscape Institute or CMLI) with a background in landscape characterisation and methodology development. Records were captured in the form of survey notes and map annotations, using the pro-forma shown at Appendix D and supported by geo-located photographs to show the landscape character and context of the Parcels.

Developing recommendations and guidance

Upon completion of the sensitivity analysis and reporting, concise spatial recommendations for appropriate mitigation and integration (linked to key landscape characteristics or robust / mappable salient landscape features) were developed for the Recommended Areas. These responded to the landscape baseline and the findings of the landscape appraisal to create a clear, evidenced audit trail for recommendations and decision making. Where Recommended Areas were of such sensitivity that release for development would be inappropriate in landscape and visual terms, this was also clearly stated.

4.5.3 Boundary Analysis

Each Recommended Area was considered in more detail to identify appropriate defensible boundaries, with the identified areas modified where appropriate to ensure alignment with recognisable features (drawing on additional desk-based analysis and site visits). This adopted the broad principles of identifying boundaries for Green Belt parcels, as set out in section 4.2.1, though with a greater level of flexibility to identify smaller features (appropriate to the more granular scale of assessment).

Given the likelihood of future modifications to proposed Green Belt boundary amendments through the Local Plan process, a series of broad principles was developed for the identification of the new Green Belt boundaries for the district.

4.6 Historic Boundary Anomalies

Separate to the above activities, a review of all Green Belt boundaries adjoining settlements across the District was undertaken to identify any small scale anomalies where the boundary does not follow a physical feature which is readily recognisable and likely to be permanent. Such boundary anomalies are often the result of the accuracy of the original Green Belt mapping or where small-scale development has taken place close to the boundary.

Boundary anomalies include situations where the Green Belt boundary cuts:

- Across open areas (for example, residential gardens or car parks) where no boundary feature is present.
- Through a building;
- Through a row of houses / development which appear to have been built around the same time.

By their nature, these boundary anomalies are therefore small scale and would not impact on the role of wider Green Belt.

The following are not considered as anomalies and are therefore not identified:

- Identifiable, self-contained development sites (e.g. school sites);
- Extended rows of housing / development which could be seen as ribbon development beyond the settlement boundary and where adjustment of the Green Belt boundary in such a location could increase the risk of coalescence with other settlements;
- Areas of development that are located beyond an existing Green Belt boundary that is readily recognisable and likely to be permanent, and where amendment to the Green Belt boundary would effectively weaken the boundary.

5 Assessment against NPPF Purposes

5.1 Key Findings

This section summarises the key findings from the assessment of Green Belt Parcels against the NPPF purposes.

In accordance with the approach set out in section 4.1, 101 Green Belt Parcels were identified for assessment (see Map 4.3). Table 5.1 sets out the scores for each Green Belt Parcel against NPPF purposes 1-4, with the purpose scoring illustrated spatially in Maps 5.1 – 5.4 and overall scores in Map 5.5.

Detailed pro-formas setting out the assessments for each Parcel can be found in Annex Report 1.

5.1.1 Purpose 1 Assessment

The overall findings of the Purpose 1 assessment are illustrated spatially in Map 5.1.

78 of the 101 Green Belt Parcels (77%) do not lie at the edge of an identified large built-up area and do not directly prevent sprawl, thus failing to meet Purpose 1. While some of these Parcels abut the edges of settlements, they play no role in preventing the sprawl of ‘large built-up areas’ (in reference to the specific policy set out in NPPF Paragraph 80, and defined for the purposes of this assessment in Figure 4.3 of this Report).

Generally, these Parcels tend to be concentrated in the more rural parts of the District; areas that are physically distant from the identified large built-up areas and do not directly prevent their outward growth. Broadly, two swathes of Green Belt can be identified that do not meet this purpose: an area to the south and south-west of Sevenoaks and an area in the north-east of the District.

Two Parcels (57 and 64) make only a limited contribution to this purpose, scoring 1+. Although these parcels directly adjoin the edge of Sevenoaks, they are ‘enclosed’ within the existing built area and thus do little to prevent sprawl. In the case of Parcel 57, this has arisen simply as a result of historic patterns of development around the River Darent, which has left this area severed from the wider Green Belt, whilst Parcel 64 has arisen as a result of modern infrastructure development (the M26 to the north) which has effectively brought formerly rural land within the settlement footprint.

21 Green Belt Parcels (21%) are ‘connected’ to a large built-up area, scoring 3 or 3+. In the almost all cases, these areas immediately prevent the outward sprawl of the district’s identified large built-up areas, Sevenoaks and Swanley. There are limited instances (for example, Parcel 76) where the Green Belt in Sevenoaks plays a role in preventing the outward sprawl of Greater London, the built-up area of which extends westwards towards the edge of the District.

Of these 21 Parcels, one third (7) score 3+ and therefore play a heightened role in preventing sprawl by providing a barrier where the boundary between the Green Belt and the large built-up area is not robust, durable or readily recognisable.

In some instances only very small areas of Green Belt separate Parcels from large built-up areas; for example in the case of Parcel 51 which is separated from Sevenoaks to the east by a very narrow strip of Green Belt (Parcel 53). Such instances have been noted qualitatively in the pro-formas in Annex Report 1 on a case by case basis.

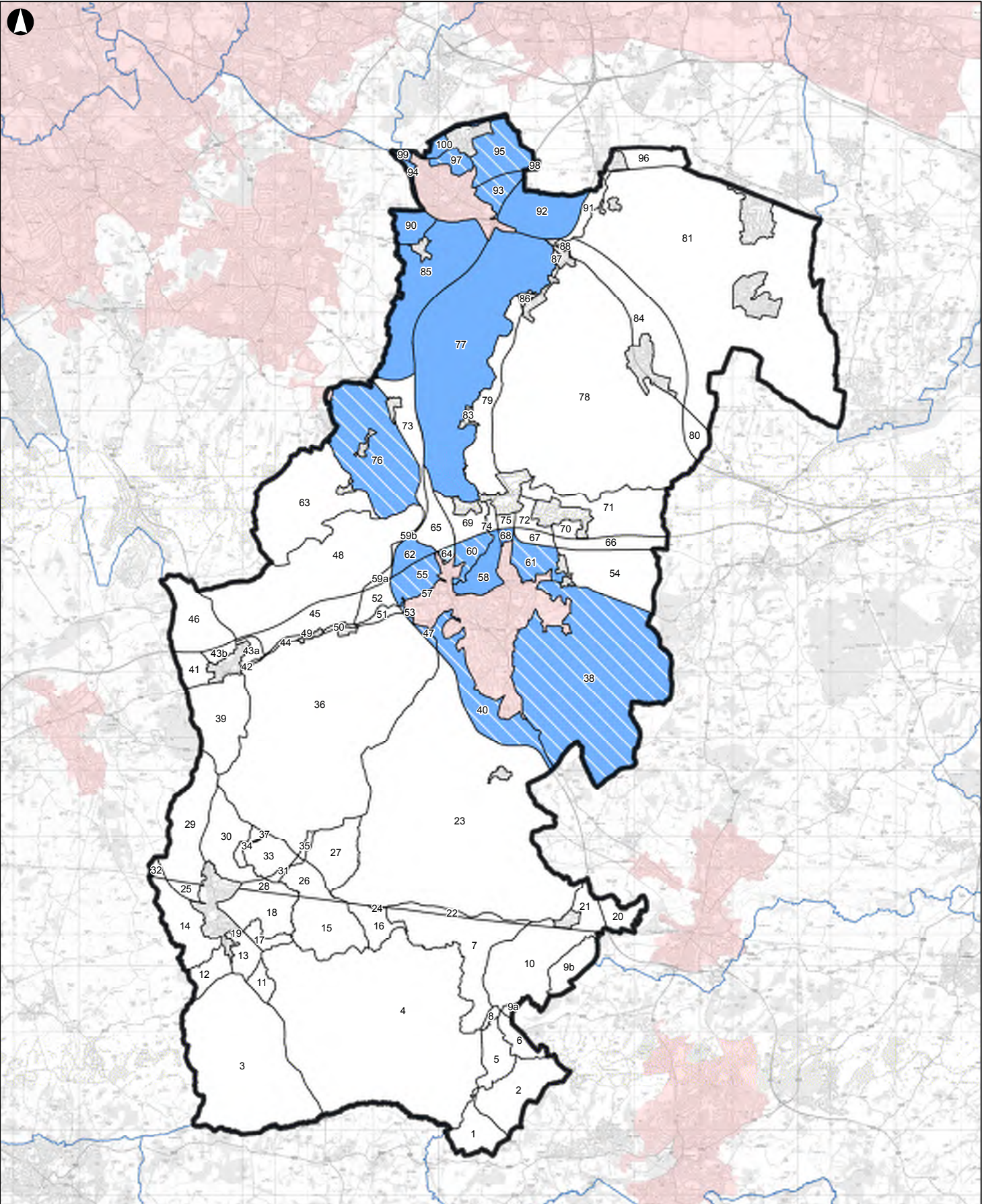
It is notable that no Parcels were identified as ‘contiguous’, scoring 5 or 5+. This can be attributed to the limited direct linkage between Green Belt in Sevenoaks District and the edges of surrounding large built-up areas, in particular Greater London and Dartford / Gravesend. However, it should be acknowledged that, as this Study has focused solely on the performance of Green Belt within Sevenoaks District, the role of certain Green Belt Parcels in preventing sprawl at a wider scale has not been identified through the quantitative assessment. In particular, Parcels along the north-eastern, northern and south-western edges of the District that are physically connected to the wider Green Belt may, at a strategic level, play an additional role in preventing the outward sprawl of large built-up areas beyond the District boundaries, including Greater London, the Dartford / Gravesend built-up area, Royal Tunbridge Wells and Tonbridge.

5.1.2 Purpose 2 Assessment

The overall findings of the Purpose 2 assessment are illustrated spatially in Map 5.2. In broad terms, the overall performance of the Green Belt against this purpose increases moving north through the District. This is linked to development patterns, with a denser network of larger, dispersed settlements closer to London in the north, and occasional nucleated settlements and sparser development further south.

25 of 101 Parcels (25%) fail to meet Purpose 2 and make no discernable contribution to the separation of settlements. These are generally so small in scale that, in relative terms, they play no role as part of larger-scale gaps between settlements (for example, Parcels 31, 35 and 33), and additionally may be so closely associated with existing settlements that they are effectively enveloped within the built area and do not form part of the gap to another settlement (for example, Parcels 19 and 83). It should be noted that, while these represent 25% of the total number of parcels, they make up a small proportion of the Green Belt in terms of area.

17 Parcels (17%) meet Purpose 2 only weakly, scoring 1. These Parcels may form less essential gaps, those which are physically large in scale (for example, Parcels 4 and a number of parcels immediately to the north, which lie between Edenbridge, Speldhurst and Royal Tunbridge Wells), or are judged to be less essential parts of smaller-scale gaps; this might be as a result of their relatively limited scale (such as Parcels 43a or 53) or as a result of physical or topographical features which restrict the potential for coalescence.



Legend

Purpose 1b Scores

- 0
- 1
- 1+
- 3
- 3+
- 5
- 5+

Large Built-Up Area

Green Belt Parcel

Neighbouring District Boundary

Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

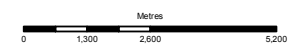
P1	30-11-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment

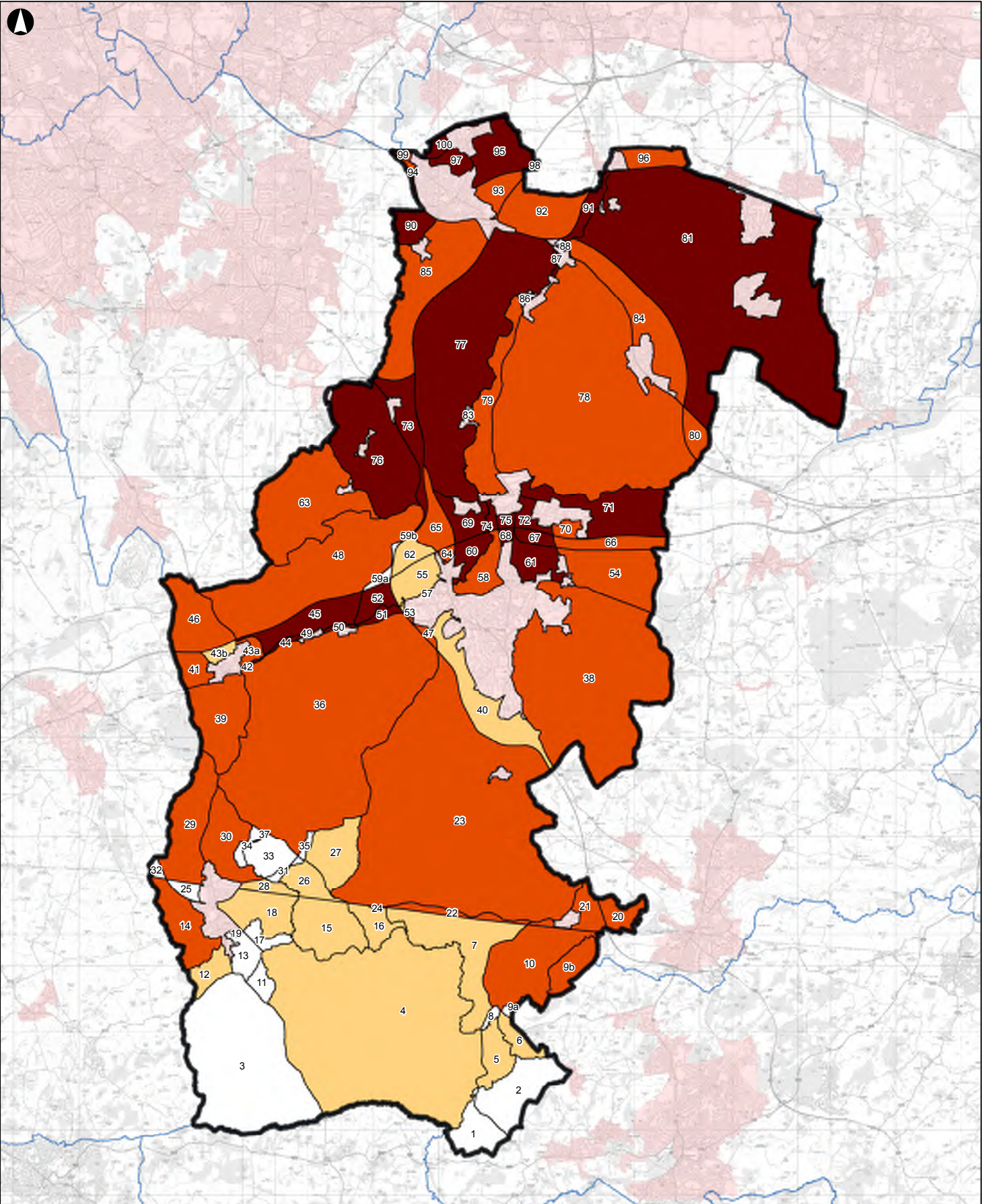


Map 5.1. Purpose 1 Assessment Scores

Scale at A3

1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No 5.1.	Issue P1



Legend

Purpose 2 Score

- 0
- 1
- 3
- 5

- Green Belt Parcel
- Neighbouring District Boundary
- Settlement
- Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

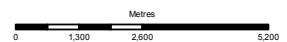
P1	30-11-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 5.2. Purpose 2 Assessment Scores

Scale at A3

1:110,000

Job No
251351-00

Drawing Status
Draft

Drawing No
5.2.

Issue
P1

Over one third of Parcels, 34 out of 101 (34%), meet Purpose 2 moderately, scoring 3. These 'wider gaps' are generally concentrated through the central and northern parts of the District and tend to closely reflect the District's settlement pattern, aligned with wider areas of open land set in between more settled corridors, along river valleys and major roads. It should be noted that, in some cases, smaller areas within these Parcels may be less important for preventing coalescence; these observations are noted qualitatively throughout the pro-formas in Annex Report 1.

25 Parcels (25%) meet Purpose 2 strongly, scoring 5. This significant proportion reflects the particularly important role that the Green Belt in Sevenoaks plays in preventing settlements from merging. These Parcels are generally concentrated along more intensely developed corridors, where the Green Belt maintains gaps that are small in scale and often at risk of being compromised by ribbon development; for example, the series of closely-located settlements along the A25, or the concentration of linear settlements along the Darent Valley. Other Parcels are important for maintaining the pattern of settlements in the north of the District at the London and Dartford / Gravesend fringes (for example, Parcels 95, 97 and 100 which maintain the narrow gap between Swanley and Hextable). Again, occasional cases where smaller areas within these Parcels may play a lesser role in preventing coalescence are noted qualitatively throughout the pro-formas in Annex Report 1.

5.1.3 Purpose 3 Assessment

The overall findings of the Purpose 3 assessment are illustrated spatially in Map 5.3.

All of the 101 Parcels meet this purpose to a greater or lesser extent, reflecting the largely rural nature of the District.

While no Parcels score 1 against Purpose 3, seven of the 101 parcels (7%) score 2, meeting the purpose weakly. These are distributed widely across the district, but in the majority are located at the fringes of settlements, including Sevenoaks, Swanley, Brasted, Farningham and Leigh. These Parcels are judged not to function as open countryside, possessing a semi-urban character with higher levels of built form, interspersed amongst some areas of open land. In some limited cases, Parcels that are isolated from existing settlements have been identified as weakly performing as a result of their more urban character and particularly high proportion of built-form (for example, Parcel 24 which contains a cluster of residential dwellings at Bough Beech).

30 Parcels (30%) meet Purpose 3 moderately, scoring 3. These Parcels, primarily concentrated in the far north and centre of the District, largely consist of open countryside but may be subject to some urbanising influences, such as ribbon development or large-scale infrastructure, or contain small areas with a contrasting, more urbanised character. However, the Green Belt continues to play an important role in preventing encroachment into the countryside.

The majority of Parcels, 64 of 101 (63%), meet Purpose 3 relatively strongly or strongly, scoring 4 or 5. This notably high proportion reflects the broadly rapid

transitions from urban-fringe to open countryside at the edge of the District's settlements, as well as the significant swathes of largely unspoilt countryside subject to little or no physical development that extent across the District. Much of the south of the District, as well as areas to the north-east, north and west of Sevenoaks, play a particularly important role in preventing encroachment into the countryside.

5.1.4 Purpose 4 Assessment

The overall findings of the Purpose 4 assessment are provided spatially in Map 5.4.

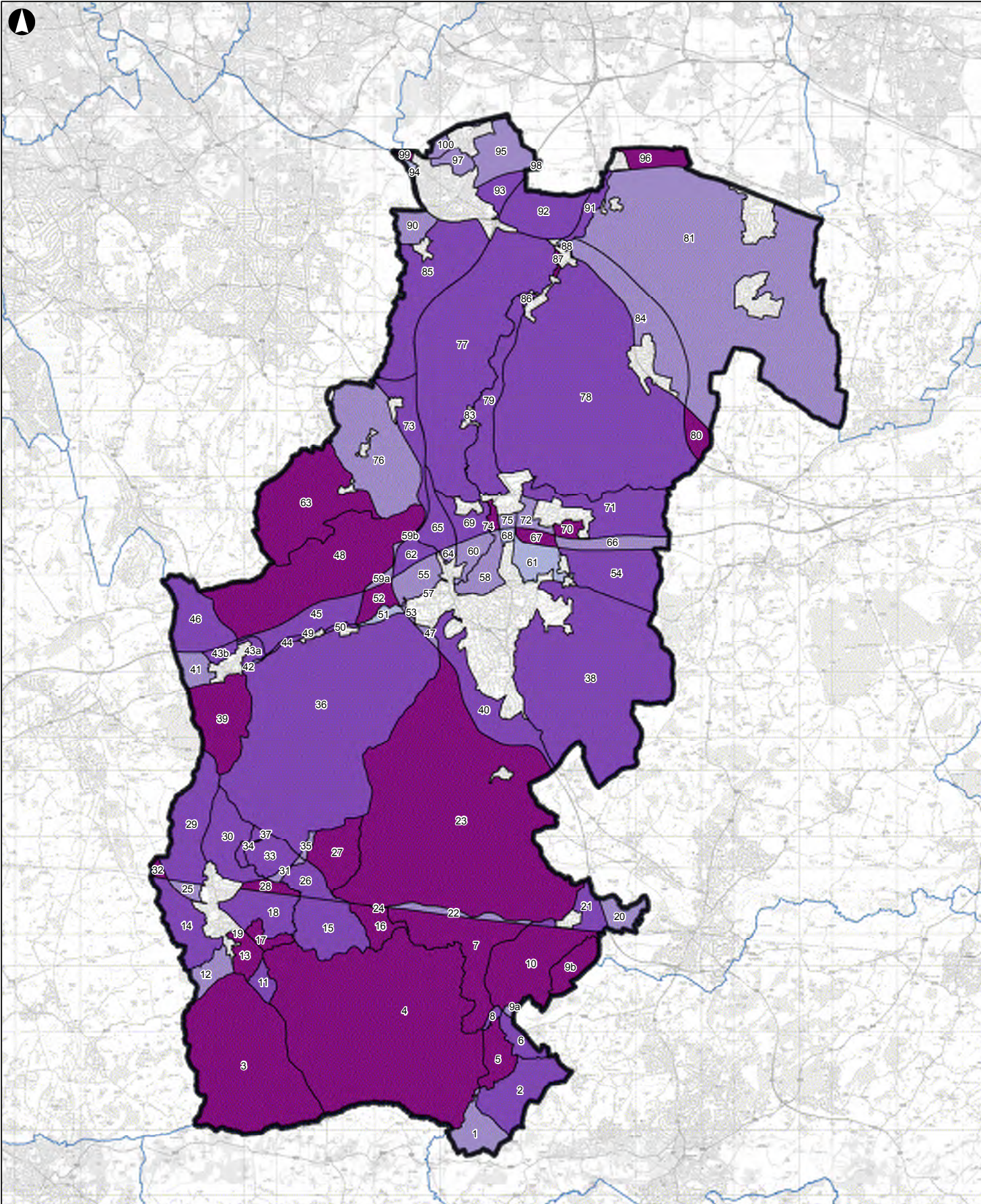
While the Green Belt undoubtedly maintains the setting of a substantial number of historic settlements in Kent, national policy is specific in its reference to historic 'towns' for this assessment. Appropriate settlements for consideration in this Study (being larger settlements with potential for strong linkage between the Green Belt and their historic cores) were identified through the Kent Historic Towns Survey and discussions with District officers. As such, the majority of Parcels, 88 of 101 (87%), do not meet Purpose 4.

Six of the 101 Parcels (6%) meet Purpose 4 weakly. While these areas are directly adjacent to the historic cores of the identified historic settlements, it was judged that they contribute only to the broader contextual settings of these settlements; for example by maintaining open land or countryside. In many cases, these areas have little or no visual connection with the historic core, such as where the settlement is inward facing (for example, Parcel 38 and the historic core of Sevenoaks) or where physical features or natural characteristics limit the connection between the settlement and the countryside (for example, Mont St Aignan Way which separates the historic core of Westerham from Parcel 14, or dense woodland around New Ash Green which limits visibility between the wider countryside and the Green Belt).

Five of the 101 Parcels (5%) score 3, meeting Purpose 4 moderately. These areas either provide immediate rural context for the historic settlement (such as Parcel 39, which maintains Westerham's unique riverside and parkland setting) or contribute to vistas between the historic core and the surrounding countryside (for example, Parcels 69 and 74 which afford views between the historic core of Otford and the wider countryside and vice versa).

Two Parcels score 5 and are judged to meet Purpose 4 strongly. These Parcels (13 and 79) are deemed particularly important to preserving the setting and special character of Edenbridge and Otford (respectively) by providing both immediate rural context for the historic settlements and unspoilt views between the historic cores and surrounding countryside.

It should be noted that, in many cases, the scores attributed to Parcels for Purpose 4 only apply to part of a wider area. Where this is the case, this is noted qualitatively in the relevant pro-formas in Annex Report 1.



Legend

Purpose 3 Score

- 0
- 1
- 2
- 3
- 4
- 5

- Green Belt Parcel
- Neighbouring District Boundary
- Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

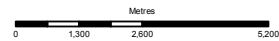
P1	30-11-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 5.3. Purpose 3 Assessment Scores

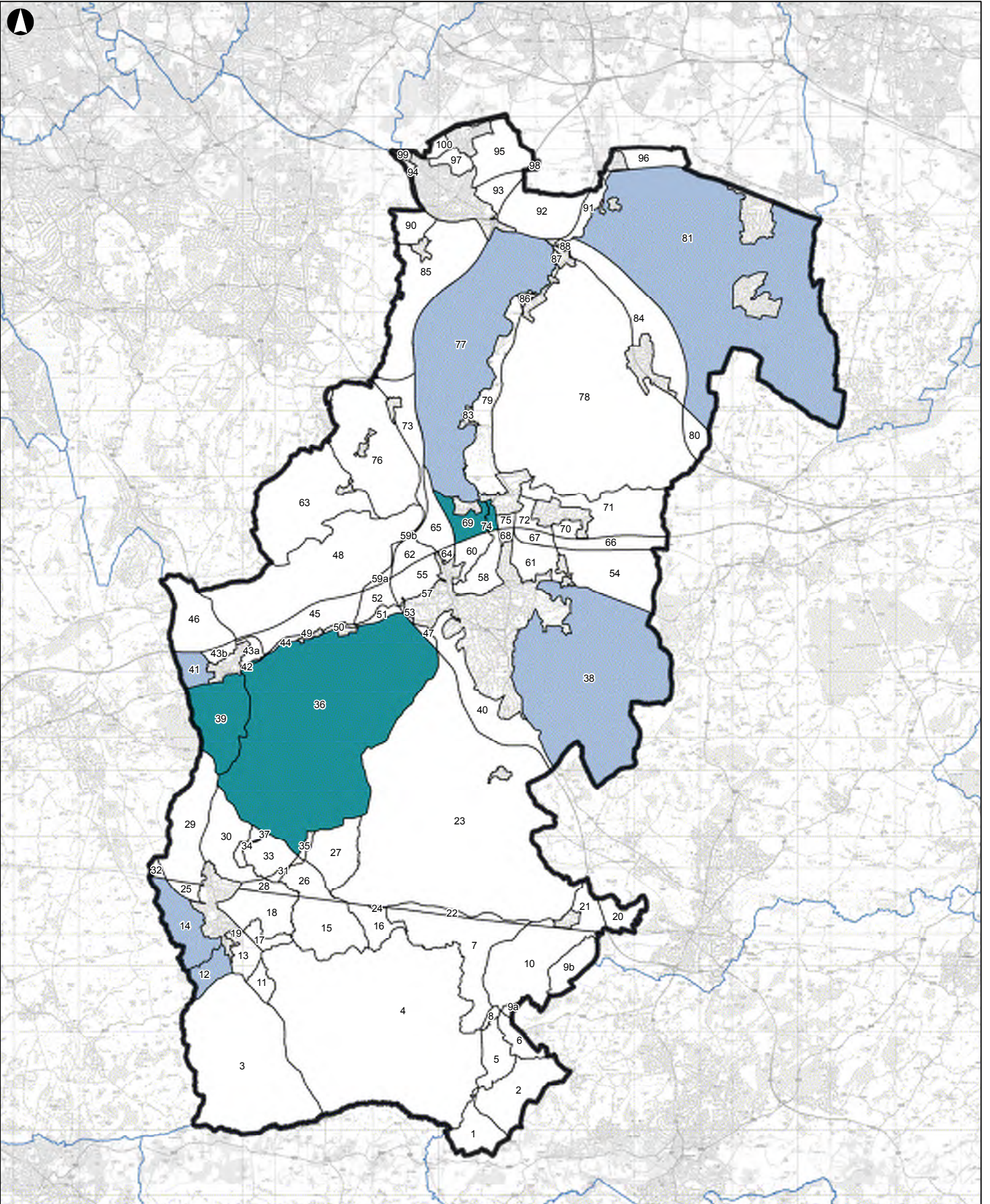
Scale at A3
1:110,000

Job No
251351-00

Drawing Status
Draft

Drawing No
5.3.

Issue
P1



Legend

Purpose 4 Scores

- 0
- 1
- 3

Green Belt Parcel

Neighbouring District Boundary

Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

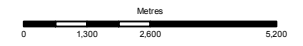
P1	30-11-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 5.4. Purpose 4 Assessment Scores

Scale at A3
1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No 5.4.	Issue P1

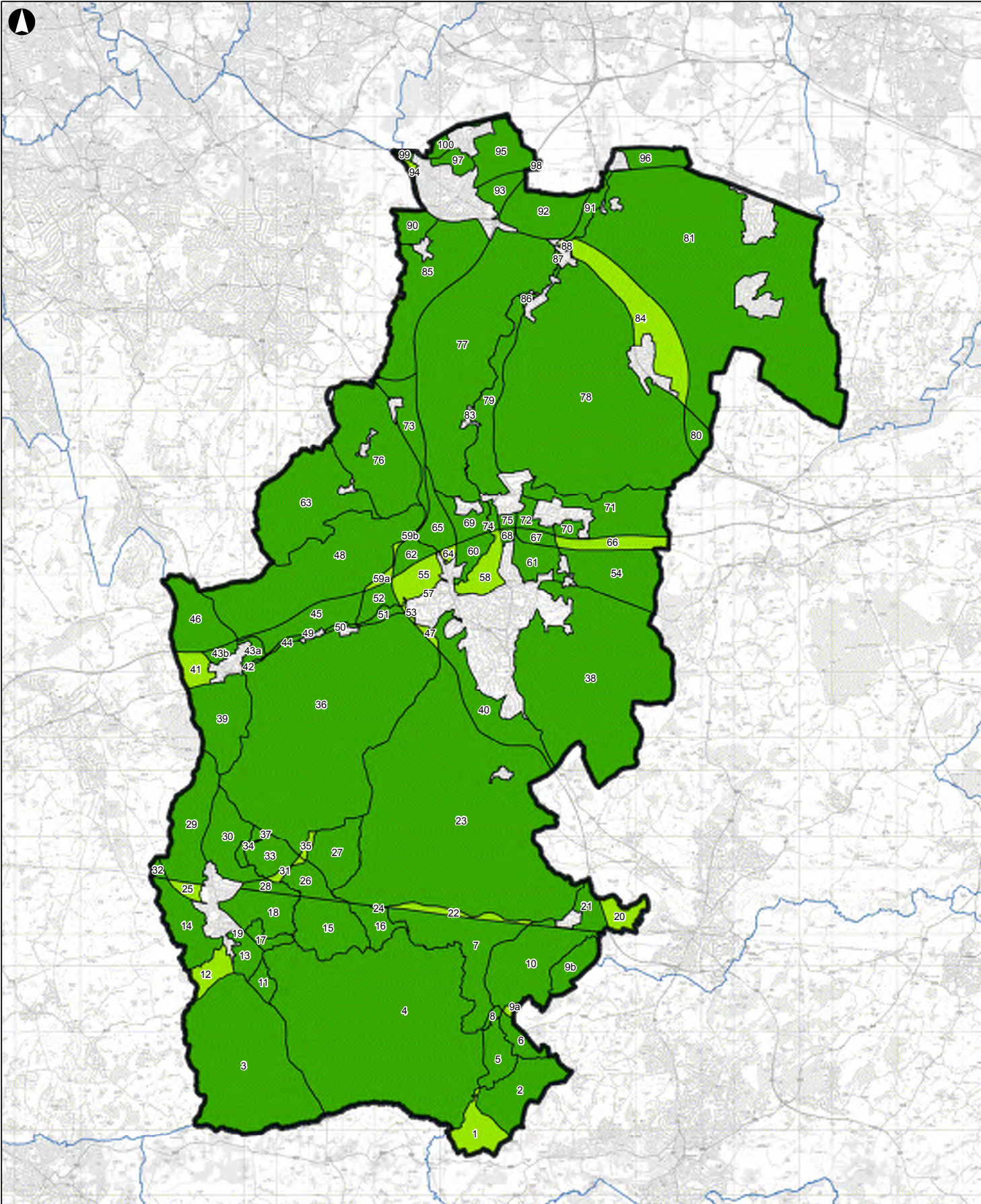
5.1.5 Overall Summary

All 101 Green Belt Parcels meet one or more of the NPPF purposes to varying degrees. The individual purpose scores for Parcels are set out in Table 5.1.

In order to summarise the outcomes from the assessment and begin to draw overall conclusions from the assessment against the NPPF purposes, Parcels have been categorised as follows:

- 77 Parcels are judged to be strongly scoring Green Belt, meeting at least one of the purposes strongly (scoring 4 or 5);
- 21 Parcels are judged to be moderately scoring Green Belt, with a moderate score (3) against at least one purpose and failing to score strongly (4 or 5) against any purpose;
- 3 Parcels are judged to be weakly scoring Green Belt, failing to meet any purpose or weakly meeting all purposes (scoring 1 or 2).

The categorisation of Green Belt Parcels is also set out in Table 5.1 and illustrated in Map 5.5.



Legend

Overall Score

- Does not meet Green Belt purposes
- Weak
- Moderate
- Strong

Green Belt Parcel

Neighbouring District Boundary

Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

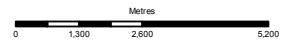
P1	30-11-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
 London W1T 4BQ
 Tel +44 20 7636 1531 Fax +44 20 7580 3924
 www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 5.5. Overall Assessment Scores

Scale at A3

1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No 5.5.	Issue P1

Table 5.1 Overall Summary of Findings for NPPF Purposes Assessment

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
1	176.1	NO	0	0	3	0	Moderate
2	334.2	NO	0	0	4	0	Strong
3	1364.7	NO	0	0	5	0	Strong
4	2876.6	NO	0	1	5	0	Strong
5	149.7	NO	0	1	5	0	Strong
6	90.4	NO	0	1	4	0	Strong
7	505.0	NO	0	1	5	0	Strong
8	17.0	NO	0	0	4	0	Strong
9a	15.2	NO	0	0	3	0	Moderate
9b	143.7	NO	0	3	5	0	Strong
10	498.7	NO	0	3	5	0	Strong
11	61.3	NO	0	0	4	0	Strong

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
12	107.3	NO	0	1	3	1	Moderate
13	96.9	NO	0	0	5	5	Strong
14	270.4	NO	0	3	4	1	Strong
15	324.5	NO	0	1	4	0	Strong
16	114.6	NO	0	1	5	0	Strong
17	59.9	NO	0	0	5	0	Strong
18	233.0	NO	0	1	4	0	Strong
19	3.5	NO	0	0	5	0	Strong
20	103.3	NO	0	3	3	0	Moderate
21	115.3	NO	0	3	4	0	Strong
22	68.1	NO	0	3	3	0	Moderate
23	3386.8	NO	0	3	5	0	Strong
24	3.6	NO	0	0	2	0	Weak
25	41.0	NO	0	0	3	0	Moderate

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
26	120.4	NO	0	1	4	0	Strong
27	246.7	NO	0	1	5	0	Strong
28	55.7	NO	0	1	5	0	Strong
29	402.4	NO	0	3	4	0	Strong
30	280.0	NO	0	3	4	0	Strong
31	19.0	NO	0	0	3	0	Moderate
32	19.3	NO	0	0	5	0	Strong
33	139.0	NO	0	0	4	0	Strong
34	38.0	NO	0	0	4	0	Strong
35	17.9	NO	0	0	3	0	Moderate
36	2837.7	NO	0	3	4	3	Strong
37	2.0	NO	0	0	5	0	Strong
38	1943.6	YES	3+	3	4	1	Strong
39	393.0	NO	0	3	5	3	Strong

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
40	363.6	YES	3+	1	4	0	Strong
41	93.4	NO	0	3	3	1	Moderate
42	5.2	NO	0	5	3	3	Strong
43a	38.1	NO	0	3	4	0	Strong
43b	41.6	NO	0	1	4	0	Strong
44	13.8	NO	0	5	4	0	Strong
45	231.9	NO	0	5	4	0	Strong
46	304.2	NO	0	3	4	0	Strong
47	21.6	YES	3+	3	3	0	Moderate
48	1131.8	NO	0	3	5	0	Strong
49	1.2	NO	0	0	2	0	Weak
50	12.3	NO	0	5	4	0	Strong
51	33.6	NO	0	5	2	0	Strong
52	88.8	NO	0	5	5	0	Strong

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
53	7.4	YES	3+	1	3	0	Moderate
54	403.1	NO	0	3	4	0	Strong
55	142.2	YES	3+	1	3	0	Moderate
57	2.0	YES	1+	0	4	0	Strong
58	142.1	YES	3	3	3	0	Moderate
59a	21.9	NO	0	0	3	0	Moderate
59b	8.3	NO	0	0	3	0	Moderate
60	93.1	YES	3+	5	3	0	Strong
61	145.5	YES	3+	5	2	0	Strong
62	83.1	YES	3	1	4	0	Strong
63	740.9	NO	0	3	5	0	Strong
64	18.5	YES	1+	3	3	0	Moderate
65	139.3	NO	0	3	4	0	Strong
66	134.5	NO	0	3	3	0	Moderate

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
67	49.3	NO	0	5	5	0	Strong
68	17.7	YES	3+	5	2	0	Strong
69	115.0	NO	0	5	4	3	Strong
70	40.5	NO	0	3	5	0	Strong
71	409.9	NO	0	5	4	0	Strong
72	59.9	NO	0	5	3	0	Strong
73	204.7	NO	0	5	4	0	Strong
74	23.3	NO	0	5	5	3	Strong
75	23.0	NO	0	5	3	0	Strong
76	739.1	YES	3+	5	3	0	Strong
77	1665.5	YES	3	5	4	1	Strong
78	2879.6	NO	0	3	4	0	Strong
79	340.8	NO	0	3	4	5	Strong
80	81.3	NO	0	3	5	0	Strong

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
81	3345.1	NO	0	5	3	1	Strong
83	3.4	NO	0	0	3	0	Moderate
84	452.4	NO	0	3	3	0	Moderate
85	654.9	YES	3	3	4	0	Strong
86	13.7	NO	0	0	4	0	Strong
87	11.0	NO	0	5	5	0	Strong
88	6.2	NO	0	0	3	0	Moderate
89	3.0	NO	0	0	2	0	Weak
90	105.6	YES	3	5	3	0	Strong
91	76.0	NO	0	5	4	0	Strong
92	314.8	YES	3	3	4	0	Strong
93	98.7	YES	3+	3	4	0	Strong
94	21.3	YES	3+	3	2	0	Moderate
95	239.6	YES	3+	5	3	0	Strong

Parcel No.	Area (Ha)	NPPF Purpose Assessment					Overall Summary
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Purpose 4 – To preserve the setting and special character of historic towns	
		(a) Parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	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	Protects the openness of countryside and is least covered by development	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside	
96	118.5	NO	0	3	5	0	Strong
97	61.8	YES	3+	5	3	0	Strong
98	6.2	NO	0	1	5	0	Strong
99	12.3	YES	3+	3	5	0	Strong
100	55.7	YES	3	5	3	0	Strong

5.2 Initial Recommendations

Based on the outcomes of the assessment of Green Belt Parcels against the NPPF purposes, this section sets out an initial series of recommendations which Sevenoaks District Council may wish to consider in the development of the new Local Plan, including consideration of whether ‘exceptional circumstances’ exist to justify any alterations to the Green Belt boundary.

While it is clear that the majority of the Green Belt in Sevenoaks is performing an important role in terms of the NPPF purposes, a number of areas have been identified which may warrant further consideration. The areas for further consideration can be broadly categorised as follows:

1. Whole Parcels scoring weakly overall against all NPPF purposes which could be considered further.
2. Whole parcels which, although medium or strongly scoring against the NPPF purposes, have particular characteristics in their own right or synergies with neighbouring weaker parcels, which might lend themselves to further consideration. These specific characteristics are set out clearly for each recommended area.
3. Medium or strongly scoring Parcels where there is considered to be clear scope for sub-division to identify weakly performing sub-areas, including the presence of boundary features which have the potential to be permanent and readily recognisable, which could be afforded further consideration in accordance with the above provisions.

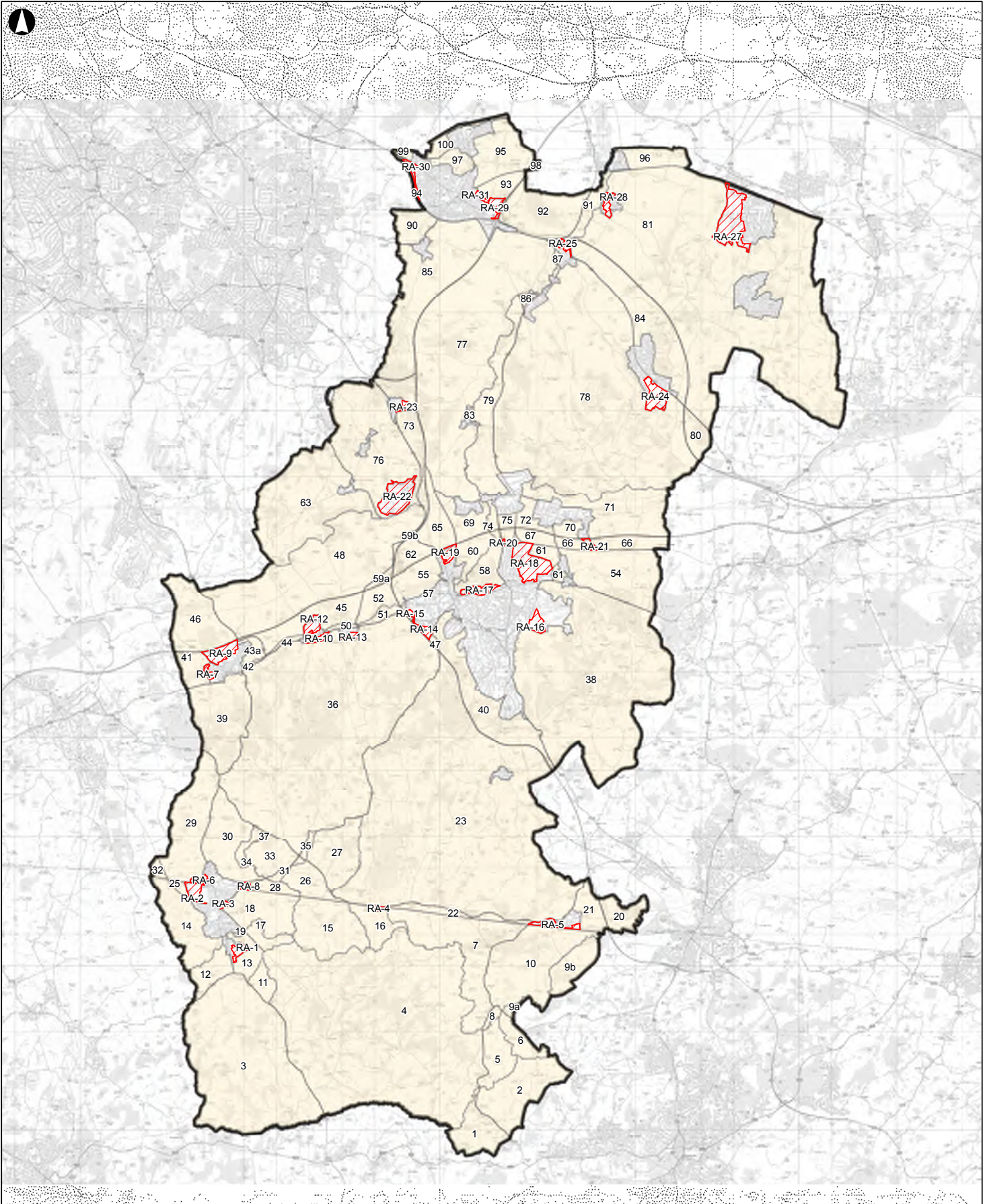
With regard to category 3, sub-areas recommended for further consideration are identified in line with the general principles for identifying boundaries of Green Belt Parcels. Where possible, boundaries of recommended sub-areas follow man-made and natural features within existing Parcels which, based on initial site visits and further desk-based work have the potential to be permanent. It is important to note that sub-area boundaries are advisory only at this stage. An initial, more detailed audit of potential boundary features is set out subsequently in chapter 8, but it is likely that further detailed consideration of exact Green Belt boundaries would be required as part of the formulation of the new Local Plan.

It should also be noted that all Recommended Areas have been identified for further consideration based on their performance against NPPF purposes only, rather than their suitability in terms of sustainability, infrastructure and wider planning considerations.




All Recommended Areas have been assigned a new ID number. A summary of all areas recommended for further consideration, including cross-references between original Green Belt Parcel IDs and Recommended Area IDs, is provided in Table 5.2. The Recommended Areas are shown spatially in Map 5.6, with further detail provided in the following sections.

Table 5.2 Summary of Recommended Areas

Category	Recommended Area	Approximate size (ha)	Recommendation Category	Green Belt Parcel
1	RA-4	4	1	24
	RA-11	1	1	49
	RA-26	3	1	89
2	RA-9	38	2	43b
	RA-19	19	2	64
	RA-25	6	2	88
3	RA-1	14	3	13
	RA-2	23	3	25
	RA-3	6	3	18
	RA-5	17	3	21
	RA-6	8	3	29
	RA-7	9	3	41
	RA-8	6	3	28
	RA-10	11	3	36
	RA-12	20	3	45
	RA-13	6	3	36
	RA-14	11	3	47
	RA-15	3	3	53
	RA-16	22	3	38
	RA-17	21	3	58
	RA-18	87	3	61
	RA-20	2	3	68
	RA-21	9	3	66
	RA-22	79	3	76
	RA-23	9	3	73
	RA-24	45	3	78
	RA-27	109	3	81
RA-28	15	3	81	
RA-29	15	3	93	
RA-30	12	3	94	
RA-31	5	3	5	



Legend

-  Green Belt Areas for Consideration in Stage 2
-  Areas Not for Consideration in Stage 2
-  Sevenoaks District Boundary

© Crown copyright and database rights 2016 OS EUL 100017428

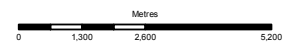
PI	Date	By	Chkd	Appd
P1	10-11-16	CG	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



Map 5.6 Areas for Further Consideration at Stage 2

Scale at A3
1:110,000

Job No
251351-00

Drawing Status
Draft

Drawing No
6.1

Issue
P1

5.2.1 Recommended Areas

The following areas have been identified for further consideration in the next stages of this Study. It should also be noted that all Recommended Areas have been identified for further consideration based on their performance against NPPF purposes only, rather than their suitability in terms of sustainability, infrastructure and wider planning considerations.

5.2.2 Category 1

RA-4



RA-4 consists of the whole of Green Belt Parcel 24, located between Leigh and Edenbridge. The Parcel meets the NPPF purposes weakly, failing to meet Purposes 1, 2 and 4 and making only a weak contribution to Purpose 3. Aside from woodland at its fringes, much of the Parcel consists of residential development clustered along Chequers Hill and The Close in Bough Beech. The Parcel has a semi-urban character and a relatively strong sense of enclosure from the wider countryside, bounded by defensible, recognisable features (B2027 and the railway line).

Recommendation: Parcel 24 (RA-4) meets the NPPF purposes weakly and while it could be considered further, it is acknowledged that the Recommended Area is an anomalous outcome of the methodology as a result of the particularly high concentration of development within a small Parcel, located some distance from an identified settlement.

RA-11



RA-11 consists of the whole of Green Belt Parcel 49, located to the north of Brasted. The Parcel meets the NPPF purposes weakly, failing to meet Purposes 1, 2 and 4 and making only a weak contribution to Purpose 3. The Parcel is visually and functionally part of the settlement of Brasted, comprising residential properties and gardens. It has a semi-urban character and a strong sense of enclosure from the wider countryside, bounded by the River Darent to the north.

Recommendation: Parcel 49 (RA-11) meets the NPPF purposes weakly and could be considered further. Adjacent RA-12 (Parcel 45) has a strong functional and physical relationship to RA-11; these Recommended Areas may therefore warrant joint consideration.

RA-26



RA-26 consists of the whole of Green Belt Parcel 89, located at the edge of Farningham. The Parcel meets the NPPF purposes weakly, failing to meet Purposes 1, 2 and 4 and making only a weak contribution to Purpose 3. Aside from woodland at its fringes, the Parcel comprises the car park and beer garden for the Red Lion public house. The Parcel has a semi-urban character and a strong sense of enclosure from the wider countryside, bounded by defensible, recognisable features (A20, Dartford Road and the River Darent).

Recommendation: Parcel 89 (RA-26) meets the NPPF purposes weakly and could be considered further. Adjacent RA-25 (Parcel 88) has a strong functional and physical relationship to RA-26; these Recommended Areas may therefore warrant joint consideration.

5.2.3 Category 2

RA-9



RA-9 consists of the whole of Green Belt Parcel 43b, located to the north of Westerham. Although the Parcel meets the NPPF purposes strongly, this relates to only one of the five NPPF purposes (Purpose 3) and it is judged that there is an exceptional case to consider it further.

The Parcel makes only a weak contribution to Purpose 2, forming a small, less essential part of the gap between Westerham and Biggin Hill to the north; it is deemed that the gap is of sufficient scale that the settlements will not merge. It is also judged that, as a result of surrounding topography, this area has a very limited relationship with the historic part of Westerham (which is visually more connected with land to the north in Parcel 46), and as such the Parcel does not score against Purpose 4.

Although the Parcel scored strongly against Purpose 3, as a result of its relative openness and largely rural land uses, it is largely isolated from the wider countryside in both physical and visual terms, and has a much stronger sense of connectivity with the prominent urban edge of Westerham to the south.

Furthermore, although only a small proportion of the total area of the Parcel is covered by built-form, this is visually prominent and dispersed throughout, including the Churchill Primary School in the south, large residential properties with ancillary developments in the south-east and dwelling houses and light industrial buildings in the east. The M25 immediately to the north is an additional urbanising influence and creates severance to the wider Green Belt. As a result of these particular characteristics, it is considered that the loss of this area may have little or no impact on the integrity and purpose of the wider Green Belt, and it was judged that it should be considered further in its entirety.

Recommendation: Parcel 43b meets the NPPF purposes strongly, but it was judged that there is scope for it to be considered further due to its isolation from the wider countryside, the strong sense of connectivity with the Westerham, and the pattern of existing built form. As such it is recommended that the whole Parcel is considered further alongside those Parcels which have been identified as scoring weakly.

RA-19



RA-19 is located to the north of Sevenoaks at Dunton Green, and comprises the entirety of Green Belt Parcel 64. Although the Parcel meets the NPPF purposes moderately, it is judged that there is an exceptional case to consider it further.

It is judged that RA-19 plays a limited role in preventing the outward sprawl of Sevenoaks, as it is effectively 'enclosed' by development along its southern, western edges and partially along its eastern edge. The remainder of the Parcel is strongly bound by large-scale infrastructure: the M26 to the north; and the South Eastern Main Line to the east. These features limit the role of the Parcel in preventing the outward sprawl of Sevenoaks (Purpose 1). Furthermore, although the Parcel forms part of the gap between Sevenoaks and Otford, it is felt that its role is reduced as a result of its strong sense of enclosure from the wider countryside and small scale (Purpose 2). While much of the Parcel has an open character, it is surrounded by urbanising influences and cut off from the wider Green Belt, therefore playing a lesser limited role in preventing encroachment (Purpose 3).

Recommendation: Parcel 64 (RA-19) meets the NPPF purposes moderately, but it was judged that there is scope for it to be considered further due to its enclosed nature and scale, limited connection to the wider countryside, and lesser role in preventing encroachment. As such it is recommended that the whole Parcel is considered further alongside those Parcels which have been identified as scoring weakly.

RA-25



RA-25 consists of the whole of Green Belt Parcel 88, located at the edge of Farningham.

Parcel 88 meets the NPPF purposes moderately, but it should be noted that this relates only to Purpose 3 and the Parcel fails to meet Purposes 1, 2 and 4. It has therefore been judged that there is a case to consider it alongside adjacent Parcel 89 (RA-26). Although the north-east of the Parcel is more open, it is physically and visually severed from the wider countryside to the east by the A20 and is subject to a number of urbanising influences, including Farningham Cricket Ground and residential development immediately to the west (Purpose 3).

Recommendation: Parcel 88 meets the NPPF purposes moderately, but it was judged that there is scope for it to be considered further, as described above. Adjacent RA-26 (Parcel 89) has a strong functional and physical relationship to RA-25; these Recommended Areas may therefore warrant joint consideration.

5.2.4 Category 3

RA-1



RA-1 is located to the south-east of Edenbridge, in the western part of Green Belt Parcel 13.

As a whole, this Parcel scores strongly against the NPPF purposes, preventing the encroachment of urban development into open land which has an unspoilt rural character (Purpose 3) and maintaining the setting and special character of the historic core of Edenbridge (Purpose 4). It meets neither Purpose 1 nor Purpose 2.

However, an area in the west of the Parcel (RA-1) may perform weakly if considered alone. This area at the edge of Edenbridge, bounded by Hever Road, and established planted buffers, has suffered previous encroachment, containing a series of small enclosed fields punctuated by built structures including stables, a caravan site, sheltered housing and a former hostel. Furthermore, the area is physically and largely visually severed from the wider countryside by dense hedgerows, both within the area and along its southern edge (Purpose 3). RA-1 is not connected to the historic core of Edenbridge thus making no contribution to Purpose 4 unlike the wider Parcel.

Recommendation: Parcel 13 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the west at the edge of Edenbridge (RA-1) may score weakly and could be considered further.

RA-2



RA-2 is located to the west of Edenbridge, in the eastern part of Green Belt Parcel 25.

As a whole, the wider Parcel scores moderately against the NPPF purposes. While it fails to meet Purposes 1, 2 or 4, it scores moderately against Purpose 3. Noting the presence of ribbon development along Little Browns Lane, the Parcel plays a role in preventing further encroachment into the countryside.

A sub-area in the east of the Parcel (RA-2) may score weakly if considered separately. This area at the edge of Edenbridge, bounded by Crouch House Road and railway lines to the north and south, has a sense of enclosure as a result of existing built form and infrastructure and a limited connection to the wider countryside. Urbanising influences, including a business park immediately to the east, residential development to the south and existing built-form along Crouch

House Road, diminish the area's rural character and limit its role in preventing encroachment into the countryside (Purpose 3).

Any further consideration of this area should take into account emerging recommendations for RA-6 which directly abuts this area to the north.

Recommendation: Parcel 25 meets the NPPF purposes moderately, but there is scope for sub-division; an identified area in the east at the edge of Edenbridge (RA-2) may score weakly and could be considered further. Adjacent RA-6 (Parcel 29) has a strong functional and physical relationship to RA-2; these Recommended Areas may therefore warrant joint consideration.

RA-3



RA-3 is located to the east of Edenbridge, in the western part of Green Belt Parcel 18.

The wider Parcel scores strongly against the NPPF purposes. Although it does not meet Purposes 1 or 4, it prevents encroachment into open land of a largely unspoilt, rural character (Purpose 3). The Parcel also makes a weak contribution

to Purpose 2, forming a small part of the less-essential gap between Edenbridge and Sevenoaks.

However, a small sub-area in the west of the Parcel (RA-3) may score weakly if considered in isolation. This area, at the edge of Edenbridge, includes an area of existing development and has an urban character (Purpose 3). This includes dwelling houses and a community centre. Although the land immediately to the east is undeveloped, it does contain some hard standing (in the north) and has a stronger visual relationship with the urban fringe than the wider countryside as a result of established dense hedgerows. RA-3 is of a relatively small scale and effectively falls within the existing settlement footprint of Edenbridge and thus plays no role in preventing coalescence between settlements (Purpose 2).

Recommendation: Parcel 18 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the west at the edge of Edenbridge (RA-3) may score weakly and could be considered further.

RA-5



RA-5 consists of two small areas to the south-east and west of Leigh, connected by a narrow strip of Green Belt along the Redbridge-Tonbridge railway line, and located in the far west of Parcel 21.

Although the wider Parcel meets the NPPF purposes strongly, preventing encroachment into open land of an unspoilt, rural character (Purpose 3) and maintaining part of the wider gap between Leigh and Tonbridge (Purpose 2), a sub-area in the west of the Parcel (RA-5) may score weakly if considered alone.

This area is effectively split into two distinct parts, connected by just a narrow strip of Green Belt. The western part of the sub-area consists of a small, enclosed area of open land enclosed by existing residential development along Peshurst Road and Lower Green and the railway line to the south, which is elevated on an embankment and heavily vegetated. This area is subject to urbanising influences on all sides and is physically and visually separated from the wider countryside, thus playing a very limited role with respect to preventing encroachment (Purpose 3). The eastern area is similarly dis-connected from the wider countryside by residential dwellings along Lealands Avenue and Green View Avenue, the railway to the south and a densely wooded plantation immediately to the east. Additionally, no part of RA-5 forms part of the gap between Leigh and Tonbridge, which is located further to the east (Purpose 2).

Recommendation: Parcel 21 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the west at the edge of Leigh (RA-5) may score weakly and could be considered further.

RA-6



RA-6 is located to the west of Edenbridge, in the south-eastern corner of Green Belt Parcel 29.

As a whole, this Parcel scores strongly against the NPPF purposes, forming much of the wider gap between Edenbridge and Oxted (Purpose 2) and preventing the encroachment of urban development into open land which has an unspoilt rural character (Purpose 3). It meets neither Purpose 1 nor Purpose 4.

A small sub-area in the south-east of the Parcel (RA-6) may score less strongly if considered separately. This area is of such a small scale that it plays a very limited role in terms of the gap between Edenbridge and Oxted (Purpose 2). It encompasses existing residential properties on Hilders Lane, which has a semi-urban character, and pony paddocks which are strongly enclosed by densely planted edges. These areas of open land are more connected with the prominent settlement edge of Edenbridge and have very limited connectivity with the wider countryside, thus playing little or no role in preventing encroachment into the countryside (Purpose 3).

Further consideration of this area should take into account emerging recommendations for RA-2 which directly abuts this area to the south.

Recommendation: Parcel 29 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the east at the edge of Edenbridge (RA-6) may score weakly and could be considered further. Adjacent RA-2 (Parcel 25) has a strong functional and physical relationship to RA-6; these Recommended Areas may therefore warrant joint consideration.

RA-7



RA-7 is located to the west of Westerham, at the eastern edge of Green Belt Parcel 41.

The wider Parcel meets the NPPF purposes moderately, maintaining part of the wider gap between Westerham and Oxted (Purpose 2) and preventing encroachment into open countryside, particularly in the west (Purpose 3). The Parcel also makes a weak contribution to the wider rural setting of historic Westerham (Purpose 4).

However, a small area at the edge of Westerham (RA-7) may score weakly if considered alone. This area, bounded by Farley Lane and Croft Road, has suffered encroachment and contains a number of residential properties as well as allotments, which contribute towards a more semi-urban character. The area has a

very contained feel with little connection to the wider countryside further west and is frequently impacted by urban influences, including the prominent settlement edge, to which the sub-area has a stronger visual connection. It therefore plays a very limited role in preventing encroachment (Purpose 3). Additionally, its small scale and sense of containment limits its role as part of the gap between Westerham and Oxted (Purpose 2) and the proliferation of residential properties limits the sub-area's contribution to the settlement's historic setting and special character (Purpose 4).

Recommendation: Parcel 41 meets the NPPF purposes moderately, but there is scope for sub-division; an identified area in the east at the edge of Westerham (RA-7) may score weakly and could be considered further.

RA-8



RA-8 is located to the north-east of Edenbridge, at the western edge of Green Belt Parcel 28.

The wider Parcel scores strongly against the NPPF purposes, preventing the encroachment of urban development into largely unspoilt, open countryside (Purpose 3). The Parcel also scores weakly against Purpose 2, forming a small

part of the less essential gap between Edenbridge and Sevenoaks, Sevenoaks Weald and Leigh.

However, an area in the west of the Parcel at the edge of Edenbridge (RA-8) may score weakly if considered alone. This area, comprising residential properties, playing fields and leisure facilities, has suffered historic encroachment and possesses a more semi-urban character when compared with the largely unspoilt, rural feel of areas to the east. Dense, established planted woodland along the eastern edge of the area increase its sense of enclosure and separation from the wider countryside, further reducing its role in meeting Purpose 3. Furthermore, this area is of such a small scale and has a sufficiently strong relationship with the edge of Edenbridge that it plays almost no role in maintaining the gaps to Sevenoaks, Sevenoaks Weald and Leigh (Purpose 2).

Recommendation: Parcel 28 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the west at the edge of Edenbridge (RA-8) may score weakly and could be considered further.

RA-10



RA-10 is located to the south of Brasted, at the northern edge of Green Belt Parcel 36.

The wider Parcel scores strongly against the NPPF purposes, particularly in relation to Purpose 3 by preventing the encroachment of urban development into unspoilt, rural areas throughout much of the Parcel. The Parcel also plays a moderate role in relation to Purpose 3 by maintaining the scale of the wider gaps between Edenbridge and Sevenoaks, and Westerham and Edenbridge, and preventing ribbon development along the A25 between Westerham, Brasted and Sundridge. It is also noted that the north-west of the Parcel plays a role in maintaining the unique setting of Westerham's historic core (Purpose 4).

However, a small area in the north of the Parcel along the southern edge of Brasted (RA-10) may score weakly if considered alone. Much of this area has been subject to encroachment in the form of residential properties, and is both visually and physically separated from the wider countryside to the south by a prominent ridgeline, lined with mature planted features. This gives the area a semi-urban character and limits its role in preventing encroachment (Purpose 3). While the role of the Green Belt around Brasted in preventing coalescence with neighbouring Sundridge and Westerham is noted, it is judged that this small-scale area to the south plays no role in maintaining these gaps by preventing ribbon development (Purpose 2), while it is physically removed from Westerham and does not contribute to the town's setting or special character (Purpose 4).

Recommendation: Parcel 36 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north at the edge of Brasted (RA-10) may score weakly and could be considered further.

RA-12



RA-12 is located to the north of Brasted, at the southern edge of Green Belt Parcel 45.

The wider Parcel scores strongly against the NPPF purposes, particularly in relation to Purpose 2 by maintaining the narrow, essential gaps between Westerham, Brasted and Sundridge. The Parcel also meets Purpose 3 strongly by preventing encroachment into areas of unspoilt, open countryside, particularly in the eastern and western parts.

However, an area to the north of Brasted (RA-12) may score weakly if considered alone. This area, at Church Road, Coles Lane, Rectory Lane and Brasted Hill Road, has suffered encroachment with built-form dispersed throughout, primarily residential dwellings. The eastern part of the area is divided into smaller, compartmentalised areas of open land with limited connectivity to the wider countryside, enclosed by established planted features and interspersed with residential properties set in large gardens. The western part contains a higher concentration of built form, including large properties set in grounds and more regular, planned housing developments at Thorn's Meadow and St Martins Meadow. These areas in particular have a semi-urban character, while the whole

of the area has a strong sense of connection to the settlement edge of Brasted as opposed to the wider countryside, with a contrasting character to the more open, rural areas immediately to the west and north-east (Purpose 3). Despite the important role of the wider Parcel, this area is not physically part of the gap between Brasted and surrounding settlements and plays a lesser role in preventing coalescence (Purpose 2).

Recommendation: Parcel 45 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the centre at the edge of Brasted (RA-12) may score weakly and could be considered further. Adjacent RA-11 (Parcel 49) has a strong functional and physical relationship to RA-12; these Recommended Areas may therefore warrant joint consideration.

RA-13



RA-13 is located to the south of Sundridge, at the northern edge of Green Belt Parcel 36.

The wider Parcel scores strongly against the NPPF purposes, particularly in relation to Purpose 3 by preventing the encroachment of urban development into unspoilt, rural areas throughout much of the Parcel. The Parcel also plays a

moderate role in relation to Purpose 3, maintaining the scale of the wider gaps between Edenbridge and Sevenoaks, and Westerham and Edenbridge, and preventing ribbon development along the A25 between Westerham, Brasted and Sundridge. It is also noted that the north-west of the Parcel plays a role in maintaining the unique setting of Westerham's historic core (Purpose 4).

However, a small area in the north of the Parcel along the southern edge of Sundridge (RA-13) may score weakly if considered alone. This area, consisting of managed open space and grassland, is both visually and physically separated from the wider countryside to the south by a prominent ridgeline, lined with mature planted features, as well as existing residential development immediately to the east and west. This gives the area a semi-urban character and limits its role in preventing encroachment (Purpose 3). While the role of the Green Belt around Brasted in preventing coalescence with neighbouring Sundridge and Westerham is noted, it is judged that this small-scale area to the south plays no role in maintaining these gaps by preventing ribbon development (Purpose 2), while it is physically removed from Westerham and does not contribute to the town's setting or special character (Purpose 4).

Recommendation: Parcel 36 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north at the edge of Sundridge (RA-13) may score weakly and could be considered further.

RA-14



RA-14 is located to the south-west of Sevenoaks, consisting of the northern part of Green Belt Parcel 47.

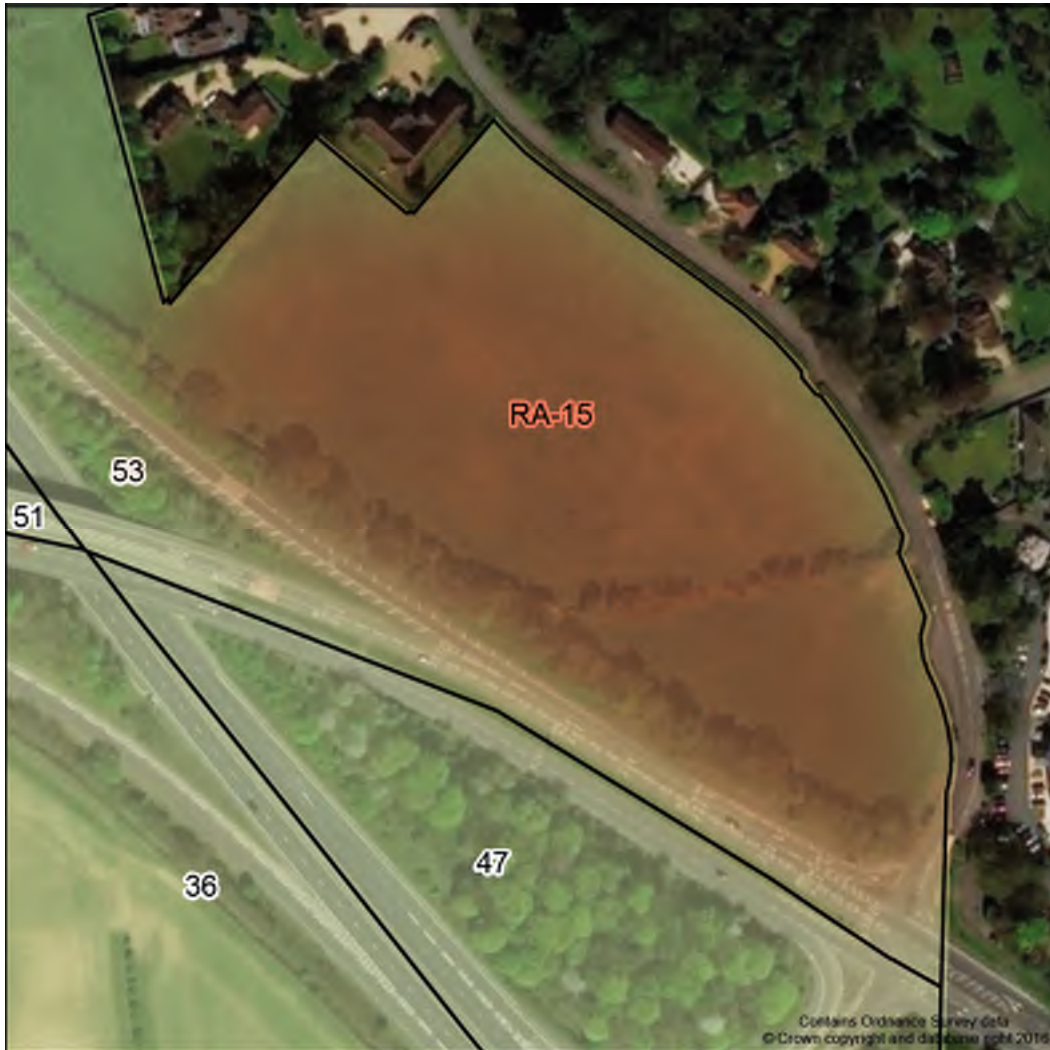
The wider Parcel scores moderately against the NPPF purposes, preventing the outward sprawl of Sevenoaks into open land (Purpose 1), forming part of the wider gap between Sevenoaks and Sundridge (Purpose 2) and preventing the encroachment of urban development into the countryside (Purpose 3).

However, a sub-area in the north of the Parcel (RA-14) plays a lesser role in relation to these purposes and may score weakly if considered alone. The area to the west of Bank Lane has a strong sense of enclosure, with development wrapping around to the north and partially to the east, and the A21 (along with associated dense planted buffers) severing connectivity of this area to the wider countryside. Together with the area's small scale, these factors limit the area's performance in terms of Purpose 1. While the Parcel is part of the gap between Sevenoaks and Sundridge, this represents only a small proportion of the gap and the area is disconnected from the countryside to the west which forms this strategic open gap (Purpose 2). In relation to Purpose 3, the area is visually and physically connected to the edge of Sevenoaks as opposed to the wider

countryside, primarily as a result of dense planted buffers, severance by infrastructure and topography, with the area sloping upwards towards Back Lane.

Recommendation: Parcel 47 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north at the edge of Sevenoaks (RA-14) may score weakly and could be considered further.

RA-15



RA-15 is located to the west of Sevenoaks, consisting of the southern part of Green Belt Parcel 53.

The wider Parcel scores moderately against the NPPF purposes, preventing the outward sprawl of Sevenoaks into open land (Purpose 1) and preventing the encroachment of urban development into the countryside (Purpose 3). The Parcel also meets Purpose 2 weakly, forming a small, less essential part of the gap between Sevenoaks and Sundridge.

However, a sub-area in the south of the Parcel (RA-15) may score weakly against these purposes if considered alone. Although this area is open and comprises paddock fields, its strong visual connection to the edge of Sevenoaks (Homedean

Road), small scale and sense of enclosure from built development to the north and east, and road infrastructure to the south and west, limits its contribution to both Purposes 1 and 3.

Recommendation: Parcel 53 meets the NPPF purposes moderately, but there is scope for sub-division; an identified area in the south at the edge of Sevenoaks (RA-15) may score weakly and could be considered further.

RA-16



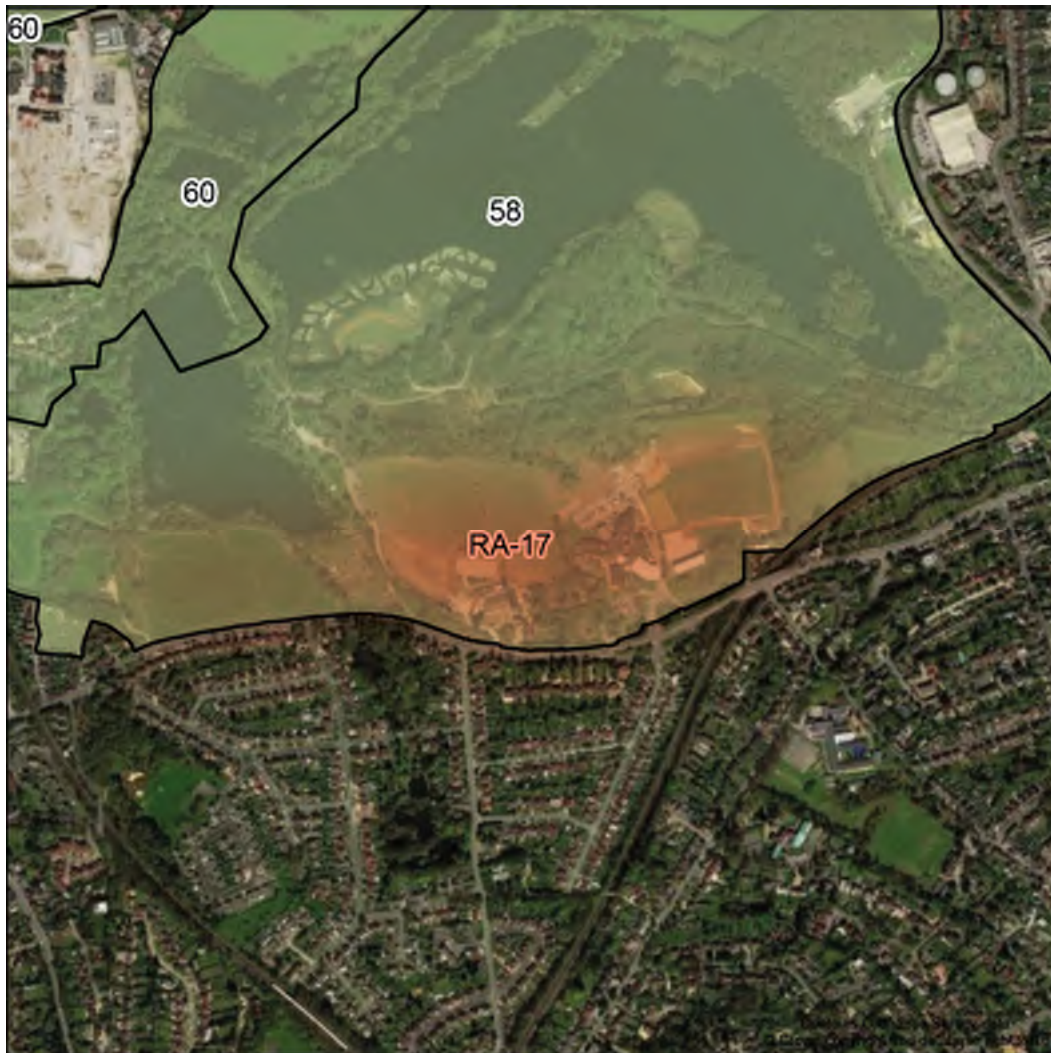
RA-16 is located to the south-east of Sevenoaks, in the north-eastern part of Green Belt Parcel 38.

The wider Parcel scores strongly against the NPPF purposes, particularly in relation to preventing encroachment into largely unspoilt countryside (Purpose 3). The Parcel also: plays an important role in preventing the outward sprawl of Sevenoaks (Purpose 1); scores moderately against Purpose 2 by maintaining the wider gaps between Sevenoaks, Hildenborough and other settlements further east; and meets Purpose 4 weakly by maintaining the wider setting of the historic core of Sevenoaks.

However, a small sub-area in the north-western corner of the Parcel (RA-16) may meet the purposes weakly if considered separately. This area is effectively 'enclosed' by built development to the north, east and west, and separated from the wider Knole Park parkland to the south by a planted lane and existing ribbon development. This would check the outward sprawl of the large built-up area (Purpose 1). As the area is effectively enveloped within the existing settlement footprint, it also plays no role in preventing coalescence between settlements (Purpose 2). Furthermore, this area has a very different character to the countryside immediately to the south. While it is largely open, the existing uses are a golf driving range and small scale paddock fields, and the area is influenced by existing urban built form which is visible as a result of local topography. The area has a semi-urban character and plays a limited role in preventing encroachment into the countryside (Purpose 3). It plays no role in relation to Purpose 4, as the historic area of Sevenoaks is some distance to the south.

Recommendation: Parcel 38 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north-east at the edge of Sevenoaks (RA-16) may score weakly and could be considered further.

RA-17



RA-17 is located to the north of Sevenoaks, at the southern edge of Green Belt Parcel 58.

The wider Parcel meets the NPPF purposes moderately, preventing the outward sprawl of Sevenoaks (Purpose 1), maintaining the wider gap between Sevenoaks and Otford (Purpose 2) and preventing encroachment into open countryside (Purpose 3).

However, an area in the south of the Parcel (RA-17) may score weakly if considered alone. This area, bounded by the edge of dense woodland to the north and Sevenoaks to the south, comprises land of a semi-urban, urban fringe character which has been subject to some previous encroachment and, in many cases, has a strong visual relationship with the wider settlement edge (Purpose 3). The area feels disconnected from the nature reserve to the north and is effectively 'enclosed' within the existing settlement footprint of Sevenoaks, thus plays a limited role in preventing outward sprawl (Purpose 1). This also limits its contribution to the gap between Sevenoaks and Otford to the north (Purpose 2).

Recommendation: Parcel 58 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the south at the edge of Sevenoaks (RA-17) may score weakly and could be considered further.

RA-18



RA-18 is located to the north of Sevenoaks, in the south-western corner of Green Belt Parcel 61.

The wider Parcel meets the Green Belt purposes strongly, in particular by preventing the coalescence of Sevenoaks and Seal (Purpose 2), where the gap is small and scale and has previously suffered encroachment. The Parcel also prevents the outward sprawl of Sevenoaks in areas where the existing edge of the settlement is weakly bounded (Purpose 1), and scores weakly against Purpose 3, preventing encroachment into open land (albeit areas that have a more semi-urban character).

An identified area in the south-west of the Parcel (RA-18) may score weakly against the NPPF purposes if considered alone. This area comprises the extent of the Sevenoaks Quarry, as well as Greatness Recreation Ground and Cemetery. Quarrying and landfill activity has had a substantial impact on this area, which no longer has any connection with the wider countryside in visual or functional terms, while the southern part of the area has an urban character, thus playing a very limited role in preventing encroachment (Purpose 3). Additionally, while the eastern and northern areas of the Parcel continue to form an important strategic

gap between Sevenoaks and both Seal and Otford, the sub-area is effectively severed from these gaps and plays a limited role in preventing the merging of settlements (Purpose 2). Furthermore, given its semi-urban character and the level of existing development that has occurred here, as well as its stronger relationship with the surrounding settlement, its role in preventing further sprawl is also reduced (Purpose 1).

Recommendation: Parcel 61 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the south-east at the edge of Sevenoaks (RA-18) may score weakly and could be considered further.

RA-20



RA-20 is located to the north of Sevenoaks, at the southern edge of Green Belt Parcel 68.

The wider Parcel meets the NPPF purposes strongly, particularly in terms of Purpose 2, maintaining a sizeable proportion of the small and essential gap between Sevenoaks and Otford. The Parcel also plays an important role in preventing the outward sprawl of Sevenoaks (Purpose 1).

However, a small area in the south of the Parcel (RA-20) has a contrasting character to the wider Parcel and may score less strongly if considered alone. This area, comprising low density structures in commercial/light industrial uses, is functionally attached to the settlement as opposed to the wider countryside and plays no role in preventing encroachment (Purpose 3). Additionally, the area's very small scale and relative enclosure limit its contribution to preventing sprawl (Purpose 1) or maintaining the gap between Sevenoaks and Otford (Purpose 2).

Recommendation: Parcel 68 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the south-east at the edge of Sevenoaks (RA-20) may score weakly and could be considered further.

RA-21



RA-21 is located to the south of Kemsing, in the centre of Green Belt Parcel 66.

The wider Parcel meets the NPPF purposes moderately by forming part of the wider gap between Sevenoaks and Kemsing, as well as the less essential gap between Kemsing and Ightham (Purpose 2) and preventing encroachment into largely open countryside (Purpose 3).

However, a small area in the centre of the Parcel at Noah's Ark (RA-21) may meet the purposes less strongly if considered alone. This area has a different character to the wider Parcel, having suffered encroachment from residential and small-scale commercial development (ribbon development along Noah's Ark and estate development at Greenlands Road). It has a semi-urban feel and plays a limited role in preventing encroachment into the countryside (Purpose 3). Given the area is already largely developed and connected to the existing settlement of Kemsing to the north, it also plays no role as part of the wider, open gap between Kemsing and settlements to the south, east and west (Purpose 2).

Recommendation: Parcel 66 meets the NPPF purposes moderately, but there is scope for sub-division; an identified area in the centre at Noah's Ark (RA-21) may score weakly and could be considered further.

RA-22



RA-22, located north-west of Sevenoaks and west of Otford, is in the southern part of Green Belt Parcel 76.

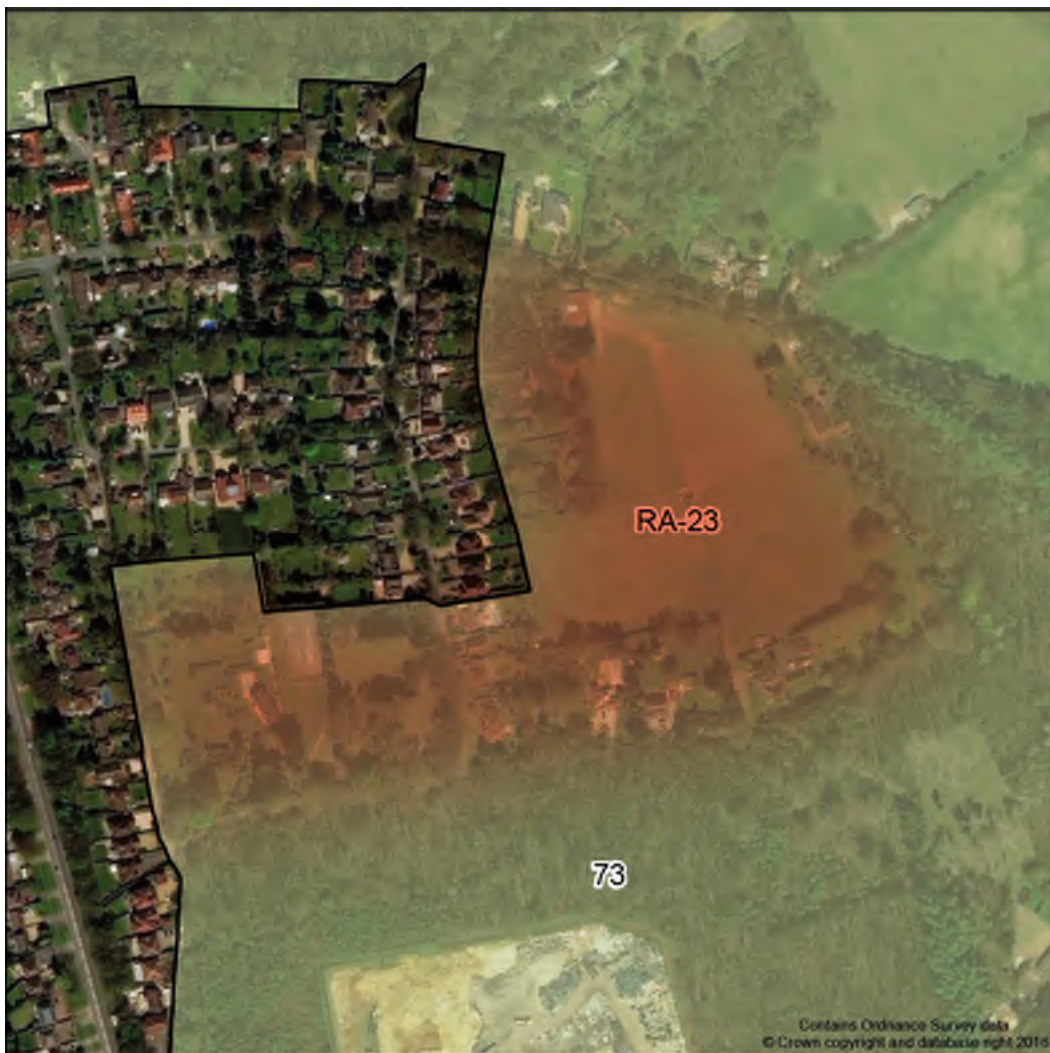
The wider Parcel meets the NPPF purposes strongly, particularly in relation to Purpose 2 by maintaining the essential gaps between Knockholt, Halstead and

Badgers Mount. It also plays an important role in preventing the outward sprawl of Greater London (Purpose 1) and preventing encroachment into largely open countryside (Purpose 3).

However, it is judged that an identified sub-area in the south of the Parcel incorporating the Fort Halstead site (RA-22) may score weakly against the NPPF purposes if considered alone. It constitutes an extensive area of existing encroachment and possesses a semi-urban character (Purpose 3). It is generally inward facing, separated from the wider countryside by extensive, dense planted buffers, thus limiting its role in preventing coalescence between settlements (Purpose 2). Furthermore, its distance from the edge of Greater London and its status as a standalone built-up area means that it would not constitute ‘sprawl’ (Purpose 1).

Recommendation: Parcel 76 meets the NPPF purposes moderately, but there is scope for sub-division; an identified area in the south at Fort Halstead (RA-22) may score weakly and could be considered further, although it is noted that this site is already one of the Council’s identified Major Developed Employment Sites in the Green Belt.

RA-23



RA-23 is located to the east of Badgers Mount, in the west of Green Belt Parcel 73.

The wider Parcel meets the NPPF purposes strongly, particularly in relation to Purpose 2 by maintaining the narrow, essential gaps between Badgers Mount and Shoreham, and between Badgers Mount and Otford. It also prevents the encroachment of urban development into countryside that is largely unspoilt in character (Purpose 3).

However, it is judged that an identified sub-area at the edge of Badgers Mount (RA-23) may score weakly against the NPPF purposes if considered alone. Much of the area has been subject to encroachment, with residential properties and gardens dispersed across the south, east and north-west of the area. This area has a semi-urban character and is functionally and visually linked to Badgers Mount, playing a limited role in preventing encroachment into the countryside (Purpose 3). Additionally, it is of such a small scale that it plays little role in preventing settlements from merging (Purpose 2).

Recommendation: Parcel 73 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the west at the edge of Badgers Mount (RA-23) may score weakly and could be considered further.

RA-24



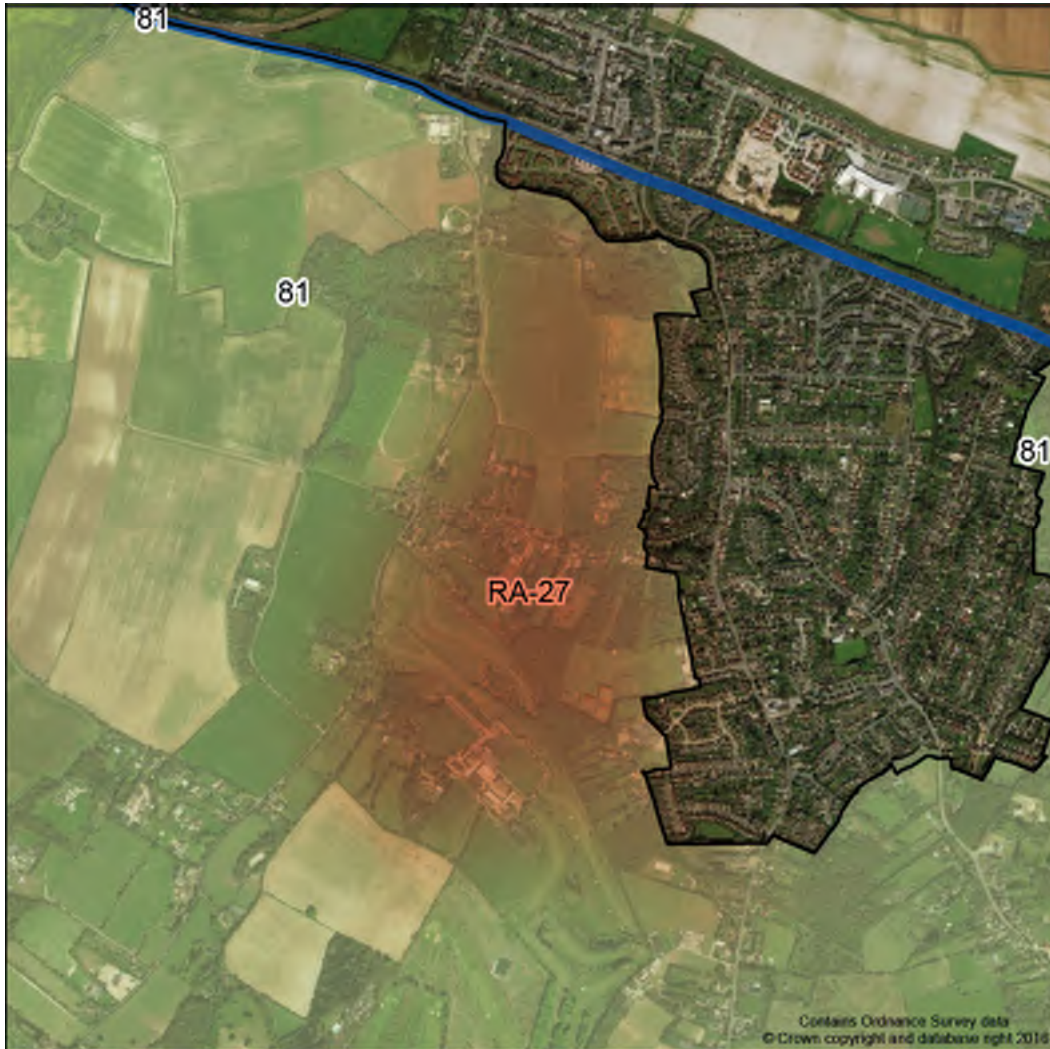
RA-24 is located to the south-east of West Kingsdown, in the north-eastern part of Green Belt Parcel 78.

The wider Parcel meets the NPPF purposes strongly, particularly in relation to Purpose 3 by preventing encroachment into unspoilt countryside. The Parcel also meets Purpose 2 moderately by maintaining a series of wider gaps between settlements, including West Kingsdown and Farningham, Eynsford and Kemsing.

However, an area in the north-east of the Parcel (RA-24) may score weakly if considered alone. This area has suffered encroachment, including residential development along School Lane, London Road and The Grove, low density structures at the former National School and leisure facilities in the north-west. Although much of the identified area is in agricultural use, it is separated from the wider countryside by wooded buffers and roads, and subject to a number of urbanising influences around its edges (Purpose 3). Additionally, this area plays a limited role in preventing the merging of settlements, as the gap between West Kingsdown and Kemsing is sufficiently large in scale that they are unlikely to coalesce (Purpose 2).

Recommendation: Parcel 78 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north-east at the edge of West Kingsdown (RA-24) may score weakly and could be considered further.

RA-27



RA-27 is located to the west of Hartley, in the north-eastern part of Green Belt Parcel 81.

The wider Parcel meets the NPPF purposes strongly, in particular by maintaining the essential gaps between Hartley, New Ash Green and Horton Kirby (Purpose 2). The Parcel also prevents encroachment into open countryside (Purpose 3) and, in the immediate vicinity of New Ash Green, makes a minor contribution protecting the wider setting of the historic settlement (Purpose 4).

However, a broad sub-area in the north-east of the Parcel at the edge of Hartley (RA-27) may score less strongly against the purposes if considered alone. This area has been subject to some encroachment, including residential and light-industrial development along Fawkham Road, Valley Road and Castle Hill, and sports facilities in the south of the area. Although much of the area has an open character, there are a number of urbanising influences that diminish its rural

character. Additionally, the area has a strong sense of enclosure and limited connectivity to the countryside further west as a result of local topography (Purpose 3). It is noted that the area plays a lesser role in preventing the coalescence of settlements, as Horton Kirby is a substantial distance to the west (Purpose 2), and the area does not form part of the rural area around the settlement of New Ash Green (Purpose 4).

Recommendation: Parcel 81 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north-east at the edge of Hartley (RA-27) may score weakly and could be considered further.

RA-28



RA-28 is located adjacent to Horton Kirby, in the north-western part of Green Belt Parcel 81.

The wider Parcel meets the NPPF purposes strongly, in particular by maintaining the essential gaps between Hartley, New Ash Green and Horton Kirby (Purpose 2). The Parcel also prevents encroachment into open countryside (Purpose 3).

However, a small sub-area in the north-west of the Parcel (RA-28) may score less strongly against the purposes if considered alone. This area is effectively set within the existing settlement form of Horton Kirby. The southern area is enveloped by development on all sides and separated from the wider countryside physically and visually. While it retains an open character, the proximity to urbanising influences significantly reduces its contribution to preventing encroachment (Purpose 3). The northern part of the area has been encroached by development and functions as part of the settlement, thus has a semi-urban character. Given the area is effectively within the settlement form of Horton Kirby, it also makes no contribution to preventing the coalescence of settlements (Purpose 2).

Recommendation: Parcel 81 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the north-west at Horton Kirby (RA-28) may score weakly and could be considered further.

RA-29



RA-29 is located to the north-east of Swanley, in the southern part of Green Belt Parcel 93.

The wider Parcel meets the NPPF purposes strongly, in particular by preventing encroachment into unspoilt rural areas (Purpose 3). The Parcel also scores moderately against Purpose 2, forming part of the wider gap between Swanley and South Darenth / Horton Kirby, and plays an important role in preventing the outward sprawl of Swanley (Purpose 1).

However, a sub-area in the south of the Parcel (RA-29) may score less strongly against the purposes if considered alone. This has suffered encroachment from development including the Olympic club and golf driving range which severs the degraded open land to the south from the wider countryside, and diminishes its rural character. The sub-area also plays a limited role in relation to Purpose 1, as a result of its small scale and envelopment by existing development and infrastructure. The sub-area does not form a discernible part of the gap between Swanley and South Darenth / Horton Kirby (Purpose 2).

Recommendation: Parcel 93 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the south at the edge of Swanley (RA-29) may score weakly and could be considered further. Adjacent RA-31 (Parcel 93) has a strong functional and physical relationship to RA-29; these Recommended Areas may therefore warrant joint consideration.

RA-30



RA-30 consists of much of Green Belt Parcel 94, located immediately to the south-west of Swanley.

The wider Parcel meets the NPPF purposes moderately, preventing the outward sprawl of Swanley (Purpose 1) and forming a small part of the wider gap between Swanley and Greater London (Purpose 2). It also contributes weakly to Purpose 3, preventing encroachment into open land.

However, a sub-area in the south of the Parcel (RA-30) may score weakly if considered alone. This area is 'enclosed' within the built-up area of Swanley, with development wrapping around to the east and north, and the A20 severing linkage to the wider countryside (Purpose 1). It is of a relatively small scale in terms of the wider gap to London to the west (Purpose 2) and has suffered encroachment from low density structures in the northern part, comprising retail, commercial and light-industrial uses. It is also strongly aligned with the prominent settlement edge to the east (Purpose 3).

Recommendation: Parcel 94 meets the NPPF purposes moderately, but there is scope for sub-division; an identified areas in the south at the edge of Swanley (RA-30) may score weakly and could be considered further, although it is noted

the southern section of the Recommended Area comprises only a small slither of land between the built-up area of Swanley and the A20.

RA-31



RA-31 is located to the north-east of Swanley, in the southern part of Green Belt Parcel 93.

The wider Parcel meets the NPPF purposes strongly, in particular by preventing encroachment into unspoilt rural areas (Purpose 3). The Parcel also scores moderately against Purpose 2, forming part of the wider gap between Swanley and South Darenth / Horton Kirby, and plays an important role in preventing the outward sprawl of Swanley (Purpose 1).

However, a sub-areas in the south of the Parcel (RA-31) may score less strongly against the purposes if considered alone. The Recommended Area is a distinct, urban-fringe area, physically separated from the wider countryside to the north by planted features. This area has been subject to light-industrial use and is more functionally aligned with the edge of Swanley (Purpose 3). The sub-area also plays a limited role in relation to Purpose 1, as a result of its small scale and

envelopment by existing development. The sub-area does not form a discernible part of the gap between Swanley and South Darenth / Horton Kirby (Purpose 2).

Recommendation: Parcel 93 meets the NPPF purposes strongly, but there is scope for sub-division; an identified area in the south at the edge of Swanley (RA-31) may score weakly and could be considered further. Adjacent RA-29 (Parcel 93) has a strong functional and physical relationship to RA-31; these Recommended Areas may therefore warrant joint consideration.

6 Assessment Against Local Considerations

This section considers each of the Recommended Areas (identified in section 5.2) against 'local considerations' in the form of absolute and non-absolute constraints. This process will assist the Council in determining whether there should be any release of Green Belt through the plan-making process, and help identify areas of land which may be less constrained for possible future development. Land covered by absolute constraints is not ruled out from further assessment at this stage on the basis that this assessment provides a high-level overview of constraints likely to preclude development but does not explore potential mitigation that might overcome such a constraints (for example, site configuration or a technical solution). These factors should be considered further through the Council's ongoing plan-making process.

All mapping in this section shows Recommended Areas with a hard edged boundary to ensure the area stands out from other constraints layers in the mapping. However, it should be noted that the boundaries of the Recommended Areas will be subject to further refinement if progressed through the Council's planning-making process.

Absolute constraints are statutory natural and historic environmental constraints that are likely 'show-stoppers' to potential future land use changes. This results in there being little or no value in de-designating affected land from the Green Belt regardless of its fulfilment of the purposes.

This category encompasses:

- Sites of Special Scientific Interest (SSSI);
- Special Areas of Conservation (SAC);
- Ramsar;
- Special Protection Areas (SPA);
- Flood Plain (Zone 3b);
- Scheduled Monuments;
- Nationally Registered Park or Garden;
- Ancient Woodland.

Non-absolute constraints are statutory natural and environmental constraints which would make a change of land use less preferable but would not preclude it completely. This category encompasses:

- Areas of Outstanding Natural Beauty (AONB);
- Agricultural Land Classification (Grades 1, 2, 3);
- Flood Plain (Zone 3a);
- Conservation Areas;
- Local Wildlife Sites;

- Local Nature Reserves;
- Areas of Archaeological Significance (designated locally);
- Open Space Designations.

6.1 District Overview

This section provides a summary of absolute and non-absolute constraints at the District level. Annex Report 2 provides maps showing all local considerations (absolute and non-absolute) at the District level as follows:

- Maps C.1 – C.5 – absolute constraints;
- Maps C.6 – C.13 – non-absolute constraints;
- Map C.14 – all land covered by absolute constraints in combination; and
- Maps C.15 – C.22 – all land covered by absolute constraints in combination, together with each of the non-absolute constraints.

6.1.1 Absolute Constraints

Sites of Special Scientific Interest (SSSI) (Map C.2, Annex Report 2)

SSSIs are protected by law to conserve their wildlife or geology, and are designated by Natural England under the Wildlife and Countryside Act 1981 (as amended). Sevenoaks District Council is required to protect these sites from development through development plans. As such they are considered an absolute constraint on development.

There are 17 SSSIs located within the District. These are distributed sporadically across the District; however there is a higher concentration in the centre and north of the District.

Special Areas of Conservation (SAC) (no map)

SACs are European sites that are strictly protected under the EC Habitats Directive. No SACs are designated within Sevenoaks District.

Ramsar and Special Protection Areas (SPA) (no map)

Ramsar sites are wetlands of international importance designated under the Ramsar Convention. SPAs are designated under the European Union Directive on the Conservation of Wildlife to safeguard the habitats of migratory and threatened birds. In the UK, Ramsar sites are also SPAs. No Ramsar or SPAs are designated within Sevenoaks District.

Flood Zone (Zone 3b) (Map C.1, Annex Report 2)

Flood Zone 3b, being the highest level of flood zone designation, is identified as land where ‘*water has to flow or be stored in times of flood*’¹⁷ and as such is not suitable for any development other than Essential Infrastructure (where the Exception Test is applied) and Water Compatible uses.

In the north of the District, there is a linear area of Flood Zone 3b stretching from Sundridge to Sevenoaks and from Sevenoaks to South Darent, reflecting the course of the River Darent and its tributaries. In the south of the District, there is a linear area of Flood Zone 3b stretching from Edenbridge in the west to Penshurst in the east, and from Leigh southwards, which reflects the course of the River Eden and the River Medway and their tributaries. Another small area of Flood Zone 3b (Bough Beech Reservoir) is located to the east of Edenbridge.

Scheduled Monuments (Map C.5, Annex Report 2)

Scheduling is a designation for nationally important sites of archaeological character. In England, Scheduled Monuments are protected under the Ancient Monuments and Archaeological Areas Act 1979, and recorded on the National Heritage List for England (Historic England). Under the Act, Scheduled Monuments must be preserved as far as possible. As such, Scheduled Monuments are considered an absolute constraint on development.

The District has 29 Scheduled Monuments, located in both Green Belt and non-Green Belt land. These are distributed sporadically across the District. The largest concentration is around Sevenoaks.

Registered Parks and Gardens (Map C.4, Annex Report 2)

Historic England compiles a national Register of Parks and Gardens of special historic interest in England in order to encourage their appropriate protection through the statutory planning process and as such are considered an absolute constraint on development. Registered Parks and Gardens can include gardens and grounds of private houses, public parks, cemeteries and other ‘designed’ landscapes.

The District has 17 Registered Parks and Gardens in total, which are located sporadically across the District. There are clusters in the south-east around Penshurst, around Sevenoaks and Westerham, and around Eynsford.

Ancient Woodland (Map C.3, Annex Report 2)

Ancient Woodland is any wooded area that has been wooded continuously since at least 1600 AD and all areas are logged on Natural England’s national inventory. Ancient Woodland can be either ancient semi-natural woodland or ancient replanted woodland, and both are offered the same protection in national policy terms.

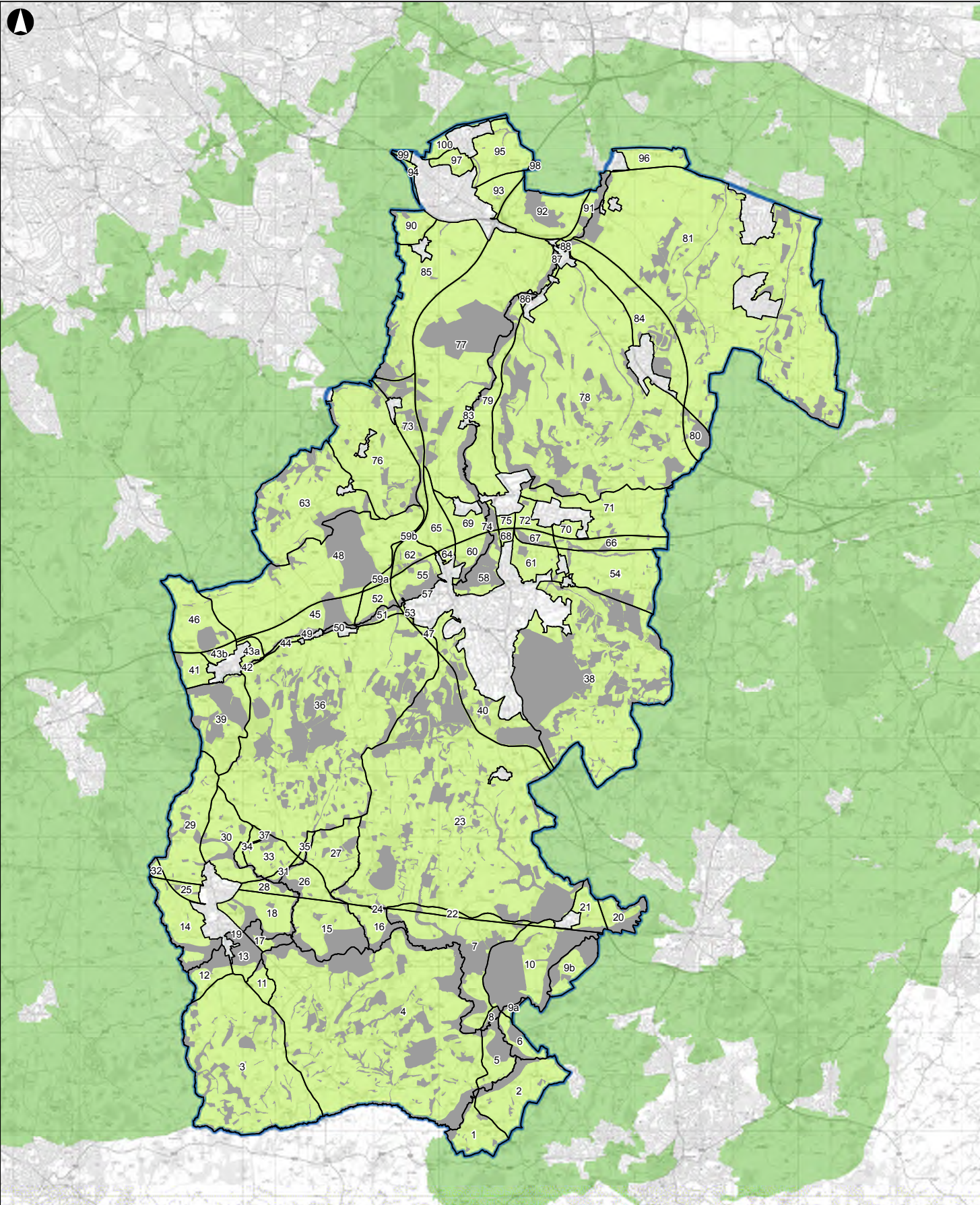
There is a significant portion of the District covered by Ancient Woodland. While this is distributed sporadically across the District, there is a noticeable band across

¹⁷ PPG, Paragraph 067, 2014 (<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/flood-zone-and-flood-risk-tables/table-3-flood-risk-vulnerability-and-flood-zone-compatibility/>)

the middle of the District from below Westerham in the west, to areas to the south and east of Sevenoaks.

Absolute Constraints in Combination

Map C.14 provides an overview of all absolute constraints in combination across the entirety of the District.



- Legend**
- Combined Absolute Constraints
 - Green Belt Parcel
 - Sevenoaks District Boundary
 - Sevenoaks Green Belt
 - Neighbouring Green Belt

© Crown copyright and database rights 2016 OS EUL 100017428

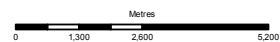
P1	10-10-2016	RS	ML	AB
Issue	Date	By	Chkd	Appd

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Sevenoaks District Council

Job Title
Sevenoaks Green Belt Assessment



**Map C.14 Refined Green Belt
Parcels Following Absolute
Constraints**

Scale at A3
1:110,000

Job No 251351-00	Drawing Status Draft
Drawing No C.14	Issue P1

6.1.2 Non-Absolute Constraints

Areas of Outstanding Natural Beauty (AONB) (Map C.10, Annex Report 2)

Under the Countryside and Rights of Way Act 2000, Natural England has the power to designate AONBs in England that are outside of national parks and that are considered to have such natural beauty it is desirable they are conserved and enhanced.

While it is recognised that major development may be appropriate in AONB in '*exceptional circumstances and where it can be demonstrated they are in the public interest*' (paragraph 116 of the NPPF), thus precluding the designation from being an absolute constraint to a change in land use, the special status of the designation and the weight which natural policy places on its protection is noted.

Over 60% of the District is covered by two AONBs. The majority of the District is covered by the Kent Downs AONB, which surrounds Sevenoaks, stretching north to Swanley and Eynsford, and beyond the District boundaries to the east and west. The south of the District, to the south of Edenbridge, is covered by the High Weald AONB.

Agricultural Land Classification (Grades 1, 2, 3) (Map C.9, Annex Report 2)

Agricultural Land Classification (ALC) assesses the quality of farmland to ensure that the best and most versatile agricultural land is preserved. The quality of agricultural land is identified spatially in Natural England's Regional ALC Maps across five grades relating to the level of protection it should be afforded. The ALC Maps were originally produced at a strategic level (as a scale of one inch to one mile) between 1967 and 1974, and updated following amendments to the classification system in 1988. Since these changes, more detailed maps have been prepared on a piecemeal basis, including identification of 3a/3b grading; at present these do not cover Sevenoaks District in its entirety and all grade 3a/3b land has not been mapped. As such, for the purpose of consistency across the District, land classified as being Grades 1-3 is considered to be subject to a non-absolute constraint.

The majority of the District is covered by Grade 3 land. There is a small amount of Grade 2 land which is mainly located in a band across the District to the north of Sevenoaks and northwards towards Eynsford, Swanley and Horton Kirby. There is no Grade 1 land within the District.

Flood Zone (Zone 3a) (Map C.6, Annex Report 2)

Flood Zone 3a covers land identified as having a high probability of flooding. Development on Zone 3a land is restricted. Highly Vulnerable development will not be permitted, while essential infrastructure and More Vulnerable uses, such as hospitals, residential and retail premises and landfill, will be subject to the Exceptions Test.

The boundaries for Zone 3a are generally conterminous with those for Zone 3b, being tightly contained within the river valleys. Within the District therefore land constrained by Zone 3a is focussed along the courses of the River Darent, the River Eden, and the River Medway, together with Bough Beech Reservoir.

Conservation Areas (Map C.11, Annex Report 2)

In England and Wales, Local Authorities have the power to designate as a Conservation Area any area of special architectural or historic interest. Under the Planning (Listed Buildings and Conservation Areas) Act 1990, Local Authorities have the power to control works and demolition of buildings, amongst other types of development, within a Conservation Area to protect or improve the character of appearance of the area.

The District has 53 Conservation Areas which are distributed sporadically across the District in both Green Belt and non-Green Belt land. There is a large concentration in the centre of the District in and around Sevenoaks, and around Sundridge and Westerham. There is also a cluster of Conservation Areas in the south-east of the District.

Local Wildlife Sites (Map C.7, Annex Report 2)

Local wildlife sites are sites of local importance for nature conservation, but which are not legally protected. These sites are designated by Kent County Council and protect threatened species and habitats acting as buffers, stepping stones and corridors between nationally-designated wildlife sites.

There are 61 Local Wildlife Sites located within the District. While distributed sporadically across the District, there is a concentration in the west between Sevenoaks and Swanley, and in the south of the District to the south of Edenbridge.

Local Nature Reserves (Map C.8, Annex Report 2)

Local Nature Reserves are designated at the local level for places with wildlife or geological features that are of special interest locally.

There are two Local Nature Reserves located within the District: Farningham Woods to the east of Swanley, and Hartley.

Areas of Archaeological Significance (Map C.12, Annex Report 2)

Local Authorities can, through their Local Plan, designate areas which are of Archaeological Significance. Areas of Archaeological Significance are a form of non-designated heritage asset that protects archaeological sites, and the potential knowledge that can be obtained within them, from being harmed by development.

The District has a significant amount of land covered by Areas of Archaeological Significance. While this is distributed sporadically across the District, there is a noticeable concentration in a wide band across the middle of the District around Sevenoaks, a band across the south of the District from Edenbridge to Penshurst, and a band in the north of the District from Sevenoaks to Horton Kirby.

Open Space Designations (Map C.13, Annex Report 2)

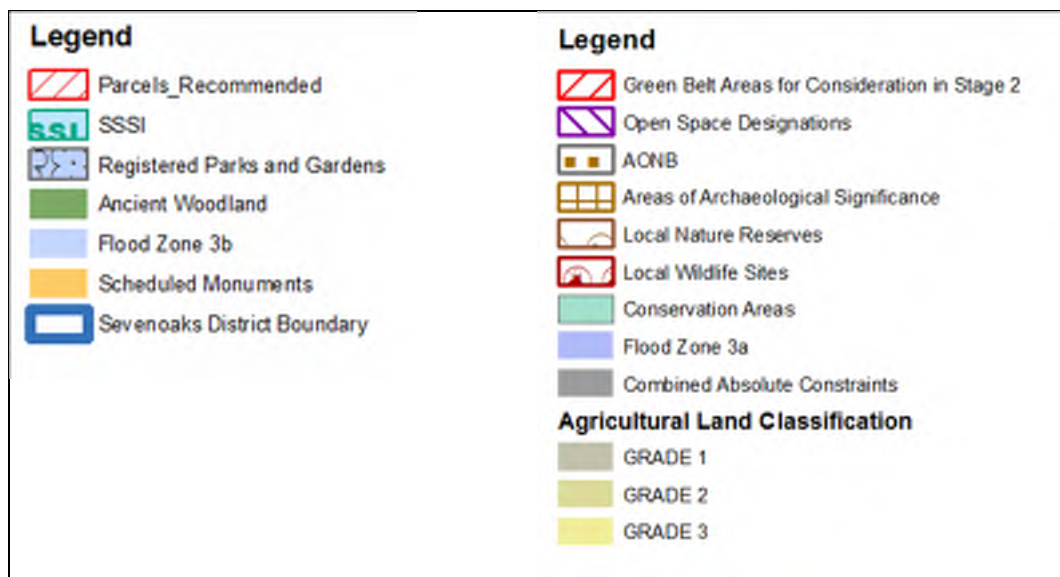
Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities and is designated at the local level.

Within Sevenoaks, open space covers a variety of different uses including amenity space and/or equipped play areas, sports pitches, allotments, burial land, parks and gardens, civic spaces, urban fringe or areas of water such as rivers, lakes and reservoirs. Open space designations are distributed across the District, with a particular concentration around Sevenoaks.

6.2 Recommended Area Assessment

This section provides commentary on the presence of absolute and non-absolute constraints within the Recommended Areas identified through the assessment against NPPF purposes (see chapter 5). Keys to the absolute and non-absolute constraints considered for each Recommended Area are provided in Figure 6.1.

Figure 6.1 Key for absolute (left) and non-absolute (right) constraints mapping



6.2.1 RA-1

Figure 6.2 RA-1 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area is entirely within an area of Flood Zone 3b, associated with the River Eden. No other absolute constraints are present.

Non-Absolute Constraints

The majority of the Recommended Area is within an area of Grade 3 Agricultural Land Classification. The remainder of the Recommended Area does not fall within any non-absolute constraints. There is a Conservation Area (Edenbridge Conservation Area) and an Area of Archaeological Significance adjacent to the western and northern boundary, and a Local Wildlife Site within close proximity to the northern boundary.

6.2.2 RA-2

Figure 6.3 RA-2 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The centre of the Recommended Area is partially within an area of Flood Zone 3b. The remainder of the Recommended Area does not contain any absolute constraints, although there is an area of Ancient Woodland within close proximity to the western boundary.

Non-Absolute Constraints

The majority of the Recommended Area is within an area of Grade 3 Agricultural Land Classification with the exception of land in the centre of the Recommended Area which is largely covered by Flood Zone 3a. There are Open Space Designations in close proximity to the south-west and south-east corners of the Recommended Area.

6.2.3 RA-3

Figure 6.4 RA-3 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

Two small portions of the Recommended Area are within an area of Flood Zone 3b; in the north and east. No other absolute constraints are present.

Non-Absolute Constraints

The eastern and southern sections of the Recommended Area are covered by Open Space Designations, which are also in close proximity to the north-east and south-west. An Area of Archaeological Significance partially covers the western section of the Recommended Area. The rest of the Recommended Area does not contain any non-absolute constraints.

6.2.4 RA-4

Figure 6.5 RA-4 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

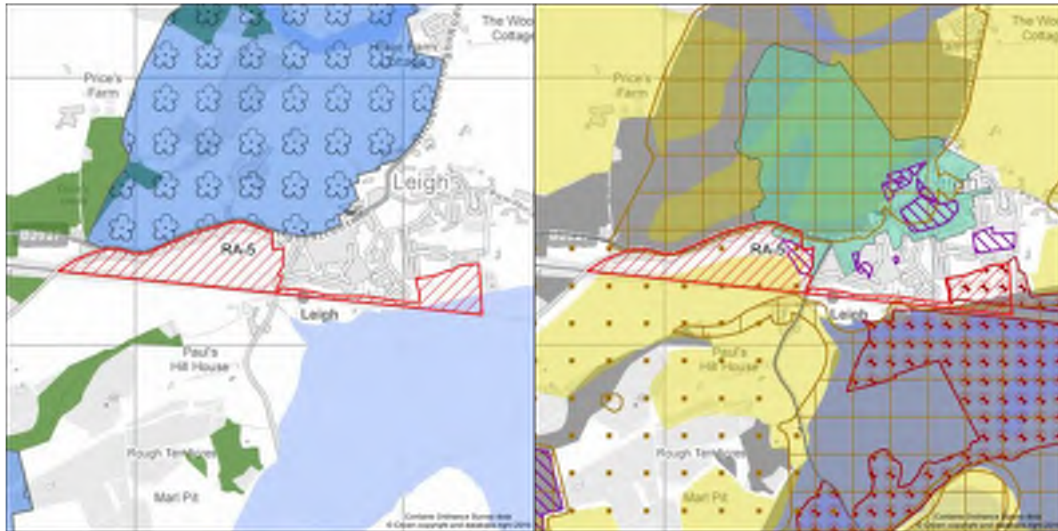
A small portion of the east of the Recommended Area is within an area of Flood Zone 3b associated with a tributary to the River Eden. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is covered in its entirety by an area of the Grade 3 Agricultural Land Classification. A small portion of the east of the Recommended Area is within an area of Flood Zone 3a, while there are two small areas of Open Space Designations in the south and west.

6.2.5 RA-5

Figure 6.6 RA-5 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

A small portion in the eastern corner of the Recommended Area is within an area of Flood Zone 3b associated with the River Medway. There is a Registered Park and Garden adjacent to the northern boundary (Hall Place) and areas of Ancient Woodland within close proximity to the southern and north-western boundaries.

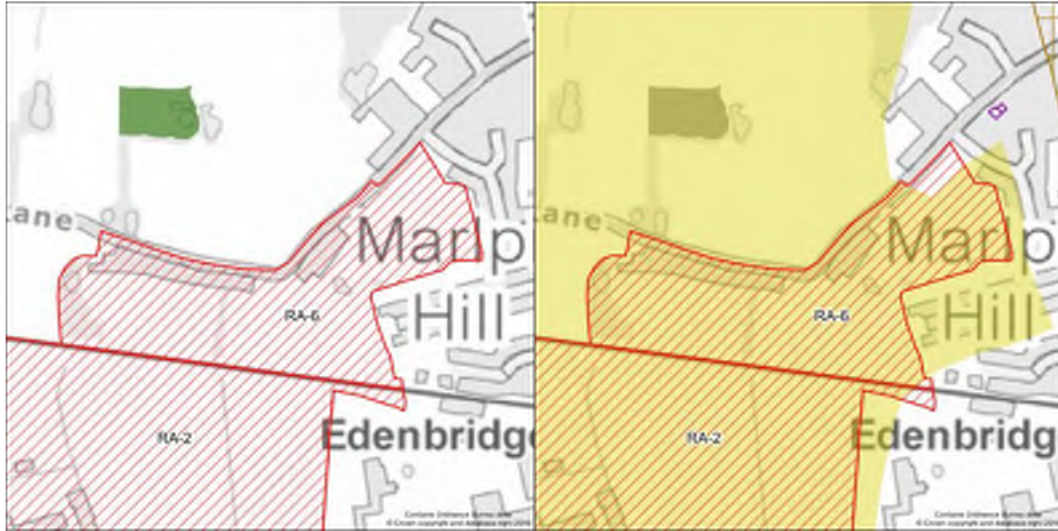
Non-Absolute Constraints

The western section of the Recommended Area is within the High Weald AONB and is also partially covered by Grade 3 Agricultural Land Classification. A small portion of the western section is also covered by the Leigh Conservation Area, an Area of Archaeological Significance, and an Open Space Designation.

The eastern section of the Recommended Area is within a Local Wildlife Site and is partially covered by an Area of Archaeological Significance. This section of the Recommended Area is in close proximity to an area of Flood Zone 3a associated with the River Medway.

6.2.6 RA-6

Figure 6.7 RA-6 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

The Recommended Area is almost entirely within an area of Grade 3 Agricultural Land Classification. No other non-absolute constraints are present.

6.2.7 RA-7

Figure 6.8 RA-7 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

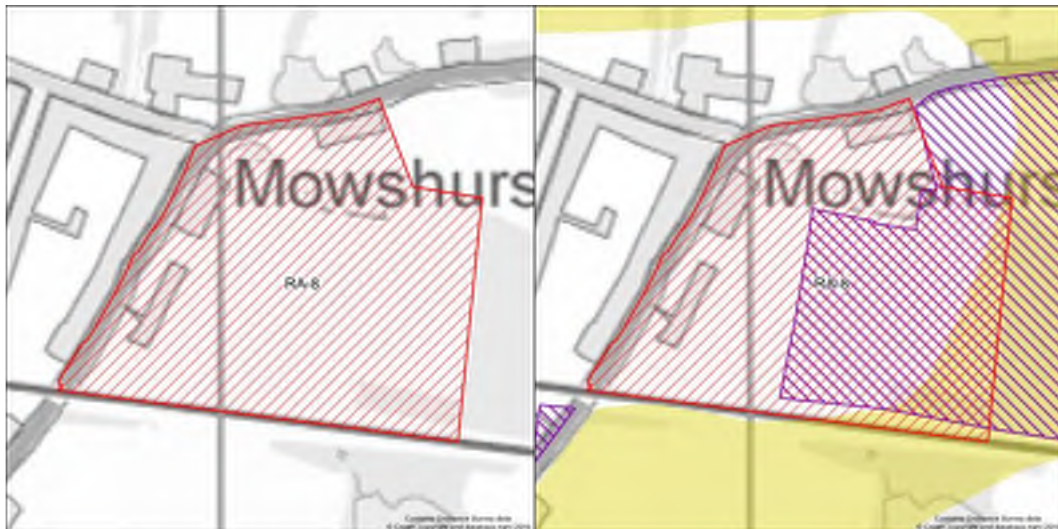
The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB, and almost entirely within an area of Grade 3 Agricultural Land Classification. A section of land in the centre/north of the Recommended Area is partially within a Local Wildlife Site and a very small portion in the west is within an Area of Archaeological Significance. Two Open Space Designations are present; one in the centre and one in the south-east.

6.2.8 RA-8

Figure 6.9 RA-8 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

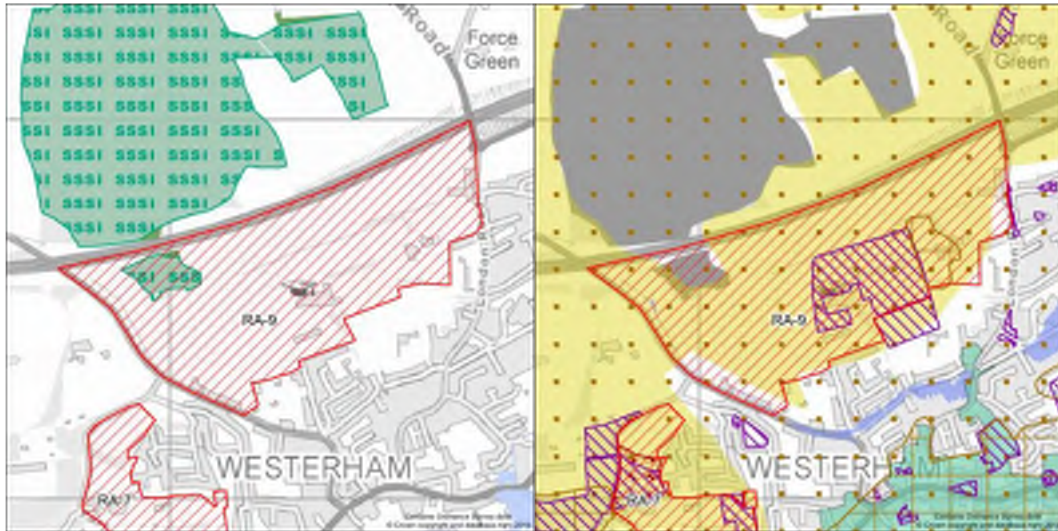
The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

Open Space Designations cover approximately half of the Recommended Area. The east of the Recommended Area is within an area of Grade 3 Agricultural Land Classification. The rest of the Recommended Area (western section) does not contain any non-absolute constraints.

6.2.9 RA-9

Figure 6.10 RA-9 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

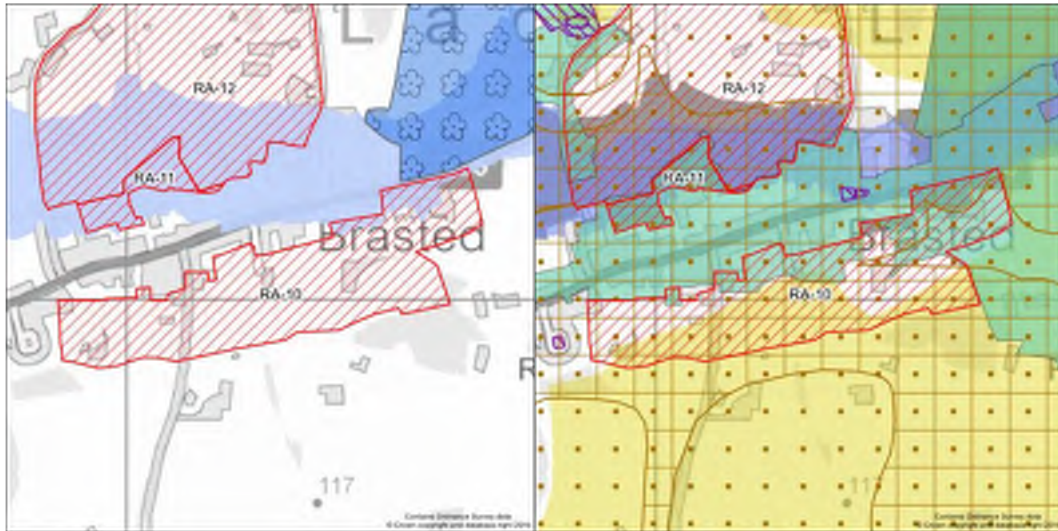
A small portion of land in the north-west of the Recommended Area is covered by a SSSI (Westerham Wood) and an area of Ancient Woodland. The remainder of the Recommended Area does not contain any absolute constraints, although there is a further section of the Westerham Wood SSSI and Ancient Woodland within close proximity of the northern boundary, to the north of the M25.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and almost entirely within an area of Grade 3 Agricultural Land Classification. A small portion of land in the east of the Recommended Area is within an Area of Agricultural Land Classification. Open Space Designations cover a central portion of the Recommended Area.

6.2.10 RA-10

Figure 6.11 RA-10 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

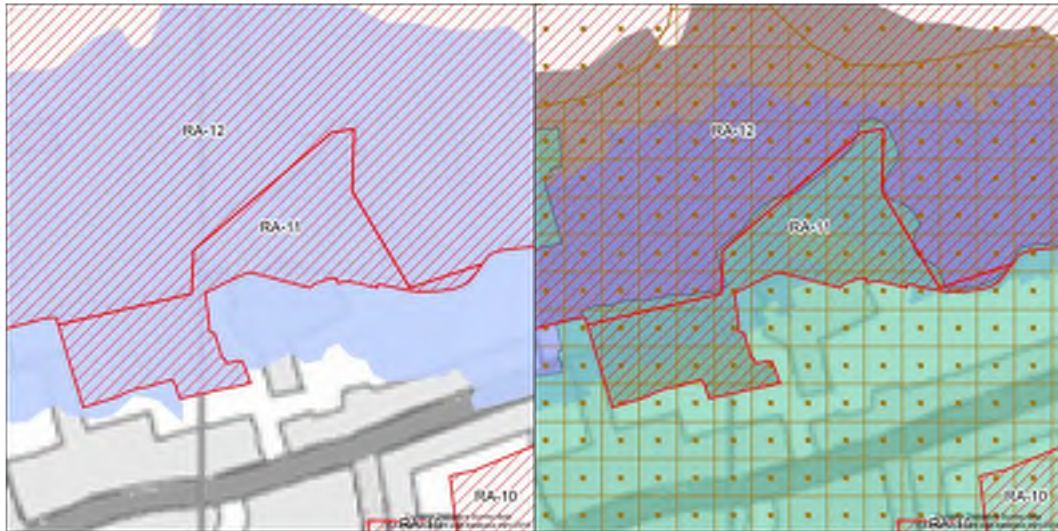
A small portion of land in the north-east of the Recommended Area is within an area of Flood Zone 3b associated with the River Darent. The remainder of the Recommended Area does not contain any absolute constraints, although there is a Registered Park and Garden (Combe Bank) adjacent to the north-east corner.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and the majority is within an area of Grade 3 Agricultural Land Classification. The north of the Recommended Area is partially within a Conservation Area (Brasted High Street) and a small portion in the north-east is within an area of Flood Zone 3a.

6.2.11 RA-11

Figure 6.12 RA-11 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

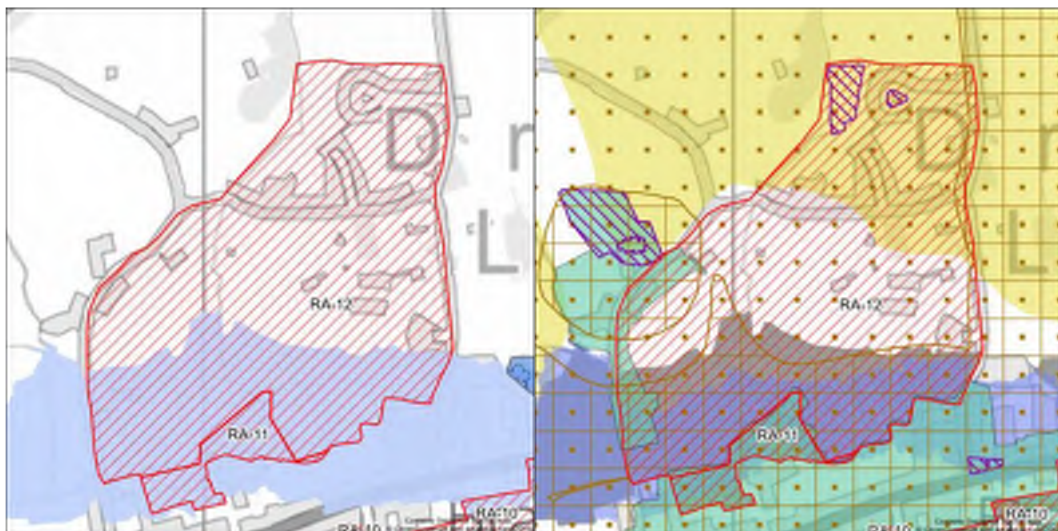
The Recommended Area is entirely within an area of Flood Zone 3b, associated with the River Darent. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and an Area of Archaeological Significance, and almost entirely within a Conservation Area (Brasted High Street) and an area of Flood Zone 3a.

6.2.12 RA-12

Figure 6.13 RA-12 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The south of the Recommended Area is partially within an area of Flood Zone 3b associated with the River Darent. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB. The north of the Recommended Area is within an area of Grade 3 Agricultural Land Classification and is also partially covered by an area of Open Space Designations. The south (and sections in the east and west) of the Recommended Area is within an Area of Archaeological Significance and an area of Flood Zone 3a. The Recommended Area is partially within two Conservation Areas – Brasted High Street Conservation Area to the south and Brasted Church Conservation Area to the west.

6.2.13 RA-13

Figure 6.14 RA-13 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and an Area of Archaeological Significance, and largely within an area of Grade 3 Agricultural Land Classification. The Recommended Area is partially within and adjacent to a Conservation Area (Sundridge) along its eastern and western boundaries. An area of Open Space Designation covers the central portion of the Recommended Area.

6.2.14 RA-14

Figure 6.15 RA-14 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

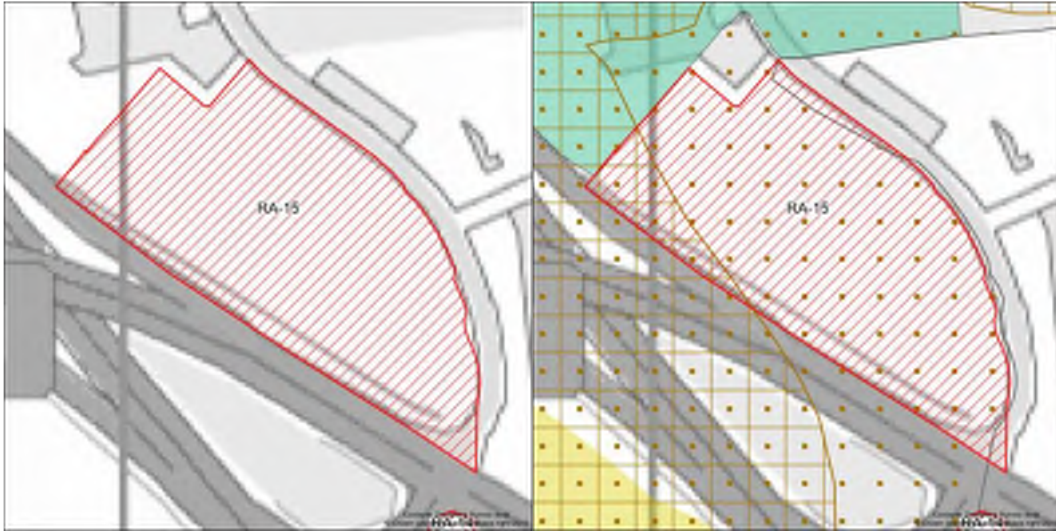
A small portion of land in the west of the Recommended Area is covered by an area of Ancient Woodland. No other absolute constraints are present. There is an SSSI (Dryhill) in close proximity to the west of the Recommended Area (to the south-west of the A21 (Sevenoaks Bypass)).

Non-Absolute Constraints

The Recommended Area is almost entirely within the Kent Downs AONB and an area of Grade 3 Agricultural Land Classification. The centre and south of the Recommended Area is within an Area of Archaeological Significance. The Recommended Area is adjacent to a Conservation Area (Bessels Green) along its northern boundary, there is a Local Wildlife Site within close proximity to the south-west, and areas of Open Space Designations to the west, north and east.

6.2.15 RA-15

Figure 6.16 RA-15 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

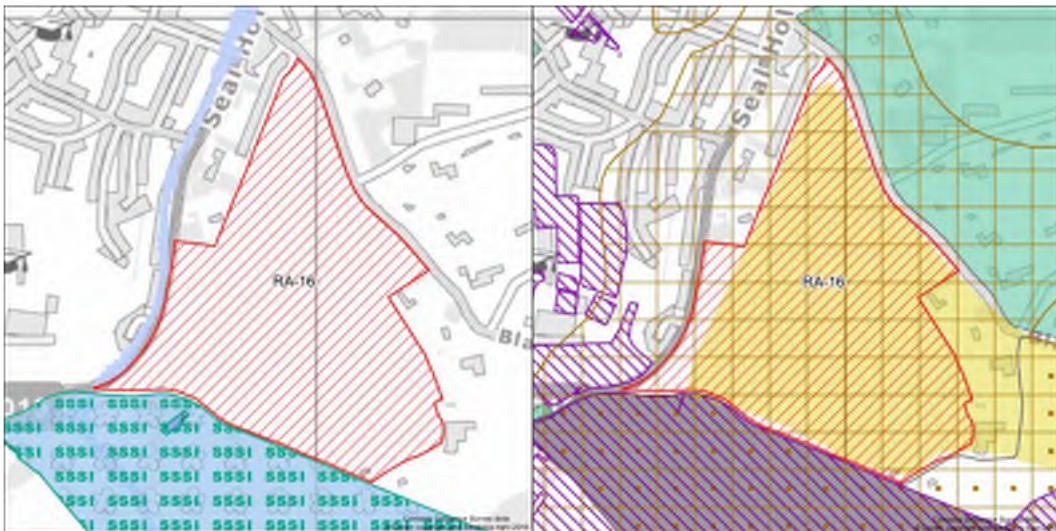
The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

The Recommended Area is almost entirely within the Kent Downs AONB. A small portion of land in the west of the Recommended Areas is within an Area of Archaeological Significance, and there is a Conservation Area (Chipstead) adjacent to the northern boundary.

6.2.16 RA-16

Figure 6.17 RA-16 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

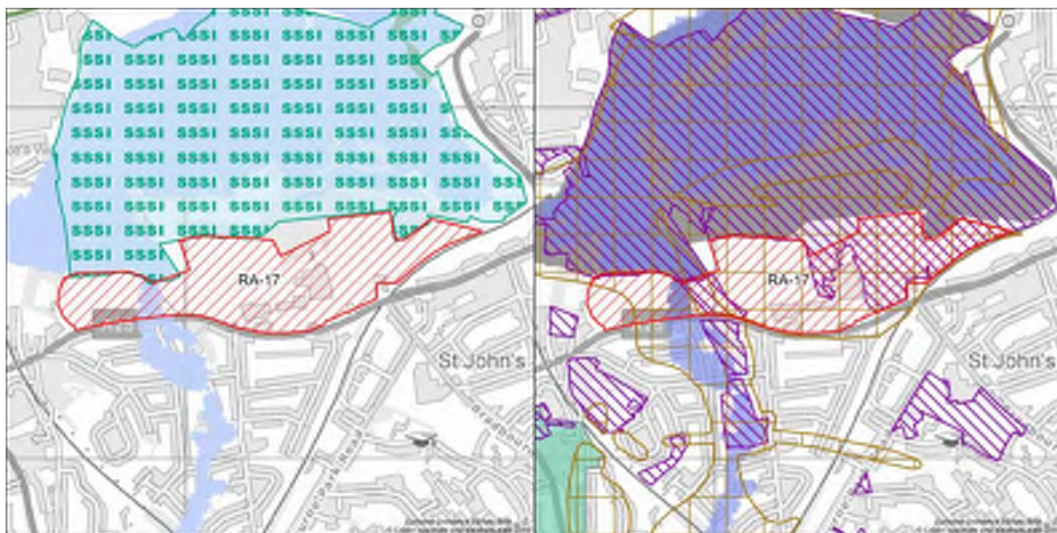
The Recommended Area does not contain any absolute constraints. However, it is adjacent to a SSSI (Knole Park) and Registered Park and Garden (Knole) along its southern boundary, and an area of Flood Zone 3b along its western boundary.

Non-Absolute Constraints

The Recommended Area is entirely within an Area of Archaeological Significance and almost entirely within an area of Grade 3 Agricultural Land Classification. The Recommended Area is adjacent to the Kent Downs AONB along its southern boundary, a Conservation Area (Wildernesse) on its north-east boundary, and an Open Space Designation to the south.

6.2.17 RA-17

Figure 6.18 RA-17 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

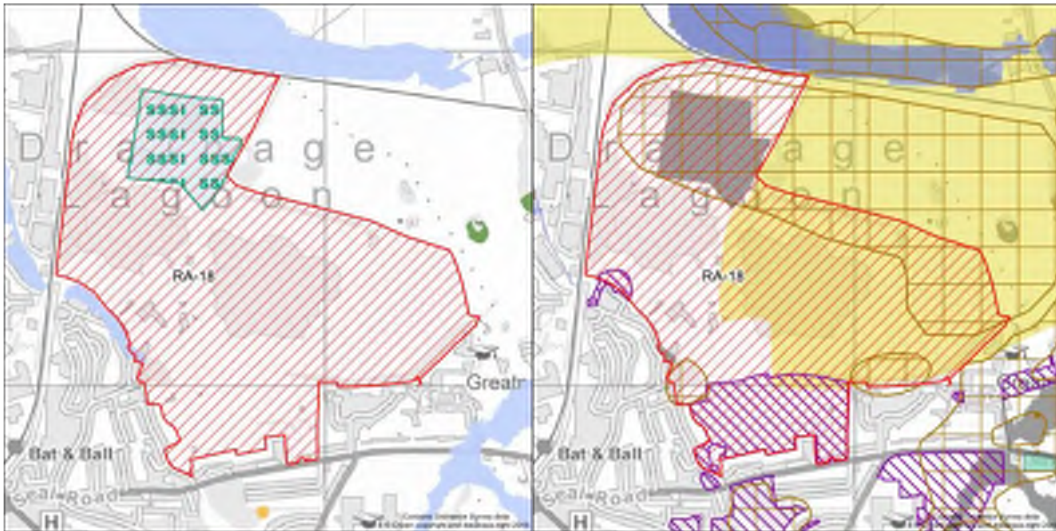
Small portions of the Recommended Area are within a SSSI (Sevenoaks Gravel Pits) which is adjacent to the Recommended Area's northern boundary, and Flood Zone 3b in the west.

Non-Absolute Constraints

The Recommended Area is almost entirely within an Area of Archaeological Significance and a small portion in the west is within an area of Flood Zone 3a. A number of areas covered by Open Space Designations are within, and adjacent to, the Recommended Area.

6.2.18 RA-18

Figure 6.19 RA-18 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

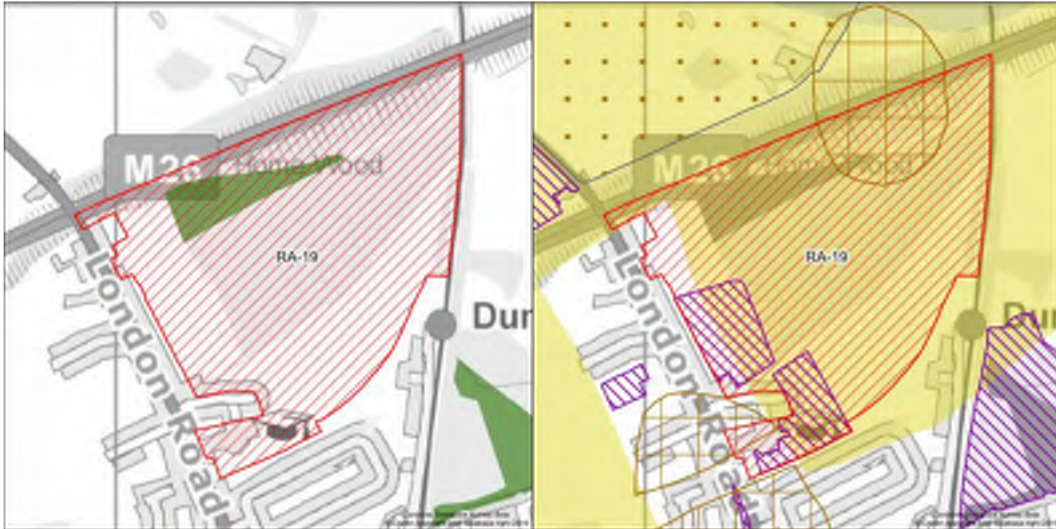
Part of the north of the Recommended Area encompasses a SSSI (Greatness Brickworks) and a small portion in the west is within an area of Flood Zone 3b which is also adjacent to the northern boundary. There is an area of Ancient Woodland within close proximity to the eastern boundary and a Scheduled Monument (Bowl barrow in Millpond Wood) to the south.

Non-Absolute Constraints

The east of the Recommended Area is within an area of Grade 3 Agricultural Land Classification and Areas of Archaeological Significance covers land in the north, east and south. The south of the Recommended Area contains Open Space Designations. The majority of the western section of the Recommended Area (with the exception of a small area covered by Open Space Designations) does not contain any non-absolute constraints.

6.2.19 RA-19

Figure 6.20 RA-19 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

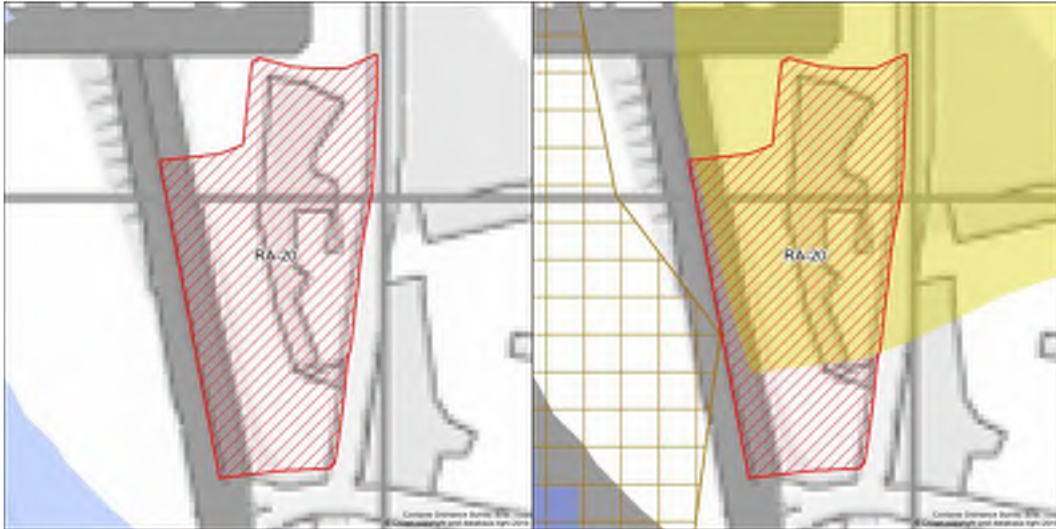
A small portion of the Recommended Area encompasses an area of Ancient Woodland. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is almost entirely within an area of Grade 3 Agricultural Land Classification and is partially within, and adjacent to, two Areas of Archaeological Significance to the north and south. Two areas in the west/south-west are covered by Open Space Designations. The Kent Downs AONB is located to the north of the M26.

6.2.20 RA-20

Figure 6.21 RA-20 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

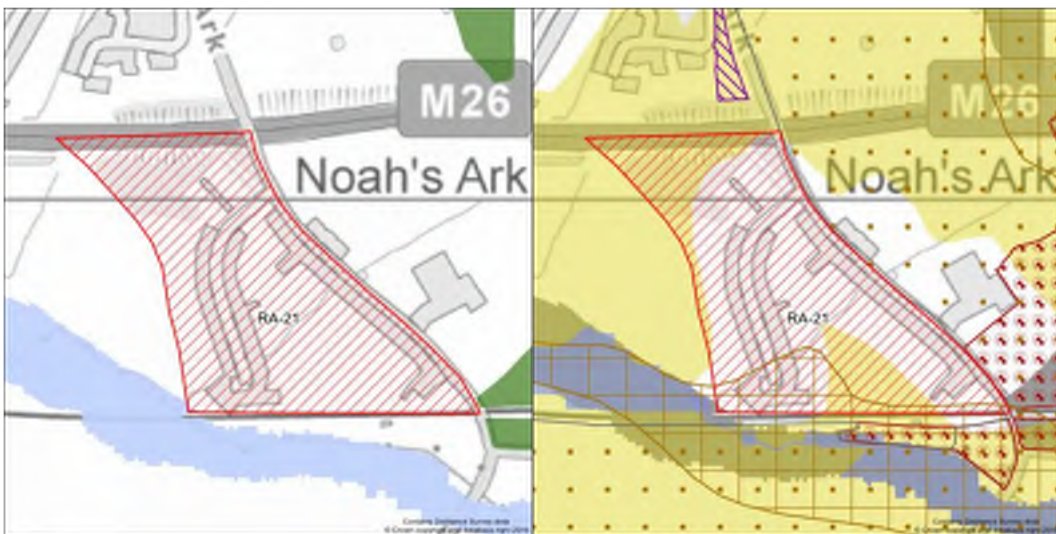
The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

The majority of the Recommended Area is within an area of Grade 3 Agricultural Land Classification. No other non-absolute constraints are present, although an Area of Archaeological Significance along its western boundary.

6.2.21 RA-21

Figure 6.22 RA-21 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area is nearly entirely clear of absolute constraints, with on a very small portion in the south-west within an area of Flood Zone 3b. No other absolute constraints are present, although there is an area of Ancient Woodland within close proximity to the south-eastern boundary.

Non-Absolute Constraints

The Recommended Area is partially within an area of Grade 3 Agricultural Land Classification in the north-west and south, and an Area of Archaeological Significance is located in the south. The Recommended Area is adjacent to the Kent Downs AONB and a Local Wildlife Site to the south and east.

6.2.22 RA-22

Figure 6.23 RA-22 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area contains, and is adjacent to, a number of areas of Ancient Woodland in the north, east and west. A Scheduled Monument (Fort Halstead) is located in the south-east.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and is partially within an Area of Archaeological Significance in the south-east an area of Grade 3 Agricultural Land Classification in the south-west. Two small areas in the north-west of the Recommended Area are covered by Open Space Designations.

6.2.23 RA-23

Figure 6.24 RA-23 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints. There are areas of Ancient Woodland within close proximity to the southern and northern boundaries.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and is adjacent to a Local Wildlife Site along the southern and eastern boundaries. An area of Grade 3 Agricultural Land Classification is located to the north-east.

6.2.24 RA-24

Figure 6.25 RA-24 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

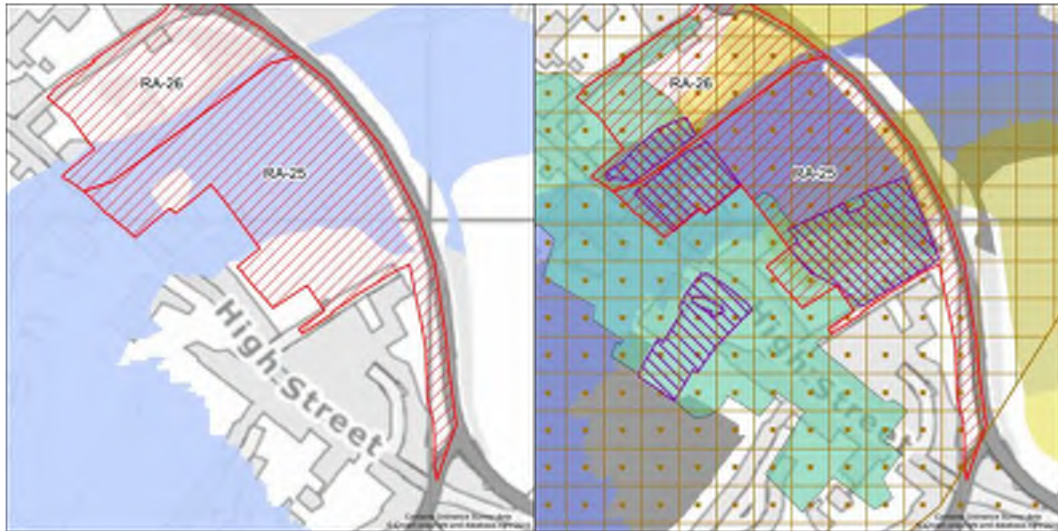
The Recommended Area does not contain any absolute constraints, with the exception of a very small area of Ancient Woodland in the south-west corner. Areas of Ancient Woodland are located to the north, west and south of the Recommended Area.

Non-Absolute Constraints

The majority of the Recommended Area is within an area of Grade 3 Agricultural Land Classification and approximately half is within the Kent Downs AONB. The north-west corner (and a very small area in the north-eastern corner) are covered by Open Space Designations. The Recommended Area is adjacent to a Local Wildlife Site along its southern and western boundaries.

6.2.25 RA-25

Figure 6.26 RA-25 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

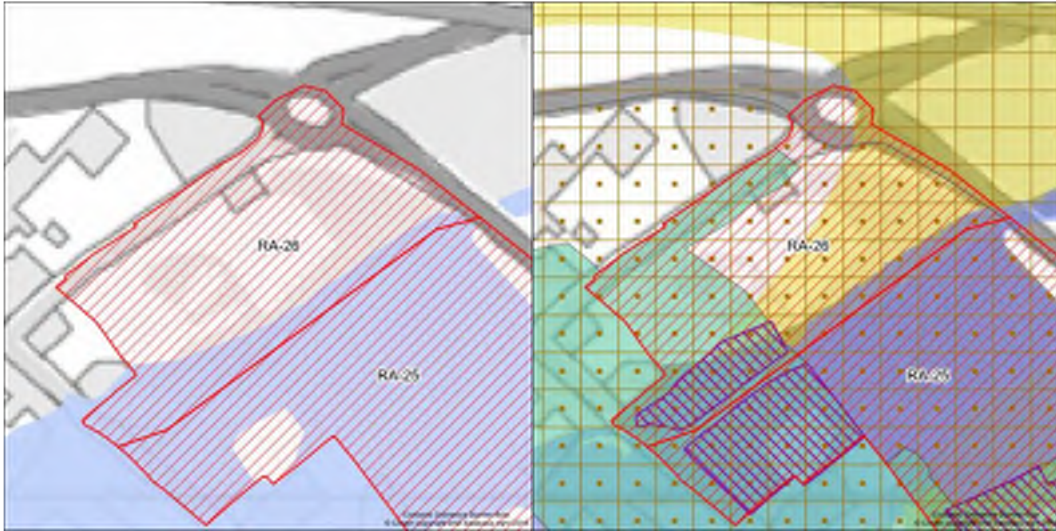
The majority of the Recommended Area is within an area of Flood Zone 3b associated with the River Darent, which is also adjacent to the Recommended Area to the north-east and south-west. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is entirely within the Kent Downs AONB and almost entirely within an Area of Archaeological Significance. The Recommended Area is partially covered by an area of Flood Zone 3a, a Conservation Area (Farningham), an area of Grade 3 Agricultural Land Classification, and Open Space Designations.

6.2.26 RA-26

Figure 6.27 RA-26 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

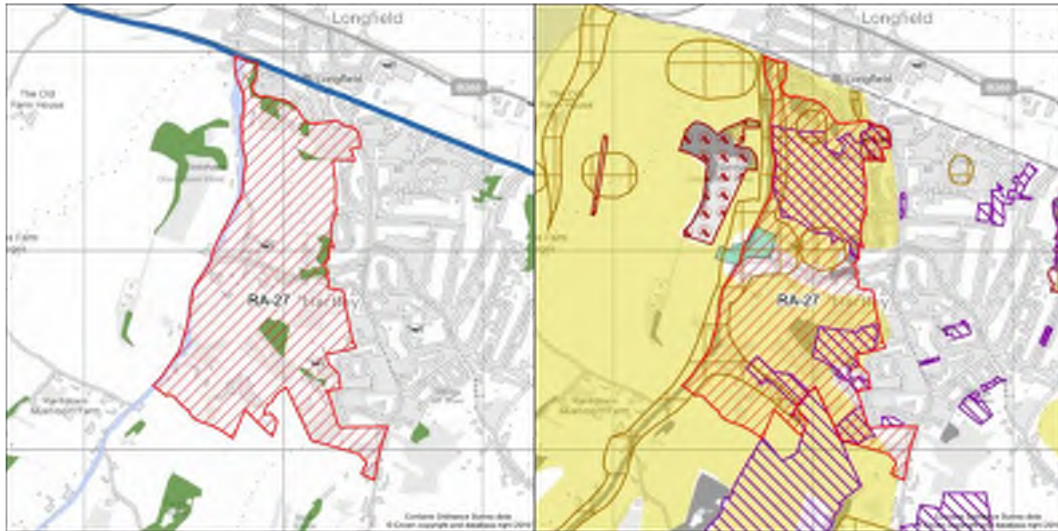
The south of the Recommended Area is within an area of Flood Zone 3b associated with the River Darent which is also adjacent to the Recommended Area to the north-east and south-west. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is entirely within an Area of Archaeological Significance and almost entirely within the Kent Downs AONB. The south-west of the Recommended Area is within a Conservation Area (Farningham) and contains an Open Space Designation, and the east is within an area of Grade 3 Agricultural Land Classification.

6.2.27 RA-27

Figure 6.28 RA-27 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

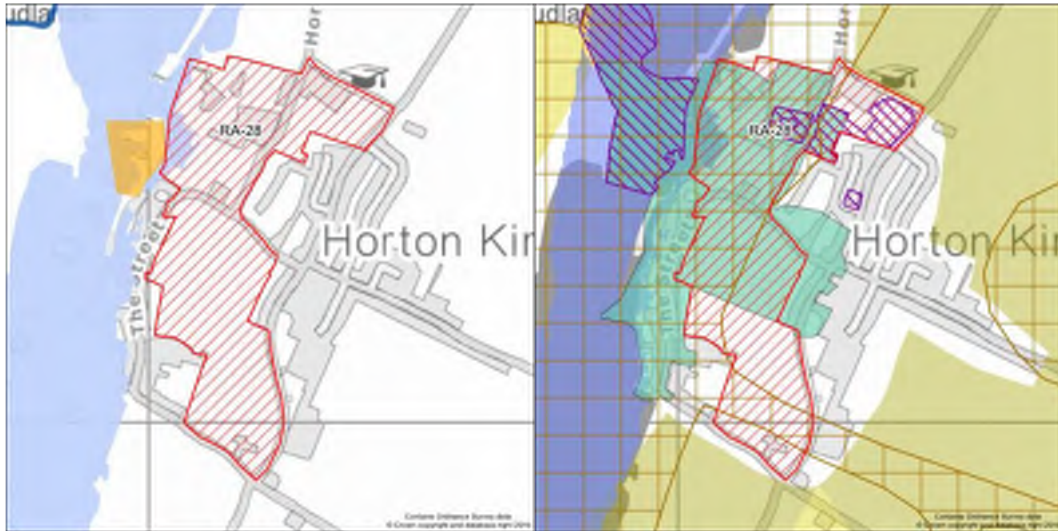
The Recommended Area contains, and is adjacent to, a number of areas of Ancient Woodland. A very small section of land on the western boundary is within an area of Flood Zone 3b. No other absolute constraints are present.

Non-Absolute Constraints

The Recommended Area is almost entirely within an area of Grade 3 Agricultural Land Classification. A small portion of the Recommended Area is within a Conservation Area (Baldwins Green) in the west, and a small portion is partially within a Local Wildlife Site in the north-east. Another Local Wildlife Site is located to the west of the Recommended Area. There are a number of Areas of Archaeological Significance and Open Space Designations across the Recommended Area.

6.2.28 RA-28

Figure 6.29 RA-28 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints, with the exception of a very small portion of land in the west which is within an area of Flood Zone 3b associated with the River Darent. The west of the Recommended Area is adjacent to a Scheduled Monument (Roman Granary).

Non-Absolute Constraints

The majority of the Recommended Area is within a Conservation Area (Horton Kirby) and within an Area of Archaeological Significance. A small portion of land in the west of the Recommended Area is within an area of Flood Zone 3a. Open Space Designations are present in the north of the Recommended Area. An area of Grade 2 Agricultural Land Classification is located to the north, east and south of the Recommended Area.

6.2.29 RA-29

Figure 6.30 RA-29 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints, with the exception of a very small portion of land in the north which contains an area of Ancient Woodland.

Non-Absolute Constraints

The Recommended Area is almost entirely within an area of Grade 2 and Grade 3 Agricultural Land Classification and Open Space Designations are present in the north, and adjacent to the west. An Areas of Archaeological Significance is located to the east of the Recommended Area.

6.2.30 RA-30

Figure 6.31 RA-30 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints.

Non-Absolute Constraints

The majority of the Recommended Area is within an area of Grade 2 Agricultural Land Classification with the southern section covered by an Open Space Designation.

6.2.31 RA-31

Figure 6.32 RA-31 absolute constraints (left) and non-absolute constraints (with absolute constraints shaded in grey) (right)



Absolute Constraints

The Recommended Area does not contain any absolute constraints. There is an area of Flood Zone 3b in close proximity to the western boundary.

Non-Absolute Constraints

The majority of the Recommended Area is within an area of Grade 2 Agricultural Land Classification. Open Space Designations cover the eastern and western sections of the Recommended Area.

6.3 Summary

In summary of absolute constraints:

- Two Recommended Areas (RA-1 and RA-11) are completely covered by absolute constraints.
- 19 Recommended Areas (RA-2, RA-3, RA-4, RA-5, RA-9, RA-10, RA-12, RA-14, RA-17, RA-18, RA-19, RA-21, RA-22, RA-24, RA-25, RA-26, RA-27, RA-28, and RA-29) are partially covered by absolute constraints.
- Ten Recommended Areas (RA-6, RA-7, RA-8, RA-13, RA-15, RA-16, RA-20, RA-23, RA-30 and RA-31) are not covered by any absolute constraint.

In summary of non-absolute constraints:

- 12 Recommended Areas (RA-4, RA-7, RA-9, RA-10, RA-11, RA-12, RA-13, RA-16, RA-22, RA-23, RA-25, and RA-26) are completely covered by non-absolute constraints.
- 19 Recommended Areas (RA-1, RA-2, RA-3, RA-5, RA-6, RA-8, RA-14, RA-15, RA-17, RA-18, RA-19, RA-20, RA-21, RA-24, RA-27, RA-28, RA-29, RA-30, and RA-31) are partially covered by non-absolute constraints.
- No Recommended Areas are not covered by any non-absolute constraint.

In summary of absolute and non-absolute constraints in combination:

- 11 Recommended Areas (RA-1, RA-4, RA-7, RA-10, RA-11, RA-12, RA-13, RA-16, RA-22, RA-23, and RA-25) are completely covered by a combination of absolute and non-absolute constraints.
- 20 Recommended Areas (RA-2, RA-3, RA-5, RA-6, RA-8, RA-9, RA-14, RA-15, RA-17, RA-18, RA-19, RA-20, RA-21, RA-24, RA-26, RA-27, RA-28, RA-29, RA-30, and RA-31) are partially covered by a combination of absolute and non-absolute constraints.
- No Recommended Areas are not covered by a combination of any absolute and non-absolute constraints.

7 Landscape Assessment

The findings from the landscape assessment for each Recommended Area are summarised below, in term of overall landscape sensitivity to residential and mixed use development and spatial recommendations in landscape and visual terms. The location of each Recommended Area is shown in Map 5.6. Further detail and evidence is given in the individual pro-formas in Annex Report 3.

7.1 Summary of Findings

7.1.1 RA-1

The Recommended Area is judged to have a **low sensitivity** to residential and mixed use development by virtue of its condition and development influences. However there is variation within this overall sensitivity judgement – the southern parts of the Recommended Area are judged to have a **moderate sensitivity** to residential and mixed use development, due to the more rural quality and its more prominent position resulting from its position towards the top of the valley slopes.

Development in the northern part of the Recommended Area could potentially strengthen the settlement edge of Edenbridge and have a positive impact on the condition of the landscape in this area. However, any proposal should consider the impact of the existing trading estate and how to integrate new development within the existing fabric of Edenbridge.

If the land in the southern part of the Recommended Area is to be considered for release for residential or mixed use development, strengthening or widening of the southernmost boundary planting is recommended in order to prevent visual encroachment of the development on the wider countryside. Account should also be taken of the intervisibility between the south facing slope and the wider landscape, through use of new planting to break up and integrate rooflines.

7.1.2 RA-2

The overall landscape sensitivity of the Recommended Area to residential and mixed use development is judged to be **low to moderate**, due to the impact of existing urban influences on the otherwise intact landscape pattern and the severance created by the railway lines.

Based on the Recommended Area's sense of enclosure and relative sense of isolation, it is judged that it could be released for residential and mixed use development in landscape and visual terms without fundamentally changing the wider landscape character. However, consideration should be given to the type of development located in the north of the area due to greater level of intervisibility with the wider landscape. Consideration should also be given to retaining and enhancing areas of intact, mature field boundaries within any new development in order to enhance the local green infrastructure network, and to better absorb any new development in visual terms.

7.1.3 RA-3

Overall landscape sensitivity of the Recommended Area to residential and mixed use development is judged to be **low** by virtue of recent development that has occurred within the Recommended Area and its relationship to the wider settlement edge.

In landscape and visual terms, the Recommended Area could be released for development without adversely impacting upon wider landscape character due to its enclosed nature. This would provide the opportunity to improve the quality of existing settlement edges and enhance the value and connectivity of green infrastructure within the Recommended Area, including improving its qualities as a gateway to the wider countryside.

7.1.4 RA-4

The Recommended Area is judged to have a **moderate sensitivity** to residential and mixed use development by virtue of the fact that development already exists within it, but further development would result in the loss of woodland which is important to the settlement's wider setting.

Under the precedent set by previous development of the area, in landscape and visual terms the central part of the Recommended Area could be released without adversely impacting upon wider landscape character. Development of the western parts should be avoided due to the landscape structure and pattern in this area which would potentially be vulnerable to development footprints.

7.1.5 RA-5

The overall landscape sensitivity of the Recommended Area to residential and mixed use development is judged to be **low to moderate**. It is unlikely that wider landscape character would be adversely effected by residential or mixed use development of the area due to the general strength of edges to the Recommended Area. However, the western portion of the Recommended Area may be more sensitive due to forming part of the High Weald AONB and its proximity to Leigh Conversation Area.

Well-designed development within the eastern part of the Recommended Area could enhance the quality and setting of the settlement and of the Public Right of Way (PROW) as a gateway to the wider countryside. Appropriate mitigation against harm caused by increased traffic through Leigh's historic core to access the development should be considered in terms of character and visual amenity.

In landscape and visual terms, the western part of the Recommended Area may be more sensitive to change due to its more historic quality and character, though the railway embankment to the south serves as a strong visual and physical buffer which would limit harm to the wider landscape.

7.1.6 RA-6

The Recommended Area is judged to have a **low sensitivity** to residential and mixed use development, by virtue of existing development influences and eroded rural landscape character. The southern fields are more sensitive to residential and mixed use development, because of higher levels of intervisibility resulting from sloping landform.

Reinforcement of the southern boundary is recommended in order to minimise the adverse impact of potential residential or mixed use development on views towards the Recommended Area from other points within the wider landscape. Retention and enhancement of hedgerow and tree vegetation along Hilders Lane is also recommended, in order to improve the area as a gateway to the settlement.

7.1.7 RA-7

The Recommended Area is judged to have a **moderate sensitivity** to residential and mixed use development by virtue of the landscape's recreational value and physical characteristics. The northern part of the area is less sensitive due to its relationship with the adjacent settlement edge and low landscape variance/quality.

In landscape and visual terms, the northernmost field could be released for residential or mixed use development without fundamentally changing wider landscape character. However, development should not adversely impact on the historic qualities of Farley Lane. Development in this area could also be allied with reinforcing the value of Farley Common as a recreational and green infrastructure resource.

7.1.8 RA-8

The Recommended Area is judged to have a **moderate sensitivity** to residential and mixed use development, by virtue of its condition and value for recreational use in close proximity to Edenbridge.

Based on the assessment, the Recommended Area could be released in landscape and visual terms without fundamentally changing the character of the wider landscape. However, retention of existing green infrastructure assets within the Recommended Area, such as dividing hedgerows and mature tree species would be recommended along with retaining the area's recreational value. There is also potential to enhance the Recommended Area's role as a gateway to the wider countryside.

7.1.9 RA-9

The Recommended Area is judged to have a **moderate to high sensitivity** to residential and mixed use development by virtue of its exposed position within the wider landscape, presence of designated landscape features and representation, in parts, of wider AONB special characteristics and qualities.

Based on the overall assessment for RA-9, in landscape and visual terms land could be released to the east of Churchill Church of England Primary School on

London Road, along the Recommended Area's eastern edge. This area possesses a high degree of enclosure and is more heavily influenced by urban fringe characteristics than the fields to the west of Churchill Church of England Primary School. Development in this area could have a wider impact on landscape character due to the high degree of exposure.

7.1.10 RA-10

The Recommended Area is judged to have a **moderate to high sensitivity** to residential and mixed use development by virtue of the impact development within the parcel could have on the wider historic landscape character.

Development within the Recommended Area could fundamentally change the historic settlement pattern of Brasted and it is therefore recommended that the Recommended Area is not considered for release for development in landscape and visual terms.

7.1.11 RA-11

The Recommended Area is judged to have a **high sensitivity** to residential and mixed development by virtue of the small scale of the area and strong influence of landscape features on the character of the landscape which could fundamentally be altered as a result of development. The area forms part of the Brasted High Street Conservation Area which is also highly sensitive in townscape character terms.

Due to the designated status, intimate spatial scale formed by the landscape pattern and associated physical landscape characteristics, such as the high degree of tree coverage and its maturity, it is recommended that the Recommended Area is not considered for release, in landscape and visual terms, for development.

7.1.12 RA-12

The Recommended Area is judged to have a **moderate sensitivity** to residential and mixed use development by virtue of its varying topography and degree of enclosure in regards to intervisibility with the wider landscape.

Due to the small scale riparian character of the southern part of the Recommended Area, this is not considered a suitable location for development. Therefore, any consideration for release for development should be concentrated in the central part of the Recommended Area in proximity to existing development.

7.1.13 RA-13

The Recommended Area is judged to have a **low sensitivity** to residential development by virtue of its condition and existing development influences.

Based on the assessment, the Recommended Area could be released in landscape and visual terms without adversely impacting upon or fundamentally changing the wider landscape character. Well considered and integrated development could

enhance the recreational and green infrastructure value of the landscape while also strengthening the settlement edge of Sundridge.

7.1.14 RA-14

The Recommended Area is judged to have a **moderate sensitivity** to residential and mixed use development by virtue of its topographic nature, which could heighten the degree of visual impact of any new development on the surrounding landscape.

The Recommended Area could be developed in part in landscape and visual terms, using the ridgeline as a defensible boundary with which to contain settlement extension to the north. This could be strengthened further by reinstating historic field boundaries and strengthening green infrastructure assets such as the area of ancient woodland.

If development were to breach the ridgeline and continue onto the south facing slope, it could have an adverse impact on the continuity of the wider landscape.

7.1.15 RA-15

The overall landscape sensitivity of the Recommended Area to residential and mixed use development is judged to be **low to moderate** by virtue of its landscape character having been eroded in parts by human influences, although its close relationship Chipstead Conservation Area and its location falling within the Kent Downs AONB render these parts more sensitive.

Based on the assessment of RA-15, the Recommended Area could be released in landscape and visual terms without fundamentally changing wider landscape character. However, consideration should be given to the form and character of development in order to preserve the historic vernacular of the adjacent settlement of Chipstead and also to respond to the AONB setting in terms of development materials, scale, density and relationship to important characteristics and special qualities.

7.1.16 RA-16

This Recommended Area is judged to have a **moderate** overall sensitivity to residential and mixed use development, by virtue of the simple landscape pattern and relatively few distinct landscape features, balanced against the level of intervisibility with the wider landscape in the southern part of the area, which is more sensitive.

Due to the prominence and intervisibility of the southern part of the Recommended Area with the wider landscape, it has a limited ability to accommodate development in landscape and visual terms. A smaller quantum of well-designed development to the northern and eastern extents of the Recommended Area and incorporating a strong green infrastructure buffer to help integrate the character of the development with that of the wider settlement could however mitigate and strengthen settlement edges in this area.

7.1.17 RA-17

The overall landscape sensitivity of the Recommended Area to residential and mixed use development is judged to be **moderate** by virtue of the combination of its location immediately adjacent to the Sevenoaks Gravel Pits SSSI and existing urban fringe characteristics.

Due to the presence of development towards the central, eastern and south-western parts of the Recommended Area (south of the existing mature woodland and east of the Darent Valley Path), and high level of enclosure within this area, releasing this portion of the Recommended Area for further development would be unlikely to fundamentally alter the wider landscape character. However, in landscape and visual terms, the western part of the area should not be considered for release for development due to the presence of historic qualities and the presence of more intact and mature landscape structure/vegetation which would be difficult to replace and therefore vulnerable to potential development footprints for this reason.

7.1.18 RA-18

The Recommended Area is judged to have a **moderate** overall sensitivity to residential and mixed use development by virtue of the visual containment and landscape disturbance, balanced against the geological interest this has revealed and the emerging succession landscape mosaic apparently being created as a result.

This is a provisional judgement based on desktop survey due to the lack of site access and it is suggested that this judgement is re-visited when site access is available.

This Recommended Area presents notable constraints to possible release for development not least the geological SSSI, the sharp variation in levels and the deep lagoon.

7.1.19 RA-19

This Recommended Area is judged to have a **low overall sensitivity** to residential and mixed use development, by virtue of the parcel's existing urban fringe character.

The Recommended Area has the capability to accommodate development in landscape and visual terms, without fundamentally altering the wider landscaper character. Well-designed development could also strengthen the function of the Recommended Area in regard to providing improved access to the wider countryside.

7.1.20 RA-20

Overall landscape sensitivity resulting from potential residential and mixed use development is deemed to be **low** by virtue of development having already

occurred within the Recommended Area and due to the relatively weak, eroded landscape character.

Reinforcement of the northern boundary features is recommended in order to further define the settlement edge and contain the current industrial visual character of development within the Recommended Area.

7.1.21 RA-21

Overall landscape sensitivity to residential and mixed use development is deemed to be **low** by virtue of the existing developed status of a large percentage of the Recommended Area.

The Recommended Area could be released in landscape and visual terms, however there is limited space for further development to occur by virtue of the existing landscape structure and pattern. Removal of woodland in the north of the Recommended Area could fundamentally change the character of the local area as a result of exposing the M26.

7.1.22 RA-22

The Recommended Area is judged to have a **low sensitivity** to residential and mixed use development, by virtue of existing development influences and its heavily enclosed.

Based on the assessment above, in landscape and visual terms the Recommended Area could be released without fundamentally changing the wider landscape character due to the strong level of enclosure. However, recommendation would be given to sensitive re-development of the Recommended Area with a focus on retaining and enhancing the green infrastructure qualities of the remaining woodland as if removed it could result in a fundamental adverse impact upon wider landscape character.

7.1.23 RA-23

The Recommended Area is judged to have a **low sensitivity** to residential and mixed use development by virtue of the absence of high quality landscape features within the area and its high level of visual enclosure.

The Recommended Area could potentially be released in landscape and visual terms without fundamentally changing the wider landscape character, new development should reflect the wider settlement pattern and landscape character and would provide an opportunity to strengthen the settlement edges and enhance recreational value.

7.1.24 RA-24

Overall landscape sensitivity of the Recommended Area to residential and mixed use development is judged **low** by virtue of its existing urban fringe influences and uses/management, relationship to existing development and the eroded, partly degraded landscape pattern. The sense of openness and intervisibility would have

a higher sensitivity to development, as would the relationship to more intact landscapes to the south.

Well-designed and integrated development in the northern half of the Recommended Area could enhance the existing settlement edge and gateway to West Kingsdown if allied to measures to restore hedgerow, woodland and green infrastructure connectivity – creation of a positive, restored green infrastructure buffer between this and the ancient woodland to the south, to reinforce the setting of the AONB at this point.

7.1.25 RA-25

Overall landscape sensitivity to residential and mixed use development varies across this Recommended Area, from **high** at Market Meadow where the land contributes strongly to the historic setting of an approach to the village, to **medium** in other parts by virtue of the sense of enclosure. However it should be noted that the relationship of these areas to the form of the settlement is relatively poor.

Given the historic sensitivity and role as a setting to the village, it is not considered that this Recommended Area could be released for development in landscape and visual terms.

7.1.26 RA-26

Overall landscape sensitivity to residential and mixed use development is judged to be **moderate-low**, by virtue of the current land use and high degree of enclosure and visual containment, balanced against proximity to the historic assets such as the Lion Hotel and the Rococo water gate / cattle barrier on the River Darent.

By virtue of its enclosure and sense of containment, the Recommended Area could be released in landscape and visual terms although it is unlikely to be suitable for development due to other constraints and its weak relationship to the established pattern of settlement.

7.1.27 RA-27

Overall landscape sensitivity of the Recommended Area to potential residential and mixed use development is assessed as **moderate**. This in view of the settlement fringe influences, large landscape scale and eroded pattern, balanced against areas on intact historic and rural character, which along with those areas with a higher level of intervisibility/sense of openness, would have a far higher sensitivity to change in landscape terms.

In landscape and visual terms, any potential release for development should focus on more visually contained areas such as the former quarry and the industrial area south of Fawkham. Any such release should also seek to restore and re-connect field patterns to provide mitigation. Development should not breach ridgelines, to maintain the perception of settlement separation and setting. A buffer should be

maintained to the church and conservation area at Baldwins Green, to conserve setting and rural character.

7.1.28 RA-28

Overall the landscape of this Recommended Area is judged to have a **moderate sensitivity** to residential and mixed use development, by virtue of areas of intact landscape pattern and the Recommended Area's role in forming part of the setting of the historic settlement, offset by localise erosion and the presence of modern development and edges, which reduce sensitivity overall.

Overall the Recommended Area is well contained from the wider landscape and is surrounded by development to three sides. However if the Recommended Area were considered for release for development this would fundamentally change the compact form and character of this (dispersed linear) settlement and any mitigation should include generous green infrastructure corridors to maintain this sense of identity and setting.

7.1.29 RA-29

The Recommended Area is judged to have a **low overall landscape sensitivity** to residential and mixed use development. This is by virtue of its degraded condition, the substantial loss of landscape pattern and interest, and the degree of visual containment afforded by landform and enclosure provided by surrounding development.

This Recommended Area has the potential to accommodate well designed development which could improve the existing settlement edge at this point. A generous and deep wooded buffer should be provided to the boundary with the Motorway for reasons of attenuation, settlement setting and landscape connectivity, as well as visual screening in relation to the transport infrastructure.

7.1.30 RA-30

Overall this Recommended Area is judged to have a **moderate-high sensitivity** to residential and mixed use development. This is due primarily to topography and the presence of remnant historic landscape feature such as the holloway and the hedgebank, which greatly elevate sensitivity, as well as creating a strong existing settlement setting.

The area to the north, between Hockenden Lane and the B1273, would be less sensitive to change by virtue of development having already occurred, whilst the southern linear area would be less suitable for development due to the strong green setting which rounds off the settlement at this point and which forms a natural break to development, as well as the value of the remnant historic landscape features. Development here may fundamentally change the landscape character.

7.1.31 RA-31

This Recommended Area is judged to have a **moderate-low overall sensitivity** to residential and mixed use development, by virtue of the simple landscape pattern and relationship to existing settlement, balanced against the level of intervisibility with the wider landscape.

Due to the prominence and intervisibility of the Recommended Area with the wider landscape, it has a limited ability to accommodate development in landscape and visual terms. A small amount of well-designed residential development to the western edge, and incorporating a strong green infrastructure buffer to the edge which restores and responds to cues provided by existing landscape structure, could however mitigate and improve the rather exposed settlement edge at this point.

8 Boundary Assessment

Paragraph 85 of the NPPF states that Green Belt boundaries should be ‘*defined clearly, using physical features that are readily recognisable and likely to be permanent*’. On this basis, following initial identification of the Recommended Areas following the assessment against the NPPF purposes, additional analysis of the durability of boundaries was undertaken concurrently with the Landscape Assessment, informed by site visits.

Where necessary and feasible, adjustments were made to these Areas to ensure alignment with boundaries that were readily recognisable on the ground. It is judged that as currently mapped, in almost all cases, Recommended Areas are bound by permanent man-made and / or natural features which are deemed to be consistent with national policy.

There are a very small number of exceptions to this, where it was judged that there would be clear scope to introduce new defensible boundaries as part of any future allocations through the Local Plan process. For example:

- **RA-15** is durably bound by physical features to the south-west by the M25 / A20, but a small length of its boundary to the north-west is not aligned with a readily recognisable feature. As this equates to around 20m, it was judged that it would be possible to establish robust planting to create a new durable boundary for the Green Belt (see Figure 8.1).
- **RA-18** is a currently an operationally active quarry with no public access. Given its current status, the extent of the Recommended Area has been identified using desk-based resources (including recent aerial photography) but could not be verified on site.

Figure 8.1 Facing west from Homedean Road across RA-15, illustrating the scale of the boundary that would need to be created to establish a robust Green Belt boundary at the north end of RA-15



Notwithstanding the principles applied to the identification of weaker areas of Green Belt, it should be noted that boundaries identified should be kept under review as part of the ongoing development of the new Local Plan. Where further consideration is afforded to possible removal of land from the Green Belt, it is suggested that the identification of suitable new Green Belt boundaries is deferred to a later point in the formulation of the Local Plan so as not to preclude the consideration of different or smaller areas to those identified by this assessment.

When reconsidering boundaries, it is recommended that the Council adopt the following principles:

- Boundaries should be based on man-made or natural physical features where, as a result of factors such as scale, magnitude or planning policies or designations, there is a strong likelihood of permanence;
- In line with the broad principles outlined in section 4.2.1, features might include:
 - Motorways and roads (both public and private);
 - Railway lines;
 - Rivers, brooks, and other smaller water features, including streams and canals;
 - Prominent physical features (e.g. ridgelines);
 - Existing or future development with strongly established, regular and consistent boundaries;
 - Protected woodland;
 - Established planted features, including hedgerows.
- Boundaries should be readily recognisable, ideally both on plan and visually on the ground;
- Where remnant or degraded features exist (e.g. remains of historic hedgerows), the potential to restore / replace these features should be explored where possible to secure and enhance the character of the landscape;
- In identifying new Green Belt boundaries, consideration should be given to the visual impact of a potential release on the wider Green Belt and, where appropriate, suitable mitigation identified to limit this impact (e.g. increasing the density of planted buffers to shield development from the wider countryside where this complements and enhances landscape character and setting and does not introduce further adverse impact);
- Consideration should be afforded to the creation of new boundaries as part of future development, and how the creation of robust features might be obligated through Local Plan site-specific and development management policies.

9 Historical Boundary Anomalies

A number of minor Green Belt boundary anomalies have been identified across the District where existing boundaries cut across open areas where no boundary feature is present; through buildings; or through rows of housing / development which appear to have been built around the same time. By their nature, these boundary anomalies are very small scale and are not considered to impact on the role of wider Green Belt.

Mapping showing the identified boundary anomalies is provided in Annex Report 4. The total area covered by these anomalies is 15.3ha.

It is recommended that the Council considers correcting these minor boundary anomalies in the production of the new Local Plan for the District.

10 Conclusions

This Study has examined the performance of the Green Belt in Sevenoaks against the Green Belt Purposes, as set out in the NPPF. The assessment has considered 101 Green Belt Parcels, bounded by readily recognisable, durable physical features.

It is notable that, nearly 50 years since the current extent of the Green Belt was established across the District, the Green Belt continues to play an important role in preventing the outward sprawl of Greater London and other large built-up areas within, and adjacent to, the District. It is also crucial for maintaining the District's settlement pattern, ensuring the continued openness of the countryside, and protecting the unique rural setting of historic towns. This Study has demonstrated clearly that the vast majority of the Green Belt (77 out of 101 Parcels) continues to perform one or more of these purposes strongly, while all parcels meet the purposes to a greater or lesser extent.

The Study has also identified a very small number of Parcels that only meet the NPPF purposes weakly. These have been recommended for further consideration by Sevenoaks District Council. In addition, a series of smaller sub-areas were also identified. These are likely to perform weakly against the NPPF purposes if considered separately, under the premise that suitable defensible boundary features can be identified to enclose such areas, and have also been recommended for further consideration.

While these Recommended Areas are distributed across the District, they generally comprise distinct areas of Green Belt which are relatively small in scale, possessing semi-urban characteristics and located adjacent to or even enclosed within urban areas, thus performing little or no role in preventing the outward sprawl of large built-up areas, the coalescence of settlements or encroachment into the countryside. Recommended Areas have been identified for further consideration based on their performance against NPPF purposes only, rather than their suitability in terms of sustainability, infrastructure and wider planning considerations.

Each Recommended Area has been subject to further assessment to understand their potential ability to absorb development. This considered, for these areas only, the distribution of absolute and non-absolute constraints, the sensitivity of the landscape to change, and the strength and durability of potential new Green Belt boundaries should land be released from the Green Belt. Table 10.1 provides a summary of these findings.

Separately, a small number of boundary anomalies were identified during the course of the Study, with suggested corrections put forward for consideration by the Council. These will ensure the continued robustness and durability of the Green Belt boundary in Sevenoaks going forward.

While the outputs of this Study will assist the Council in determining whether there should be any release of Green Belt through the plan-making process, this Study provides only an initial, high level view of sites against a select range of policy constraints. This assessment does not preclude consideration and further

assessment by Sevenoaks District Council of other areas of the Green Belt as part of its wider planning-making process (e.g. through the Site Selection process).

The recommendations set out in this Study will not automatically lead to the release of land from the Green Belt. Ensuring maximum protection for the Green Belt, in line with national policy, continues to be a core planning principle in the formulation of Local Plan policy. The Recommended Areas identified through this Study will need to be subject to more detailed assessment by the Council to determine the appropriateness and feasibility of adjustments to the Green Belt boundary. Following this work, further decision making by the Council in updating the Local Plan will determine which areas, if any, might be released from or added to the Green Belt. The Green Belt Assessment will ultimately form part of a suite of evidence, which will be used to inform the plan-making process.

Sevenoaks District Council will also need to carefully consider whether, in accordance with the NPPF, whether there are any ‘exceptional circumstances’ that justify the Green Belt boundary in the District to be altered through the preparation of the New Local Plan. At that time, the Council will need to consider the definition of new Green Belt boundaries, taking into account the principles set out in this Study and having regard to their intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the plan period.

Table 10.1 Summary of Constraints and Landscape Sensitivity Assessments for Recommended Areas

Recommended Area	Assessment of Absolute Constraints	Assessment of Non-Absolute Constraints	Assessment of Landscape Sensitivity
RA-1	Completely constrained	Partially covered	Low-Moderate
RA-2	Partially constrained	Partially covered	Low-Moderate
RA-3	Partially constrained	Partially covered	Low
RA-4	Partially constrained	Completely covered	Moderate
RA-5	Partially constrained	Partially covered	Low-Moderate
RA-6	Unconstrained	Partially covered	Low
RA-7	Unconstrained	Completely covered	Moderate
RA-8	Unconstrained	Partially covered	Moderate
RA-9	Partially constrained	Completely covered	Moderate-High
RA-10	Partially constrained	Completely covered	Moderate-High
RA-11	Completely constrained	Completely covered	High
RA-12	Partially constrained	Completely covered	Moderate
RA-13	Unconstrained	Completely covered	Low
RA-14	Partially constrained	Partially covered	Moderate
RA-15	Unconstrained	Partially covered	Low-Moderate
RA-16	Unconstrained	Completely covered	Moderate
RA-17	Partially constrained	Partially covered	Moderate
RA-18	Partially constrained	Partially covered	Moderate

Recommended Area	Assessment of Absolute Constraints	Assessment of Non-Absolute Constraints	Assessment of Landscape Sensitivity
RA-19	Partially constrained	Partially covered	Low
RA-20	Unconstrained	Partially covered	Low
RA-21	Partially constrained	Partially covered	Low
RA-22	Partially constrained	Completely covered	Low
RA-23	Unconstrained	Completely covered	Low
RA-24	Partially constrained	Partially covered	Low
RA-25	Partially constrained	Completely covered	Moderate-High
RA-26	Partially constrained	Completely covered	Low-Moderate
RA-27	Partially constrained	Partially covered	Moderate
RA-28	Partially constrained	Partially covered	Moderate
RA-29	Partially constrained	Partially covered	Low
RA-30	Unconstrained	Partially covered	Moderate-High
RA-31	Unconstrained	Partially covered	Low-Moderate

Appendix A

Glossary of Terms

Term	Definition
Connected	Displaying a low level of containment rather than simply adjoining an area.
Contiguous	Predominantly surrounded by built form (from a least two large built-up areas) but also retaining a strong link to the wider Green Belt.
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on local planning authorities and county councils in England and public bodies to engage constructively with prescribed bodies, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
Green Belt Parcel	Area of Green Belt land identified for assessment against the NPPF purposes on the basis of existing permanent and defensible boundary features.
Green Infrastructure	A network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Intervisibility	A measure of the visual exposure of a series of locations or landscapes and therefore how these series of landscapes are visually connected and define the character of a view or landscape.
Landscape Sensitivity	A measure of the ability of a landscape to accept change combining judgements of the landscape susceptibility and landscape value, to the specific type of change or development proposed (e.g. residential and mixed use development), without causing irreparable damage to the essential fabric and distinctiveness of that landscape.
Landscape Susceptibility	The ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.
Landscape Value	The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons.
Large Built-Up Area	Areas defined to correspond to the major settlements identified in the respective Local Plans in Sevenoaks and neighbouring local authorities and used in the NPPF Purpose 1 assessment.
Largely Rural Character	Land with a general absence of built development, largely characterised by rural land uses and landscapes with some other sporadic developments and man-made structures.
Less Essential Gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
Neighbouring Town	Refers to settlements within Sevenoaks, as well as settlements in neighbouring authorities for the assessment against NPPF Purpose 2.
Open Land	Open land refers to land that is lacking in built development.
Openness	Openness refers to the extent to which Green Belt land could be considered open from an absence of built development.

Term	Definition
Recommended Area	Area of Green Belt land (either a whole Green Belt Parcel or part of a Green Belt Parcel) identified through the assessment of Green Belt Parcels against the NPPF purposes which is recommended for further consideration.
Semi-Urban Character	Land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.
Strong Unspoilt Rural Character	Land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland / scrubland and open fields.
Urban Character	Land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
Wider Gap	A gap between settlements which may be less important for preventing coalescence.

Appendix B

Summary of matters raised
during Duty to Cooperate
Workshop on proposed
methodology

The following methodological matters were raised during the Duty to Cooperate Workshop held with neighbouring authorities on 30 August 2016¹⁸:

- **Parcels for Assessment:** Comments were provided on the proposed parcels for assessment. In particular, a number of attendees expressed concern regarding the identification of parcels that crossed the District boundary and that this approach would not be consistent with Green Belt assessments undertaken by neighbouring districts.
 - *Response:* All comments were considered, with some minor adjustments made where specific comments were raised. With regard to the cross-district parcels, given the advanced stage of the assessments undertaken by a number of neighbouring districts, it was determined that, where parcels cross into neighbouring local authority areas, the boundaries would be modified to exclude areas outside Sevenoaks District to ensure consistency with neighbouring approaches and avoid potential conflict.
- **Purpose 1:** While, broadly there was agreement with the proposed approach to assessing Green Belt against Purpose 1, several comments were raised around the identification of particular large built-up area beyond the boundaries of Sevenoaks District. In particular, the representative of Dartford Borough Council stressed that Dartford (and urban areas to the east) should be considered separately to Greater London given these settlements have not physically coalesced.
 - *Response:* Where appropriate, the large built-up areas considered for the Study were modified, taking into account comments from neighbouring authorities. Specifically in response to the comment raised by Dartford, the Dartford / Gravesend built-up area was identified separately from Greater London.
- **Purpose 2:** There was some discussion around the proliferation of ribbon development, particularly in the north of the District around New Ash Green and Hartley, and how this would be considered as part of the Study. Specific comments were made around the identification of relevant settlements for consideration as part of Purpose 2.
 - *Response:* The presence of ribbon development was noted as a particular factor in identifying the performance of Green Belt against Purpose 2, as this may perceptually reduce the scale of gaps. The detailed criterion for the assessment acknowledge the role of ribbon development, and such characteristics will be noted qualitatively during the site visits and used to inform the conclusions. Specific modifications to the identified settlements have been made in response to comments received.
- **Purpose 4:** The identification of appropriate ‘historic settlements’ was discussed. It was suggested that Dartford’s historic core has no direct relationship with the Green Belt and should thus not be considered as part of

¹⁸ Attendees comprised: representatives of Dartford Borough Council, Gravesham Borough Council, Tandridge District Council and Tunbridge Wells Borough Council.

the Study. Comments were raised around the identification of additional settlements outside of Sevenoaks District.

- *Response:* Given the specific reference to ‘historic towns’ within national policy wording, it was considered appropriate to focus assessment on larger settlements. The Kent Historic Towns Survey provides a suitably evidenced basis for identifying the primary historic settlements for consideration as part of this assessment, with additional settlements considered on a case-by-case basis utilising professional judgement in line with the wording set out in national policy.
- **Purpose 5:** It was acknowledged that Purpose 5 is not helpful in terms of assessing the relative value of parcels and should therefore not be included in the assessment criteria. However, the overarching importance of Purpose 5 at a broader scale was acknowledged.
- **Constraints and Landscape Assessment:** The assessment of constraints and landscape sensitivity alongside Green Belt was discussed at a broad level. Some concern was expressed about the conflation of what were deemed to be separate matters in planning terms.
 - *Response:* The need to separate these assessments was acknowledged. The constraints and landscape assessments have been carried out in isolation from the assessment against the NPPF purposes, clearly set out in separate sections of the report following the conclusions made on the ‘recommended areas’ arising from the Green Belt assessment. These assessments will provide additional contextual information to assist the Council in its future plan-making and will no Green Belt recommendations will be made on the basis of these separate factors.

Appendix C

Draft Pro-Forma for NPPF Purposes Assessment

Green Belt Parcel			
Area (ha)			
Local Authority			
Location Plan			
Description			
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 large built-up areas.		
	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.		
Purpose 1: Total Score			/5
(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.		
Purpose 2: Total Score			/5

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.		
Purpose 3: Total Score			/5
(4) To preserve the setting and special character of historic towns	Protects land which provides immediate and wider context for historic settlement, including views and vistas between the settlement and the surrounding countryside.		
Purpose 4: Total Score			/5

Appendix D

Draft Pro-Forma for Landscape Assessment

Recommended Area:	
[Photo]	[Photo]
Approximate Size (ha):	
LCA context:	
2011 Countryside Character Assessment (Key characteristics represented on site, as appropriate):	
Draft Landscape Character and Sensitivity Study:	
Landscape Value	
Landscape value indicators:	
Landscape Susceptibility	
Physical character (Landform, landscape pattern and scale):	
Visual character (Skylines and sense of enclosure/openness):	
Perception and experiential quality:	

Cultural and historic character:
Settlement setting:
Settlement edge and form:
Overall landscape susceptibility rating and comments:
Landscape Sensitivity
Overall landscape sensitivity of the Recommended Area to residential and mixed use development, considering landscape value and susceptibility:
Summary recommendations:

Appendix E

Approaches to Green Belt in
neighbouring authorities

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
London Borough of Bexley	Bexley's Local Plan consists of the Core Strategy 2012. The Council is currently preparing a Detailed Policies and Sites Local Plan. The 2012 Local Development Scheme estimated that the Detailed Sites and Policies Local Plan would be adopted in April 2015 however this is still awaiting publication.	The eastern part of the Borough contains part of south-east London's Metropolitan Green Belt. Core Strategy (2012) Policy CS17 (Green Infrastructure) which aims to protect, enhance and support Bexley's green infrastructure by " <i>protecting metropolitan green belt... from inappropriate development</i> ".	N/A	N/A
London Borough of Bromley	Bromley's Local Plan consists of the saved policies from the Bromley UDP (2006) and the Bromley Town Centre Area Action Plan. The 2016 Local Development Scheme estimates that the new Borough-Wide Local Plan will be adopted in January 2017.	The Green Belt covers 7,700 ha of land in the Borough, representing over half of the Borough's total area. Policy G1 (The Green Belt) in the 2006 UDP states that ' <i>within the Green Belt, as defined on the Proposals Map, permission will not be given for inappropriate development unless very special circumstances can be demonstrated that clearly outweigh the harm by reason of inappropriateness or any other harm</i> '.	N/A	N/A
Dartford Borough Council	Dartford's Local Plan comprises the Dartford Core Strategy (2011) and 1995 Local Plan saved policies. The Local Development Scheme estimates that the draft Development Policies Plan Document will be adopted in	The southern part of the Borough contains part of south-east London's Metropolitan Green Belt. Saved Strategic Policy S4 from the 1995 Local Plan (consolidated in the 2011 Core Strategy) states that	N/A	N/A

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
	November 2016 while evidence gathering for the Core Strategy review is estimated to commence at the end of 2016.	<i>'there is a presumption against development in the Metropolitan Green Belt, as defined in the Local Plan; continued protection will be given to the countryside and its amenity value and its recreation potential will be enhanced'.</i>		
Gravesham Borough Council	Gravesham's Local Plan consists of the Gravesham Local Plan Core Strategy 2014. The Local Development Scheme (2015) estimates that the Site Allocations and Development Management Policies DPD will be adopted in December 2017.	78% of the Borough is designated as Green Belt. The 2014 Core Strategy does not contain any Green Belt specific policies although it does state in the section on settlement pattern that <i>'the eastern Green Belt boundary in Gravesham is considered to be very important as the gap between Gravesend and the Medway Towns is now one of the few barriers preventing the merging of settlements along the southern part of the Thames Estuary and the further eastward sprawl of London'.</i>	N/A	N/A
Wealden District Council	Wealden's Local Plan consists of the Wealden Core Strategy Local Plan (2013). The Local Development Scheme (2015) estimates that the new Wealden Local Plan will be adopted in 2018.	There are no Green Belt specific policies in the 2013 Wealden Core Strategy Local Plan; however Policy SPO14 states: <i>'we will maximise the use of previously developed land for new development wherever possible, and make the most efficient use of existing resources, for example by ensuring housing densities are compatible with the particular</i>	N/A	N/A

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
<p>Tandridge District Council</p>	<p>Tandridge’s Local Plan currently comprises of the 2008 Tandridge District Core Strategy. The 2015 Local Development Scheme estimates that the new Local Plan will go out to Regulation 19 Proposed Submission Stage in 2016/2017 and it is expected to be adopted in late 2017/2018.</p>	<p>The current 2008 Tandridge District Core Strategy does not have a specific Green Belt policy however Policy CSP 1 on the Location of Development states that <i>‘there will be no village expansion by amending the boundaries of either the Larger Rural Settlements or Green Belt Settlements... There will be no change in Green Belt boundaries, unless it is not possible to find sufficient land within the existing built up areas and other settlements to deliver current and future housing allocations’</i>.</p>	<p>Tandridge District Council Green Belt Assessment (Stage 1)</p>	<p>The Council are currently undertaking a Green Belt Assessment which involved three stages:</p> <ul style="list-style-type: none"> • Stage 1: Defining the area for assessment. Assessing the entirety of the Green Belt, Strategic Green Belt areas within the Metropolitan Green Belt and Local Parcels split by durable boundaries were identified. • Stage 2: Green Belt parcels were then assessed against NPPF Green Belt Purposes 1 to 5. • Stage 3: Outputs are to be presented in a three-tiered scoring system whereby Green Belt areas: <ul style="list-style-type: none"> - demonstrably serve the purpose - serve the purpose but to a lesser extent; or - serve the purpose to little or no extent. • In addition to the outputs above, areas will be identified within defined parcels where there is a clear deviation from the overall assessment of the wider parcel, which: <ul style="list-style-type: none"> - serves the purposes less obviously/effectively. - serves the purposes more obviously/effectively. <p>The findings of the Green Belt Assessment have not yet been published but will form part of the</p>

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
Tonbridge and Malling Borough Council	Tonbridge and Malling’s Local Plan currently comprises the 2007 Core Strategy, the 2008 Development Land Allocations DPD, the 2008 Tonbridge Central Area Action Plan and the 2008 Managing Development and the Environment DPD.	Nearly three quarters of the Borough lies within the Metropolitan Green Belt. The 2007 Core Strategy states of the Green Belt: <i>‘a key feature of Green Belts is their permanence. Very special circumstances are required for any departure from Green Belt policy and an exceptional justification is required for any change to existing Green Belt boundaries’</i> .	Tonbridge and Malling Borough Council Green Belt Study (September 2016)	<p>wider evidence base for the Local Plan and will be used to inform part of its preparation.</p> <p>The Council published a Green Belt Study in September 2016.</p> <p>The Study assessed the current Green Belt against four of the five NPPF Green Belt Purposes. Assessment was not made against the Purpose 5 as it was considered that this was an equal and inherent function across the whole Green Belt designation.</p> <p>Study areas were generally considered according to existing parish boundaries. However Tonbridge was defined according to the Council’s Development Plan Proposals map. Larger settlements, including Tonbridge, were broken down into parcels defined by existing physical features.</p> <p>Outputs were presented in a three-tiered scoring system, whereby a Green Belt area was judged to:</p> <ul style="list-style-type: none"> • Perform well or successfully against purpose of the Green Belt; • Perform moderately against purpose of the Green Belt; or • Make limited or no contribution to purpose of the Green Belt. <p>Green Belt areas adjacent to Sevenoaks District were found to be performing moderately or well against NPPF Green Belt Purposes.</p> <p>The Study notes that further study options include:</p>

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
				<ul style="list-style-type: none"> • Reviewing the Study in light of emerging evidence and consultation outcomes related to the Local Plan. • More detailed study into land identified as having a limited contribution to the Green Belt purposes. • More detailed study of well-performing areas, in order to consider ways of strengthening the designation/boundaries; e.g. improving access for recreation.
<p>Tunbridge Wells Borough Council</p>	<p>Tunbridge Wells’ development plan comprises the saved policies from the 2006 Local Plan, Core Strategy (2010) and Site Allocations Local Plan (2016). Work has commenced on a new Local Plan, which is expected to be adopted in 2020.</p>	<p>Core Policy 2 defines the boundary of the Green Belt through reference to the 2006 Local Plan Proposals Map. The policy states that <i>‘the general extent of the Green Belt will be maintained for the Plan period’</i> and that there is a <i>‘general presumption against inappropriate development that would not preserve the openness of the Green Belt’</i>.</p>	<p>In progress</p>	<p>TBC</p>