Stage 2 Green Belt Assessment – Additional Sites



Sevenoaks District Council

Green Belt Assessment Stage 2

Additional Site Assessment – Pedham Place (SA-142)

Reference:

| 22 June 2023



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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.

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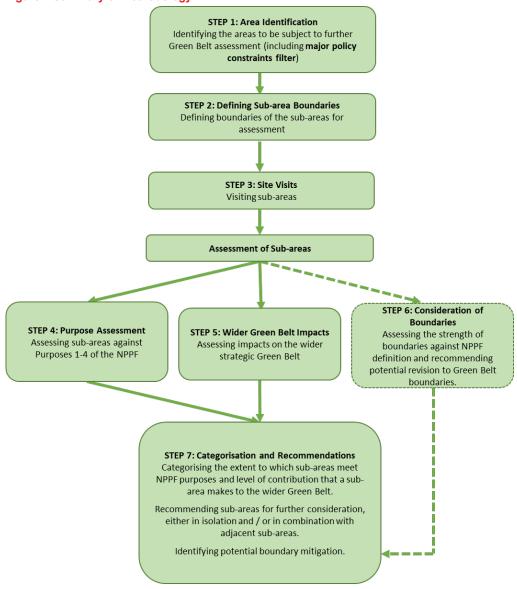
1. Scope of additional work

Arup has been appointed by Sevenoaks District Council (SDC) to undertake a further Stage 2 Green Belt Assessment (GBA) for an additional site. The additional site was not originally assessed as part of the GBA Stage 2 assessment however it was considered as part of a wider 'parcel' (no. 78) within the Stage 1 GBA undertaken by Arup and issued to SDC in January 2017.

The purpose of this GBA Stage 2 Additional Site review was to provide an assessment of the potential site against the Green Belt purposes, as set out in the National Planning Policy Framework (NPPF). The assessment evaluated how well the site meets the Green Belt purposes set out in the NPPF and to consider the impact on the wider Green Belt if the site was to be removed from the Green Belt.

The assessment is aligned with the methodology detailed in the earlier Stage 2 GBA, also undertaken by Arup.

Figure 1 Summary of Methodology



The note is structured as follows:

- Section 2 sets out the assessment area.
- Section 3 sets out the key findings, recommendations, and conclusions.
- Appendix presents the assessment pro-forma for the additional site.

Assessment of the Sub-Area 2.

A sub-area is an area of Green Belt that has boundaries that are defined 'clearly, using physical features that are readily recognisable and likely to be permanent'. The sub-area was defined in line with the general principles used to identify all of the sub-areas in the Stage 2 GBA.

As Stage 2 sub-areas are smaller than Stage 1 parcels, a wider range of boundary features is used to delineate sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries were drawn along features which were readily recognisable, but not necessarily permanent. Permanent and defensible boundary features (both man-made and natural) are listed in the first column of Table 1. The additional boundary features, which are not necessarily permanent, are listed in the second column of Table 1.

Table 1: Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams and other watercourses
Railway lines Canals	Prominent physical/topographical features, e.g. embankments
Rivers and waterbodies	Existing development with strongly-established, regular or consistent boundaries
Natural 'buffer' features such as ridgelines	Well-established woodland edges, tree belts and hedgerows

Major policy constraints were mapped to remove areas which are entirely or largely constrained and effectively rule out the development of the land. The following 'major' policy constraints were used:

- Flood zone 3b (functional floodplain)
- Sites of Special Scientific Interest (SSSI)
- **Scheduled Monuments**
- Registered Parks and Gardens
- Ancient Woodland.

The major policy constraint found in close proximity to this sub-area is Ancient Woodland, which forms part of the southern boundary.

The starting point for defining the sub-area was the red line boundary of the promoted site (Figure 2). The boundaries in each direction were examined as per the methodology above, which resulted in the sub-area boundary shown in Figure 3. The sub-area has been labelled as SA-141, following on from those sub-areas already assessed in the Stage 2 GBA.

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Figure 2: Map showing the red line boundary of the promoted site

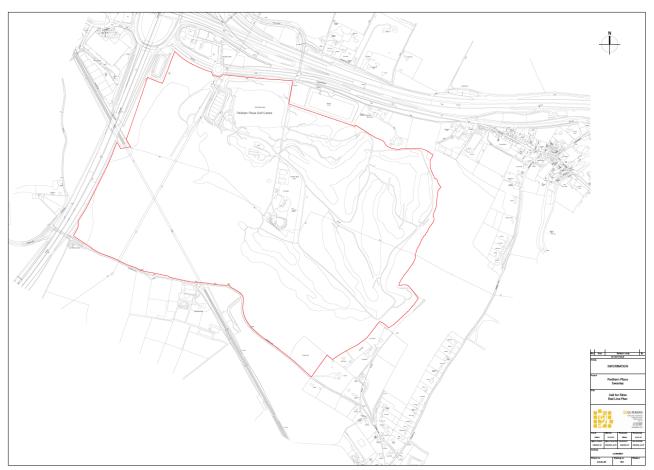


Figure 3: Map showing the sub-area (orange)



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3. Key Findings

This section summarises the key findings from the assessment of the sub-area against the NPPF purposes, consideration of the sub-area as part of the wider strategic Green Belt, and consideration of boundaries. Purposes 1-4 Assessment

Table 2 shows the performance scores of SA-142 against the NPPF purposes 1-4. Overall, the sub-area was found to perform strongly in the purpose assessment.

Table 2: Summary of SA-141 scores against NPPF Purposes

Purpose	Score
1: To check the unrestricted sprawl of large built-up areas	3
2: To prevent neighbouring towns from merging	3
3: To assist in safeguarding the countryside from encroachment	3
4: To preserve the setting and special character of historic towns	0

Strategic Green Belt Assessment

Additional qualitative assessment was undertaken to identify the role of the sub-area as part of the wider strategic Green Belt. The sub-area was found to have an open nature with views onto wider Green Belt. It's release in isolation is considered to be likely to impact on the performance of the wider Green Belt against NPPF purposes 1, 2 and 3. Overall, SA-142 was considered to make an important contribution to the wider Green Belt.

Boundary Consideration

The strength of the sub-area boundaries was considered against the NPPF definition of predominately readily recognisable and likely to be permanent boundaries. It was concluded that if the sub-area was released, the new inner boundary would require strengthening.

Categorisation and Recommendation

The sub-area performs strongly against the NPPF purposes, and it is concluded the sub-area makes an important contribution to the wider Green Belt. Therefore, the sub-area is not recommended for further consideration.

It is important to note that the recommendation set out in this note will not automatically lead to the retention of the land within the Green Belt.

The recommendation has been made based on the performance of the sub-area against NPPF purposes, and its performance in the context of the wider Green Belt. The suitability of the sub-area as a potential development site in terms of sustainability, deliverability, infrastructure and wider planning considerations has not been taken into account in the recommendation. It remains the responsibility of the Council to make the final decision.

Appendix

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Boundaries

The sub-area is bounded by the A20, mature treeline and hedgerow to the north, mature treeline and hedgerow to the east, Crockenhill Lane to the south and mature treeline and the London Orbital Motorway (M25) to the west. Inner Boundary: part north and part west. Outer Boundary: part north, east, south and part west.



Looking north-east from centre of east boundary.



Looking east from centre of sub-area.



Looking towards south-west corner of sub-area from centre of sub-area.



Looking west from northern part of the public right of way.

Assessment of sub-area against NPPF Purposes 1-4

Sub-area Assessment Summary

	Purpose 1		Purpose 2	Purpose 3	Purpose 4
Sub-area scores	Criteria (a)	Criteria (b)	3	3	0
	Yes	3			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a large built-up area The sub-area is located at the edge of the large built up area of Swanley, with physical connections on part of its north and part of its west boundaries.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary

The sub-area is connected to the large built-up area of Swanley. There are no outer boundary features within a reasonable distance of the sub-area which would regularise built form and prevent outward sprawl. The sub-area has predominantly recognisable and likely to be permanent inner boundary, which provides an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring builtup areas The sub-area forms a wider part of the gap between Swanley and Farningham and Swanley and Eynsford, contributing to the overall openness and scale of these gaps. It is judged that there might be some scope for development without significant physical or perceptual erosion of the gap between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development

Approximately 3% of the sub-area is covered by built form excluding hardstanding. The built form consists of a golf clubhouse and driving range to the north-east of the sub-area, and two light industrial buildings and two smaller buildings with associated access track and car parking in the centre of the sub-area. The remainder of the sub-area contains open fields and a golf course which contributes towards a more urban managed character, and areas of mature trees and hedgerow. The topography is undulating allowing for views onto wider countryside, especially towards the north-east, south and south-west. Overall, the sub-area has a largely rural character.

Purpose (4) To preserve the setting and special character of historic towns

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside

The sub-area does not abut a historic town or provide views to a historic town and does not meet this purpose.

Summary of assessment of sub-area against NPPF purposes 1 - 4

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area performs moderately against purpose 2 and purpose 3 and does not meet purpose 4.

Strategic Assessment							
Stage 1 Parcel Scores (GBA)	Purpose 1		Purpose 2	Purpose 3	Purpose 4		
for parcel 78	Criteria (a)	Criteria (b)					
	No	0	3	4	0		

Assessment of wider impact

At a more granular level, the sub-area performs a stronger role against purposes 1 due to its proximity to Swanley and a similar role to the Stage 1 parcel against purpose 2 as it forms a wider part of the gap between the settlements of Swanley, Farningham and Eynsford. The sub-area performs a similar role to the Stage 1 parcel against purpose 4 due to its lack of physical or perceptual connections to any historic core, and performs a weaker role against purpopse 3 compared with the Stage 1 parcel due to its relatively higher proportion of urbanising influences within the sub-area such as buildings associated with the golf club and its use as a golf course.

The sub-area does not adjoin any other sub-areas and is surrounded by wider Green Belt to the north, east, south and south west. The sub-area adjoins the large built-up area of Swanley to the north-west.

The removal of the sub-area in isolation is likely to impact on the performance of surrounding Green Belt due to the high level of openness and views onto wider countryside. The role played by neighbouring Green Belt against purpose 2 would strengthen as the release would significantly reduce the gap between Farningham, Eynsford and Swanley. Although the M20 and M25 would restrict further unchecked sprawl to the north and west, the release of this sub-area would constitute disproportionate and irregular sprawl of the large built-up area. There are no outer boundary features to prevent unchecked sprawl to the east and south which are readily recognisable and likely to be permanent, which would strengthen the role played by surrounding Green Belt against purpose 1. The removal of the sub-area would also leave neighbouring Green Belt with a greater role to play against purpose 3 in maintaining the openness of the countryside.

Summary of wider assessment

Overall, the sub-area plays an important role with respect to the Stage 1 parcel, and its release in isolation would harm the performance of the wider Green Belt.

Boundary Assessment

Commentary on boundary features and impact on Green Belt boundary strength The existing inner boundaries and part of the outer boundary (south) are readily recognisable and likely to be permanent. Part of the outer boundary (north, east and south east) are readily recognisable but not likely to be permanent. If the sub-area was released, the majority of the new inner boundary would meet the NPPF definition, however part of the new inner boundary would not meet the NPPF definition and would require strengthening.

Categorisation & Recommendation

Sub-area category & recommendation

Overall, the sub-area performs strongly against the NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.