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**Our ref:** AC/CN 201634

10<sup>th</sup> February 2021

Dear Sir / Madam,

**Penn Farm, Penn Lane, Ide Hill, Sevenoaks, Kent, TN14 6BG**  
**Section 73A of the Town and Country Planning Act 1990**  
**Planning Portal Reference Number: PP-09485699**

**PLANNING STATEMENT**

This planning statement has been prepared by Strutt & Parker, on behalf of the Montreal Estate, in support of a retrospective planning application for the installation and operation of a ground source heat pump at Penn Farm, Penn Lane, Ide Hill, Sevenoaks, Kent, TN14 6BG.

The application comprises this letter which serves as a Planning Statement, the Application Form, Location Plan, Block Plan, and evidence to support the application; including a Metering Schematic Plan, Collector Layout Plan (Drawing BSL-JS-0003), and Service Trench Drawing (Drawing BSL-SK-001).

This application generates a fee of £924 payable to the Council. The application is submitted through the Planning Portal. This payment, plus the planning portal admin fee of £25, will be arranged through the Planning Portal system.

**Site and Description of Works**

Penn Farm is located on the eastern side of Penn Lane, to the north of the village of Ide Hill. The application site forms part of the wider Montreal Estate which includes several farms over approximately 2,600 acres.

The site is located within Kent Downs Area of Outstanding Natural Beauty (AONB) and within the Metropolitan Green Belt. The site does not contain any statutory or locally listed buildings, and is not within a conservation area.

Penn Farm has seen considerable recent investment with the replacement of redundant agricultural buildings with modern facilities and a refurbished building for staff welfare already completed. Works to convert another



building to form a Farm office are advanced. All these works have been carried out with the benefit of planning approval as evidenced by the table below:

Reference	Description	Decision	Date
<b>18/00635/FUL</b>	Demolition of existing dairy shed and open barn and erection of new agricultural buildings.	Granted	5th March 2018
<b>18/02211/DETAIL</b>	Details pursuant condition 3 (Surface Water Drainage Strategy) of 18/00635/FUL	Granted	17 <sup>th</sup> April 2019
<b>19/00997/AGRNOT</b>	Replacement and re-profiling of the roof on the former milking parlour and office building at Penn Farm.	Prior approval not required	30th April 2019
<b>19/01590/LDCPR</b>	Replacement roof, windows, doors and cladding.	Granted	25th July 2019
<b>19/01969/NMA</b>	Non material amendment to 18/00635/FUL	Withdrawn	30 <sup>th</sup> July 2019
<b>19/02315/CONVAR</b>	Variation of conditions 2 and 5 of 18/00635/FUL to demolish of existing dairy shed and open barn and the erection of new agricultural buildings with amendment to approved drawings and new plan numbers and removal of condition 3 (drainage).	Granted	6 <sup>th</sup> November 2019
<b>19/02970/FUL</b>	Conversion of existing farm building to Montreal Estate's Farm Office.	Granted	12 <sup>th</sup> December 2019
<b>20/01063/DETAIL</b>	Details pursuant to condition 7 (Foul water sewage disposal) of 19/02970/FUL.	Granted	9 <sup>th</sup> June 2020
<b>20/01187/CONVAR</b>	Variation of condition 2 (materials) and condition 3 (approved plans) to 19/02970/FUL for Conversion of existing farm building to Montreal Estate's Farm Office with amendment to the materials to be used and changes to the fenestration.	Granted	18 <sup>th</sup> June 2020
<b>20/02150/DETAIL</b>	Details pursuant to condition 8 (external lighting) of 19/02315/CONVAR	Granted	14 <sup>th</sup> September 2020
<b>20/02121/DETAIL</b>	Details pursuant to condition 7 (ecology) of 19/02315/CONVAR.	Granted	14 <sup>th</sup> September 2020
<b>20/02203/DETAIL</b>	Details pursuant to condition 9 (lighting) subject to 20/01187/CONVAR	Granted	28 <sup>th</sup> September 2020



20/03385/DETAIL	Details pursuant to condition 5 (landscaping) subject to 20/01187/CONVAR.	Granted	11 <sup>th</sup> January 2020
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The Montreal Estate have explored various options for serving these buildings with renewable energy. The most appropriate approach (given the green belt and AONB status of the farm) was the installation of, a Ground Source Heat Pump system.

It had originally been assumed that these works would have constituted Permitted Development undertaken under the provisions of Schedule 2, Part 14, Class L of the General Permitted Development (England) Order (2015) (as amended).

However, having been provided with details of the system as now installed, we believe that there is ambiguity as to whether all works can be regarded as falling within the curtilage of the buildings (although nevertheless within the agricultural holding of Penn Farm). For the avoidance of doubt (and without prejudice to the possibility that express permission is not required), the Estate is therefore submitting this planning application.

This sub-surface development has included the installation of:

- An underground collector area, a manifold chamber;
- 2 x 90mm header pipes, Insulated pipe for hot & hot return;
- Balanced Mains Cold Out pipe;
- Insulated pipe for flow and return to underfloor manifolds;
- Grey Water from Tank pipe; and
- Mains Water-in pipe.

The heat pump system connects directly into the existing workshop and welfare buildings, and the Farm office building which is in the process of being completed.

## **Planning Policy**

### **National Planning Policy Framework**

The National Planning Policy Framework (NPPF) was published in March 2012, revised on the 24th July 2018 and again in February 2019. The NPPF states that “*at the heart of the Policy Framework is a presumption in favour of sustainable development*” (paragraph 10 and 11). The presumption in favour of sustainable development, as set out in the Framework indicates that where this test is met, applications should be approved without delay.



Paragraph 147 of the NPPF establishes that when located in the Green Belt, some elements of renewable energy projects may comprise inappropriate development. It follows therefore that not all such schemes will be so regarded.

### **Assessment of Development**

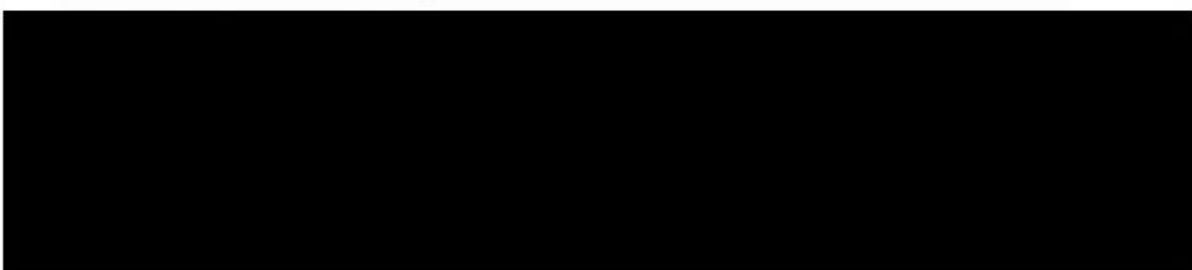
The key planning consideration in connection with this application is that no above ground features are evident from the installation of the heat pump system. The infrastructure is entirely subterranean. As a result, there is no impact on the openness of the green belt, nor any loss of land to agricultural activity. Given this fact, it is our assessment that the works cannot therefore be regarded as inappropriate in green belt terms under Paragraph 147 of the NPPF. Nor can it be considered to have an adverse landscape impact.

In Sevenoaks' planning application 18/01300/FUL, a ground source heat pump with associated equipment and construction of a small outbuilding plant room, was proposed within the curtilage of a detached dwelling. The site was within the AONB and the Metropolitan Green Belt. In addition, the application involved above ground works for the plant room, which is not required at Penn Farm. The application was assessed in relation to the impact of the outbuilding on the openness of the Green Belt, the impact on the AONB, noise, impact on neighbour amenity, and impact on the Conservation Area and Listed Building. The case officer properly assessed the underground heat pump and equipment to have no impact on both the Green Belt and the AONB. The equipment was determined to have no visual impact on amenity, nor to cause any undue impact in regards to noise.

All of the heat pump infrastructure at Penn Farm is below ground, with the exception of the installation of equipment within the existing buildings, which does not constitute development. As such, the works have had no impact on the openness of the Green Belt, nor any impact upon the beauty of landscape of the AONB. The development does not therefore conflict with the aims of the NPPF to protect the Green Belt from inappropriate development, and ensures the beauty and landscape of the AONB is preserved and enhanced. Furthermore, the development is in compliance with Sevenoaks planning policies which seek to protect the Green Belt from inappropriate development, protect the landscape of the AONB, and ensure development does not have a negative in terms of noise or impact on neighbouring amenity (policies EN1, EN2, EN5, EN7, SP1, L01, and L08). Retrospective planning permission should therefore be granted

Please do not hesitate to contact us for further information or evidence if required in order to assist with the determination of this application.

Yours faithfully



**Craig Noel BA MSc DipUP MRTPI**  
**Director**





Encls:

Location Plan  
Block Plan  
Metering Schematic Plan  
Collector Layout Plan (Drawing BSL-JS-0003)  
Service Trench Sketch (Drawing BSL-SK-001).