

SGN PLACE
SEVENOAKS GASHOLDER STATION
CRAMPTONS ROAD, SEVENOAKS, KENT, TN14 5ES
PLANNING APPLICATION - MARCH 2021



SEVENOAKS GASHOLDER STATION,
CRAMPTONS ROAD, SEVENOAKS

Planning Statement

Submitted on behalf of
SGN Property Services

March 2021

SEVENOAKS GASHOLDER STATION, CRAMPTONS ROAD, SEVENOAKS

PLANNING STATEMENT

**ON BEHALF OF
SGN PROPERTY SERVICES**

MARCH 2021

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CONTENTS

Page No.

1.0	INTRODUCTION	01
	i) Preparation and Submission of Supporting Documents	01
	ii) Scope and Purpose of Planning Statement	04
2.0	THE SITE AND ITS SURROUNDINGS	05
	i) The Site and Surrounding Area	05
	ii) Planning History	05
3.0	PROPOSED DEVELOPMENT	08
	i) Description of Development	08
	ii) Stakeholder and Community Engagement	11
4.0	PLANNING POLICY CONTEXT	13
	i) Introduction	13
	ii) National Planning Policy Framework (as updated February 2019)	13
	iii) Planning Practice Guidance (as updated 01 October 2019)	17
	iv) Sevenoaks District Council Core Strategy (February 2011)	18
	v) Sevenoaks District Council Allocations and Development Management Plan (February 2015)	19
	vi) Emerging Local Plan	22
	vii) Other Documents	23
	viii) Neighbourhood Plan	23
5.0	PLANNING ANALYSIS	27
	i) Principle of Development and Housing Delivery	27
	ii) Design, Scale and Layout	30
	iii) Quality of Residential Accommodation	32
	iv) Housing Mix and Affordable Housing	33
	v) Transport, Parking and Accessibility	34
	vi) Flood Risk and Drainage	37
	vii) Contamination	38
	viii) Trees, Landscaping, and Open Space	38
	ix) Ecology and Biodiversity	39
	x) Air Quality	40
	xi) Noise Considerations	41
	xii) Neighbouring Amenity	41
	xiii) Energy and Sustainability	42
	xiv) S106 Draft Heads of Terms	43
	xv) Other Material Considerations	44
	• Heritage and Archaeology	
6.0	CONCLUSIONS	46

APPENDICES

APPENDIX 1: Site Location Plan

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of SGN Property Services Ltd (the Applicant) in support of a Full Planning Application submitted in respect of residential development at 'Sevenoaks Gasholder Station, Crampton's Road' (hereafter referred to as the 'Site') as shown on the Site Location Plan (**Appendix 1**). The site is located within the administrative area of Sevenoaks District Council ('SDC').

1.2 The application Description of Development is as follows:

Construction of a residential development consisting of 136no. dwellings, with new vehicular accesses from Otford Road and Cramptons Road, associated parking, landscaping, drainage, boundary treatments and earthworks (the 'Proposed Development').

i) Preparation and Submission of Supporting Documents

1.3 In order to prepare a comprehensive and thorough assessment to support the planning application a number of reports have been prepared as follows:

Table 1.1: Planning Application Reports

Report	Consultant
Covering Letter	Barton Willmore
Planning Statement (incl. Draft Heads of Terms)	Barton Willmore
Design and Access Statement	MAX Architects
Townscape Assessment	MAX Architects
Flood Risk Assessment	Cube Consulting Engineers
Drainage Strategy	Cube Consulting Engineers
Preliminary Ecological Appraisal	Middlemarch Environmental
Bat Surveys	Middlemarch Environmental
Addendum to the Preliminary Ecological Appraisal	Middlemarch Environmental
Arboricultural Impact Assessment	Middlemarch Environmental
Geotechnical and Geoenvironmental Desk Study	A-squared Studio
Energy Strategy	Skelly and Couch
Transport Assessment	Vectos
Residential Travel Plan	Vectos
Delivery and Servicing Plan	Vectos
Air Quality Assessment	Ensafe Consultants
Noise Impact Assessment	Sound Matters

Report	Consultant
Daylight and Sunlight Report	eb7
Statement of Community Involvement	Kaizen

1.4 In addition, a number of drawings have been submitted to support the application:

Table 1.2: Planning Application Drawings

Drawing Title	Drawing Number
Location Plan	0330_0001 Rev P01
Boundary Plan	0330_0005 Rev P01
Site Plan	0330_0050 Rev P01
Podium Plan	0330_0900 Rev P01
Block Podium Plan	0330_0901 Rev P01
Ground Floor Plan	0330_1000 Rev P01
Rotunda Ground Floor Plan	0330_1001 Rev P01
North Block & Town Houses Ground Floor Plan	0330_1002 Rev P01
South Block & Town Houses Ground Floor Plan	0330_1003 Rev P01
Level 1 Plan	0330_1010 Rev P01
Rotunda Level 1 Plan	0330_1011 Rev P01
North Block & Town Houses Level 1 Plan	0330_1012 Rev P01
South Block & Town Houses Level 1 Plan	0330_1013 Rev P01
Level 2 Plan	0330_1020 Rev P01
Rotunda Level 2 Plan	0330_1021 Rev P01
North Block & Town Houses Level 2 Plan	0330_1022 Rev P01
South Block & Town Houses Level 2 Plan	0330_1023 Rev P01
Level 3 Plan	0330_1030 Rev P01
Rotunda Level 3 Plan	0330_1031 Rev P01
North Block & Town Houses Level 3 Plan	0330_1032 Rev P01
South Block & Town Houses Level 3 Plan	0330_1033 Rev P01
Level 4 Plan	0330_1040 Rev P01
Rotunda Level 4 Plan	0330_1041 Rev P01
North Block & Town Houses Level 4 Plan	0330_1042 Rev P01
South Block & Town Houses Level 4 Plan	0330_1043 Rev P01
Level 5 Plan	0330_1050 Rev P01
Rotunda Typical Upper Level Plan	0330_1055 Rev P01
Level 6 Plan	0330_1060 Rev P01
Level 7 Plan	0330_1070 Rev P01

Drawing Title	Drawing Number
Level 8 Plan	0330_1080 Rev P01
Level 9 Plan	0330_1090 Rev P01
Roof Plan	0330_1095 Rev P01
Rotunda Roof Plan	0330_1096 Rev P01
Section 01 Looking North	0330_2000 Rev P01
Block Section 01 Looking North 1 of 2	0330_2001 Rev P01
Block Section 01 Looking North 2 of 2	0330_2002 Rev P01
Section 02 Looking East	0330_2010 Rev P01
Block Section 02 Looking East	0330_2011 Rev P01
North Elevation (Unfolded)	0330_3000 Rev P01
Block North Elevation (Unfolded)	0330_3001 Rev P01
South Elevation	0330_3010 Rev P01
Block South Elevation	0330_3011 Rev P01
East Elevation	0330_3020 Rev P01
Block East Elevation	0330_3021 Rev P01
West Elevations	0330_3030 Rev P01
Block West Elevations	0330_3031 Rev P01
Courtyard Elevation (Unfolded)	0330_3040 Rev P01
Block Courtyard Elevation (Unfolded)	0330_3041 Rev P01
Rotunda Elevation (Unfolded)	0330_3050 Rev P01
Block Rotunda Elevation 01 (Unfolded)	0330_3051 Rev P01
Rotunda Elevation 02 (Unfolded)	0330_3052 Rev P01
North & South Blocks Bay Studies 01 & 02	0330_3100 Rev P01
North & South Blocks Bay Study 03	0330_3110 Rev P01
Townhouse and Bay Study	0330_3120 Rev P01
Rotunda Typical Bays	0330_3130 Rev P01
General Arrangement Landscaping Plan	573-CTF-XX-00-DR-L-1000 Rev 00
General Arrangement Green Roof Plan	573-CTF-XX-RL-DR-L-1001 Rev 00
Landscape Site Sections	573-CTF-XX-ZZ-DR-L-2000 Rev 00
Planting Plan	573-CTF-XX-ZZ-DR-L-5000 Rev 00
Below Ground Drainage Layout	1020-C-DR-0100 Rev P02

ii) Scope and Purpose of the Planning Statement

1.5 The purpose of this Planning Statement is to assess the planning merits of the application, explain the form and content of the Proposed Development against adopted and emerging policy guidance and best practice, and to assess the Proposed Development in light of any other material considerations.

1.6 The Planning Statement therefore:

- Describes the Site and the surrounding area (Section 2);
- Describes the Proposed Development (Section 3);
- Identifies the Planning Policy Framework by reviewing the relevant National and local planning policy and guidance (Section 4);
- Provides a Planning Analysis of the Proposed Development against the key material considerations (Section 5);
- Concludes the Planning Balance and material considerations which should be taken into account in the determination of the planning application (Section 6).

2.0 THE SITE AND ITS SURROUNDINGS

i) The Site and Surrounding Area

- 2.1 The Site is approximately 0.9 hectares (ha) in size and comprises the former gasholder site in Sevenoaks. The Site previously contained two large above ground gasholders, which were recently dismantled in 2018. The Site has always been associated with the gasholders, with the gas works being installed soon after the arrival of the railway in the late 1800s, and the gas holders remaining on the Site up until they were demolished.
- 2.2 The Site has been cleared except for a Pressure Reduction Station in the north-west corner of the Site, which is accessed from Crampton's Road, and a series of ancillary structures. The majority of the Site is hard surfaced with some vegetation.
- 2.3 The east of the Site is bordered by Crampton's Road and residential properties. The west of the Site is bordered by Otford Road, with residential properties to the north between Otford Road and Crampton's Road. To the south are several large retail warehouse premises occupied by Wickes, Carpetright and Currys PC World. There is a Public Right of Way (PRoW) which bisects the Site north/south.
- 2.4 The topography primarily slopes upwards away from and along the PRoW with a south to north level change of approximately 3.6m. The western side of the PRoW slopes upwards to the boundary with a level change of approximately 0.5m to the north and 3m to the south. To the eastern side of the PRoW the Site slopes upwards from west to east and the level changes range between 1.2m and 2.0m.
- 2.5 Sevenoaks Wildlife Reserve, which is part of the Green Belt, and is a Site of Special Scientific Interest (SSSI), is located to the west of the Site beyond Otford Road.
- 2.6 The Site is approximately 7-minutes walk from the Bat and Ball Railway Station which lies to the south and has two services per hour to London Blackfriars. The station also connects with the main Sevenoaks Station which provides quick services of under 30 minutes to London Bridge.

ii) Planning History

- 2.7 The main planning history for the Site relates to its use as a gas works, with the relevant planning history as follows:

Table 2.1 – Sevenoaks Gasholder Station Planning History

Reference	Description	Decision	Date
82/01439/HIST	Erection of detached single storey building and construction of storage yard to form distribution depot for SEGAS with ancillary parking.	Granted	16 Feb 1983
81/00626/HIST	Development of 4,060 square metres of industrial/warehousing space on land forming part of former gas works site.	Refused	20 May 1983
84/01466/HIST	Installation of portakabin for use as stores/mess room.	Granted	30 Jan 1985
85/01182/HIST	Non-food retail warehousing, residential and ancillary development.	Granted	20 Nov 1985
92/00656/HIST	Stationing of temporary site office and portable building/store, installation of chemical toilet and use of land for storage of equipment in connection with SEGAS maintenance operations.	Granted	30 Jun 1992
94/01218/HIST	Retention of temporary site office and portable building/store and continued use of land for storage of equipment in connection with SE Gas maintenance operations. (Renewal of temporary permission SE/92/0656).	Granted	06 Sep 1994
00/01018/HAZNOT	Continued storage of Natural Gas (Hazardous substances application).	Granted	28 Nov 2000
00/01171/HAZNOT	Continued storage of Natural Gas (East). (Hazardous Substances Application).	Granted	28 Nov 2000
14/03561/FUL	Replacement of existing gas installation; proposal is for two new permanent regulators and one	Granted	16 Jan 2015

Reference	Description	Decision	Date
	temporary regulator to be housed in above ground GRP kiosks. Provision of a new vehicle crossover and gated access from Crampton's Road.		
17/03608/DEMNOT	Demolition of gasholders and associated structures.	Granted	12 Dec 2017

3.0 PROPOSED DEVELOPMENT

i) Description of Development

3.1 As above, the Full Planning Application Description of Development is as follows:

Construction of a residential development consisting of 136no. dwellings, with new vehicular accesses from Otford Road and Cramptons Road, associated parking, landscaping, drainage, boundary treatments and earthworks (the 'Proposed Development').

Layout

3.2 The application proposes the re-development of the Site to provide the following:

- 10no. two and three storey townhouses located along the eastern part of the Site;
- 67no. apartments contained within a 10 storey rotunda on the western part of the Site;
- 41no. apartments within the 4 storey northern block; and
- 18no. apartments within the 4 storey southern block.

3.3 8no. of the townhouses will face onto Crampton's Road and the remaining 2no. townhouses facing internally into the development. All will be three storeys in height apart from the southern most townhouse which will be two storeys in height to respond to the existing properties along Crampton's Road.

3.4 All dwellings have been designed to comply with Nationally Described Space Standards (NDSS).

3.5 All dwellings will meet Building Regulations M4(2) Standards, with 1no. dwelling meeting M4(3) Standards, being wheelchair accessible.

3.6 The submission is accompanied by an Accommodation Schedule providing further detail on the proposed housing mix within each building and will be discussed further in Section 5.0.

Appearance

3.7 The Design and Access Statement (MAX Architects) sets out the evolution of the proposals on the Site and the design approach to the appearance of the dwellings which have been

carefully considered to respect the history of the Site as well as the surrounding residential areas. This should be read in conjunction with this Planning Statement.

3.8 The appearance of the development will comprise the following features which are supported by the Kent Design Guide:

- Provision of a variety in house types and sizes to respond to sustainable location of the Site;
- Use of sensitive materials which have been subject to several design evolutions, creating a palette that reflects the wider landscape, through yellows and greens for glazed bricks on the rotunda and red/orange/brown hues for the apartments and townhouses;
- Creation of a rotunda to reflect the height and form of the gasholders which were an integral part of the Site's history;
- Linear alignment of the townhouses to reflect the linear pattern of development along Crampton's Road;
- Creation of a green and open heart to the development with tree planting, soft landscaping and minimal hard surfacing;
- Planting around the proposed parking areas to soften the hard surfacing; and
- Retention of existing Public Right of Way, with upgrades to it to make it accessible for all users.

Landscape

3.9 The layout of the Site has been developed to create a landscape-led central heart to the development which will provide substantial soft landscaping, trees, pathways and planted mounds to create an active and interesting communal green space.

3.10 This open space will provide amenity greenspace as well as areas of informal play for future residents, making use of the topographical changes to provide integrated play features.

3.11 The landscaping drawings submitted with the application demonstrate the areas of structural planting, amenity grassland, hedging and tree planting proposed for the Site. These areas are not only focused within the heart of the development yet also around the edges of the Site to soften the parking areas and access from Otford Road. In addition, the development includes green roofs on the northern and southern apartment blocks which will be planted with a high biodiversity mix.

- 3.12 The hard landscaping within the Site will respond to the new building palette, with clay pavers for the access roads, permeable surfacing for parking areas, resin bound gravel for pedestrian pathways and the use of grasscrete for the access to the retained SGN compound.

Access

- 3.13 Vehicular access will predominately be provided from Otford Road for access to the rotunda and northern apartment block.
- 3.14 There will be a secondary vehicular access provided from Crampton's Road to access the southern apartment block.
- 3.15 The existing access into the northern part of the Site from Crampton's Road will be retained for access to the retained SGN infrastructure and will only be used for this purpose and for access to the development by emergency vehicles.
- 3.16 Pedestrian movements will be encouraged through the Site with new pathways between the apartment blocks and pavement out to Otford Road. In addition to this, the existing PRoW known as 'SU2' which runs north/south through the centre of the Site will be retained and re-surfaced as part of the development. The existing fencing around the PRoW will be removed from the central part of the Site so this route feels more open within the central green of the development.

Parking

- 3.17 All townhouses will be provided with car parking in line with Kent County Council's Parking Standards (Kent Design Guide Review: Interim Guidance Note 3 Nov 2008 – Residential Parking), applying the 'edge of centre' location standard.
- 3.18 Parking will also be provided for the apartment blocks, contained within a podium for the northern block and accessed from Otford Road, and accessed by Crampton's Road for the southern block.
- 3.19 Parking for the rotunda will be located around the western edge of the Site, accessed from Otford Road.
- 3.20 The development will provide 97no. parking spaces in total, a ratio of 0.7 spaces per dwelling. This includes 9no. disabled parking spaces.
- 3.21 The development will provide cycle parking, with 184no. spaces proposed.

ii) Stakeholder and Community Engagement

3.22 The proposal has been subject to a series of meetings with the District Council, meeting with Kent County Council (KCC) and sessions with SDC Members as follows:

- First pre-application meeting with SDC on 11 August 2020;
- Pre-application meeting with KCC Highways on 27 October 2020;
- Second pre-application meeting with SDC on 06 November 2020;
- Design Review Panel afternoon with Design South East on 20 November 2020;
- Councillor's Briefing on 26 November 2020;
- Follow-up pre-application meeting with SDC following Member's Briefing on 06 December 2020; and
- General correspondence with KCC Public Rights of Way team throughout 2020.

3.23 The pre-application advice received confirmed the principle of the development, including the increase in density on the Site when compared with the current site allocation and the design approach to the rotunda. The scheme was also received positively by Councillors and the scheme has been refined further taking into account the advice and opinions received.

3.24 This scheme has also been subject to ongoing engagement with SDC's Urban Design Officer as the plans have evolved and further demonstrates the Applicant's engagement with the Council.

3.25 Further details of the design iterations following the pre-application meetings can be found within the DAS.

3.26 In addition to the above, the proposal has also been subject to public consultation and community engagement more widely, as follows:

- Distribution of letters and flyers regarding the emerging plans to 400 households closest to the Site;
- Distribution of flyers to 900 households living further away;
- Creation of a dedicated website to present the emerging proposals with a link to an on-line survey; and
- Creation of a dedicated phone line and email address to ensure calls and requests for further information could be provided.

- 3.27 The Statement of Community Involvement (Kaizen, March 2021) submitted with the application sets out the results of the engagement in detail. However, this has been summarised within this section.
- 3.28 The website proved to be popular, with 905 unique views and 376 downloads of the emerging plans. Of these, 205 members of the community shared their views through the on-line survey, paper survey, emails and telephone calls.
- 3.29 The feedback from the community engagement indicates that the most common concerns with the proposed development include:
- Parking;
 - Too many houses;
 - Impact on traffic and congestion;
 - Designs not in keeping with the area, poor quality of the design;
 - Negative impact on local infrastructure and services;
 - Environmental concerns including light pollution and lack of green space;
 - Impact on quality of life;
 - Height is too high; and
 - Impact on views, light and privacy of neighbours.
- 3.30 Interestingly, the results show that despite concerns with the proposal, in general, 50% of the community are supportive of proposals for much needed housing in the area.
- 3.31 Relating specifically to the proposals, while respondents were generally not supportive of the designs, 44% of respondents were pleased to see improvements to the PRow through the Site.
- 3.32 This Planning Statement will go on to set out how the above concerns have been taken into account as part of the proposals. It will demonstrate that the development will contribute significantly to the much needed high quality housing within the local area while ensuring it does not detrimentally impact on the highway network, environment, amenity or general character of the area.

4.0 PLANNING POLICY CONTEXT

i) Introduction

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that where the Development Plan contains relevant policies, applications for development which are in accordance with these policies should be allowed unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) are material considerations.

4.2 Throughout this section, the planning proposals for the Site are addressed in the context of the Development Plan for Sevenoaks District Council. The relevant documents to this application comprise:

- Core Strategy (February 2011);
- Allocations and Development Management Plan (February 2015);
- Interactive Policies Map; and
- The Sevenoaks District Strategy for Transport 2010-2026 (July 2010).

4.3 The area is contained within that put forward by Sevenoaks Town Council as a designated neighbourhood area. This will be explored further below.

4.4 The area is not one safeguarded for minerals, therefore although part of the Development Plan, the Kent Minerals and Waste Local Plan does not apply in this instance.

ii) National Planning Policy Framework (as updated February 2019)

4.5 On 24 July 2018, the revised National Planning Policy Framework was published by the Government, replacing the previous 2012 NPPF. Minor amendments were subsequently made to the NPPF (February 2019). The NPPF sets out the Government's planning policies for England and how these are expected to be applied, representing a material consideration in all planning decisions.

4.6 For dealing with planning applications, the policies in the Framework are applied from the date of publication. Plans may also need to be revised to reflect policy changes which the revised Framework has made.

- 4.7 It is noted the Government is currently consulting on changes to the NPPF which include: the introduction of Design Codes at a national and local level; greater emphasis on beauty and place-making; support for development that both mitigates climate change and ensures it can adapt to its effects; and more funding for heritage.

Section 2 – Achieving Sustainable Development

- 4.8 The central tenet of the NPPF remains the delivery of “sustainable development” through the planning process. Paragraph 8 of the NPPF identifies that there are three dimensions of sustainable development: **economic, social** and **environmental**. It is recognised that these roles should not be undertaken in isolation, because they are mutually dependant, as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in a mutually supportive way (so that opportunities can be taken to secure net gains across each of the different objectives).

- 4.9 In order to achieve sustainable development, the NPPF is separated into sections against which proposals should be assessed and the relevant aspects of which are highlighted below.
- 4.10 The NPPF (Para 11) places significant emphasis on the “presumption in favour of sustainable development” which should be applied through plan-making and decision-taking.
- 4.11 In terms of decision-taking, Paragraph 11 states that this means approving development proposals that accord with an up-to-date Development Plan, without delay. However, where there are no relevant Development Plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:
- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

Section 5 – Delivering a Sufficient Supply of Homes

- 4.12 Paragraph 59 makes it clear that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Section 8 – Promoting Healthy and Safe Communities

4.13 The NPPF at Paragraph 91 seeks to ensure decisions aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

Section 9 – Promoting Sustainable Transport

4.14 Promoting sustainable transport should be considered from the earliest stages of a development proposal so that:

- The potential impacts of development of transport networks can be addressed;
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
- Opportunities to promote walking, cycling and public transport use are identified and pursued;
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

4.15 Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (underlining for emphasis).

Section 11 – Making Effective Use of Land

4.16 Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) The identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) Local market conditions and viability;
- c) The availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) The desirability of maintaining character and setting; and
- e) The importance of securing well-designed, attractive and healthy places.

Section 12 – Achieving Well-designed Places

- 4.17 The NPPF attaches importance to good design which is considered synonymous with sustainable development. Planning policies and decisions should ensure that developments (as set out at Paragraph 127):
- a) Function well and add to the quality of an area;
 - b) Are visually attractive as a result of good architecture;
 - c) Respond to local character and history;
 - d) Establish or maintain a strong sense of place;
 - e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development;
 - f) Creates places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion and resilience.

- 4.18 Paragraph 130 states that permission should be refused for development of poor design that fails to take the opportunity for improving the character and quality of an area and the way it functions, however, where the design of a development clearly accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development.

Section 14 – Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 4.19 Paragraph 150 states that development should avoid increasing vulnerability to a range of impacts arising from climate change.
- 4.20 Paragraph 163 sets out that flood risk should not increase elsewhere and, where appropriate, applications should be supported by a site-specific flood risk assessment. It also sets out the information required to assess a proposal should it be located within areas at risk from flooding, including ensuring development is appropriately flood resistant and resilient and incorporates sustainable drainage systems.

Section 15 – Conserving and Enhancing the Natural Environment

- 4.21 Paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by measures such as protecting and enhancing valued landscapes and minimising impacts on and providing net gains for biodiversity.
- 4.22 The NPPF (Para 170) also states that existing and future development should be prevented from being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution and land instability.

Section 4 – Decision Making

- 4.23 The NPPF directs that LPAs should approach decision making in a positive and creative way, by approving development proposals that accord with an up-to-date development plan. LPAs should therefore work positively with applicants to deliver sustainable developments that secure improvements to the economic, social and environmental conditions of an area.

Annex 1: Implementation

- 4.24 The Annex reiterates that the policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of its publication. Plans may need to be revised to reflect policy changes which the replacement Framework has made.
- 4.25 Existing policies should not always be considered out-of-date simply because they were adopted or made prior to the revised NPPF. Due weight should be given to them according to their degree of consistency with the Framework.

iii) Planning Practice Guidance (as updated 01 October 2019)

- 4.26 The Planning Practice Guidance (PPG) builds on principles within the NPPF and provides further detailed technical guidance, with reference to relevant legislation and other guidance.
- 4.27 The PPG sets out the importance of good design. It advocates the need for quality design and confirms that this is an integral part of achieving the fundamental objective of sustainable development. It affirms how good design should follow the 10 characteristics set out in the National Design Guide.
- 4.28 The PPG also considers the effective use of land and how development can adapt to climate change.

iv) SDC Core Strategy (2011)

4.29 The Core Strategy brings together objectives and overarching principles to deliver development within the District up to 2026. It was adopted on 22 February 2011 and forms part of the Development Plan. The following policies are considered relevant for development at the Site:

- **Policy LO1: Distribution of Development** sets out that development will be focused in the built confines of existing settlements with the Sevenoaks Urban Area as the principal focus for development.
- **Policy LO2: Development in Sevenoaks Urban Area** sets out that provision will be made for approximately 1,330 dwellings (2006-2026) on a range of sites suitable for residential use within the urban area. It seeks to focus development in locations within the town centre or those within easy walking distance of the town centre or railway stations.
- **Policy SP1: Design of New Development and Conservation** considers that all new development should be designed to a high quality and should respond to the distinctive local character of the area in which it is situated. It also sets out that new development should create safe, inclusive and attractive environments that meet the needs of users, incorporate principles of sustainable development and maintain and enhance biodiversity.
- **Policy SP2: Sustainable Development** sets out that the District will contribute to reducing the causes and effects of climate change by promoting best practice in sustainable design and construction to improve the energy and water efficiency of all new development and contribute to the goal of achieving zero carbon development as soon as possible. This includes a 10% reduction in the total carbon emissions through the on-site installation and implementation of decentralised, renewable or low-carbon energy sources.
- **Policy SP3: Provision of Affordable Housing** states that development should seek to provide 40% affordable housing when proposing 15 dwellings or more, with at least 65% of the affordable units social rented, unless an alternative mix is required by the Council. In exceptional circumstances where it is demonstrated to the Council's satisfaction through an independent assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be

accepted or, failing that, a financial contribution towards provision off-site will be required.

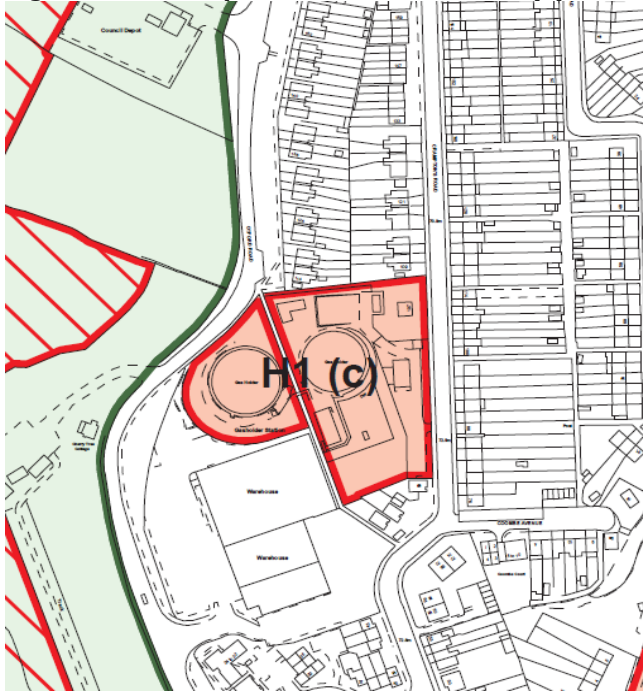
- **Policy SP5: Housing Size and Type** sets out that the Council will require new housing development to contribute to a mix of different housing types in residential area taking into account the existing pattern of housing in the area, evidence of local need and site specific factors. It will seek the inclusion of small units (less than three bedrooms) in new development schemes in suitable locations to increase the proportion of smaller units in the District housing stock.
- **Policy SP7: Density of Housing Development** states that within the urban areas of Sevenoaks, Swanley and Edenbridge new residential development will be expected to achieve a density of 4dph. In suitable locations close to Sevenoaks and Swanley town centres higher densities will be encouraged.
- **Policy SP9: Infrastructure Provision** ensures that where new development creates a requirement for new or improved physical, social and green infrastructure beyond existing provision, developers will be expected to provide, or contribute to, the additional requirement.
- **Policy SP10: Green Infrastructure, Open Space, Sport and Recreation Provision** sets out that residential development proposals in areas where there is an existing shortage in open space provision, or where the development would otherwise result in a shortage in provision, will be expected to contribute to overcoming the shortage, either through on site provision or a financial contribution to off site provision.
- **Policy SP11: Biodiversity** ensures the biodiversity of the District will be conserved and opportunities sought for enhancement to ensure no net loss of biodiversity. It states that sites designated for biodiversity value will be protected with the highest level of protection given to nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and sites of local importance for biodiversity.

v) SDC Allocations and Development Management Plan (2015)

4.30 The SDC Allocations and Development Management Plan (ADMP) was adopted on 17 February 2015 and sets out allocated sites as well as the development management policies used to guide development in the District. It forms part of the Development Plan.

- 4.31 The Site is allocated within the ADMP for approximately 39 residential units under Policy H1(c) at a density of 40dph.

Figure 4.1 – Adopted Site Allocation H1(c) Sevenoaks Gasholders



- 4.32 The ADMP also provides a series of development management policies that are relevant to the proposal for this Site, as follows:

- **Policy SC1: Presumption in Favour of Sustainable Development** sets out that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.
- **Policy EN1: Design Principles** states that proposals will be permitted where:
 - a) the form of the proposed development would respond to the scale, height, materials and site coverage of the area;
 - b) the layout of the proposed development would respect the topography and character of the site and the surrounding area and sensitively incorporate natural features such as trees, hedges and ponds within the site;
 - c) the proposal would not result in the loss of buildings, open spaces or green infrastructure that would have an unacceptable impact on the character of the area;
 - d) the proposal would ensure satisfactory means of access for vehicles and pedestrians and provide adequate parking and refuse facilities;

- e) the proposal would incorporate, within the design opportunities for increasing biodiversity potential, where possible, and retaining and enhancing Green Infrastructure features including sustainable drainage systems. Proposals that affect a site's existing biodiversity and Green Infrastructure should be designed in a way that avoids or mitigates any potential harm;
 - f) the design of new buildings and the layout of spaces, including footways, car and cycle parking areas, would be permeable and provide connectivity with neighbouring areas;
 - g) new development would be inclusive and where appropriate make satisfactory provision for the safe and easy access of those with disabilities; and
 - h) the design of new developments would result in the creation of a safe and secure environment and incorporate adequate security measures and features to deter crime, fear of crime, disorder and anti-social behaviour.
- **Policy EN2: Amenity Protection** states that proposals will be permitted where they would provide for adequate residential amenities for existing and future occupiers of the development and would safeguard the amenities of existing and future occupants of nearby properties in respect of excessive noise, vibration, odour, air pollution, activity or vehicle movements, overlooking or visual intrusion, unacceptable loss of privacy, or light enjoyed by the occupiers of nearby properties.
 - **Policy EN5: Landscape** sets out that proposals that affect the landscape throughout the District will be permitted where they would:
 - a) conserve the character of the landscape, including areas of tranquillity; and
 - b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD.
 - **Policy EN6: Outdoor Lighting** states that proposals for lighting will be permitted where lighting would be well integrated within the scheme, any impact on the night sky would be minimised, there would be no harmful impact on privacy or amenity for nearby residential properties, and any potential impacts on wildlife would be avoided or adequately mitigated where avoidance is not possible.
 - **Policy EN7: Noise Pollution** sets out that proposals will be permitted where it would not have an unacceptable impact when considered against the indoor and outdoor acoustic environment including existing and future occupiers of the development and the amenities of existing and future occupants of nearby properties and would not result in unacceptable noise levels from existing noise sources that cannot be adequately mitigated.

- **Policy GI1: Green Infrastructure and New Development**

sets out that proposals will be permitted where opportunities for provision of additional green infrastructure have been fully considered and would be provided where justified by the character of the area or the need for open space. It also states that open spaces should be located where they can provide a safe link for the population and connectivity for biodiversity with existing green infrastructure.

- **Policy T1: Mitigating Travel Impact** sets out that new developments will be required to mitigate any adverse travel impacts, including their impact on congestion and safety, environmental impact, such as noise and tranquillity, pollution and impact on amenity and health. This may mean ensuring adequate provision is made for integrated and improved transport infrastructure or other appropriate mitigation measures, through direct improvements and/or developer contributions.

- **Policy T2: Vehicle Parking** states that new residential developments should be made in accordance with the current KCC vehicle parking standards in Interim Guidance Note 3 to the Kent Design Guide (or any subsequent replacement).

It also makes provision for departing from the minimum or maximum requirements taking into account specific circumstances that may require lower or higher parking provision, including as a result of the development site's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems.

- **Policy T3: Provision of Electrical Vehicle Charging Points** sets out that all new residential developments should include an electrical socket with suitable voltage and wiring for the safe charging of electric vehicles. It also states that schemes for new apartments and houses with separate parking areas should include a scheme for at least one communal charging point.

vi) Emerging Local Plan

- 4.33 The emerging SDC Local Plan consists of the Local Plan Proposed Submission Version (Regulation 19 Consultation December 2018). Although the emerging Local Plan has been partly subject to an 'Examination in Public' in late 2019, the remaining Local Plan Hearing sessions were cancelled as the Planning Inspectorate suggested SDC should withdraw their emerging Local Plan due to a lack of 'Duty to Cooperate'.

- 4.34 On 4 June 2020, SDC was granted permission to bring a judicial review against the Planning Inspector’s decision to reject the emerging draft Local Plan. This was dismissed by the High Court on 13 November 2020.
- 4.35 SDC launched an appeal against the High Court ruling in January 2021.
- 4.36 As such, at the time of writing, the emerging Local Plan has limited weight in consideration.

vii) Other Documents

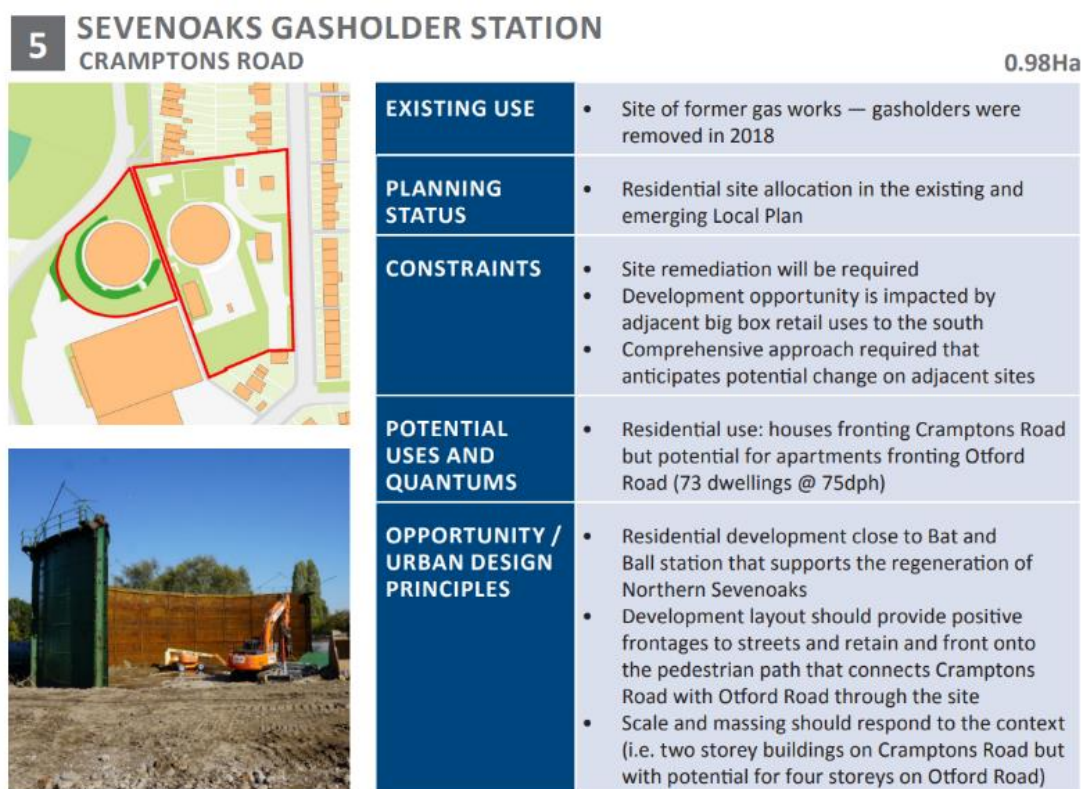
- 4.37 The planning proposals for the Site have had regard to relevant Supplementary Planning Documents (SPD). This includes:
- Affordable Housing (October 2011);
 - Sevenoaks Residential Character Area Assessment (April 2012); and
 - Kent Design Guide (July 2007).
- 4.38 The Sevenoaks District Strategy for Transport (July 2010) sets out the approach to transport across the District to 2026. The primary objective set out within the Strategy for the Sevenoaks Urban Area includes improving public transport interchange facilities and improving facilities for walking and cycling. The Strategy identifies the Bat and Ball signalised junction as a “congestion hotspot” and that strategies to provide improvements to the roads and reduce the need to travel by car should be encouraged.
- 4.39 The SPDs and other documents are referred to in other accompanying reports with related planning considerations detailed under the planning analysis as follows in Section 5.0.

viii) Neighbourhood Plan

- 4.40 The Sevenoaks Neighbourhood Area was designated in 2013 and since this time consultations have been carried out for the preparation of the Neighbourhood Plan. This included a six-week public consultation from 31 January 2020 to 13 March 2020 on the Consultation Draft of the NP.
- 4.41 The NP sets out that it will provide a long-term strategy for Sevenoaks, identifying development opportunities including the potential for approximately 1,000 new homes in Northern Sevenoaks of which approximately 600 homes, together with a significant new open space will be at the Greatness Quarry site. In addition, it considers the delivery of leisure actives including a boating lake, parkland and walking and cycling routes.

- 4.42 Alongside the NP, a Northern Sevenoaks Masterplan has been produced. This was subject to public consultation in May/June 2017. It focuses on community infrastructure and facilities at Bat and Ball in addition to housing and employment.
- 4.43 The emerging Northern Sevenoaks Masterplan designates the Site for residential development. Policy D1 of the draft NP states development will be promoted on sustainable sites, which include the 'Sevenoaks Gasholder Station'.
- 4.44 The Site is set out within the draft NP as providing houses along Cramptons Road, and potential for apartments fronting Otford Road at a density of around 75dph as below:

Figure 4.2 – Extract from Sevenoaks Town NP Consultation Draft (January 2020)



- 4.45 The above is clear that the provision of housing at a high density is supported on the Site, including the use of apartments.
- 4.46 Other relevant policies contained within the NP include:
 - Policy C3:** ensures development in residential areas will be of a high quality and take account of the Sevenoaks Residential Character Area Assessment Supplementary Planning Document (SPD).

- **Policy C7:** states that development will be supported where it protects and enhances the landscape setting and character of the town and visibility to and from the open countryside.
- **Policy L2:** sets out that proposals to remove trees and hedgerows must be justified and any trees or hedgerows lost through development should be replaced. New tree and hedgerow provision should be of a species that is both suitable for the location and responds to the character and biodiversity of the site within which it is located.
- **Policy M1:** states that the NP promotes walking and cycling and supports the removal of barriers to pedestrian and cycle movement across the town.
- **Policy M3:** states the NP promotes the delivery of a new walking and cycling route that connects Bat and Ball / Otford Road with Dunton Green.
- **Policy D2:** states that development proposals that fall within the Northern Sevenoaks Masterplan study area boundary will follow the development principles set out in the Northern Sevenoaks Masterplan.
- **Policy D3:** sets out that all residential development proposals must provide a range of homes to meet local needs. Affordable housing provision will be required as part of all eligible developments.
- **Policy D5:** promotes the delivery of new homes that are energy efficient, that are constructed using materials that reduce the impact on the environment and that are designed to maximise daylight and sun penetration whilst also avoiding overheating.

4.47 The progress with the NP was on hold while the District Council was awaiting a decision on the emerging Local Plan. As such, the current timescales for progression with the NP are as follows:

- Submission of draft NP to SDC in April 2021; and
- Referendum on the NP in June 2021

4.48 Therefore, the masterplan has limited weight in planning consideration as the NP is not yet adopted.

4.49 There is the potential that the NP could be adopted following the Referendum in June, by which time this application may be in its latter stages of determination by SDC. If this were

the case, it is considered the proposals are in accordance with draft Policy D1 of the NP as promoting development on a sustainable site that has been identified for residential development.

5.0 PLANNING ANALYSIS

5.1 This section of the Planning Statement sets out an assessment of the Proposed Development against the relevant planning policy and guidance. A topic-based approach is taken in respect of the prevailing planning considerations, with due regard to the planning policies at a National and local level as previously set out within Section 4.0.

5.2 The following overarching planning considerations apply to this application submission:

- i) Principle of Development and Housing Delivery;
- ii) Design, Scale and Layout;
- iii) Quality of Residential Accommodation;
- iv) Housing Mix and Affordable Housing;
- v) Transport, Parking and Accessibility;
- vi) Flood Risk and Drainage;
- vii) Contamination;
- viii) Trees, Landscaping and Open Space;
- ix) Ecology and Biodiversity;
- x) Air Quality;
- xi) Noise Considerations;
- xii) Neighbouring Amenity;
- xiii) Energy and Sustainability;
- xiv) S106 Draft Heads of Terms; and
- xv) Other Material Considerations

i) Principle of Development and Housing Delivery

5.3 The District's spatial strategy requires effective use of urban land within existing settlements, while protecting the environment and the Green Belt. This vision seeks for the majority of new housing development to be focused in the urban areas of Sevenoaks and Swanley (under Policy LO1 of the Core Strategy). The Site lies within the urban confines of Sevenoaks, outside the Green Belt.

5.4 In addition, Policy LO2 of the Core Strategy seeks to focus development in locations within the town centre or those within easy walking distance of the town centre or railway stations. The Site is within easy walking distance of Bat and Ball station (under 10 minutes), and has been identified by the draft Sevenoaks NP as a sustainable site.

- 5.5 Within the adopted ADMP, the Site (ref: H1(c) Sevenoaks Gasholder Station) is allocated for residential development with an approximate net capacity of 39 units. Within the previously emerging Local Plan, the Site (ref: ST2 (9) Sevenoaks Gasholders) was allocated for residential development with a site capacity of 98 units. It is noted that SDC's Brownfield Register identifies the Site (ref: BFR108) with a net dwelling range of 98 units. The Council has therefore clearly considered the Site should be accommodating more than that set out within the ADMP. The principle of development of the Site for residential use is therefore acceptable, as it has been allocated within both the adopted and emerging Local Plans.
- 5.6 When considering the increase in housing requirements since the Core Strategy was adopted, which set a housing target of 165 dwellings per year, to the previously emerging Local Plan which considered the Government's housing target of 698 dwellings per year, it is clear there is a need for more housing delivery in the District.
- 5.7 Indeed, the Council within its own Housing Delivery Test Action Plan (August 2020) identified that there is only a 2.6-year supply of deliverable housing sites (which included the 20% buffer required as an 'Action Plan' authority).
- 5.8 Moreover, since this time the most recent Housing Delivery Test results (19 January 2021) show that the Council has only delivered 70% of its requirement over the past 3 years, moving from an 'Action Plan' authority to 'Presumption'. As such, development in the District is subject to Paragraph 11d of the NPPF. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or**
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:**
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**
- 5.9 The NPPF promotes the effective use of land and gives substantial weight to the value of using suitable brownfield land within settlements for homes, and supporting appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (Para 118). The Site entirely complies with this approach, taking advantage of sustainably located brownfield land, making effective use of this land and bringing it back into a suitable use within the urban confines of an existing settlement, as encouraged by Policy LO1 of the Core Strategy and the NPPF.

- 5.10 The Proposed Development represents a rare opportunity to provide an increased number of dwellings on a sustainable site, in accordance with Paragraph 123 of the NPPF which makes clear that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.
- 5.11 Moreover, the Site provides an opportunity for the Council to increase its housing supply and delivery on a highly sustainable site that lies outside the Green Belt. This will assist in reducing pressure on potential Green Belt sites outside the urban confines of Sevenoaks, ensuring that the Council does not have to rely upon protected areas to meet its housing need.
- 5.12 It should also be noted that the development proposal would bring forward several immediate economic benefits alongside wider social and environmental benefits, fully according with the policy objectives of the NPPF, and that further weigh in favour of the principle of the proposals, including:

A Social Role:

- The creation of 136 dwellings that include a range of types of housing to support the creation of strong, vibrant and healthy communities through provision of studio, 1-bed, 2-bed and 3-bed dwellings;
- All dwellings will be designed to meet NDSS and M4(2) Standards;
- The provision of open space within the heart of the Site which will contribute to increasing the quality of the environment, providing a range of social experiences;
- All properties to have private amenity space; and
- Open space will be in easy walking distance of the new homes and thereby encouraging the development of healthy communities.

An Economic Role:

- The development will create local jobs through construction process, contributing to the local economy;
- The occupation of the development by future residents will deliver retail expenditure on convenience goods, comparison goods and expenditure on leisure goods and services in the local area;
- Financial contributions through CIL which will benefit the local area; and
- SDC would gain income from Council Tax Revenue and the New Homes Bonus.

An Environmental Role:

- The Site is a sustainable, accessible location with additional connections and improvements to pedestrian and cycle routes;
- The proposed development is not located within an area of flood risk;
- Through the delivery of a high-quality sensitive scheme development provides the opportunity to enhance the natural environment in terms of both landscape and ecology habitat and benefits when compared to the existing brownfield land;
- The use of solar panels and a fabric first approach will contribute to creating a more energy efficient scheme; and
- Creation of new habitat features including biodiverse green roofs, planting of trees and bird and bat boxes.

5.13 As such, the Proposed Development is considered to be acceptable in principle, with a density of development that is entirely consistent with the NPPF as sustainable development that will assist SDC in securing a much-needed increased rate of housing delivery while protecting the Green Belt.

ii) Design, Scale and Layout*Layout*

5.14 The re-development of the Site proposes the following:

- New vehicular and pedestrian accesses from Otford Road and Crampton's Road;
- 10 storey rotunda building within the western part of the Site, designed to reflect the form of the original gasholders;
- 4 storey apartment blocks on the eastern part of the Site, an a 'C' shape formation to frame a central open green amenity space;
- 2 and 3 storey town houses fronting Crampton's Road, with generous terraces and on plot parking; and
- Retention and improvement of existing PRow which runs centrally through the Site.

5.15 The layout of the development has been based upon the previous location of the gasholders on the western part of the Site and as this part of the Site is set the furthest away from residential properties. The circular character of the rotunda building is reflected within the layout of the parking around the western edge of the Site.

- 5.16 The northern and southern apartment blocks will frame the central space of the Site, including the existing PRoW, creating an open and green amenity space which can be enjoyed by existing and future residents. Parking will be provided for the northern block within a podium beneath the building, with parking for the southern apartment block located in the southern part of the Site.
- 5.17 The layout of the development includes appropriate refuse and recycling facilities, contained within the north-eastern part of the ground floor of the rotunda building, within the entrance to the podium in the northern apartment block and within the northern part of the ground floor of the southern block. Appropriate drag distances are achieved for the properties and suitable access is provided for refuse vehicles. The proposal therefore accords with Policy EN1 of the ADMP in this regard.
- 5.18 The layout of the development includes the retention of the existing gas infrastructure compound along the northern boundary which would not be removed as part of the development.

Design and Scale

- 5.19 The development has been designed to respond to the historic use of the Site, as well as responding to the existing character of the area. The Design and Access Statement (MAX Architects) provides full detail on the evolution of the design process, taking into account the on-site and off-site opportunities and constraints.
- 5.20 The townhouses have a linear form that will respond to the character of Crampton's Road, while the apartment blocks behind will respond to the internal spaces of the Site, framing the central green heart of the development.
- 5.21 The materials for the apartments and townhouses will feature red/multi-coloured brickwork with bronze detailing for fenestration, balustrades, panels and louvres. This effect on the overall design of the properties is demonstrated within the elevational treatment visuals within the DAS, and illustrate that the individual elements of the proposal, as well as the development as a whole will respond to the materials palette within the existing streetscene and wider landscape, consistent with Policy EN1 of the ADMP and the Kent Design Guide.
- 5.22 The proposed rotunda building has also been designed using materials that respond to the wider character of the area, as demonstrated within the DAS. These include the use of light red/multi-coloured brickwork, set against dark grey fenestration and balcony balustrades. The rotunda will also feature glazed brickwork to the vertical piers ranging from dark green

to pale yellow. This has been designed to respond to the wider landscape, including the wildlife reserve.

- 5.23 The Townscape Assessment (MAX Architects, March 2021) provides detail on the impact of the proposed development within the wider area, including from the wildlife reserve. The view from this point is screened by trees due to the route of the footpath, however, the Assessment demonstrates that even when viewed from the wildlife reserve the rotunda would provide a focal point similar to the previous gasholder structure.
- 5.24 In addition, the site sections illustrate that the Site lies within a valley which ensures the rotunda would not detrimentally impact on the skyline when viewed from wider vistas such as at Otford Mount to the north and Rye Lane to the west.
- 5.25 The Townscape Assessment demonstrates that the proposal will change the views of the Site, yet this would not be harmful to the immediate or wider character of the area through the form and layout of the development and the careful use of the materials palette, as discussed above.
- 5.26 Indeed, this materials palette has been subject to lengthy discussion with SDC's Urban Design Officer and has resulted in a materials palette that is acceptable to SDC, as it provides interest while responding to the character of the area. Further details of materials can be secured by condition if required.
- 5.27 The DAS provides full detail on the evolution of the design process, taking into account the on-site and off-site opportunities and constraints. As demonstrated above, and within the DAS, the development will respond to the historic use of the Site, respect neighbouring amenity and the general character of the area, while also ensuring the re-development of the Site can achieve the most efficient use of land for residential use. The proposal therefore complies with Policy EN1 of the ADMP, the Kent Design Guide and the NPPF.

iii) Quality of Residential Accommodation

- 5.28 All apartments and townhouses will comply with NDSS, providing high quality internal spaces. They will all also have access to private amenity space through balconies for apartments and terraces for the townhouses. This will ensure appropriate amenity space for all occupants, in accordance with Policy EN2 of the ADMP.
- 5.29 All apartments will be highly accessible, with staircases and lifts within the apartment blocks and rotunda to provide easy access to parking, cycle storage and bin storage.

- 5.30 In addition, all dwellings will meet Building Regulations M4(2) Standards and 1no. dwelling will meet M4(3) Standards, being wheelchair accessible.
- 5.31 The design of the development has taken into account the light levels received by the apartments and townhouses. The Energy Statement (Skelly and Couch, March 2021) confirms that all dwellings on the Site will benefit from good levels of daylight, above the minimum requirements, thus providing a good level of amenity within the apartments and townhouses.
- 5.32 The development has also been designed so that the majority of the apartments and townhouses face east or west with some south-facing properties, and some dual-aspect units. This has therefore reduced the number of north facing properties, further ensuring a good level of amenity for future residents.
- 5.33 It is therefore considered the quality of housing will be of a high standard, with appropriate levels of daylight and sunlight, outlook and privacy provided for all properties. This would be consistent with Policy EN2 of the ADMP and the NPPF.

iv) Housing Mix and Affordable Housing

- 5.34 Policy SP5 of the Core Strategy seeks to increase the number of smaller units (less than 3 bedrooms) in new developments in suitable locations. This is due to the predominance of large family sized housing within the District, which creates an opportunity for smaller units to contribute to the different housing types in the District, while taking in account existing patterns of development. Adopted policy seeks at least 50% of housing as 2-bedroom or less across all new developments, based on the previous Strategic Housing Market Assessment (SHMA) from 2009.
- 5.35 However, since this time the SHMA has been updated to reflect the changes in the existing housing stock and market changes. As such the SHMA (2015) sets out the following housing mix to 2023:

Table 5.1 - 2015 Strategic Market Housing Assessment Unit Mix (2013-2023)

	1-bedroom	2-bedroom	3-bedroom	4-bedroom
Market	5-10%	25-30%	40-45%	20-25%
Affordable	30-35%	30-35%	35-40%	15-20%
All Dwellings	15-20%	25-30%	35-40%	15-20%

5.36 The Proposed Development will provide the following mix:

Table 5.2 – Proposed Housing Mix

	1-bedroom (incl. studio)	2-bedroom	3-bedroom	Total
Market	46	57	25	128
Affordable	0	1	7	8
Total	46	58	32	136
Total %	33%	43%	24%	100%

5.37 The proposed development will provide a greater number of 1 and 2 bed units than set out within the SMHA (2015), however, the provision of smaller units is supported by Policy SP5. As such, the proposed mix is in general accordance with this policy.

Affordable Housing

5.38 The Viability Report submitted with the application demonstrates that the scheme cannot support the delivery of affordable housing due to the site-specific constraints.

5.39 However, the Applicant is keen to make an affordable offer in line with its core values of creating places that can accommodate all within the community. As such, the Applicant is able to provide 8no. affordable housing units, as Discounted Market Sale properties. These will comprise the 8no. townhouses fronting onto Crampton’s Road and can be secured through a S106 Agreement.

v) Transport, Parking and Accessibility

Access and Transport Considerations

5.40 Policy T1 of the ADMP sets out that new developments will be required to mitigate any adverse travel impacts, including their impact on congestion and safety, environmental impact, such as noise and tranquillity, pollution and impact on amenity and health.

5.41 The application proposes a new access to the development from Otford Road. This will provide vehicular and pedestrian access to the rotunda and the northern apartment block.

5.42 There will also be a new vehicular and pedestrian access from Crampton’s Road providing access to the southern apartment block. This access will be one-way entry due to the visibility splays required in this location. This will mean residents with vehicles will exit the Site at

Oxford Road. The Transport Assessment (Vectos, March 2021) demonstrates this arrangement would not harmfully impact the highway network at Oxford Road.

- 5.43 The existing access from Crampton's Road will be retained to be used by SGN to access the gas infrastructure of the north of the Site which will remain in place. This will not be used by residents, but will be used by emergency vehicles if access is required to the northern part of the north apartment block.
- 5.44 These proposed access from Oxford Road will be positioned so it will create a safe entry and exit from the Site and ensure any vehicles exiting from the service road to the north would not be put at risk. Appropriate visibility splays will be provided for this access and the new access from Crampton's Road to ensure safe entry and exit for vehicles and pedestrians from the Site.
- 5.45 The Transport Assessment demonstrates that the proposed development will result in approximately 59 two-way vehicle trips during the AM peak hour and 53 two-way vehicle movements during the PM peak hour. This equates to approximately one additional two-way vehicle movement per minute during the AM and PM peak hours. The multi-modal trip generation anticipates 61% of residents will travel by vehicle modes in the peak periods.
- 5.46 It is fully demonstrated within the Transport Assessment that these trips, alongside delivery and servicing trips would not result on a severe impact on the highway network, including that at Bat and Ball junction. The combination of the provision of cycle spaces across the development, the provision of electrical vehicle charging points, reduction in the number of vehicle parking spaces onsite, provision of a Travel Plan and potential for a Car Club scheme will ensure appropriate mitigation of the development.
- 5.47 The development will therefore accord with Policy T1 of the ADMP and the NPPF in ensuring any impacts are mitigated and that development will not result in a severe impact on the highway network.

Movement within the Site

- 5.48 Policy M3 of the draft Sevenoaks NP states the NP promotes the delivery of a new walking and cycling route that connects Bat and Ball / Oxford Road with Dunton Green. It considers using the existing PRow which runs through the Site as a way of facilitating this.
- 5.49 The existing PRow will be retained and re-surfaced as part of the development. The existing fencing around the PRow will be removed so this route becomes part of the development. This will open up this route to users, improving its feeling of safety and promoting a more

active use of this route for both existing and future residents. This will therefore be in accordance with the vision for connectivity set out within the draft NP.

- 5.50 Movement generally through the Site will be facilitated by additional pathways between the apartment blocks and rotunda and all pathways will be accessible for wheelchair users, ensuring inclusive design in accordance with Policy EN1 of the ADMP.

Vehicle and Cycle Parking

- 5.51 The Sevenoaks District Strategy for Transport (July 2010) identifies the Bat and Ball signalised junction as a “congestion hotspot” and that strategies to provide improvements to the roads and reduce the need to travel by car should be encouraged. The proposal is highly sustainably located, within close walking distance to Bat and Ball Station, local shops (Sainsbury’s and Aldi) and other community facilities as well as bus services into Sevenoaks Town Centre. As such, the proposed parking ratio is 0.7 spaces per property will naturally reduce the number of vehicles within the development, promoting alternative modes of transport.
- 5.52 Alongside this, cycle storage facilities will be provided within each apartment block, within the rotunda and within the curtilages of the town houses. This will ensure every household is able to own and securely store bicycles, thus encouraging alternative modes of transport. The 184 spaces will exceed the requirements set out within the KCC guidance.
- 5.53 The ratio of parking spaces and the substantial areas of cycle parking will not only promote sustainable travel, alongside the Travel Plan, yet will also assist in ensuring there will not be a severe impact on the Bat and Ball junction as a result of the development, as demonstrated within the Transport Assessment.
- 5.54 In addition to this, pre-application advice with KCC and SDC indicated that the level of parking proposed at 0.7 spaces per dwelling is acceptable taking into account the highly sustainable location of the Site and walkable connections with public transport. This is consistent with Policy T2 of the ADMP and Interim Guidance Note 3 to the Kent Design Guide which makes provision for departing from the minimum or maximum requirements taking into account specific circumstances that may require lower or higher parking provision, including as a result of the development site’s accessibility to public transport.
- 5.55 The Parking Beat Survey (within Transport Assessment) found that the existing parking demand upon Crampton’s Road is at 80%. The proposed development could increase this to 89% as the worst-case scenario, however, this is considered to not result in harmful stress upon the highway in regard to any parking that may result outside of the development Site.

As such, due to this, the acceptance of the parking ratio by KCC, coupled with the potential for a car club, over provision of cycle spaces and the highly sustainable nature of the Site, it is not considered reasonable to refuse development on the basis of the parking ratio.

- 5.56 The infrastructure required for vehicle charging points can be provided for the development and the Applicant is content to accept this as a condition.
- 5.57 It is considered the impact on the highway and the proposed accessibility and parking proposals therefore accord with Policy EN1, T1, T2 and T3 of the ADMP, the draft Sevenoaks NP and NPPF.

vi) Flood Risk and Drainage

- 5.58 Policy LO1 of the Core Strategy states that development should be directed away from areas at risk from flooding. The Site lies in Flood Zone 1, being a low risk of tidal/fluvial flooding, thus is consistent with this policy.
- 5.59 The Flood Risk Assessment (Cube Consulting Engineers, March 2021) accompanying the application also confirms the Site is also at a low risk of surface water flooding and low risk of groundwater flooding.
- 5.60 The FRA confirms the Site is not suitable for infiltration due to the history of the Site as a gasworks and the partial overlay with a Principle Aquifer. The surface water on the Site is currently drained via an existing surface water drainage system before discharging to the foul water public sewer system. As such, the proposal will propose a similar system, however, all surface water will be stored in a below ground attenuation tank before being discharged into at a controlled, reduced rate. This will ensure the appropriate management of surface water onsite, ensuring there remains a low risk of surface water flooding.
- 5.61 The storage tank will either discharge to the watercourse alongside Otford Road, as detailed within the Drainage Strategy (Cube Consulting, March 2021), or if this is not possible, will be discharged into the public sewer. Thames Water has confirmed there is capacity within the public sewer system.
- 5.62 The system will be designed to accommodate surface water runoff for a storm event of up to a 1 in 100 year +40% climate change.
- 5.63 In regards to foul drainage, the Drainage Strategy sets out that foul water will be collected in the internal landscaped area before it is conveyed to the existing Thames Water sewer.

Thames Water has confirmed there is sufficient capacity within the public sewerage network to accommodate the development.

- 5.64 As such, appropriate drainage will be able to be provided for the Site in respect of both surface water and foul drainage in accordance with LO1 of the Core Strategy, EN1 of the ADMP and the NPPF.

vii) Contamination

- 5.65 The Geotechnical and Geo-environmental Desk Study report (A-squared Studio, August 2020) has reviewed the previous site investigations carried out on the Site since 2001 and carried out a walkover of the Site in its present form. It sets out that due to history of the Site, there is the potential for contaminants to be present within the existing and Made Ground.

- 5.66 The Report also considers there may be asbestos within the existing buildings which will be demolished as part of the re-development of the Site. While this is the case, effective remediation can be achieved for the Site and this can be secured via condition.

- 5.67 The proposed drainage also has had regard to the previous use of the Site and, as set out within Section vi) above, infiltration is not proposed due to the history of the Site as a gasworks and the partial overlay with a Principle Aquifer. This will ensure no pollutant pathways are introduced by the development into the groundwater, thus ensuring there is limited risk to this, complying with the NPPF.

viii) Trees, Landscaping and Open Space

- 5.68 The Site does not contain any trees protected by a Tree Preservation Order.
- 5.69 The Arboricultural Impact Assessment (Middlemarch Environmental, March 2021) confirms that the tree cover within the Site is predominately located along the boundaries with trees present of low and moderate quality (being Category B and C).
- 5.70 In order to accommodate the development some trees within the Site will need to be lost. These include 3no. Category C trees, 1no. Category C group, 3no. Category B trees and partial removal of trees from the Category B groups.
- 5.71 The AIA sets out that the loss of the Category B trees will be appropriately mitigated through planting of new trees within the open spaces of the development. This is illustrated by the landscaping plans accompanying the application submission. The development will also ensure the retained trees are protected throughout construction with the use of tree

protection fencing. This includes retention of T1, T2, T3, T4, T5, T7, T8, T13, and parts of G1, G3 and G4, demonstrating that the development can be accommodated without the complete loss of trees across the Site, consistent with Policy EN1 of the ADMP.

- 5.72 The landscaping details demonstrate that the development will provide a significant improvement to the visual appearance of the Site. This will be provided through the large open space within the centre of the Site, featuring trees, ornamental planting and amenity grass. The edges of the Site will also be improved through ornamental planting between parking spaces, along the southern boundary and around the access from Otford Road and hedges around the rotunda.
- 5.73 The landscaping will also create a safer and more user-friendly PRoW when compared with the existing, enclosed and unappealing route through the Site. This would not only improve the experience of users travelling through the Site yet also create a pleasant environment for future occupiers, consistent with Policy EN2 of the ADMP and NPPF.

ix) Ecology and Biodiversity

- 5.74 The Site lies to the east of the Sevenoaks Gravel Pits Site of Special Scientific Interest (SSSI), also known as the Sevenoaks Wildlife Reserve. The Greatness Brickworks SSSI lies 0.7km to the north-east of the Site and these areas have been considered by the Preliminary Ecological Appraisal (Middlemarch Environmental, March 2021).
- 5.75 The Sevenoaks Gravel Pits SSSI has also been considered further within the Addendum to the Preliminary Ecological Appraisal report (Middlemarch Environmental, March 2021).
- 5.76 The securing of a Construction Environmental Management Plan via condition, including measures to reduce noise and dust, will ensure any impacts from the construction of the Site on the SSSI will be appropriately mitigated.
- 5.77 The Preliminary Ecological Appraisal (PEA) and Bat Surveys Report (Middlemarch Environmental, September 2020) identify the ecology currently present on the Site. The PEA sets out that the Site has limited value in terms of its floral species with shrubs, trees and small areas of improved grassland. This is due to its nature as a brownfield site.
- 5.78 The Site does provide habitat for birds, and the bat survey indicate bats use the Site for some foraging and commuting. However, there was no evidence of bats using the buildings on the Site for roosting and as such, the Bat Survey report concludes there are no bat roosts present in the buildings or trees on the Site. The consideration of bats within the Site can be addressed through ecological conditions.

5.79 The habitat within the Site was also identified as being suitable for hedgehogs.

5.80 As such, the following mitigation measures are proposed:

- Pre-cautionary approach taken to site clearance in respect of any reptiles, following the guidance set out within the PEA;
- Vegetation and building clearance undertaken outside the nesting bird season unless in the presence of an experienced ecologist;
- Tree protection fencing for retained trees;
- Re-planting of trees and grassland within the central heart of the Site to provide improved habitat;
- Creation of living, green roofs to promote bird and insect biodiversity;
- Installation of bird boxes;
- Installation of bat boxes; and
- Use of sensitive, directional lighting throughout the construction period and final development.

5.81 Therefore, the proposal is considered to conserve and provide opportunities for enhancement to biodiversity and will ensure no long-term harmful impacts to the Sevenoaks Gravel Pits SSSI in accordance with SP11 of the Core Strategy and the NPPF.

x) Air Quality

5.82 The Site does not lie within Air Quality Management Area (AQMA). The nearest AQMA is located approximately 0.4km to the south of the Site (around the Bat and Ball junction).

5.83 The Air Assessment (Ensafe Consultants, March 2021) confirms that the development will not risk future users to poor air quality, with pollutant levels across the Site below the relevant air quality objectives. As such, the proposals will comply with Policy EN2 of the ADMP in respect of safeguarding the amenities of existing and future occupants of nearby properties in respect of air pollution.

5.84 In addition to safeguarding existing and future residents, the Air Assessment concludes that the development would not result in adverse air quality impacts to sensitive receptors beyond the Site, both at the construction and operational phase. This includes consideration of the impact of dust to the Sevenoaks Gravel Pits SSSI, confirming there would not be an adverse impact to this protected area, subject to mitigation.

5.85 The appropriate mitigation for the construction phase of the development can be through a Construction Management Plan, or similar, to ensure any impacts will not be adverse to receptors and this can be secured by condition.

xi) Noise Considerations

5.86 The Noise Impact Assessment (Sound Matters, February 2021) considers the impact of existing noise on the proposed use of the Site for residential occupation, as well as identifying the existing receptors around the Site and the impact of proposed building plant within the Site.

5.87 The Assessment concludes that the majority of the Site is at low risk with regard to noise, with noise levels below that considered suitable in the daytime (55dB) and night-time (45-50dB).

5.88 The rotunda and northern elevation of the north apartment block could experience higher levels of noise due to the proximity and position in relation to Otford Road. As such, these apartments will be ventilated using mechanical supply and extract with heat recovery (MVHR). This will ensure the impact from any external noise is mitigated sufficiently enabling a good level of amenity within the apartments, in accordance with Policy EN2 and EN7 of the ADMP and NPPF.

5.89 The noise impact from the construction of the development on the nearby residential properties could be controlled through a Construction Management Plan which the Applicant is content to be secured through condition.

xii) Neighbouring Amenity

5.90 The development has been carefully designed to take account of existing residential properties along Crampton's Road to the north, east and south. It has also taken into account the properties inset from Otford Road to the north.

5.91 The proposed apartment blocks have been altered from 5 to 4 storeys to reduce impact on neighbouring properties and will be stepped away from the northern and southern boundaries to ensure there will not be a harmful loss of light to neighbouring gardens or habitable windows. Indeed, the Daylight and Sunlight Assessment (eb7, March 2021) demonstrates high level of compliance with BRE standards for daylight levels to neighbouring properties to the north.

- 5.92 The report also demonstrates that the proposal would result in a minimal difference in sunlight to the rear gardens of neighbouring properties to the north, with levels entirely in accordance with BRE targets.
- 5.93 In addition, the set back of the apartment blocks will ensure existing neighbours retain an appropriate level of privacy, with separation distances over 21m.
- 5.94 The townhouses have also been designed to respond to the existing neighbouring properties, with the southernmost part of the development stepping down in height to a 2-storey townhouse to respect the 2-storey neighbouring dwelling. This will ensure the proposal will not have a harmful impact on this property in respect of light and privacy.
- 5.95 It is noted that the site to the south, currently occupied by Wickes, may be considered for re-development in the future (as indicated by the draft Sevenoaks NP and masterplan). This may include residential use. The proposals under this application would not prejudice any future residential development of the Wickes site in terms of amenity. This is due to the Site being located north of the Wickes building, thus would not result in a loss of light to this area if re-developed. In addition, the rotunda and southern apartment block have been designed so that the angle of these buildings and window placements should not impact on any development on the Wickes site harmfully impacting light or privacy of the gasholder Site.
- 5.96 As such, the proposals will ensure the amenities of existing residents would be safeguarded, as there would not be a harmful loss of privacy or light, nor would there be an unacceptable level of overlooking or visual intrusion as a result of the development, in accordance with Policy EN2 of the ADMP and the NPPF.

xiii) Energy and Sustainability

- 5.97 Policy SP2 of the Core Strategy sets out that development should seek to ensure a 10% reduction in the total carbon emissions through the on-site installation and implementation of decentralised, renewable or low-carbon energy sources.
- 5.98 In addition, Policy D5 of the draft Sevenoaks NP encourages the delivery of energy efficient homes that have been designed to maximise daylight while avoiding overheating.
- 5.99 The Energy Strategy (Skelly and Couch, March 2021) sets out that the development will include the following energy efficient measures:
- Adoption of a fabric first approach to construction of the development;

- PV panels on the roof of the rotunda and apartment blocks to provide power to the apartments in lieu of grid electricity;
- Consideration of window placement within the apartment blocks to capture good daylight levels to reduce the need for artificial lighting;
- Use of MVHR to recover wasted heat;
- Installation of solar Control Glazing installed to control overheating and lower heating demand;
- Installation of Direct Electrical Hot Water Storage to reduce heat loss and associated electric heating to reflect the move away from gas related power;
- Installation of efficient LED lighting, and
- Ensuring a maximum water usage of 110 litres per person per day.

5.100 These measures will ensure the development exceeds the target set out within Policy SP2 of the Core Strategy, with a 37% reduction in carbon emissions and a further 10% reduction through the use of PV panels.

5.101 The proposals will therefore promote the use of renewables in accordance with Policy SP2 of the Core Strategy and the development will be constructed using energy efficient measures to further the sustainability of the scheme, as supported by the NPPF.

xiv) S106 Draft Heads of Terms

Policy Background

5.102 One of the key objectives of the NPPF is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being (Para 8).

5.103 Paragraph 56 of the NPPF and Regulation 122 of the Community Infrastructure Levy Regulations make it a legal requirement that planning obligations should only be sought where they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

5.104 The Council's CIL Regulation 123 List (November 2014) sets out that the following types of infrastructure will be funded through CIL receipts:

- Transport schemes other than site-specific access improvements;
- Flood defence schemes;
- Water quality schemes;
- Education;
- Health and social care facilities;
- Police and emergency services facilities;
- Community facilities;
- Communications infrastructure (beyond that directly secured by agreement between the developer); and
- Green infrastructure other than site-specific improvements or mitigation measures (for example improvements to parks and recreation grounds).

5.105 SDC's CIL Regulation 123 List makes it clear that the Council will only use planning obligations to secure the re-provision of any infrastructure that is permitted to be lost through a planning permission granted for re-development of that site, alongside affordable housing provision.

5.106 SDC's CIL Regulation 123 List states this re-provision of infrastructure can include:

- Site specific access improvements (these could also be secured through s278 of the Highways Act 1980 in some circumstances);
- On-site open space, for example children's play areas;
- Site specific green infrastructure, including biodiversity mitigation and improvement;
- On-site crime reduction and emergency services infrastructure, for example CCTV or fire hydrants; and
- Site specific Public Rights of Way diversions or impact mitigation.

Draft Heads of Terms

5.107 In this case, the proposal will provide the infrastructure listed above on-site without any loss of such infrastructure as a result of the development. Therefore, any planning obligation for this development should secure:

- Provision of affordable housing on-site in the form of Discount Market Sale properties.

5.108 As such, in accordance with Paragraph 56 of the NPPF and SDC's CIL Regulation 123 List, all other contributions as a result of the development should be secured through CIL.

xv) Other Material Planning Considerations

Heritage and Archaeology

5.109 The nearest heritage asset is Bat and Ball Railway Station, which is Grade II listed. The station dates from 1862 and was the original terminus for Sevenoaks before the main line was built in 1868. The station is located approximately 0.6km south of the Site and situated on higher ground. The approach to the station is characterised by the junction to the west and commercial properties opposite the station car park. The proposal will therefore not harm the character of the approach to the listed building, nor the setting of the asset due to the distance and intervening residential and commercial developments.

5.110 There are 3no. Locally Listed Assets within 0.5km of the Site. These are located north of the Site and comprise a terracotta plaque at 3 and 4 Otford Road; a plaque in the terrace of 158-160 Crampton's Road and a plaque outside of 17 and 19 Moor Road. The proposal will not harm these assets by virtue of asset type.

5.111 The Site lies within an Area of Archaeological Potential, however, due to the history of the Site it has seen activity below ground since its first use in the late 1800s. As such, it is unlikely anything significant would be discovered. However, the Applicant is agreeable to further investigations secured by condition, only if this were considered reasonable and necessary.

6.0 CONCLUSIONS

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 This Statement has set out the local and national planning policy relevant to the consideration of the residential development of the Site.
- 6.3 This Statement has established that the residential development proposed on the Site is acceptable in principle. The density of development is entirely consistent with the NPPF, while respecting the character of the area. In addition, the Proposed Development will assist SDC in securing an increased rate of housing delivery outside of the Green Belt, which is urgently needed following the recent Housing Delivery Test results (January 2021) and the status of the Presumption in Favour of Sustainable Development for the District.
- 6.4 The Proposed Development will not harm the amenity of existing residents and will provide appropriate amenity for future residents of the development in terms of noise, air quality and the re-development will ensure the Site is safeguarded in regard to contamination.
- 6.5 Safe and suitable access will be provided into the Site alongside sufficient vehicle and cycle parking and it has been demonstrated that the proposals will not result in a severe impact to the surrounding highway network. The existing PRow will be retained and enhanced to improve accessibility within and out of the Site.
- 6.6 The Proposed Development will provide appropriate ecological mitigation in respect of its proximity to the Sevenoaks Gravel Pits SSSI and the development itself will provide a comprehensive landscaping scheme which will create enhancements to biodiversity as well as a high quality communal space which can be enjoyed by existing and future residents.
- 6.7 The Proposed Development will not increase the flood risk of the area and will provide appropriate drainage for surface water and foul water.
- 6.8 The Proposed Development will promote sustainability through energy efficient measures including PV panels and the use of sustainable modes of construction.
- 6.9 The Proposed Development will have significant social, economic and environmental benefits, including the provision of affordable housing secured by a S106 Agreement and financial contributions to the community through CIL.

6.10 This Planning Statement has therefore demonstrated that the Proposed Development represents sustainable development in terms of the NPPF. The Proposed Development clearly accords with both local and national policy and as such, the application can be approved without delay.

APPENDIX 1

Site Location Plan

