



**LAND ADJACENT TO SHOREHAM HOUSE,
CHURCH STREET, SHOREHAM,
KENT, TN14 7RY**

**PLANNING STATEMENT
ON BEHALF OF MR KAI MIDGLEY**

Date: 24th November 2021
Ref: Land Adjacent to Shoreham House

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1.0 INTRODUCTION AND DESCRIPTION OF DEVELOPMENT

i) Introduction

- 1.1 This Planning Statement (“the / this statement”) has been prepared by PowerHaus Consultancy on behalf of the applicant Mr Kai Midgley, as part of an application for the development of a new dwelling and replacement of existing built garages on the Land Adjacent to Shoreham House, Shoreham House, Church Street, Shoreham, Kent, TN14 7RY.
- 1.2 The site is located within the planning jurisdiction of Sevenoaks District Council (SDC). The site is located within the Green Belt, the Kent Downs Area of Outstanding Natural Beauty (AONB) and the designated Shoreham Conservation Area. It is previously developed land containing ten built garages serving the parking requirements of Shoreham House (NPPF Definition Annex 2 – permanent structure and associated fixed surface infrastructure). A site location plan showing the site in the context of the surrounding area is submitted as part of this application and attached at **Appendix 1**.
- 1.3 The application is presented by Mr Kai Midgely one of the residents of Shoreham House and has been formulated in agreement and in discussion with the other residents of the Shoreham House, which comprises seven apartments. Each of the residents has a parking space within the existing pre-fabricated single storey garages that form the application site. The scheme will replace these existing poor quality garages with new highly designed garages and some surface visitor parking. The development will help residents recuperate personal funds used to fund the roof works and maintenance requirements granted and referred to in the Planning History Table 2.1 below.
- 1.4 Shoreham House is not listed but is a valued historic building within the Shoreham conservation area. Many of the residents cannot afford their share of the financial contribution to the works. The sale of this plot to Mr Kai Midgley will contribute to a share of the value generated, which each Shoreham House resident will be able to utilise towards the maintenance costs of Shoreham House.
- 1.5 Notwithstanding these financial considerations, the proposed house and replacement garages are considered to align with adopted policies and enhance the character of the conservation area, which will be considered further below.
- 1.6 The description of development for the application is as follows:
- “Erection of one three-bedroom two storey house with basement and double garage and demolition and replacement of ten single storey garages with two garage blocks and four surface level car parking for 11 cars.”*
- 1.7 Further details of the application are provided in Section 2 of this statement and on the drawings and Design and Access Statement (DAS) submitted as part of the application.
- 1.8 The application follows the Council’s recent refusal of application 21/01404/FUL dated 09/07/2021 which proposed a much larger house. This proposal has been significantly reduced to address the grounds for refusal of that application. The scale of the replacement garages have also been amended to reduce the height of the garage roofs by creating a dormer top, which reduces the massing of the buildings in elevation. The Council refused the application on 5 grounds, including.
- The land lies within Metropolitan Green Belt where strict policies of restraint apply. The proposal would be inappropriate development harmful to the maintenance of the character of the Green Belt and to its openness. The Council does not consider that the special circumstances put forward in this case are sufficient to justify overriding policy with the National Planning Policy Framework.

- The proposal would harm the setting of the nearby listed buildings because of the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with the National Planning Policy Framework and policies SP1 of the Sevenoaks Core Strategy and EN4 of the Sevenoaks Allocations and Development Management Plan.
- The land lies within the Shoreham Conservation Area. The proposed development would harm the character and appearance of this area due to the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with the National Planning Policy Framework and policies SP1 of the Sevenoaks Core Strategy and EN4 of the Sevenoaks Allocations and Development Management Plan.
- The land lies within an Area of Outstanding Natural Beauty. The proposal would fail to preserve or enhance the character and appearance of the area due to the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with policy EN5 of the Sevenoaks Allocations and Development Management Plan.
- The proposal would harm the character and appearance of the area because of the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with the National Planning Policy Framework and policies SP1 of the Sevenoaks Core Strategy and EN1 of the Sevenoaks Allocations and Development Management Plan.

1.9 Each of these five reasons for refusal has been considered and addressed within this application submission. It has also been informed by and responds to pre-application advice received from the Council which is described further below.

Purpose and Format of the Planning Statement

1.10 The purpose of this statement is to provide information to allow the necessary considerations of the application against relevant planning policies and all other material considerations. The statement sets out how the relevant policies and material considerations in the determination of the application have been taken into account.

1.11 The statement forms part of the information submitted as part of this application and is to be read in conjunction with the following submitted application documents (Table 1.1 and Table 1.2).

Table 1.1 – Submitted Application Documents

Document Title	Author
Application Form, Notices and Ownership Certificates	PowerHaus Consultancy
Site Location Plan	Andrew Barrett Architects
Design and Access Statement	Andrew Barrett Architects
Existing and Proposed Drawings	Andrew Barrett Architects
Arboricultural Report	Chartwell Tree Consultants Ltd
Preliminary Ecological Assessment	The Ecology Partnership
Heritage Statement	PowerHaus Consultancy

Table 1.2 – Submitted Application Drawings

Drawing Title	Drawing Reference
Location Plan	CS-992-PD-B-000
Existing Site Plan	CS-992-PD-B-001
Existing House Elevations	CS-992-PD-B-002
Proposed Site Plan	CS-992-PD-B-003
Proposed Floor Plans and Elevations	CS-992-PD-B-004
Proposed Garage Buildings	CS-992-PD-B-005
Proposed Road Elevation and Site Cross Section	CS-992-PD-B-006

1.12 This statement demonstrates that the application:

- Has been prepared in the context and informed by pre-application discussions with SDC;
- Delivers a high-quality home in a highly sustainable location;
- Does not affect the five purposes of the Green Belt or result in harm to the openness of the Green Belt;
- Continues to protect and enhance the valued AONB;
- Does not result in harm to the character of the conservation area;
- Is in accordance with the relevant planning policies at national, strategic and local level constituting sustainable development.

1.13 **Section 2** of this Statement describes the site surroundings and the relevant planning history; **Section 3** sets out the relevant planning policies; **Section 4** provides an assessment of the application against relevant planning policies; and **Section 5** provides a summary and conclusions.

Pre-Application Advice

1.14 A request for pre-application advice was sent to SDC in September 2020. A virtual meeting was held with Planning Officer Mike Holmes on 15 October 2020 and feedback was received on 16 October 2020, which is attached at **Appendix 2**. A summary of the key points raised is provided below. Where applicable, an explanation of how the issue has been addressed is given and is shown in italics:

- Concerns about the proposal complying with the exceptions to inappropriate development set out in paragraph 145 (now paragraph 149) of the NPPF, criterion “e) limited infilling in villages”. The Council considers that the development does not comprise an infill site within the Green Belt as it is outside the defined village boundary of Shoreham. *The applicant contends that whilst the village boundary is drawn around the existing Shoreham House, the site and properties beyond the boundary are very much part of the defined village as described further in paragraphs 4.4 – 4.12 below and supported by the Conservation Area Assessment.*
- The Council’s Green Belt Supplementary Planning Document (February 2015) defines limited infill development as the completion of an otherwise substantially built-up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only. For settlements where a Green Belt boundary has been defined, the boundary usually marks the edge of the settlement where there is a break in development or a change in character to more loose-knit development. Where a change of character is not apparent between the defined settlement and development within the adjoining Green Belt, there may be circumstances where infill development is appropriate in the Green Belt, provided the purposes of the Green Belt would not be compromised – *see paragraphs 4.15 – 4.34.*
- The proposal would not meet the requirements of paragraph 145 (now paragraph 149) g) since the proposed development would have a greater impact on the openness of the Green Belt than the existing development. *The applicant demonstrates that the proposed new house would have no greater impact on the openness of the Green Belt and the defining of the whole village within it – see paragraphs 4.30 – 4.32 below.*
- The Council accepts that it cannot demonstrate a 5-year housing land supply at this time, that the titled balance of NPPF paragraph 11d) could be engaged. However, as the development is situated in the Green Belt and is therefore a restriction removing the application of the titled balance, VSC must be demonstrated – *see paragraphs 3.16 - 3.17 below.*
- The Council considers that there are no very special circumstances (VSC) in favour of the development to overcome the inappropriate development, housing need does not amount to VSC as demonstrated in appeal decisions, *see paragraphs 3.19 – 3.20 below.*
- Proposals within the AONB may be permitted where the form, scale, materials and design will conserve and enhance the character of the landscape – *the submitted architects drawings demonstrate that the proposed development reflects the scale of surrounding buildings*

proportional to the setting of the area. The proposed materials reflect the traditional building materials and architectural character of the area.

- An appropriate approach should be taken to groundworks and proposed drainage given the site falls within Source Protection Zone 2. *The application site does not fall within Flood Zone 2 as demonstrated by the Environment Agency Flood Maps attached at **Appendix 3**.*

2.0 SITE LOCATION AND PLANNING HISTORY

Site and Surroundings

- 2.1 The application site is located within the grounds of Shoreham House located with access from Station Road, within the village of Shoreham. The application site currently consists of a line of prefabricated flat roofed lock up garages which runs along the eastern boundary. The site is mostly obscured from Station Road by virtue of a substantial brick wall and high fence which runs for the length of the frontage of the site (except the point of access). Shoreham House is a large detached property, which has been subdivided into seven flats over two floors and within the roof. A site location plan showing the site in context of the surrounding area is attached at **Appendix 1**.
- 2.2 The site behind the garages does not form part of the main landscaped gardens of Shoreham House and is therefore left more natural and wild. The car parking spaces are in use by the residents of Shoreham House. It is currently overgrown with mixed shrubs and trees. The proposed siting and layout is informed by a formal Arboricultural assessment including root protection areas of existing trees, albeit that the site location of the new dwelling has no existing mature trees on it.
- 2.3 The site is located within walking distance of local amenities including Shoreham Village School, Raspberry Hill Park and Shoreham Village Hall. The site is located approximately 300m from Shoreham Train Station, providing regular services to London Blackfriars and Sevenoaks. It is a highly sustainable village location.
- 2.4 Shoreham train station is located outside the formal village boundary. On arrival at the station, heading towards the village, the first significant development on the left is the Darenth Golf Course and wedding venue. Shoreham Place comprising approximately 20 residential dwellings is also located on the left on Station Road set back from the road. A short gap appears between Shoreham Place and The Lodge which is located to the east of the application site and also on the left hand side of Station Road. On the right hand side before reaching the application site is the vicarage and set back is St Peter and St Paul parish church, accessed from Station Road/Church Street around the bend opposite the village pub is Ye Olde George Inn.
- 2.5 The impression on arrival by train to the village is that whilst the station is located on the edge of the village that it marks the start of the settlement boundary, that on reaching The Lodge and the Old Vicarage that the built up area starts from this point.
- 2.6 The site is located within the Green Belt, the Kent Downs Area of Outstanding Natural Beauty (AONB) and Shoreham Conservation Area. The site is adjacent to the formal Shoreham Village boundary to the north west. There are a number of listed buildings located near to the site, including Outbuildings to the Rear of the Ye Olde George Inn (Grade II), Ye Olde George Inn (Grade II), Coachmans Cottage and The Old Vicarage (Grade II) opposite the site.
- 2.7 The site is within the defined Flood Zone 1, however Flood Zones 2 and 3 lie to the west of the site – see **Appendix 3**.

Relevant Planning History

- 2.8 A desk-top based search has been undertaken with regards to the planning history for the site. A summary of the relevant planning history for the site can be found in Table 2.1 below:

Table 2.1: Relevant Planning History for Shoreham House

Application Reference	Address	Description	Decision and Date
21/01404/FUL	Land Adjacent to Shoreham	Erection of one three-bedroom three storey house with basement and double garage and demolition	Refused

	House, Church Street	and replacement of ten single storey garages with two garage blocks and four surface level car parking spaces for 11 cars.	09/09/2021
20/03677/HOUSE	Shoreham House, Church Street	Roofing works and associated timber and masonry repairs and decorations.	Granted 09/02/2021
13/03730/FUL	Eyot House, Church Street	Demolition of existing detached dwelling and construction of a new 6 bedroom detached dwelling, demolition of existing detached double garage and construction of a new detached double garage and store. Construction of a swimming pool, raised decking area and new bridges for car and pedestrian access.	Granted 02/05/2014
90/01301/HIST	Shoreham House, Church Street	Conversion and extension of outhouse into two bedroom dwelling, as amended by letter received 12/9/90.	Granted 17/09/1990

The Proposed Development

- 2.9 The application proposes the demolition of the existing garage block used by residents of Shoreham House for parking and the erection of one three-bedroom three storey house with basement and double garage. The Shoreham House residents parking will be replaced by two garage blocks with space for seven cars and four surface level car parking for a total of 11 cars. The proposed dwelling will appear as a two-storey house with the second floor accommodation within the roof.
- 2.10 The proposed dwelling has a gross internal floor area of 220.01sqm. This is a reduction of 189.49sqm from 409.50sqm which was proposed for application reference 21/01404/FUL. The height has also been reduced by 1.1m and is now proposed to be 8.5m to the main ridge. Drawing reference CS-992-PD-B-006 Proposed Site Cross Section demonstrates the transition in height of the existing adjacent dwelling and the proposed development. Shoreham House varies in height from 8.2m to 9.50m. The proposed height is therefore considered in line with Shoreham House.
- 2.11 The proposed double garage for the dwelling is located to the east of the house, creating an enclosed courtyard in front of the house. The replacement garages are proposed to the west of the proposed dwelling with one block forming the western boundary close to the flank wall. The other block will be located in parallel to the west creating a further courtyard area. A further four car parking spaces are provided at surface level. The scale of the replacement garages has been amended to reduce the height of the garage roofs by creating a dormer top, which reduces the massing of the buildings in elevation
- 2.12 The development seeks to enhance the area through the use of high-quality design that respects the townscape, architectural character, building forms and alignments of this countryside village. The proposed materials, colours and textures reflect the traditional architectural character of a converted agricultural barn. The dwelling will be rendered with a traditional pitch roof and large scale windows front and back with only an obscured bathroom window on the elevation adjacent to The Lodge.
- 2.13 Vehicular access to the site will be from the existing access on Station Road, which would provide sufficient width and capacity to serve the proposed development. The access to the right which extends towards Shoreham House will remain as is, to the left the drive will be realigned to provide access to the proposed dwelling, garage blocks and surface level parking.
- 2.14 Further details of the proposed development are contained within the Design and Access Statement and proposed drawings, submitted as part of this Application.

3.0 POLICY CONTEXT

Local Development Framework

- 3.1 Under section 70 of the Town and Country Planning Act 1990 and Section 38 of the Planning and Compulsory Purchase Act 2004, development should be determined with regard to the development plan, unless material considerations indicate otherwise. Paragraph 11c of the National Planning Policy Framework (NPPF) (2021) states that for decision-taking this means approving development proposals that accord with an up-to-date development plan without delay.

Development Plan

- 3.2 For the purpose of this statement, and in accordance with s38(2), the development plans for the assessment of this application comprise the following documents:
- Core Strategy (CS) DPD Adopted February 2011;
 - Allocations and Development Management Plan (ADMP) Adopted February 2015;
 - Green Belt Supplementary Planning Document Adopted February 2015;
 - Countryside Character Assessment (CCA) Supplementary Planning Document Adopted October 2011; and
 - Shoreham Conservation Area Appraisal Adopted July 2019
- 3.3 Other material considerations include:
- The National Planning Policy Framework (NPPF) (July 2021)
 - Planning Practice Guidance (2014 and regularly updated)

The National Planning Policy Framework (NPPF)

- 3.4 The National Planning Policy Framework (NPPF) sets out the Government's approach to planning matters and is a material consideration in the determination of planning applications. Chapters 13 (Green Belt), 15 (Conserving and enhancing the natural environment) and 16 (Conserving and enhancing the historic environment) are particularly relevant to this application. A separate Heritage Assessment deals with historic assets, policy and legislation.

Development Plan

Sevenoaks Core Strategy DPD (2011)

- 3.5 The Sevenoaks Core Strategy is the key component of the Council's Local Development Framework (Local Plan). It provides the overarching strategic principles for planning and the distribution of development for the period between 2006 and 2026.

Allocations and Development Management Plan (2015)

- 3.6 The ADMP was adopted by the Council February 2015 and forms part of the Local Plan for SDC alongside the Core Strategy. The ADMP allocates specific sites for new development, defines protected sites, designated Green Belt boundaries, contains detailed planning policies and replaces all remaining saved policies from the Sevenoaks District Local Plan, 2000.

Green Belt Supplementary Planning Document

- 3.7 The Council's Supplementary Planning Document for development within the Green Belt (adopted 2015), provides detailed guidance for development located within the Green Belt.

Countryside Character Assessment (CCA) (2011)

- 3.8 The CCA defines and describes the different types and character areas of the landscape in the Sevenoaks District, and evaluates each area in terms of the condition of the landscape and its sensitivity. The assessment is used in the consideration of planning applications to supplement planning policies by describing the local landscape character to which the Development Management policies apply.

3.9 The CCA defines the landscape of Eynsford and Shoreham Downs as:

- Condition – Moderate
- Sensitivity – High

3.10 The key landscape actions for Eynsford and Shoreham Downs focus on:

- The management of the landscape to conserve historic buildings and their settings and the restoration of heritage landscape feature such as hedgerows, hedged lanes and woodland edges.
- The open arable fields may be retained, but enclosure by hedgerows and appropriate, small broadleaf woodland and shaws should be restored along rural lanes and around settlements.
- The restorage of estate farmland features such as cross-contour beech avenues would also augment local distinctiveness.

Shoreham Conservation Area Appraisal Adopted July 2019

3.11 The Conservation Area Appraisal is designed to preserve the special character of conservation areas. The conservation area appraisal outlines the history of the area and explains what makes it special. It identifies the elements that make up the character and special interest of the area, and those that detract from it, and provides recommendations for the area's future management, which is considered further in the separate Heritage Assessment.

Local Plan Review

3.12 The Proposed Submission Version of the Local Plan was submitted to the Secretary of State for independent examination 30 April 2019. Following hearing sessions in September and October 2019, the Planning Inspector issued the final report in March 2020. The Inspector's Report raises concerns in respect of legal compliance, namely the Duty to Cooperate (DtC) and soundness. The Inspector found failure in respect of the DtC and as such has recommended that the Plan should not be adopted. SDC is now in the process of preparing a new Local Plan.

3.13 The Council's Local Development Scheme (LDS) was recently approved at Committee, 19 October 2021. The LDS sets out the Council's proposals and timetable for the production of the Local Plan. The Council are currently in the process of updating the existing evidence base documents to ensure that they remain up to date.

3.14 Following approval of the LDS, SDC opened a 'Call for Sites' as part of a review of the emerging Local Plan. The Call for Sites is being undertaken in two stages. Stage One requests sites that are located within settlements and not in Green Belt and Stage Two requests sites located in Green Belt. Sites fitting the Stage Two criteria can be submitted from 25 November 2021. The Call for Sites will close January 2022.

3.15 It is anticipated that consultation of the draft Local Plan (Regulation 18) will take place late Spring 2022. Pre-submission publication (Regulation 19) will take place December 2022/ January 2023. The plan will be published Winter 2022/23 for final representations, which will be provided to the examining Inspector April 2023. There are no proposed policies or designations that have reached a material stage to be considered further as part of this appraisal.

Sevenoaks Housing Supply Position

3.16 The housing need identified in the CS (2011) was 165 dwellings per annum (dpa). The Housing Delivery Test measures net dwellings provided in a local authority area against the number of homes required. Based on the number of homes delivered in Sevenoaks over 3 years, between 2017-18 and 2019-20, Sevenoaks returned a delivery measure of 70 per cent. This is less than the identified requirement of 85 per cent. Consequently, a 20 per cent buffer is applied to the housing supply calculation.

- 3.17 As the Core Strategy is more than 5 years old, under paragraph 74 of the NPPF, the Council are to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their local housing need. The Council's Five Year Housing Land Supply (September 2021) identifies the annual local housing need of 714. Sevenoaks identify that they have the capacity to deliver 2,479 residential units in the next 5 years. This represents 2.9 years of the five year supply requirement of 4,284 (including the 20% buffer). Accordingly, SDC cannot demonstrate 5 years' worth of deliverable housing sites.
- 3.18 Furthermore, Paragraph 61 of the NPPF requires the level of housing need to be calculated using the standard method, as set out in the Planning Practice Guidance (PPG). Lichfield's has recently calculated the housing needs using the Government's currently standard methodology, which identifies that the housing need for SDC is 820 dpa (August 2020 – see **Appendix 4**). This is significantly greater than the Council's Core Strategy figure of 165 dwellings per year and Action Plan figure of 714.
- 3.19 The robustness of the Council's supply was explored at a recent appeal (April 2021), reference APP/G2245/W/20/3260956 for the erection of 26 dwellings in Green Belt, Salts Farm, Fawkham. The Inspector undertook an assessment based upon the housing supply context acknowledging that even by relying upon the Council's published figures, the shortfall against the 5-year supply is severe. The Inspector further noted that the Council's grave position as regards to providing sufficient housing is compounded by what are limited options for building within the urban area given a significant proportion of the Council is protect by Green Belt and Areas of Outstanding Natural Beauty.
- 3.20 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. The Council's Core Strategy housing requirement is not reflective of the current local housing need and as a consequence of the Council's position in relation to housing land supply and the Housing Delivery Test, footnote 7 of Paragraph 11 d) applies in that policies which are most important for determining the application are out-of-date. As noted by the Inspector (appeal reference APP/G2245/W/20/3260956) this includes Policy LO1.

4.0 ASSESSMENT OF THE PROPOSED DEVELOPMENT

4.1 This section assesses the component parts of the proposed development against the statutory development plan and other material considerations, as outlined in Section 3.

4.2 The following are a list of the Local Plan policies that are relevant to the determination of this application and that can reasonably be considered to be consistent with the NPPF, albeit updated by consideration of the NPPF guidance:

- Core Strategy (2011):
 - Policy LO1 Distribution of Development
 - Policy LO7 Development in Rural Settlements
 - Policy SP1 Design of New Development and Conservation
 - Policy SP2 Sustainable Development
 - Policy SP5 Housing Size and Type
 - Policy SP11 Biodiversity
- Allocations and Development Management Plan (2015)
 - Policy EN1 Design Principles
 - Policy EN2 Amenity Protection
 - Policy EN4 Heritage Assets
 - Policy EN5 Landscape
 - Policy T2 Vehicle Parking

4.3 The development is considered to raise the following issues:

- i) Principle of Residential Development within Shoreham village
- ii) Housing Need
- iii) Green Belt
- iv) Heritage and Conservation
- v) Landscape and Visual Impact
- vi) Design and Appearance
- vii) Transport and Highways
- viii) Trees
- ix) Ecology

i) Principle of Residential Development within Shoreham Village

4.4 CS Policy LO7 *Development in Rural Settlements* states that within the settlement confines of Shoreham, infilling and redevelopment on a small scale only will be permitted taking account of the limited scope for development to take place in an acceptable manner and the limited range of services and facilities available. New development should be of a scale and nature appropriate to the village and should respond to the distinct local characteristic of the area in which it is situated.

4.5 Paragraph 79 of the NPPF states that to promote sustainable development in rural areas housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

4.6 Paragraph 119 of the NPPF continues and states that planning policies and decisions should (amongst other things) promote and support the development of underutilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained, and available sites could be used more effectively.

- 4.7 The site is located within the village boundary of Shoreham as implied by the Shoreham Conservation Area Appraisal (CAA) which states '*entry to the village from the east; the built up areas of the village is still well-defined, with open fields giving way immediately to the boundary walls of the Old Vicarage and the Lodge on either side*'. The CAA implies that the village starts from the Old Vicarage and the Lodge. The site is therefore very much considered within the boundary of Shoreham village.
- 4.8 It is also clear in walking from Shoreham station that the site forms part of the village including the defined built up area. Both the Lodge and the existing garages are fronted by continuous fencing along the boundary of Shoreham House, the Vicarage and St Peter and St Paul's Church and therefore all form part of the built up area of the village. Given the more significant gap between the residential area of Shoreham Place and the Lodge it is understandable why this area remains outside the village boundary and the built up area of Shoreham. The local plan map does not in our view recognise the continuous character of the village formed by the application site and The Lodge with continuous fencing.
- 4.9 It should therefore be determined in accordance with policy LO7. Even if the Council disagrees, paragraph 3.6 of the Green Belt Development SPD (2015) states that where a change of character is not apparent between the defined settlement and development within the adjoining Green Belt, there may be circumstances where infill development is appropriate in the Green Belt, provided the purposes of the Green Belt would not be compromised. The character and function of the Green Belt is considered further in paragraph 4.15 – 4.34 below to demonstrate that it will not be compromised.
- 4.10 The application proposes one three-bedroom house with double garage and replacing the existing 10 garages that are in a poor state of repair with two garage blocks to house 3 and 4 cars each. The garages will be single storey with low flat top/dormer roofs, reflecting the character and materials of Shoreham House and the wider context of the village.
- 4.11 The NPPF seeks well designed development and encourages Local Planning Authorities to promote effective use of land in meeting the need for homes. The site is previously developed land as defined in Annex 2 of the NPPF. There is scope to utilise the application site, which is characterised by poor quality garages, delivering one house with garage and replacement garages to maintain the Green Belt functions and openness and contribute to the character of the conservation area. The proposal provides an opportunity to enhance the setting of the property by removing the poor quality garages to construct a new dwelling which will not affect the amenities of any of the adjoining properties.
- 4.12 It is therefore considered that the principle of one family sized dwelling designed to reflect the village rural architectural character and replacement of the existing single storey garages is acceptable in line with policy LO7 and the Green Belt Development SPD.

ii) Housing Need

- 4.13 As set out in Section 3 above, the NPPF sets out the Government's objective of significantly boosting the supply of homes, with LPAs required to meet objectively assessed housing needs (OAN). SDC is now at the end of its plan period and its strategic policies are older than five years old. The new Local Plan has not yet reached a material stage to be relevant to the consideration of the application.
- 4.14 As expressed in paragraph 3.16 to 3.20 the Council failed the Housing Delivery Test 2020 and cannot demonstrate a five year housing land supply as required by paragraph 74 of the NPPF. Therefore, the presumption in favour of sustainable development is engaged until shortfall can be addressed (NPPF paragraph 11 footnote 8).

iii) Green Belt

- 4.15 CS Policy LO1 *Distribution of Development* seeks to prevent development outside of defined development boundaries unless it is compatible with policies protecting Green Belt and AONB and where it protects the rural character of the area.
- 4.16 Paragraph 147 states that inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 149 states that the construction of new buildings should be regarded as inappropriate. There are, however, a number of exceptions to this including criterion e) limited in filling in villages and criterion g) limited infilling or the partial or complete redevelopment or previously developed land, whether redundant or in continuing use which would not have a greater impact on the openness of the Green Belt.
- 4.17 The Council refused application reference 21/01404/FUL as it was considered that the proposal would be inappropriate development harmful to the maintenance of the character of the Green Belt and to its openness. The Council did not consider that the special circumstances put forward were significant to justify overriding policy with the NPPF.
- 2.15 In light of this, the proposed dwelling has been significantly reduced in size to address the Council's design reasons for refusal. The proposed dwelling now has a gross internal floor area of 220.01sqm, this is a reduction of 189.49sqm. The height has also been reduced by 1.1m and is now proposed to be 8.5m to the main ridge. Shoreham House varies in height from 8.2m to 9.50m. Drawing reference CS-992-PD-B-006 Proposed Site Cross Section demonstrates the transition in height of the existing adjacent dwelling and the proposed development. The proposed height is therefore considered in line with Shoreham House and reduced in height in comparison to The Lodge.
- 4.18 The proposed development is previously developed land. The site currently consists of a line of prefabricated flat roofed lock up garages. Given the existing conditions, we do not consider that the proposed development would cause substantial harm to the openness of the Green Belt (as per the test of Paragraph 149 (g)). The development represents an appropriate form of development given the residential context within a sensitive landscape location. As identified in the Shoreham Village conservation area appraisal, some parts of the village are screened from the surrounding countryside by existing trees and planting both within the village and adjacent to it preventing views into and out of the area. This part of the village is well screened from the surrounding countryside, views and openness of the wider Green Belt.
- 4.19 Paragraph 149 e) of the NPPF allows exceptions to the inappropriateness of new buildings in the Green Belt, allowing limited infilling, which is mirrored by policy LO7 above also allowing for limited infilling.
- 4.20 Whilst the NPPF does not include a definition of 'infilling' the Green Belt SPD provides guidance on the local interpretation and application of local and national Green Belt policy. It defines limited infill as:
- 'The completion of an otherwise substantially built up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only' (paragraph 3.3).*
- 4.21 With respect to infilling on the edge of defined settlements, the SPD takes the view that the defined boundary usually marks a break in development or represents a change in character to more loose-knit development, and where this is the case, infill development beyond a defined settlement boundary would compromise the purpose of the Green Belt therefore constituting inappropriate development (paragraph 3.5). Nevertheless, it states that:
- 'Where a change of character is not apparent between the defined settlement and development within the adjoining Green Belt, there may be circumstances where infill*

development is appropriate in the Green Belt, provided the purposes of the Green Belt would not be compromised'(paragraph 3.6).

- 4.22 The Green Belt SPD confirms that the Council defines limited infill development as the completion of an otherwise substantially built-up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only. The Shoreham Conservation Area Appraisal considers the site within the village boundary, as explained in paragraph 4.7 above.
- 4.23 The case of Julian Wood v SoS and Gravesham Borough Council [2015] established that the term 'village' for the purposes of paragraph 145(e) (now paragraph 149) exception to inappropriate Green Belt development, is not necessarily the same as the settlement boundary.
- 4.24 For context, the Julian Wood case concerned an appeal made against the refusal of planning permission for a single dwelling, which lay in the Green Belt but was surrounded by existing development. The court considered that the main issue was the interpretation of Paragraph 89 of the NPPF (now paragraph 149) which provides that limited infilling in villages is an exception to the general rule that the construction of new buildings is inappropriate in Green Belt.
- 4.25 The court ruled that the policy required the decision-maker to consider whether, as a matter of fact on the ground, the site appeared to be in the village. The court found that the fact that the site lay outside the village boundary as designated in the development plan was not determinative.
- 4.26 Appeal reference APP/G2245/W/19/3230759 (September 2019) allowed and planning permission was granted for the erection of a single detached dwelling on infill plot at Harefield, Badger Road, Badgers Mount. Despite the site lying beyond the urban confines of Badgers Mount as defined in the SDC ADMP, the Inspector considered that the properties lying off Badger Road are a continuation of the built form of Badgers Mount and comprise of part of the outer edge of the village. Consequently, the Inspector considered that the proposal constituted limited infilling in a village and would as a result fall under the exception in NPPF paragraph 149 (e). While it is acknowledged that every appeal has to be considered in relation to its particular site circumstances there are clear similarities between the two sites.
- 4.27 As such, whilst the CAA defines the site within the confines of Shoreham Village, if there was any disagreement, it is clear that the properties lying off Station Road are a continuation of the built form of Shoreham Village and comprise part of the outer edge of the village. The site must be considered as part of the village and be considered as limited infilling as established when visiting the property from the train station, from the village and when viewing the site on the ground.
- 4.28 The site is located within walking distance of local amenities including Shoreham Village School, Raspberry Hill Park and Shoreham Village Hall, all of which form an integral part of the village. It is considered that the site forms part of the village both in spatial and visual terms.
- 4.29 The surrounding area is predominantly characterised by a mix of residential dwellings, mainly family sized, with the application site adjoined by residential dwellings on the north, west and eastern boundaries. The proposed dwelling would be located approximately 20m from The Lodge, the neighbouring property to the east of the site and approximately 35m from Shoreham House. There is a generous space in between the proposed dwelling and the neighbouring properties. The proposed development is considered limited infill between the existing built form.
- 4.30 In terms of the impact of Green Belt purposes we note the following:
- The function of the Green Belt in terms of checking the unrestricted sprawl of large-built up areas would not be affected as the proposal constitutes infilling and the 'green wash' defining the service village character remains unaltered.
 - The development would not result in coalescence of settlements.

- The proposal does not represent further ‘encroachment’ into the countryside with the proposed dwelling contained by the confines of Shoreham House boundary, the Lodge to the east and the Old Vicarage to the north.
 - The proposal would not affect the setting and character of the historic part of the village as set out in paragraphs 4.33 – 4.51 below.
 - The proposal would not affect the ability to regenerate and recycle urban land within settlements outside of the Green Belt.
- 4.31 Having regard to the above, it is considered that the proposal would represent limited infilling in a village that would not have an adverse impact on the Green Belt purposes in accordance with paragraph 149 (e) of the NPPF.
- 4.32 Neither would the proposal be detrimentally to the openness of the Green Belt. Whilst Green Belt openness is not defined and is not just about physical views into and out of an area, the site has no particular open character. The location of the existing garages is set behind a strong fence line which contains the boundary of Shoreham House aligning Station Road. Whilst single storey they are permanent buildings that infill any open nature of the site. Mature trees and hedging also align the front of the site with many trees and shrubs that create a verdant character to the location.
- 4.33 There are no views from Station Road through to the River Darent, which sits in a lower topography beyond Shoreham House. Nor are there views through to the north as the Old Vicarage is located north of the proposed application site. There is no east west open aspect to the location as residential properties align the Station Road frontage, contributing to the natural infill character of this plot to reflect the village character.
- 4.34 The application proposal is therefore assessed to have no material impact on Green Belt openness and Shoreham Village will still be seen in any views into and out of the village as part of the Green Belt and wider countryside. There is no open aspect to the site that marks a relieve to the urban frontages to the village, which is interspersed by trees and buildings throughout the village. It is considered in principle to comply with the NPPF, the Core Strategy and the Green Belt SPD.

iv) Heritage and Conservation

- 1.15 In terms of heritage grounds for refusal the Council considered that the development:
- Harmed the setting of neighbouring listed buildings due to the large size of the proposed dwelling and cluttered design of the development as a whole, contrary to policies SP1 and EN4; and
 - Harmed the character of the conservation area due to the large size of the proposed dwelling and cluttered design of the development as a whole contrary to policy SP1.
- 4.35 The separate Heritage Statement provides an assessment of the new application and considered the grounds for refusal and how the development scheme has been designed to address these.
- 4.36 The relevant policies considered in this assessment are set out below.
- 4.37 CS Policy SP1 *Design of New Development and Conservation* requires all new development to be designed to a high quality, responding to the distinctive local character of the area in which it is situated. Account should be taken of local Character Area Assessments, Conservation Area Appraisals and Management Plans, Village Design Statements and Parish Plans. In rural areas account should be taken of guidance in the Countryside Assessment and AONB Management Plans.
- 4.38 ADMP Policy EN4 *Heritage Assets* states proposals that affect a Heritage Asset, or its setting, will be permitted where the development conserves or enhances the character, appearance and setting of the asset.

- 4.39 Paragraph 194 of the NPPF requires the applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 4.40 Paragraph 197 sets out a series of policy objectives that local planning authorities should take account of in determining planning applications which includes the desirability of sustaining and enhancing the significance of heritage assets and putting them into viable uses consistent with their conservation. Local authorities should also take account of the positive contribution that the conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness.
- 4.41 Paragraph 199 of the NPPF requires that great weight should be given to the conservation of a designated heritage asset such as a conservation area. Conservation is defined as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.
- 4.42 Paragraph 206 goes further to state that local planning authorities should look at opportunities for new development within conservation areas to enhance or better reveal their significance.

Heritage Assessment

- 4.43 In accordance with the requirements of the NPPF, the significance of the designated heritage assets which will be affected by the application proposals have been described in the separate Heritage Statement. This includes an assessment of the contribution made by the application site to the significance of Shoreham Conservation Area and the setting of the neighbouring listed buildings. There are no other heritage designations affecting the site.
- 4.44 The important setting of both the Lodge adjacent and the Old Vicarage opposite the site will be preserved by the setting back of the new building from Station Road frontage and creating a good distance from The Lodge to preserve the importance of these two buildings to the character of the Shoreham village conservation area and Station Road street frontage.
- 4.45 The significance of Shoreham village's conservation area reflects the linear development of the village over the centuries and particularly the importance of its growth following the arrival of the railway in the 19th Century, attracting countryside leisure users. The confines of the village are clearly defined to the east of the village reflected in the conservation area appraisal with fields giving way to the boundaries of The Lodge and the Old Vicarage. The site is part of the village in the same way these two listed buildings are, alongside Shoreham House and properties that front Station Road leading to Ye Olde George Inn.
- 4.46 The re-design of the new house as an agricultural style converted barn, preserves the setting of both nearby listed buildings and contributes to the conservation area character of Shoreham Village reflective of its slow development over the centuries as a countryside Kent village.
- 4.47 The application scheme is considered to cause no harm to the designated heritage assets being designed with these in mind. The removal of unsightly poor quality lock-up garages will enhance the conservation area, continuing to keep cars off Station Road and the detraction they can cause from the quality of the conservation area, as noted in the conservation area appraisal.
- 4.48 The significance of the designated heritage assets will therefore be sustained, preserved and if not enhanced. The proposals therefore meet the statutory duty of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF (2021) and policies SP1 and EN4.

v) Landscape and Visual Impact

- 4.49 Paragraph 174 of the NPPF states planning policies and decisions should contribute to and enhance the natural and local environment by:

- a. Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b. Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;...
- 4.50 Paragraph 176 of the NPPF states great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which has the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations and should be given great weight. The scale and extent of development within these designated areas should be limited.
- 4.51 Policy EN5 *Landscape* advises that the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection in relation to landscape and scenic beauty. Proposals within the AONB will be permitted where the form, scale, materials and design would conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance.
- 4.52 In terms of landscape and visual impact, the Council considered that application reference 21/01404/FUL would fail to preserve or enhance the character and appearance of the area due to the large size of the proposed dwelling and the cluttered design of the development as a whole. As noted in paragraph 2.10, the proposed dwelling has been significantly reduced in size. The gross internal floor area proposed has been reduced from 409.50sqm to 220.01sqm. This is a significant reduction of 189.49sqm. In addition, the height has been reduced by 1.1m and now sits at 8.5m to the main ridge.
- 4.53 As explained in paragraph 4.4 – 4.12, the site is very much considered as part of the village location and character. The site is bound by residential properties and roads. It has little association with the landscape character of the wider and more distant countryside landscape, including the AONB and has limited visual connection to the openness of the AONB.
- 4.54 It is considered that the proposed development has the opportunity to enhance the proposal site and be more in keeping with the local residential setting of the village. The design of the proposed development by A. Barrett RIBA has considered and reflected the village character and proximity of the proposed new house to Shoreham House and its verdant tree canopy character. The existing Shoreham House resident's single storey poor quality garages will be replaced with two blocks for 7 cars in brick and tiled buildings to reflect local materials and character, typical of the conservation area. The scale of the replacement garages has been amended to reduce the height of the garage roofs by creating a dormer/flat roof top, which reduces the massing of the buildings in elevation.
- 4.55 The proposed development would not directly affect the appearance of the street scene, as the development is proposed to be set back from the highway and would be shielded by the existing front boundary fence and vegetation which is to be retained. Glimpses of the dwelling may be visible in winter months from the fields to the south of the site but not from public footpaths, but as the dwelling would be located within a village, sitting between The Lodge and Shoreham House, it would not be out of keeping with the current view. There are no views into or out of the site north, south, east or west. It is therefore considered that the development will have no impact on the ANOB designation in line with NPPF paragraphs 174, 176 and Policy EN5.

vi) Design and Appearance

- 4.56 CS Policy SP1 *Design of New Development and Conservation* states 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. The District's heritage assets and their settings will be protected and enhanced.

- 4.57 ADMP Policy EN1 *Design Principles* reinforces Policy SP1 but provides additional criteria which are to be met in all proposals including, an appropriate scale and massing, layout, incorporation of natural features, impact upon character, a satisfactory means of access for vehicles and pedestrians and biodiversity potential.
- 4.58 ADMP Policy EN2 *Amenity Protection* states proposal will be permitted where they provide adequate residential amenities for existing and future occupiers of the development and would safeguard the amenities of existing and future occupants of nearby properties, ensuring the development does not impact the amenity of nearby properties.
- 4.59 Section 12 of the NPPF promotes the creation of high quality buildings and place stating that good design is a key aspect of sustainable development (paragraph 126). Paragraph 130 of the NPPF sets out criteria for good design include: adding to the overall long term quality of the area; visually attractive architecture and landscape design; sympathetic to local character creating a sense of place and optimising the site's potential.
- 4.60 The proposed development would result in the erection of a three bedroom, two storey detached dwelling, which would be in keeping with the neighbouring Shoreham House and adjacent Lodge building. The scale and layout reflects the family sized housing genre of the location, providing high levels of amenity. The layout optimises the site's potential without impact on the character of the area. The proposal is therefore considered to be in line with the NPPF and meets the provisions of Policy SP1, EN1 and EN2.

vii) Transport and Highways

- 4.61 ADMP Policy T1 *Mitigating Travel Impact* requires new developments to mitigate any adverse travel impacts. This includes their impact on congestion and safety, environmental impacts, such as noise and tranquillity, pollution and impact on amenity and health.
- 4.62 ADMP Policy T2 *Vehicle Parking* states vehicle parking provision, including cycle parking, in new residential development should be made in accordance with the current Kent County Council vehicle parking standard. For a three bedroom house, two parking spaces are required.
- 4.63 ADMP Policy EN1 *Design Principles* requires proposals to ensure satisfactory means of access for vehicles and pedestrians are provided and adequate parking and refuse facilities.
- 4.64 The access to the new dwelling will be shared with the existing Shoreham House access. It will be served by a new double garage with access to the new house through the garden.
- 4.65 The replacement garages are a like for like replacement of the existing built garages and four additional visitor spaces are proposed to accommodate guests staying with Shoreham House residents.
- 4.66 Given the low level of vehicular trip generation and the likelihood that vehicular access to the site will be taken in equal measure, the impact on the local road network will not be significant or material for the purpose of highway safety or capacity and can be accommodated without having any impact on the operation of the network. The proposal is therefore considered in accordance with Policy T1, T2 and EN1.

viii) Trees

- 4.67 An Arboricultural Impact Assessment has been undertaken by Chartwell Tree Consultants. In order to accommodate the proposed scheme, Chartwell Tree Consultants have recommended the removal of Sycamores (T9, T10, T11, T12 & T13), Elders (T3, T17 & T18), Holly (T15 & T16) and Lime (T4). These trees are young Category C trees. No category A or B trees are proposed to be removed and existing category B trees will be retained with special attention given to their root protection during construction.
- 4.68 Given the poor physiological and structural condition of the Elder (T19) trees, it is also recommended that this is removed just on Arboricultural grounds. It is considered that the loss of

the above trees will not have a significant determinantal impact on the visual amenity of the area as they are either low quality, young trees or not significantly visible from the wider area. The Elder is proposed to be replaced with a Cherry Tree. In order to mitigate the loss of the trees, the planting of good quality, heavy standard trees is proposed.

- 4.69 Trees that are being retained will be provided with adequate protection so that the amenity value of the trees on the site is preserved. Retained trees will be protected from soil compaction and impact damage where necessary by protective barriers and/ or system and methods of ground protection.
- 4.70 Paragraph 174 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, geological conservation interests and soils;
 - Recognising the wider benefits of the ecosystem services; and
 - Minimising impacts on biodiversity and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 4.71 The site benefits from a large number of existing trees which contribute to its character and quality, which will be retained and protected. It is proposed that in addition to the replacement of the Elder tree, two further Cherry trees will be planted within the grounds of the new development.


ix) Ecology

- 4.72 CS Policy SP11 *Biodiversity* states the biodiversity of the District will be conserved and opportunities sought for enhancement to ensure no net loss of biodiversity. Opportunities will be sought for the enhancement of biodiversity through the creation, protection, enhancement, extension and management of sites and through the maintenance and, where possible, enhancement of a green infrastructure network to improve connectivity between habitats.
- 4.73 A Preliminary Ecological Appraisal has been prepared by The Ecology Partnership. There are no internationally designated sites within 10km of the site. The site is not designated for nature conservation, but it is situated within 2km of two Sites of Special Scientific Interest (SSSI), Otford to Shoreham Downs and Magpie Bottom. Due to the distance involved and the small-scale nature of the proposal, no adverse impacts to these sites are predicted.
- 4.74 The habitats on site included amenity grassland, scattered mixed trees, tall ruderals and ephemerals/ short perennials. These habitats are considered to be of site level interest with the most ecologically valuable features being the boundary habitats and mature trees. These features should be retained and buffered from development where possible. The loss or removal of the remaining habitats would not be considered beyond impacts at site level and would not warrant consideration within an EclA assessment.
- 4.75 The scattered trees introduced shrub and scrub are considered to provide suitable habitat for common breeding birds. Precautionary measures should be undertaken during the clearance of these habitats by undertaking such works outside of breeding bird season (March-September inclusive). New opportunities can be provided for breeding birds on site by creating new areas of dense mixed scrub within the northern receptor site.
- 4.76 The habitats on site are largely sub-optimal for foraging and commuting bats but the scattered trees and tall ruderals on the southern section of the site could provide some, limited foraging opportunities.
- 4.77 Potential ecological enhancements that can be implemented and have been recommended within the Preliminary Ecological Appraisal. Recommendations include use of native species planting and the installation of bat and bird boxes on site. These enhancements would provide an increase in biodiversity interest to the site post development and allow the site to conform to the relevant local planning policies described.

4.78 The recommendation for further survey work, mitigation and suitable ecological enhancements set out in the Preliminary Ecological Appraisal are in line with Policy SP11 and can be conditioned.

5.0 CONCLUSIONS

- 5.1 The proposal accords with the strategic objectives of the Core Strategy (2011), albeit that the site is situated within Green Belt where the fundamental aim of national policy is to prevent urban sprawl by keeping land permanently open (paragraph 133). The site's previously developed land status and location within Shoreham village is favourable for its development for housing in this regard in accordance with NPPF paragraph 149 e) and g).
- 5.2 The proposed development incorporates the advice received from the Council at pre-application stage and represents a sustainable and responsive design, reflecting the context of its location. It has also addressed the items that the Council refused the previous scheme on, namely the impact upon Green Belt, Heritage and AONB.
- 5.3 Inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances, however, paragraph 149 explains that certain forms of development are appropriate in Green Belt, including limited infilling in villages (paragraph 149 criterion e). For the reasons set out within this statement, the proposal represents appropriate infill development as defined by paragraph 149 criterion e, which would not have an adverse impact on the purposes of Green Belt.
- 5.4 The proposed development is proposed within the footprint of previously developed land. The redevelopment of the site would not amount to substantial impact on the openness of the Green Belt and is therefore in accordance with Paragraph 149 criterion g of the NPPF.
- 5.5 The application site is considered to be part of Shoreham Village irrespective of the settlement boundary in the adopted Local Plan as assessed on the ground.
- 5.6 The density of the proposal reflects the local characteristics of Shoreham Village and will contribute to Shoreham's sense of place. Technical documents prepared with the application have shown that the development would not result in unacceptable adverse impacts.
- 5.7 The application demonstrates that the proposal would not result in any harm to Shoreham Village Conservation Area or the setting of the surrounding listed buildings. Rather, the application would result in an enhancement of the conservation area through the provision of a high-quality development, which has been designed with consideration of the characteristics of the built form in the village.
- 5.8 The proposal would not be harmful to local wildlife or habitat, however enhancements to biodiversity would be provided.
- 5.9 It is therefore considered that the application accords with the NPPF and the policies of the adopted Local Plan and permission should be granted without delay.

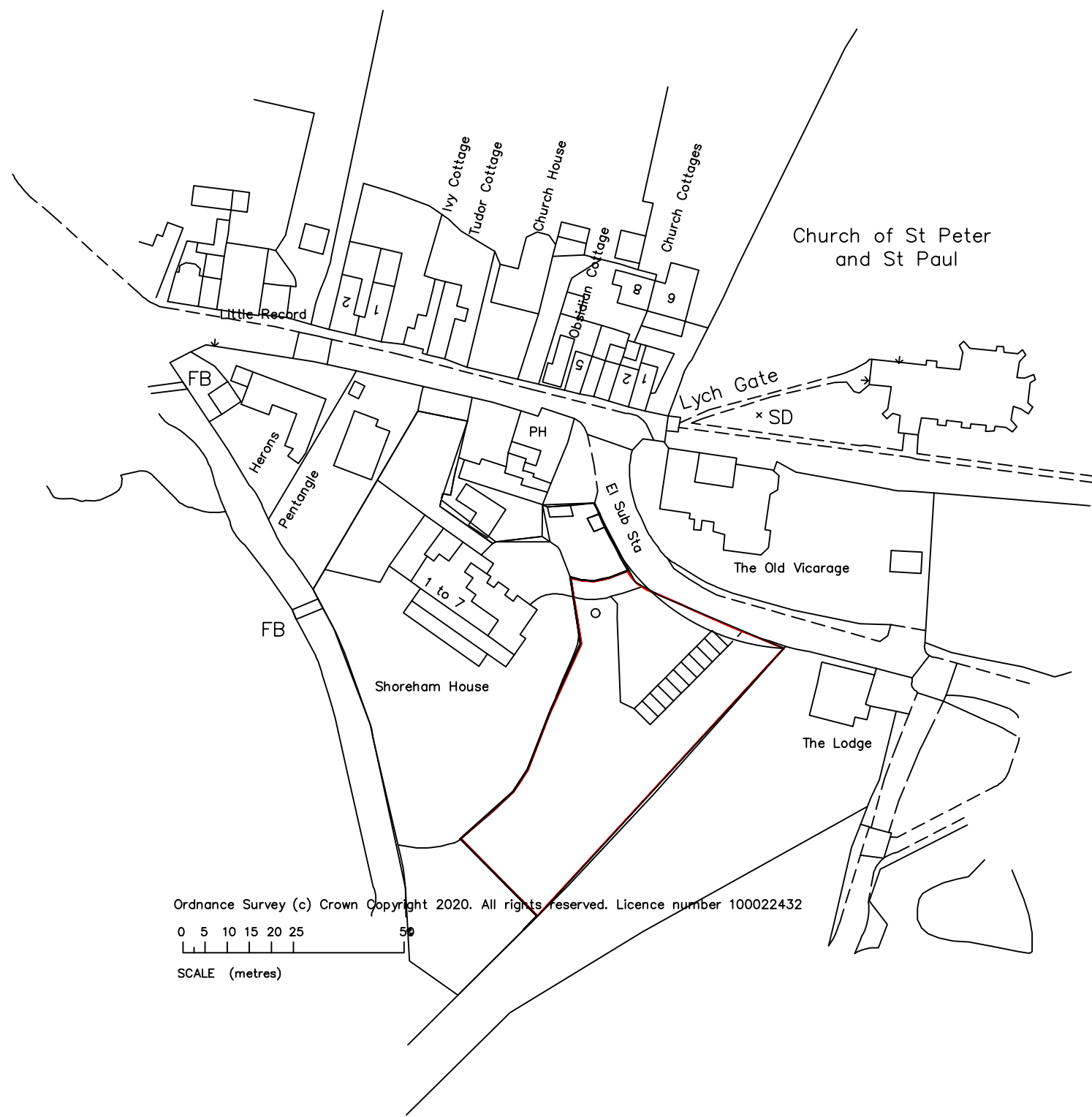

Signed: _____

On behalf Powerhaus Consultancy

Date: 24th November 2021

APPENDICES

Appendix 1 – Site Location Plan



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 0 5 10 15 20 25 50
 SCALE (metres)

Rev	Date	Comments
Client MR K MIDDLEY		
Project NEW DWELLING SHOREHAM HOUSE CHURCH STREET SHOREHAM KENT TN14 7RY		
Title LOCATION PLAN		
Project No. 965	Date JAN 2021	
Drawing No. CS-992-PD-000	Revision	
Scale 1:1250@A3	Drawn	
	Check	
A.BARRETT R.I.B.A CHARTERED ARCHITECT 4 BARNET WOOD ROAD BROMLEY, KENT BR2 8HJ Tel 020 3121 1056 Mob 07802 236530		

**Appendix 2 – Officer’s Delegated Report
and Decision Notice Reference
21/01404/FUL dated 9 July 2021**

Application report

Application Reference:	21/01404/FUL	Date of report:	08.07.21
Proposal:	Erection of one three-bedroom three storey house with basement and double garage and demolition and replacement of ten single storey garages with two garage blocks and four surface level car parking spaces for 11 cars.	Case officer:	Mike Holmes
Address:	Land adjacent to Shoreham House, Church Street, Shoreham		

Description of site

The application site is located within the grounds of Shoreham House, within the village of Shoreham. The application site currently consists of a line of pre-fabricated flat roofed lock up garages, which runs along the eastern boundary. The site is mostly obscured from Station Road by virtue of a substantial brick wall and high fence, which runs for the length of the frontage of the site (except the point of access). Shoreham House is a large detached property, which has been subdivided into seven flats over two floors and within the roof.

Description of proposal

The application proposes the demolition of the existing garage block used by residents of Shoreham House for parking and the erection of one three-bedroom three storey house with basement and double garage. The Shoreham House residents parking will be replaced by ten single storey garages within two garage blocks and four surface level car parking for 11 cars. The proposed dwelling will appear as a two-storey house with accommodation within the roof.

Relevant planning history

There is no relevant planning history for the site that relates to this application.

Relevant constraints

The following constraints are relevant to the site:

- Metropolitan Green Belt
- Kent Downs Area of Outstanding Natural Beauty
- Shoreham Conservation Area
- Source Protection Zone 2
- Tree Preservation Orders
- Biodiversity Opportunity Area
- Area of Archaeological Potential

- Nearby listed buildings

Policies

National Planning Policy Framework (NPPF)

Para 11 of the NPPF confirms that there is a presumption in favour of sustainable development, and that development proposals that accord with an up-to-date development plan should be approved without delay.

Para 11 of the NPPF also states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, permission should be granted unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; 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.
- Footnote 6 (see reference above) relates to policies including SSSIs, Green Belt, AONBs, designated heritage assets and locations at risk of flooding.

Core Strategy (CS)

- LO1 Distribution of Development
- LO8 The Countryside and the Rural Economy
- SP1 Design of New Development and Conservation
- SP5 Housing Size and Type
- SP7 Density of Housing Development
- SP11 Biodiversity

Allocations and Development Management (ADMP)

- SC1 Presumption in Favour of Sustainable Development
- EN1 Design Principles
- EN2 Amenity Protection
- EN4 Heritage Assets
- EN5 Landscape
- EN6 Outdoor Lighting
- GB2 Basements within Residential Developments in the Green Belt
- GB3 Residential Outbuildings in the Green Belt
- T1 Mitigating Travel Impact
- T2 Vehicle Parking
- T3 Provision of Electrical Vehicle Charging Points

Other

- Development in the Green Belt Supplementary Planning Document (SPD)
- Countryside Character Assessment Supplementary Planning Document (SPD)
- Shoreham Conservation Area Appraisal

Publicity expires on: 22.06.21

Consultation responses

Shoreham Parish Council - Shoreham Parish Council objects to this development on the basis that it constitutes inappropriate development in the Green Belt. Shoreham Parish Council acknowledges that the applicant has taken care with the design and materials but the height and scale of the building is out of keeping with the Conservation Area, in which it is situated and there do not appear to be any exceptional circumstances, which would allow for such a development to be built. The property will also overlook a neighbouring property, affecting the privacy of its residents. Finally, there are concerns over potential flooding risks and the Environment Agency should be contacted to check whether a build in this location would have any effect on neighbouring properties.

Conservation Officer - Based on the volume, height and design of the proposal and its likely impact on the setting of the listed building - as well as on the setting of the Conservation Area and the other identified constraints - it is not recommended - at least at this stage - that the application is approved unless the expected Heritage Statement can provide a robust justification and evidence that negligible harm would result on the setting and significance of the designated heritage asset. Once this higher principle has been established it may be possible to consider a smaller/ lower building on the site provided that some mitigation measures are put in place.

Natural England - No comments.

County Biodiversity Officer - No objection subject to conditions relating to invasive species, reptiles and ecological enhancements, and an informative relating to breeding birds.

Arboricultural and Landscape Officer - No objection and details of a landscaping scheme submitted by condition is suggested.

County Highways Development Planner - No objection subject to details of an electrical vehicle charging point to be provided for the new dwelling being provided by way of condition.

County Archaeological Officer - No objection subject to a condition requiring archaeological field evaluation works.

Environment Agency - No objection subject to conditions relating to contamination and surface water drainage.

Thames Water - No objection.

County Development Contributions Team - Requests that the CIL funds be allocated to ensure the impacts of the development can be met and the development can be regarded as sustainable.

Representations

We received three letters of support and three letters of objection raising the following issues:

- Impact on the Green Belt
- Impact on the AONB
- Impact on the conservation area
- Overlooking
- Impact on visual amenity
- Increase in traffic
- Loss of privacy
- Setting of a precedent

Planning appraisal

The main planning considerations are:

- Impact on the Green Belt
- Impact on heritage assets
- Design and impact on the character and appearance of the area
- Impact on residential amenity
- Impact on highways safety
- Trees, landscaping and biodiversity
- Drainage

Impact on the Green Belt

As set out in paragraph 133 of the NPPF, the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 134 of the NPPF confirms that the Green Belt serves five purposes. These purposes include to assist in safeguarding the countryside from encroachment.

Paragraph 143 states that where a proposal is inappropriate development in the Green Belt, it is by definition harmful and should not be approved except in very special circumstances.

Paragraph 144 of the NPPF advises we should give substantial weight to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm, is clearly outweighed by other considerations. Therefore, the harm in principal to the Green Belt remains even if there is no further harm to openness because of the development.

At paragraph 145, the NPPF states that new buildings in the Green Belt are inappropriate development. There are some exceptions to this, such as limited infilling in villages and infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development.

Openness is an essential characteristic of the Green Belt and is different from visual impact. Openness is about freedom from built form. Even if there is absence of harm to openness, there can be harm in principle to the Green Belt from inappropriate development.

The applicant has presented the case that the development could be considered an infill within a village or the complete redevelopment of previously developed land.

Our Development in the Green Belt SPD defines limited infill development as the completion of an otherwise substantially built up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only.

It goes on to define a substantially built up frontage as an otherwise continuous and largely uninterrupted built frontage of several dwellings visible within the street scene.

The SPD also confirms that for settlements where a Green Belt boundary has been defined, the boundary usually marks the edge of the settlement where there is a break in development or a change in character to more loose-knit development. Where this is the case, infill development beyond a defined settlement boundary would compromise the purposes of the Green Belt and would constitute inappropriate development.

It is not considered that the development comprises the completion of an otherwise substantially built up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only.

This part of the street is made up of large properties positioned within large plots. This is not a substantially built up frontage, particularly as some of the houses are set well back from their plot frontage, including Shoreham House.

In addition, the frontage of the site has a width of approximately 40m, which cannot be considered narrow.

Shoreham possesses a Green Belt boundary and there is a clear change of character as you pass the Old George Inn travelling south out of the village, with the compact development of the High Street significantly opening up beyond the Old George Inn.

As well as a change in character, the introduction of significant built form as represented by the proposed house, the development would result in an encroachment into the countryside.

Overall, the development would not comprise limited infilling within the village as supported by paragraph 145.e) of the NPPF.

Turning to whether the proposal could comprise the redevelopment of previously developed land, the site possesses an existing block of lock up garages and an area of hardstanding and forms part of the curtilage of Shoreham House. It is therefore accepted that the site falls within the definition of previously developed land.

The existing block of lock up garages is single storey in design and has a modest footprint. The proposed dwelling would be two storeys in height, with accommodation in its roof provided by a roof, pitched up to a large flat roof area.

The proposed house would be significantly greater in footprint, height and volume compared with the existing lock up garages.

The proposal also includes three single storey garage buildings, a double garage to serve the new dwelling and a four bay and three bay garage building to serve Shoreham House. This would add further massing and built form to the site.

The cumulative impact on the openness of the Green Belt that the proposed development would have would therefore be significantly greater than the impact that the existing block of garages has on openness.

The proposal would not, therefore, comprise acceptable redevelopment of previously developed land, since it would have a greater impact on the openness of the Green Belt than the existing development.

The development would therefore be inappropriate development in the Green Belt, which would harm the openness of the area and would represent an encroachment into the countryside. This fails to comply with the NPPF.

There are material considerations that could be considered as very special circumstances and these will be considered in greater detail at the end of the report.

Impact on heritage assets

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on a local planning authority, in considering development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting, or any features of architectural or historic interest it possesses.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a requirement on a local planning authority in relation to development in a Conservation Area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Interpretation of the 1990 Act in law has concluded that preserving the character of the Conservation Area can not only be accomplished through positive

contribution but also through development that leaves the character or appearance of the area unharmed.

The NPPF also states that great weight should be given to the conservation of heritage assets (para.193).

Policy SP1 of the Core Strategy states that the District's heritage assets and their settings, including listed buildings, conservation areas and archaeological remains will be protected and enhanced.

Policy EN4 of the ADMP states that proposals that affect a Heritage Asset, or its setting, will be permitted where the development conserves or enhances the character, appearance and setting of the asset.

The application site falls within the Shoreham Conservation Area, Shoreham House and the surrounding properties all contribute to the character of the conservation area, there is an important grouping of buildings within the conservation area just to the north of the site and also a number of listed buildings (Old Vicarage, George Inn, 1-5 Church Cottages and the Church of St Peter and St Paul). The site is also within an Area of Archaeological Potential.

The existing block of lock up garages have no architectural merits and so there is no objection to the demolition of this block.

The proposed dwelling would be too high and too bulky at roof height, emphasised by the fact that the dormer windows would be obtrusive and add unnecessary volume to the already bulky roof form. The design of the house would also be cluttered.

The combined impact of the height, bulk and cluttered design of the dwelling would impact detrimentally upon the setting of the listed buildings to the north and would be likely to be visible from them.

The proposal would also cause harm to the setting of the conservation area by introducing a large house within a leafy area that has its properties, in this part of the road, widely spaced apart with a loose and open grain. Such a property as proposed would also impart a more suburban appearance to the site.

In addition, there are too many garage buildings proposed further adding to the cluttering of the appearance of the development.

Paragraphs 195 and 196 of the NPPF ask whether the harm incurred by a proposal would result in either substantial or less than substantial harm to the significance of the designated heritage assets. In this case it is concluded that the development would result in less than substantial harm.

There are no public benefits to be gained from the proposal and the applicant has not presented any instead concluding that the development would preserve, if not enhance, the setting of the nearby listed buildings and the conservation area

No objection to the proposal has been raised by the County Archaeological Officer, subject to a requirement requiring archaeological field evaluation works to be submitted by way of condition.

Overall, however, the development would harm the setting of nearby listed buildings and would harm the character and appearance of the conservation area. This conflicts with the NPPF and policies SP1 of the Core Strategy and EN4 of the ADMP.

Design and impact on the character and appearance of the area

The Countryside and Rights of Way Act 2000 states that the Local Planning Authority should conserve and enhance Areas of Outstanding Natural Beauty. Designating an Area of Outstanding Natural Beauty protects its distinctive character and natural beauty and can include human settlement and development.

There are therefore two considerations directly related to a site's AONB status when determining a planning application. Firstly, does the application conserve the AONB and secondly, if it does conserve the AONB does it result in an enhancement. A failure to achieve both of these points will result in a conflict with the requirements of the Act.

Policy EN5 of the ADMP states that the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection in relation to landscape and scenic beauty. Proposals within the AONB will be permitted where the form, scale, materials and design will conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance.

Policies SP1 of the Core Strategy and EN1 of the ADMP state that all new development should be designed to a high quality and should respond to and respect the character of the area in which it is situated.

As noted above, the development would cause harm character and appearance of the area through the introduction of a large house within a leafy area that has its properties, in this part of the road, widely spaced apart with a loose and open grain. Such a property as proposed would also impart a more suburban appearance to the site.

The development would therefore fail to conserve and enhance the landscape character of the AONB and the character and appearance of the area generally, failing to comply with the NPPF and policies SP1 of the Core Strategy and EN1 and EN4 of the ADMP.

Impact on residential amenity

Policy EN2 of the ADMP requires proposals to provide adequate residential amenities for existing and future occupiers of the development and to safeguard the amenities of existing and future occupants of nearby properties.

The neighbouring properties potentially most affected by the development would be Shoreham House to the west, The Lodge to the east and Old Vicarage to the north.

Shoreham House and Old Vicarage would be situated in excess of 30m from the proposed dwelling and so this would not detrimentally impact the amenities of the nearby properties. Shoreham House would be situated 12m from one of the blocks of garages. However, the garage block would be single storey in design and so would not have a detrimental impact on the amenities of the occupiers of Shoreham House.

The Lodge would retain a gap of approximately 21m from the new dwelling. This is the minimum space accepted as preserving residential amenity in terms of overlooking, loss of privacy, impact on visual amenity, and loss of daylight and sunlight. This relationship would also preserve the amenities currently enjoyed by the occupiers of The Lodge.

Finally, the development would provide adequate residential amenities for the future occupiers of the development. Overall, the development would comply with the NPPF and policy EN2 of the ADMP.

Impact on highways safety

Policy EN1 states that all new development should provide satisfactory means of access for vehicles and pedestrians and provide adequate parking. Policy T2 of the ADMP states that dwellings in this location with three bedrooms require two parking spaces.

Policy T3 of the ADMP states that electrical vehicle charging points should be provided within new residential developments to promote sustainability and mitigate climate change.

The introduction of a single dwelling would not significantly increase the flow of traffic locally. In addition, the continued use of the existing vehicular access is wholly acceptable as is the level of vehicle parking proposed for the site. Suitable provision of electrical vehicle charging points could be sought by condition.

Overall, the development would be in accordance with the NPPF and the policies referred to above.

Trees, landscaping and biodiversity

Policy EN1 of the ADMP states that proposals which would create high quality design and meet a number of criteria will be permitted. These include the fact that the layout of the proposed development would sensitively incorporate natural features such as trees and hedges.

Policy SP11 of the Core Strategy states that the biodiversity of the District will be conserved and opportunities sought for enhancement to ensure no net loss of biodiversity.

Both the Arboricultural and Landscape Officer and the County Biodiversity Officer have raised no objection to the scheme subject to conditions. It is therefore the case that the development would comply with the NPPF and the policies referred to above.

Drainage

The matter of drainage for a scheme of this size in this location would be dealt with under building regulations and so no planning controls are deemed necessary in this instance.

Community Infrastructure Levy (CIL)

This proposal is CIL liable and there is no application for an exemption.

Other issues

The development would not set a precedent locally since each application is considered on its own merits.

Very Special Circumstances

As noted above, paragraph 144 of the NPPF states that when considering any planning application, we should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by any other considerations.

Possible very special circumstances - these can be summarised as:

- The District-wide need for housing

The harm in this case has been identified as:

- The harm in principal from inappropriate development in the Green Belt, which must be given significant weight
- The harm to the openness of the Green Belt, which is also given significant weight
- Encroachment into the Green Belt, which is given significant weight
- The harm to the setting of nearby listed buildings, which is given significant weight
- The harm to the character and appearance of the conservation area, which is given significant weight
- The harm to the AONB, which is given significant weight
- The harm to the character and appearance of the area, which is given moderate weight

The District-wide need for housing has recently been afforded very substantial weight by an Inspector (Salts Farm appeal - 20/00882/OUT). When weighed against the harm, which in the instance of Salts Farm comprised harm in principal from inappropriate development in the Green Belt and harm from encroachment into the Green Belt.

Whilst acknowledging the weighting that could be afforded to our need for housing delivery, in this instance there are a significant number of other harms associated with this development, which would have a greater substantial weight and would not be clearly outweighed by the need to deliver houses in the District.

Conclusion

The proposal is inappropriate development in the Green Belt and would harm the setting of listed buildings, the conservation area, the AONB, the character and appearance of the area.

As the Council cannot demonstrate a 5 year housing supply at this time, the tilted balance of NPPF paragraph 11d) is engaged. However, in this instance, as the development is situated within the Green Belt, an AONB and affects designated heritage assets the policies of the NPPF for the protection of these constraints provide a clear reason for the refusal of planning permission in terms of NPPF paragraph 11d)i).

Recommendation

It is therefore recommended that this application is refused.

Case officer: Mike Holmes

Date: 08.07.21

Manager/Principal: C Shearing

Date:08.07.2021

Mr Kai Midgley
C/O PowerHaus Consultancy
The Stanley Building
7 Pancras Square
London
N1C 4AG

Application number: 21/01404/FUL

TOWN AND COUNTRY PLANNING ACT 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

Refusal of planning permission

Site : Land Adjacent To Shoreham House Church Street Shoreham Kent
TN14 7RY

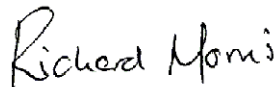
Development : Erection of one three-bedroom three storey house with basement and double garage and demolition and replacement of ten single storey garages with two garage blocks and four surface level car parking spaces for 11 cars.

Sevenoaks District Council, as the local planning authority has **refused planning permission** for the above development, for the following reason(s):

- 1) The land lies within the Metropolitan Green Belt where strict policies of restraint apply. The proposal would be inappropriate development harmful to the maintenance of the character of the Green Belt and to its openness. The Council does not consider that the special circumstances put forward in this case are sufficient to justify overriding policy within the National Planning Policy Framework.
- 2) The proposal would harm the setting of the nearby listed buildings because of the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with the National Planning Policy Framework and policies SP1 of the Sevenoaks Core Strategy and EN4 of the Sevenoaks Allocations and Development Management Plan.
- 3) The land lies within the Shoreham Conservation Area. The proposed development would harm the character and appearance of this area due to the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with the National Planning Policy Framework and policies SP1 of the

Sevenoaks Core Strategy and EN4 of the Sevenoaks Allocations and Development Management Plan.

- 4) The land lies within an Area of Outstanding Natural Beauty. The proposal would fail to preserve or enhance the character and appearance of the area due to the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with policy EN5 of the Sevenoaks Allocations and Development Management Plan.
- 5) The proposal would harm the character and appearance of the area because of the large size of the proposed dwelling and the cluttered design of the development as a whole. This conflicts with the National Planning Policy Framework and policies SP1 of the Core Strategy and EN1 of the Sevenoaks Allocations and Development Management Plan.



Richard Morris
Deputy Chief Executive
Chief Officer - Planning & Regulatory Services

Dated: 9 July 2021

Notes for the applicant

Community Infrastructure Levy (CIL)

If any appeal is made and is allowed, this proposal may be liable for the Community Infrastructure Levy (CIL). This may be payable to the District Council, as the local collecting authority, on commencement of application 21/01404/FUL.

If CIL is liable, we will contact all relevant interested parties once we have issued a decision notice and serve them with a liability notice. This will identify the parties, the scale of liability, how it was calculated, when it will be due for payment and the opportunities to claim relief. Should you wish to claim relief from CIL you must make an application to us before any work starts on site. There is no automatic exemption from the CIL and it is not possible to make a retrospective claim once work has started.

Any party liable to pay CIL must assume liability before any work starts; they must provide us with a valid [Commencement Notice](#). If this is not provided we can impose surcharges and require immediate payment.

Please email planning.information@sevenoaks.gov.uk quoting 21/01404/FUL if you have any questions about CIL, before work commences.

National Planning Policy Framework

In dealing with this application we have implemented the requirements in the National Planning Policy Framework to work with the applicant/agent in a positive, proactive and creative way by offering a pre-application advice service; as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible and if applicable suggesting solutions to secure a successful outcome. We have considered the application in light of our statutory policies in our development plan as set out in the officer's report.

Building Control

If any appeal is allowed applicants are advised to contact our Building Control service On 01732 227376 for further information on whether it is necessary for permission To be given under the building regulations.

Please remove any site notice that was displayed on the site pursuant to the application.

NOTIFICATION TO APPLICANT ON REFUSAL OF PLANNING PERMISSION

Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under Section 78 of the Town and Country Planning Act 1990.
- If this is a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice, and you want to appeal against your planning authority's decision on your application, then you must do so within 28 days of the date of this notice.
- If an enforcement notice is served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: 28 days of the date of service of the enforcement notice, or within 6 months of the date of this notice, whichever period expires earlier.
- If this is a decision to refuse planning permission for a minor commercial application, and you want to appeal against your local planning authority's decision then you must do so with 12 weeks of the date of this notice.
- Appeals can be made online at: <https://www.gov.uk/planning-inspectorate>. If you are unable to access the online appeal form, please contact the Planning Inspectorate to obtain a paper copy of the appeal form on tel: 0303 444 5000.
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal. Further details are on www.gov.uk.

**Appendix 3 – Pre-application Response
Received 16 October 2020**

PowerHaus Consultancy
The Stanley Building
7 Pancras Square
London
N1C 4AG

Tel No: 01732 227000
Ask for: Mike Holmes
Email: DCNorth@sevenoaks.gov.uk
My Ref: PA/20/00341
Date: 16 October 2020

Dear Sir/Madam

Pre-Application Advice Enquiry

Site: Shoreham House Church Street Shoreham Kent TN14 7RY

Development: Erection of new dwelling with double garage and demolition and replacement of ten single storey garages with two garage blocks and four surface level car parking spaces for 11 cars.

I refer to the information submitted on 24 September 2020 for the above proposal and our meeting on 15 October 2020.

Purpose of this letter

This letter will provide feedback on your scheme and set out some key information that may be helpful to you when considering your proposal. You are advised to seek your own independent advice on the issues raised in this email, to help you understand how planning policy may have an impact on your proposal. Appended to this letter is further information and website links, to help you research the planning issues in more detail, before submitting an application.

Summary of Pre-Application Advice

On the basis of the information submitted and current planning policy, I have concerns regarding the ability of the proposal to comply with Green Belt policy. I would recommend that these issues, which are set out below in more detail, are re-considered and addressed before the submission of any application.

Planning Assessment

Based on the information submitted, the main issues relevant to your proposals are considered below.

Green Belt

As your proposal is in the Green Belt, section 13 of the National Planning Policy

Chief Executive: Dr. Pav Ramewal
Council Offices, Argyle Road, Sevenoaks, Kent TN13 1HG
Telephone: 01732 227000 DX 30006 Sevenoaks
Email: information@sevenoaks.gov.uk
www.sevenoaks.gov.uk

Framework (NPPF) is particularly relevant. There is a supplementary planning document (SPD) adopted by us on the Green Belt, which you will also find helpful.

Reviewing your proposal, I have some concerns about the proposal complying with the exceptions to inappropriate development set out in paragraph 145 of the NPPF.

I would disagree that the development comprises an infill within the Green Belt. Our Green Belt SPD provides a definition of what comprises an infill development and this proposal would not meet that definition.

Within the SPD, we define limited infill development as the completion of an otherwise substantially built up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only.

The definition of a substantially built up frontage is also provided within the SPD as being an otherwise continuous and largely uninterrupted built frontage of several dwellings visible within the street scene.

This is would not be the case here since the site is surrounded by large properties set within large plots.

Whilst the definitions within the SPD are provided by us, a number of Inspectors have relied to these definitions when carrying out their own assessment of appeals involving proposed development in the Green Belt, claimed by the appellant to be infill development, and these Inspectors have found in our favour.

I would also argue that the proposal would not meet the requirements of paragraph 145.g), since the proposed development would have a greater impact on the openness of the Green Belt than the existing development.

It follows that there would be a presumption against granting planning permission unless a case for very special circumstances were presented that clearly outweighed the harm in principle, as well as the harm to the openness of the Green Belt that the proposal would represent, in addition to any other harm identified.

At this time I fail to see what such a case would be based upon. I note reference to our 5 year housing land supply in your submission. As the Council cannot demonstrate a 5 year housing supply at this time, the tilted balance of NPPF paragraph 11d) is engaged. However, in this instance, as the development is situated within the Green Belt, the policies of the NPPF for the protection of the Green Belt provide a clear reason for the refusal of planning permission in terms of NPPF paragraph 11d)i). Therefore, this matter cannot be relied upon in any case for very special circumstances

In terms of appeal decisions that relate to infilling in the Green Belt within the Sevenoaks District I have located the following decisions that may be of assistance.

- 18/00600 and 18/03043/FUL - both dismissed
- 18/02850 - allowed but took account of our local definitions for infilling
- 19/00538 - allowed

Area of Outstanding Natural Beauty (AONB)

Proposals within the AONB may be permitted where the form, scale, materials and design will conserve and enhance the character of the landscape.

Any formal planning application should address this matter in detail, acknowledging our Countryside Character Assessment Supplementary Planning Document (SPD) and justifying how the development conserves and enhances the landscape character of the area.

Policy EN5 of the Allocations and Development Management Plan (ADMP) apply here.

Heritage

A heritage statement should accompany any formal planning application addressing the significance of the nearby listed buildings, the Shoreham Conservation Area and the Area of Archaeological Potential, and any harm that may result from the development to the character and setting of these heritage assets.

Policy SP1 of the Core Strategy and policy EN4 of the ADMP apply here.

Design and impact on character of the area

The proposed development should respond to the scale, height, materials and site coverage of the area and should respect the topography and character of the site and surrounding area.

Again, it would be for you to demonstrate that the design and appearance of the development would respect the wider street scene.

Policy SP1 of the Core Strategy and policy EN1 of the ADMP apply here.

Impact on neighbouring amenity

The development should not result in excessive overlooking or visual intrusion or result in an unacceptable loss of privacy or light enjoyed by the occupiers of nearby properties.

Policy EN2 of the ADMP applies here.

Other issues

An appropriate approach should be taken to groundworks and proposed drainage given the site falls within Source Protection Zone 2.

Any formal planning application should be accompanied by a comprehensive tree survey report and preliminary ecological survey work since the site is surrounded by protected trees and lies within a Biodiversity Opportunity Area.

Conclusion

Please note that this letter is not intended to provide a comprehensive response of all issues which may be relevant. The advice refers to the issues we consider likely to be the most pertinent to the consideration of an application in the event of a submission along the lines presently proposed.

This advice is without prejudice to the decision making processes of the local planning authority and in no way prejudices any future determinations or decisions made by the local planning authority.

Please review the additional information attached to this letter.

Yours sincerely

Mike Holmes
Case Officer

APPENDIX

Planning Policy and Constraints

The planning constraints listed below may be of particular relevance to your proposal:

- Metropolitan Green Belt
- Kent Downs Area of Outstanding Natural Beauty
- Shoreham Conservation Area
- Source Protection Zone 2
- Tree Preservation Orders
- Biodiversity Opportunity Area
- Area of Archaeological Potential
- Nearby listed buildings

You can find further information on other constraints that may be relevant to your proposal, by using the interactive map on our website:

<https://maps.sevenoaks.gov.uk/planning/>

Both national and local planning policy will be relevant to your proposal, if a planning application is submitted for the site. You can review these policies on the following websites:

National Planning Policy Framework (NPPF)

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Sevenoaks District Council:

https://www.sevenoaks.gov.uk/info/20014/planning_policy

In particular, please refer to the policies in the Core Strategy 2011 and the Allocation and Development Management Plan (ADMP) 2015 and our Supplementary Planning Documents.

New Local Plan

Please note that Sevenoaks District Council is currently undergoing the process to adopt a new local plan. As such, dependent upon the time of any planning applications submission local policy considerations may have changed. Planning decisions will be based upon the adopted local policies at the time of the decision. The applicant is advised to review the proposed timetable for the adoption of the new local policies, please see link below:

https://www.sevenoaks.gov.uk/info/20014/planning_policy

Community Infrastructure Levy (CIL)

Please note under the terms of the Planning Act 2008 (as amended) and

Community Infrastructure Levy Regulations 2010 (as amended), the Sevenoaks Community Infrastructure Levy (CIL) may be chargeable on this development.

Applicants are recommended to take their own advice. For further information please see the planning portal website:

<http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil> and Sevenoaks District Council website:

<http://www.sevenoaks.gov.uk/services/housing/planning/planning-applications/community-infrastructure-levy-cil>

Consideration of this pre application response

The information and advice in this letter is not intended to provide a comprehensive response of all issues which may be relevant, but intends to set out those which I consider likely to be most pertinent to the consideration of an application in the event of a submission along the lines presently proposed.

Please note that this response is given at officer level, does not constitute a formal response or decision and should not be considered as binding on the Council in the event of a consequent planning application.

I would recommend that you research all relevant policies and guidance, which may change over time, and consider how they apply to your proposal before submitting any planning application. You may also wish to discuss your proposals with adjoining properties prior to submission as the Council will notify them of the application and you may be able to address their concerns prior to submission.

As a final note, please be advised that Planning Validation Requirements and application forms can be found on the planning section of our website. You do not need to fill out the validation list, but it will help guide you as to what information should be submitted to ensure swift validation of your application.

Appendix 4 – Environment Agency Flood Map for Planning

Flood map for planning

Your reference
Shoreham

Location (easting/northing)
552211/161531

Created
14 Apr 2021 14:38

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

The Open Government Licence sets out the terms and conditions for using government data.
<https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Flood map for planning

Your reference

Shoreham

Location (easting/northing)

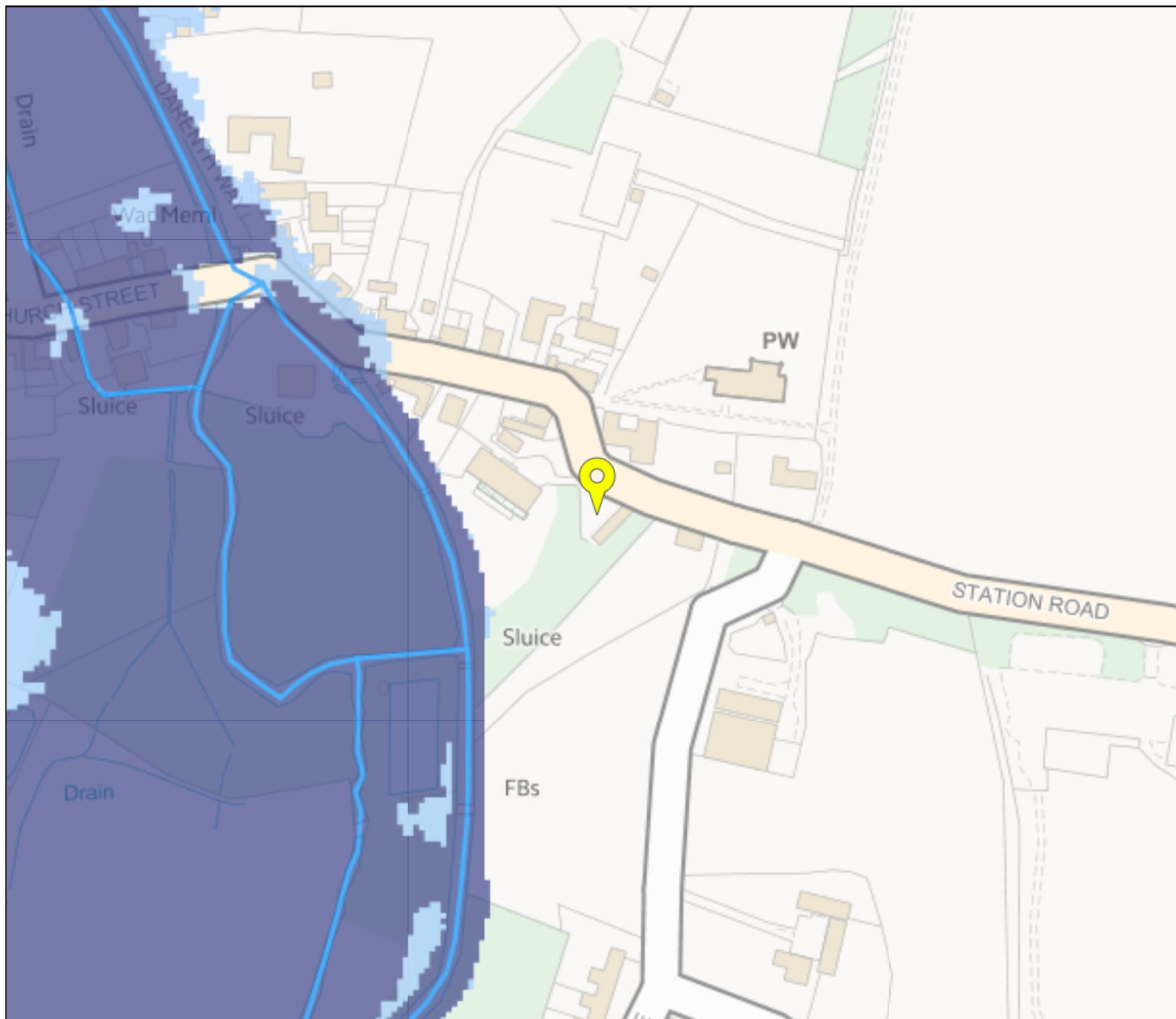
552211/161531









Scale

1:2500

Created

14 Apr 2021 14:38



-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

0 20 40 60m

Appendix 5 - Lichfield Standard Methodology Calculation

**LICHFIELDS**

How many homes? The new Standard Method

The new 2020 Standard Method for Local Housing Need

The introduction of a standard method for assessing housing needs for planning purposes (first consulted on in 2017, then adopted in 2018) intended to shift time, resources and debate at examination away from the ‘numbers’ question and towards the ‘how’ and ‘where’ of building new homes. This method – which equated to a figure of around 266K per annum when launched – was based on the 2014-based Household Projections plus an uplift for affordability, subject to a ‘cap’.

In August 2020, the Government consulted on a proposed new Standard Method, which had a greater focus on affordability, the results of which were to boost the national figure to 337K, with most of the increases in the areas where the gap between house prices and incomes was greatest. This unleashed a political and media storm that led to the proposal being dubbed 'the mutant algorithm', and the Government indicated that it would be reviewing its draft proposals.

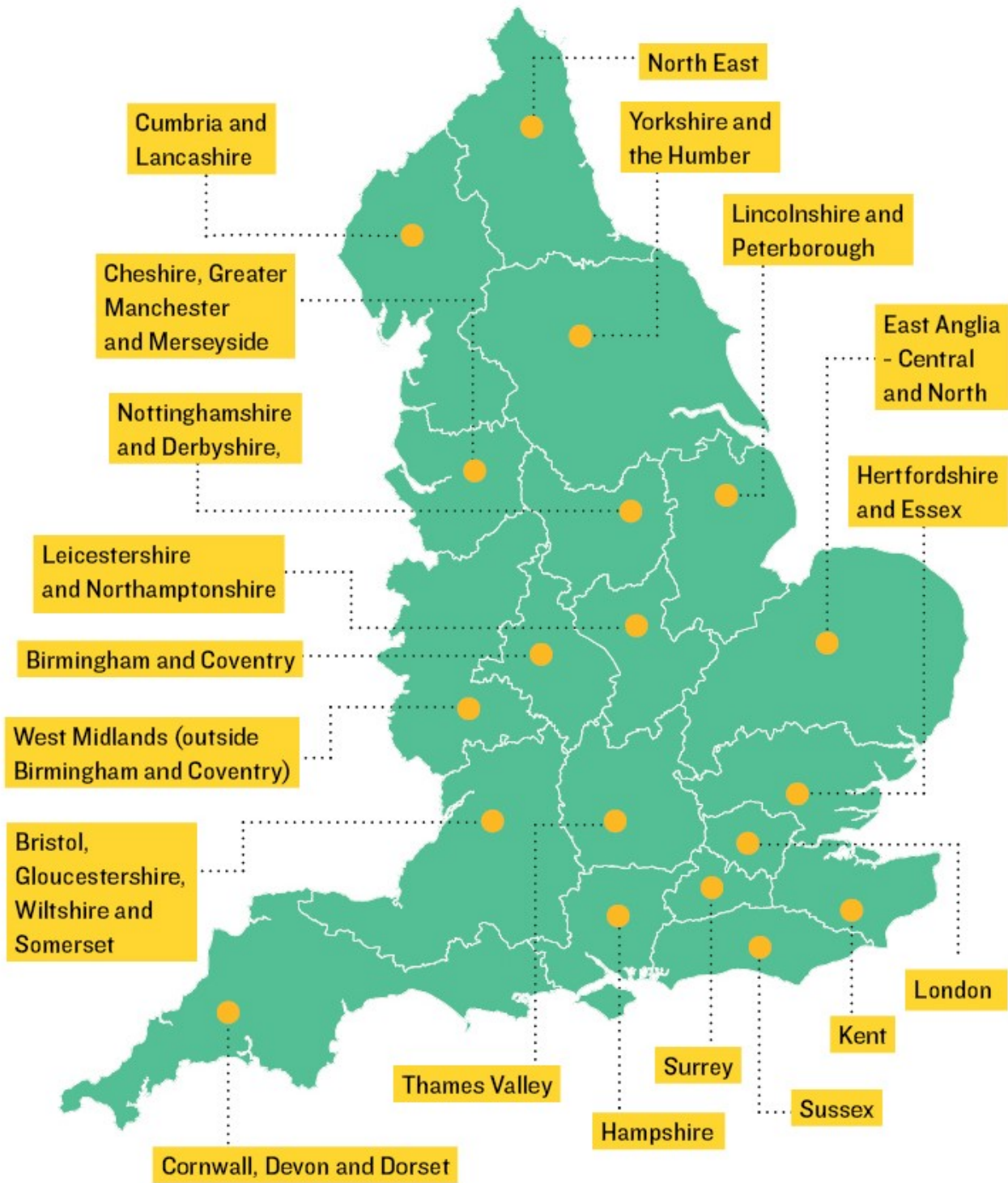
On 16th December 2020, the Government launched its solution: scrap its August proposals, revert back to the method it introduced in 2018, but with a modification to top up the number in the 20 largest cities and urban areas by 35%, reflecting Government objectives to, inter alia, drive housing into existing urban areas and encourage brownfield development.

You can read more about our thoughts on the changes – plus a regional analysis - in our [blog here](#).

The Government helpfully published a spreadsheet containing the indicative figures from the new method on 16th December. To aid interpretation, Lichfields has reviewed these figures, addressed a small number of anomalies, and compiled into tables grouped by sub-regions and with additional data to enable comparison of the new figures with current local plans, recent rates of housing delivery, the original method and the 'mutant algorithm'.

The figures from the Standard Method are minimum estimates of local housing need and are not binding housing requirements. Plan makers may set housing requirements greater than the Standard Method or provide for less housing, subject to the provisions of the NPPF. The White Paper – Planning for the Future – put forward proposals for Government to set binding housing requirement figures for individual local plans that would take into account supply, policy and environmental factors, but these provisions do not yet exist, and are unlikely to do so for some time.

For information on how we have calculated the figures, please [click here](#).



Regions

Birmingham and Coventry

Bristol, Gloucestershire, Wiltshire and Somerset

Cheshire, Greater Manchester and Merseyside

Cornwall, Devon and Dorset

Cumbria and Lancashire

East Anglia - Central and North

Hampshire

Hertfordshire and Essex

Kent

Leicestershire and Northamptonshire

Lincolnshire and Peterborough

London

Nottinghamshire and Derbyshire

North East

Surrey

Sussex

Thames Valley

West Midlands (outside Birmingham and Coventry)

Yorkshire and The Humber

Birmingham and Coventry

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Bristol, Gloucestershire, Wiltshire and Somerset

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Birmingham and Coventry	12,537	15,991	14,177	18,125	16,295
Birmingham and Black Country	8,119	10,409	10,100	11,058	11,615
Cannock Chase	241	596	276	575	276
East Staffordshire	613	729	430	582	430
Lichfield	478	624	321	423	321
Tamworth	177	338	149	305	149
Birmingham	2,555	3,696	3,577	3,056	4,829
Dudley	806	728	636	880	636
Sandwell	1,074	646	1,488	1,141	1,488
Solihull		718	807	1,011	807
Walsall	599	714	882	823	882
Wolverhampton	671	769	750	844	1,013
Bromsgrove	368	326	379	694	379
Redditch	337	351	174	368	174
Wyre Forest	200	173	231	353	231
Coventry-Warwickshire	4,418	5,583	4,077	7,067	4,680
North Warwickshire	203	260	171	439	171
Nuneaton and Bedworth	703	588	429	662	429
Rugby	620	796	525	705	525
Stratford-on-Avon	730	1,362	603	1,675	603
Warwick	932	965	627	910	627
Coventry	1,230	1,612	1,722	2,676	2,325

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Cheshire, Greater Manchester and Merseyside

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Bristol, Gloucestershire, Wiltshire and Somerset	13,766	14,295	14,795	20,818	15,623
Bath and North East Somerset	720	1,151	648	1,216	648
Wider Bristol	3,729	3,917	5,145	6,742	5,973
Bristol	1,320	1,535	2,368	2,490	3,196
North Somerset	1,049	820	1,365	1,708	1,365
South Gloucestershire	1,360	1,562	1,412	2,544	1,412
Swindon-Wiltshire	3,567	3,445	3,036	4,383	3,036
Swindon	1,467	887	1,030	1,466	1,030
Wiltshire	2,100	2,558	2,006	2,917	2,006
Cheltenham-Gloucester	1,768	1,860	1,754	2,143	1,753
Cheltenham	546	582	531	528	531
Gloucester	727	495	658	578	658
Tewkesbury	495	782	564	1,037	564
Rural Gloucestershire	1,199	1,538	1,492	2,603	1,492
Cotswold	420	676	487	1,209	487
Forest of Dean	323	287	370	608	370
Stroud	456	575	635	786	635
Somerset	2,783	2,384	2,721	3,731	2,721
Mendip	419	526	599	1,064	599
Sedgemoor	644	481	746	824	746
South Somerset	725	624	685	612	685
Somerset West and Taunton	995	753	691	1,231	691

Cornwall, Devon and Dorset

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Cumbria and Lancashire

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Cheshire, Greater Manchester and Merseyside	12,410	23,006	17,134	18,668	18,594
Central Liverpool	1,414	4,978	3,414	3,439	3,959
West Lancashire	324	375	193	277	193
Knowsley	450	854	261	415	261
Liverpool		2,500	1,558	1,154	2,103
Sefton	640	551	623	695	623
Wirral		698	779	898	779
Cheshire East	1,800	2,788	1,068	1,774	1,068
Cheshire West and Chester	1,100	2,183	584	1,659	584
Greater Manchester	6,974	11,420	10,533	10,243	11,448
Bolton	694	497	776	708	776
Bury		288	601	673	601
Manchester	3,333	3,108	2,613	1,645	3,527
Oldham	289	534	693	805	693
Rochdale	460	761	503	990	503
Salford		2,851	1,344	1,326	1,344
Stockport	480	922	1,079	1,098	1,079
Tameside		535	651	763	651
Trafford	718	703	1,369	1,239	1,369
Wigan	1,000	1,222	905	996	905
Mid Mersey	1,122	1,637	1,535	1,554	1,535
Halton	552	522	246	386	246
Warrington		468	855	711	855
St Helens	570	647	434	456	434

East Anglia - Central and North

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Hampshire

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Cornwall, Devon and Dorset	11,067	11,712	12,587	15,914	12,587
Dorset	3,187	2,528	4,448	3,807	4,448
Bournemouth, Christchurch and Poole	1,723	1,157	2,655	1,731	2,655
Dorset	1,464	1,371	1,793	2,075	1,793
Exeter	3,058	3,272	3,265	5,116	3,264
Torbay	494	378	586	635	586
East Devon	950	953	928	1,614	928
Exeter	600	882	625	694	625
Mid Devon	393	453	367	641	367
Teignbridge	621	606	758	1,532	758
North Devon	862	1,005	756	1,067	756
North Devon	431	738	336	650	336
Torridge	431	267	420	417	420
Plymouth	3,960	4,907	4,119	5,924	4,119
Cornwall	2,625	3,191	2,820	4,054	2,820
Plymouth	445	1,010	623	823	623
South Hams	445	509	355	769	355
West Devon	445	197	321	278	321

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Hertfordshire and Essex

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Kent

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Cumbria and Lancashire	6,782	6,838	3,465	5,963	3,463
Allerdale	304	358	106	320	106
Barrow-in-Furness	119	107	0	159	0
Blackburn with Darwen and Hyndburn	838	492	210	512	210
Blackburn with Darwen with Darwen	625	356	154	346	154
Hyndburn	213	136	56	165	56
Burnley-Pendle	492	469	208	437	208
Burnley	194	250	62	224	62
Pendle	298	219	146	213	146
Carlisle	565	587	193	286	193
Central Lancashire	1,341	1,768	1,010	1,394	1,010
Chorley	417	625	569	771	569
Preston	507	757	250	385	250
South Ribble	417	387	191	238	191
Copeland	277	138	11	154	11
Eden	242	286	95	133	95
Fylde Coast	1,155	1,233	689	1,173	689
Blackpool	280	326	121	303	121
Fylde	415	531	272	488	272
Wyre	460	376	296	383	296
Lancaster	522	509	410	417	410
Ribble Valley	280	454	143	298	143
Rosendale	247	117	190	271	190
South Lakeland	400	319	198	410	198

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Leicestershire and Northamptonshire

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
East Anglia - Central and North	12,837	14,799	15,333	19,020	15,332
Bedford	970	1,245	1,305	1,153	1,305
Cambridgeshire	3,604	3,604	3,853	3,935	3,854
Cambridge	700	831	658	745	658
East Cambridgeshire	575	377	597	554	597
Fenland	550	467	538	844	538
Huntingdonshire	804	932	976	1,019	976
South Cambridgeshire	975	997	1,085	773	1,085
Central Norfolk	3,058	3,411	3,221	5,056	3,221
Breckland	612	623	661	1,070	661
Broadland	706	661	517	922	517
North Norfolk	400	494	552	730	552
Norwich	477	550	598	502	598
South Norfolk	863	1,082	893	1,832	893
Great Yarmouth	420	306	357	373	357
Ipswich	2,135	2,061	2,276	3,755	2,276
Babergh	300	401	416	789	416
Ipswich	489	262	459	552	459
Mid Suffolk	430	522	535	754	535
East Suffolk	916	876	866	1,660	866
King's Lynn and West Norfolk	660	469	538	540	538
Luton and Central Bedfordshire	1,137	2,965	2,981	3,465	2,981
Central Bedfordshire	712	2,276	2,386	2,752	2,386
Luton	425	689	595	713	595
West Suffolk	853	739	800	743	800

Lincolnshire and Peterborough

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London

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Hampshire	6,549	8,453	8,625	10,318	8,976
Basingstoke and Deane	850	1,201	884	684	884
East Hampshire	592	936	623	932	623
Hart and Rushmoor	859	1,083	546	913	546
Hart	423	589	286	512	286
Rushmoor	436	494	260	401	260
Isle of Wight	520	325	688	1,045	688
PUSH East	1,804	1,650	2,909	3,430	2,909
Portsmouth	547	253	855	730	855
Fareham	147	289	514	403	514
Gosport	170	136	344	309	344
Havant	315	308	504	963	504
Winchester	625	664	692	1,025	692
PUSH West	1,924	3,258	2,977	3,312	3,326
Southampton	815	967	1,002	832	1,353
Eastleigh		1,093	694	885	694
New Forest	521	345	729	782	729
Test Valley	588	853	550	813	550

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Nottinghamshire and Derbyshire

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North East

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Hertfordshire and Essex	6,545	11,856	18,757	20,151	18,757
Brentwood		273	453	393	453
Broxbourne	454	303	594	465	594
Maldon	294	320	308	623	308
North Essex	1,942	3,426	3,747	5,086	3,747
Braintree	273	636	857	776	857
Chelmsford	805	1,032	946	1,557	946
Colchester	864	1,003	1,078	1,612	1,078
Tendring		755	866	1,141	866
South West Herts	1,136	2,140	4,043	3,708	4,043
Dacorum	430	544	1,023	922	1,023
Hertsmere	266	560	716	668	716
St Albans		482	893	997	893
Three Rivers	180	274	624	588	624
Watford	260	281	787	533	787
Stevenage and North Herts	380	539	1,416	947	1,417
North Hertfordshire		312	973	625	973
Stevenage	380	227	444	322	444
Thames Gateway South Essex	1,500	1,845	4,043	4,599	4,043
Southend-on-Sea	325	369	1,181	1,324	1,181
Thurrock	925	608	1,147	1,483	1,147
Basildon		419	1,001	820	1,001
Castle Point		147	354	386	354
Rochford	250	303	360	586	360
Welwyn Hatfield		455	875	667	875
West Essex and East Herts	839	2,556	3,277	3,663	3,277
Epping Forest		404	953	868	953
Harlow		561	473	442	473
Uttlesford		812	706	1,231	706
East Hertfordshire	839	778	1,145	1,122	1,145

Surrey

*Surrey Heath has been included as part of Hampshire rather than Surrey as the Council identifies itself as being in a Housing Market Area with Rushmoor and Hart (both in Hampshire).

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Kent	7,577	8,045	12,073	14,908	12,072
Ashford, Maidstone, Tonbridge & Malling	2,401	2,674	2,999	4,220	2,999
Ashford	1,093	726	970	1,211	970
Maidstone	883	1,262	1,186	1,569	1,186
Tonbridge and Malling	425	686	843	1,440	843
East Kent	2,707	1,913	3,553	4,470	3,553
Canterbury	800	702	1,120	1,125	1,120
Dover	700	445	596	1,279	596
Shepway	350	451	752	1,043	752
Thanet	857	316	1,085	1,023	1,085
North Kent	2,004	2,608	4,131	4,505	4,131
Medway		823	1,662	1,176	1,662
Dartford	865	861	776	1,441	776
Gravesham	363	243	655	405	655
Swale	776	681	1,038	1,483	1,038
Sevenoaks-Tunbridge Wells	465	849	1,390	1,713	1,389
Sevenoaks	165	359	711	820	711
Tunbridge Wells	300	490	678	893	678

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Leicestershire and Northamptonshire	8,561	9,101	8,888	13,258	9,496
Leicestershire	4,444	5,264	4,913	7,604	5,520
Leicester	1,280	1,490	1,734	1,119	2,341
Blaby	380	512	345	1,148	345
Charnwood	820	969	1,105	1,636	1,105
Harborough	640	738	550	1,238	550
Hinckley and Bosworth	450	378	452	889	452
Melton	245	231	201	205	201
North West Leicestershire	481	822	359	1,153	359
Oadby and Wigston	148	123	167	216	167
North Northamptonshire	1,750	1,735	1,837	3,009	1,837
Corby	460	533	506	799	506
East Northamptonshire	420	383	457	821	457
Kettering	520	496	526	853	526
Wellingborough	350	322	348	535	348
West Northamptonshire	2,367	2,102	2,139	2,645	2,139
Daventry	707	733	348	970	348
Northampton	1,048	677	1,288	811	1,288
South Northamptonshire	612	692	503	864	503

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Lincolnshire and Peterborough	4,641	4,607	3,958	5,514	3,956
Central Lincolnshire	1,539	1,374	1,086	1,242	1,086
Lincoln	513	284	297	294	297
North Kesteven	513	677	455	585	455
West Lindsey	513	413	334	363	334
Peterborough	2,233	2,356	2,199	3,009	2,198
Rutland	150	217	122	307	122
South Holland	467	547	418	580	418
South Kesteven	645	611	732	839	732
Peterborough	971	981	926	1,282	926
Rest of Central Lincolnshire	869	877	672	1,262	672
Boston	310	382	249	443	249
East Lindsey	559	495	423	819	423

Sussex

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Thames Valley

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West Midlands (outside Birmingham and Coventry)

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
London	41,882	36,686	69,318	93,532	93,579
Greater London	41,882	36,686	69,318	93,532	93,579
Barking and Dagenham	1,236	687	2,210	1,657	2,983
Barnet	2,349	2,136	3,971	5,744	5,361
Bexley	446	324	1,773	1,797	2,394
Brent	1,525	1,623	2,647	2,695	3,574
Bromley	641	582	897	2,487	1,211
Camden	1,120	919	1,568	5,604	2,117
City of London	141	262	114	116	154
Croydon	1,649	1,774	2,303	2,205	3,109
Ealing	1,297	1,673	2,361	2,247	3,188
Enfield	798	435	3,257	2,213	4,397
Greenwich	2,685	2,156	3,265	4,289	4,408
Hackney	1,330	1,145	1,862	5,031	2,514
Hammersmith and Fulham	1,031	1,242	1,286	2,289	1,736
Haringey	1,320	878	1,848	2,786	2,495
Harrow	593	1,043	1,880	1,336	2,538
Havering	1,170	417	1,910	1,975	2,579
Hillingdon	559	1,155	2,704	2,026	3,651
Hounslow	822	1,240	1,151	1,338	1,554
Islington	1,264	1,011	2,309	2,218	3,117
Kensington and Chelsea	733	320	998	3,285	1,347
Kingston upon Thames	642	444	1,510	1,526	2,038
Lambeth	1,559	1,426	1,673	2,341	2,259
Lewisham	1,385	1,135	3,095	3,735	4,178
Merton	411	422	1,519	1,333	2,051
Newham	2,867	2,573	3,616	3,644	4,882
Redbridge	1,123	617	1,572	3,084	2,122
Richmond upon Thames	315	373	441	2,247	595
Southwark	2,736	1,773	3,299	3,547	4,453
Sutton	427	615	598	1,233	807
Tower Hamlets	3,931	2,697	4,585	6,121	6,190
Waltham Forest	862	747	2,375	2,574	3,206
Wandsworth	1,847	1,825	2,537	3,059	3,425
Westminster	1,068	1,019	2,182	5,750	2,946

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Nottinghamshire and Derbyshire	6,608	8,746	7,516	10,460	8,227
Chesterfield	867	1,435	993	1,752	993
Bolsover	272	326	224	446	224
Chesterfield	240	209	229	323	229
North East Derbyshire		340	252	419	252
Bassetlaw	355	560	288	564	288
Derby	1,389	2,355	1,810	2,495	2,118
Derby	647	645	881	624	1,189
Amber Valley		569	381	663	381
South Derbyshire	742	1,141	548	1,209	548
Derbyshire Dales	284	385	230	343	230
High Peak	350	398	263	420	263
Nottingham Core	2,939	2,950	2,970	3,319	3,373
Nottingham	1,009	1,552	1,149	897	1,551
Erewash	368	247	392	344	392
Broxtowe	362	240	368	490	368
Gedling	426	294	458	534	458
Rushcliffe	774	617	604	1,054	604
Nottingham Outer	779	1,223	1,250	2,131	1,250
Ashfield		290	481	813	481
Mansfield	325	366	275	554	275
Newark and Sherwood	454	566	494	764	494

Yorkshire and The Humber

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Current local plan requirements based on data collected by Lichfields using MHCLG Local Plan progress [tracker](#). Recent delivery – average net additional dwellings for 2017/18, 2018/19 and 2019/20 by local authority calculated by Lichfields using [MHCLG Live Table I22](#). Standard method (2017) and Standard method (2020, with urban uplift) – calculated by Lichfields using ONS 2014-based Household Projections (2020-30), ONS Median Workplace-based affordability ratio (2019) and local plans data. Figures cross-checked with MHCLG data published [here](#). 35% uplift applied to urban areas listed in PPG para ID: 2a-004-2020I216 Step 4. 'Mutant algorithm' figures calculated based on methodology proposed in 'Changes to the current planning system August 2020' [here](#).

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
North East	6,545	9,815	6,262	7,288	6,625
Darlington	434	537	165	253	165
County Durham		1,477	1,266	1,140	1,266
Hartlepool	347	297	180	246	180
Middlesbrough	1,321	1,828	817	1,192	817
Middlesbrough	410	532	256	354	256
Redcar and Cleveland	234	437	89	392	89
Stockton-on-Tees	677	860	472	445	472
Northumberland		1,641	651	1,172	651
Tyne and Wear	3,135	4,035	3,182	3,284	3,546
Gateshead	425	285	445	494	445
Newcastle upon Tyne	850	1,867	1,036	774	1,399
North Tyneside	790	817	803	884	803
South Tyneside	325	262	341	435	341
Sunderland	745	803	558	697	558

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Surrey	3,480	3,741	6,314	6,738	6,315
North East Surrey	594	774	1,662	1,940	1,663
Elmbridge	225	315	633	774	633
Epsom and Ewell	181	170	577	604	577
Mole Valley	188	288	453	563	453
Reigate-Tandridge	585	787	1,290	1,624	1,290
Reigate and Banstead	460	516	644	1,091	644
Tandridge	125	271	646	533	646
Runnymede and Spelthorne	666	749	1,137	850	1,137
Runnymede	500	493	531	361	531
Spelthorne	166	256	606	489	606
Surrey Heath	191	323	328	408	328
West Surrey	1,444	1,109	1,897	1,916	1,897
Guildford	562	334	787	733	787
Waverley	590	485	679	835	679
Woking	292	289	431	348	431

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	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Sussex	6,090	6,176	10,160	13,629	10,483
Coastal West Sussex	2,747	2,467	4,563	6,700	4,886
Brighton and Hove	660	461	924	1,520	1,247
Lewes	275	302	385	800	385
Adur	177	80	248	326	248
Arun	1,000	611	1,368	2,063	1,368
Chichester	435	622	753	1,120	753
Worthing	200	390	885	871	885
North West Sussex	2,104	2,380	2,510	3,618	2,510
Crawley	340	444	476	598	476
Horsham	800	1,160	920	1,715	920
Mid Sussex	964	776	1,114	1,305	1,114
Rother and Hastings	550	398	1,187	1,626	1,187
Hastings	215	169	451	453	451
Rother	335	229	736	1,173	736
Wealden and Eastbourne	689	931	1,901	1,685	1,900
Eastbourne	239	152	675	486	675
Wealden	450	779	1,225	1,199	1,225

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Thames Valley	9,333	14,253	12,115	14,655	12,342
Buckinghamshire	0	2,694	2,936	3,111	2,936
Eastern Berkshire	313	1,176	1,617	1,511	1,617
Slough	313	628	863	597	863
Windsor and Maidenhead		548	754	914	754
Milton Keynes	1,767	1,781	1,806	1,417	1,806
Oxfordshire	4,820	5,018	3,192	4,784	3,191
Cherwell	1,582	1,345	756	1,305	756
Oxford	431	219	603	656	603
South Oxfordshire	981	1,230	608	723	608
Vale of White Horse	1,028	1,410	661	1,447	661
West Oxfordshire	798	814	563	653	563
Western Berkshire	2,433	3,585	2,565	3,832	2,792
Bracknell Forest	557	953	614	805	614
Reading	689	710	649	700	876
West Berkshire	525	484	513	692	513
Wokingham	662	1,438	789	1,635	789

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
West Midlands (outside Birmingham and Coventry)	6,097	7,786	5,490	9,378	5,665
Herefordshire	825	784	846	1,166	846
Shropshire	2,239	2,860	1,687	3,070	1,687
Shropshire	1,375	1,728	1,177	2,129	1,177
Telford and Wrekin	864	1,131	510	941	510
Stoke-Stafford	1,850	2,375	1,694	2,527	1,869
Stoke-on-Trent	570	905	500	684	675
Newcastle-under-Lyme	285	274	355	395	355
South Staffordshire	175	251	254	364	254
Stafford	500	771	400	829	400
Staffordshire Moorlands	320	174	185	255	185
Worcestershire	1,183	1,767	1,263	2,614	1,263
Malvern Hills	421	475	404	929	421
Worcester	283	233	362	290	421
Wychavon	479	1,059	497	1,396	421

	Current Local Plan requirement	Average delivery (last 3 years)	Standard Method (2017)	"Mutant Algorithm"	Standard Method (2020, with cities and urban centres uplift)
Yorkshire and The Humber	19,335	19,930	16,395	17,870	18,851
Calderdale		399	800	587	800
Doncaster	1,230	1,249	546	961	546
Hull-East Riding	2,020	2,204	1,306	1,945	1,444
East Riding of Yorkshire	1,400	1,264	908	1,221	908
Kingston upon Hull	620	940	397	724	536
Kirklees	1,730	1,337	1,666	1,107	1,666
Leeds-Bradford	5,723	4,429	4,491	3,598	6,063
Bradford	2,476	1,415	1,704	1,211	2,300
Leeds	3,247	3,014	2,787	2,387	3,763
North East Lincolnshire	512	247	211	470	211
North Lincolnshire	754	366	396	415	396
North Yorkshire	1,330	2,476	1,749	2,039	1,748
York		768	1,026	763	1,026
Craven	242	262	150	224	150
Hambleton	260	512	196	349	196
Harrogate	637	756	364	579	364
Richmondshire	191	178	12	124	12
Rotherham	850	483	566	736	566
Ryedale	200	334	184	357	184
Scarborough	450	481	172	339	172
Selby	450	576	342	589	342
Sheffield	2,486	3,471	2,997	2,745	3,743
Barnsley	1,134	1,016	866	1,013	866
Sheffield	1,352	2,454	2,131	1,733	2,877
Wakefield	1,600	1,877	970	1,982	970



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