

Planning Design & Access Statement

PLANNING APPLICATION BY:

MR P CAZALY

RELATING TO:

**HAWFIELD, ADJOINING 1
SINGLES CROSS COTTAGES,
BLUEBERRY LANE,
KNOCKHOLT, TN14 7NH**



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1. INTRODUCTION

1.1. I am instructed by my client Mr P Cazaly to prepare this Planning, Design and Access Statement in support of an application for planning permission for the following development at Hawfield, adjoining 1 Singles Cross Cottages, Blueberry Lane, Knockholt:

“Demolition of 2no. existing barns (approved as apart hotels under 20/02590/LDCPR & 21/01388/FUL); erection of 1no. holiday let with associated works”.

1.2. I am familiar with the site and the surrounding area and have studied carefully the site’s planning history, been involved in pre-application discussions with the Council and have then advised on the preparation of this application for planning permission.

1.3. This statement should be read in conjunction with the drawing package prepared by Rayner Davies Architects Ltd and ecology reports by AA Environmental Ltd.

2. THE APPLICATION SITE AND SURROUNDING AREA:

2.1. The application site is located on the western side of Blueberry Lane, a road which is approximately 185m south of Singles Cross and 650m from the centre of Knockholt Pound village. The character of the area comprises residential dwellings in the countryside with the closest properties being Singles Cross Cottages immediately north which form a ribbon of development set close to the highway. The site is readily accessible to the road network and not in an isolated position. To the south are two residential buildings at Blueberry Farm being the original farmhouse and converted barn.

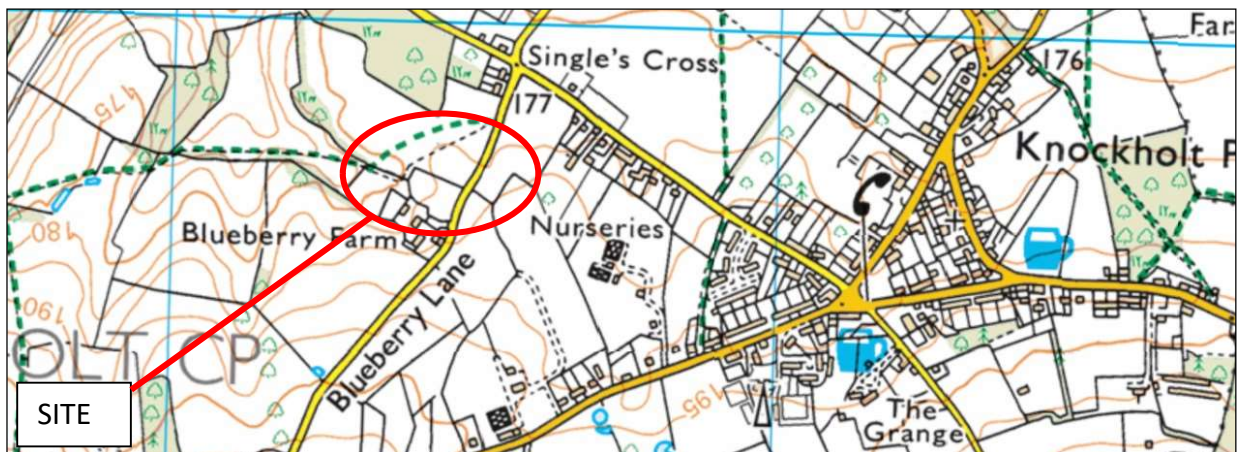


Figure 1: Proposed OS Map.

2.2. The western parcel of the application site comprises two barns located against a dense tree belt which have a lawful C1 use following the approval of lawful development certificate **20/02590/LDCPR**. Building operations to the two buildings were approved under **21/01388/FUL**. The buildings are single storey structures which have gable ends with sloped asymmetrical hipped roofs.



Figure 2: Existing barns – C1 Hotel use.

2.3. The barns are served by an existing gated access onto Blueberry Lane in the eastern parcel of the application site. A formal access onto Blueberry Lane and access road was permitted under **20/01804/LDCPR**. The eastern parcel is a field used for sheep grazing, with hedgerows forming the eastern and southern boundaries of this part of the site.



Figure 3: Eastern parcel of application site.

2.4. A right of way (SK693) runs to the north of the site as outlined in the below figure:



Figure 4: Right of Way Map.

2.5. In terms of planning designations, the site is located in the Metropolitan Green Belt, but is not located in an AONB or Conservation Area. The site is situated in Flood Zone 1.

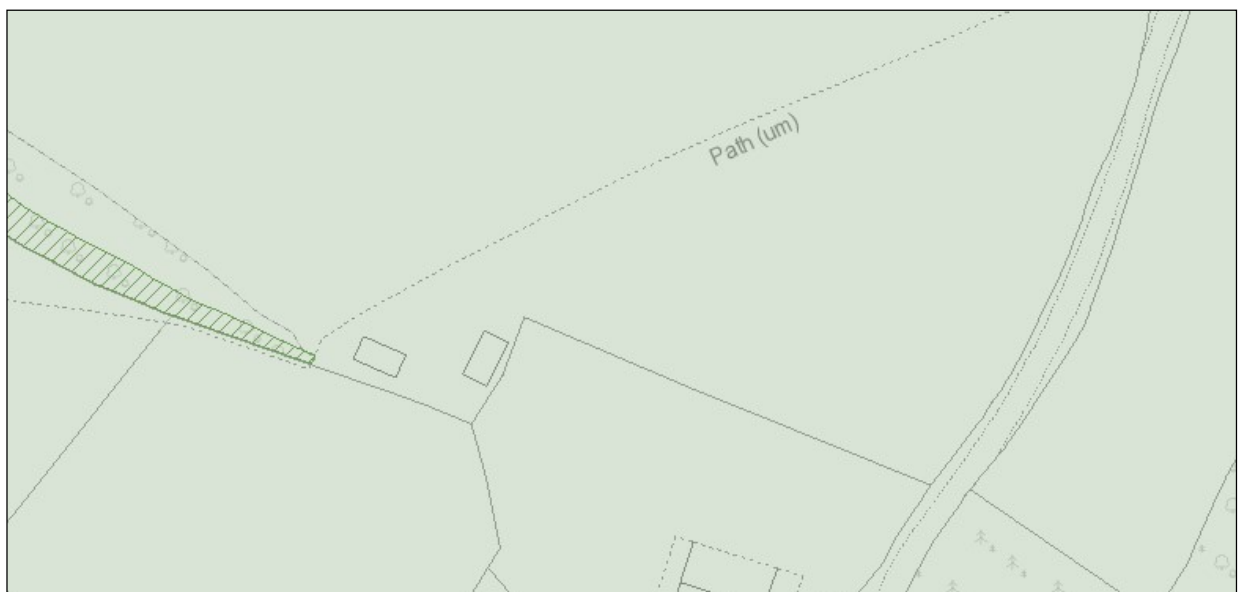


Figure 5: Extract from Proposals Map.

3. PLANNING HISTORY:

(i) Site

3.1. The Council approved the change of use of the two barns subject of this application from agricultural use to Class C1 use, first under prior approval **20/01796/PAN** and then subsequently under lawful development certificate **20/02590/LDCPR**. This change of use was approved under Schedule 2, Part 3, Class R of The Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO).

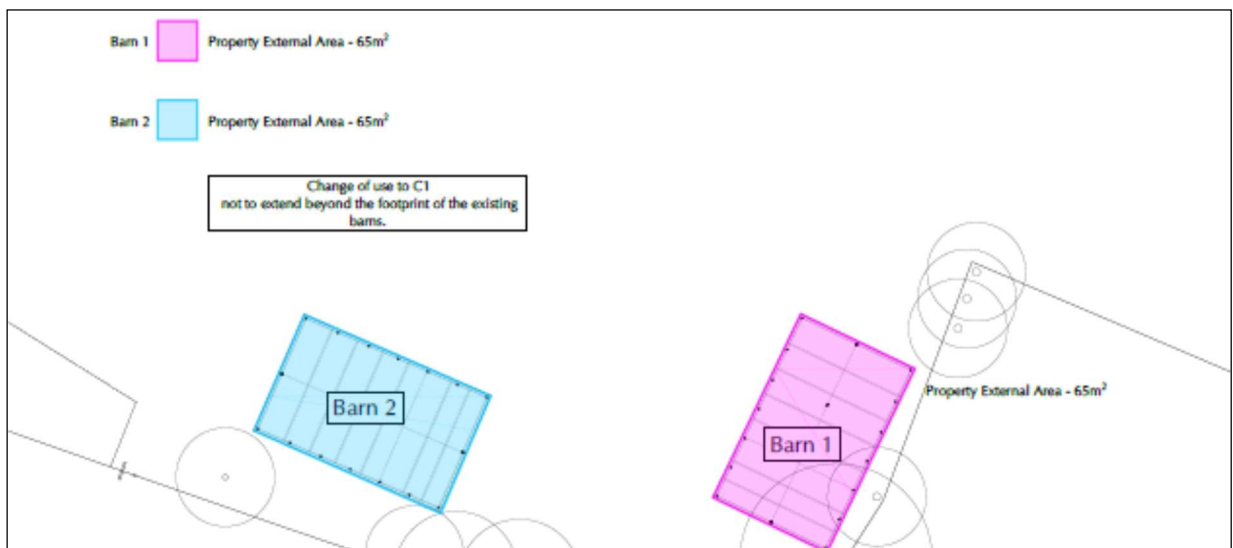


Figure 6: Approved plan of hotel use – C1

3.2. The Council approved the formation of a vehicle access and hardstanding to the lawful C1 use under lawful development certificate **20/01804/LDCPR**.

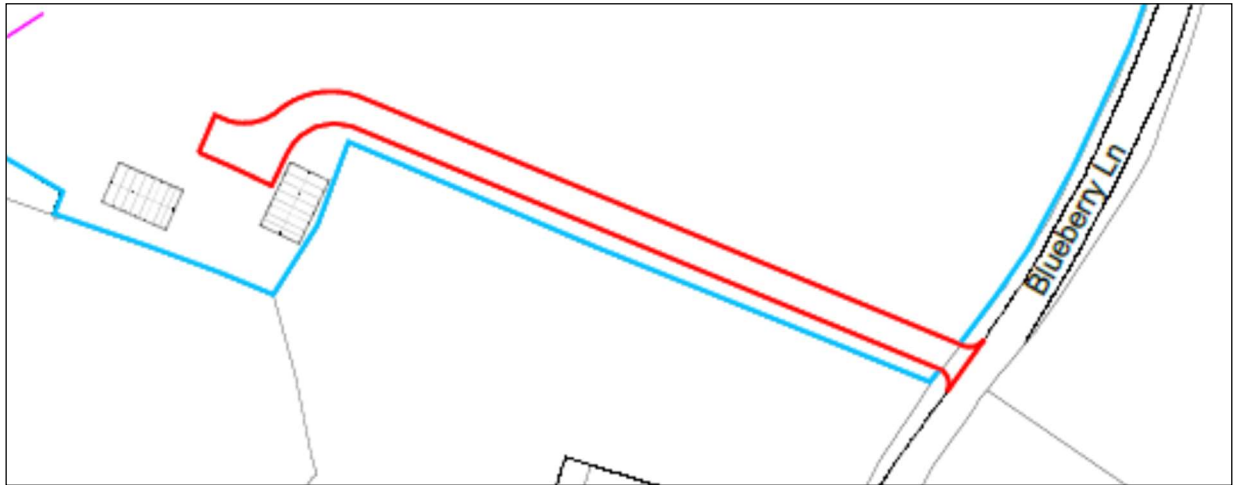


Figure 7: Approved access.

3.3. Class R does not allow for any associated operational development to take place as part of the permitted development right. The Council subsequently permitted building operations for the apart hotels under **21/01388/FUL** at Planning Committee.

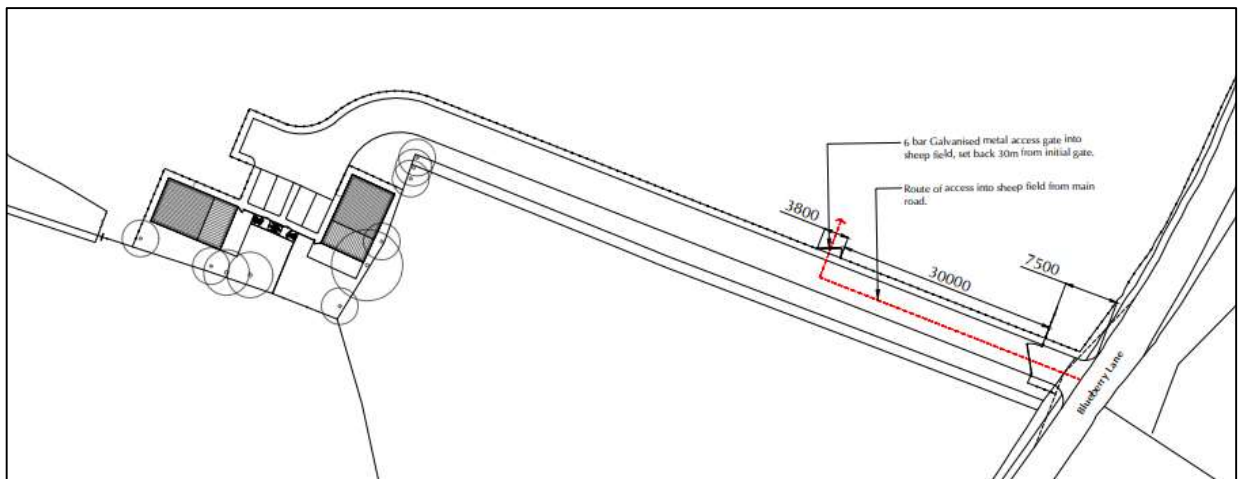


Figure 8: Approved site plan - 21/01388/FUL.

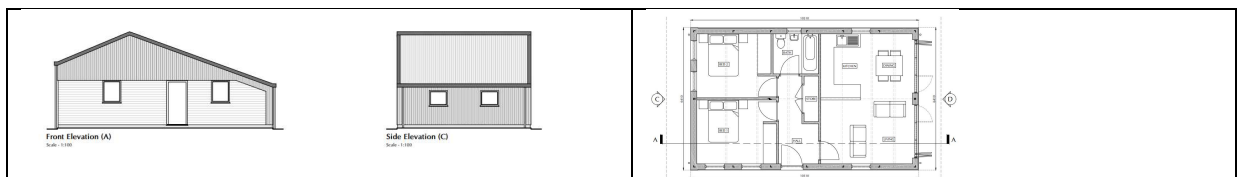


Figure 9: Approved floor plans and elevations.

3.4. The following pertinent conclusions were made by the Council within the Committee Report under application **21/01388/FUL**:

Green Belt

- In this instance, whether or not the barns are presently enclosed, their overall form in terms of height and size is clearly definable.
- The addition of cladding to the buildings would not increase the height or size of the existing buildings and in the circumstances, I do not consider that the three-dimensional impact of the built form would be greater than the existing.
- It is therefore my conclusion, that the proposals would represent appropriate development in the Green Belt.

Design / Landscape

- It is proposed to finish the barns in timber cladding with a grey slate roof. I consider this would reflect traditional materials seen in the wider locality and appear suitably subdued in terms of colouring, appropriate to their relatively isolated and rural setting.
- For these reasons, though they would be visible to the footpath, I do not consider the buildings themselves would appear visually prominent within the countryside or to be harmful to the visual amenities of the area.

3.5. Notwithstanding the positive comments received above by Officers, the following comments were made by local residents and consultees against the application.

- Concern in respect of maintaining the legal line of right of way SK693 and apart hotels proximity to this.
- Inappropriate to enhancing the openness and character of the green, verdant landscape.
- Apart hotels have no consideration to the location of the buildings. Poor location for commercial use which would impede the footpath.

- 130m of Green Belt agricultural land being hard surfaced to establish access to barns.
- Destruction of existing pasture for parking and turning.

3.6. The above comments and planning history has informed this application proposal.

(ii) Pre-Application

3.7. The applicant submitted for pre-application advice under reference **PA/22/00359** which has informed this planning application. This advised that given the nature of the proposed development very special circumstances would have to be demonstrated.

(iii) District

Green Belt Fallbacks

3.8. There are a number of local examples where the Council have given weight to fallback positions as very special circumstances. The fallback positions related to the conversion of agricultural buildings into dwellings. In both cases the Council gave significant weight to these to support the demolition of agricultural buildings for new dwellings.

3.9. I have reviewed these examples below:

<p>Planning Application: 22/01246/FUL</p>
<p>Site: Land South West Of Court Lodge Farm Stack Road Horton Kirby Kent DA4 9DU</p>
<p>Proposal: Demolition of existing barn and outbuilding with the erection of 5no. dwellings with associated amenity space, parking and landscaping works.</p>

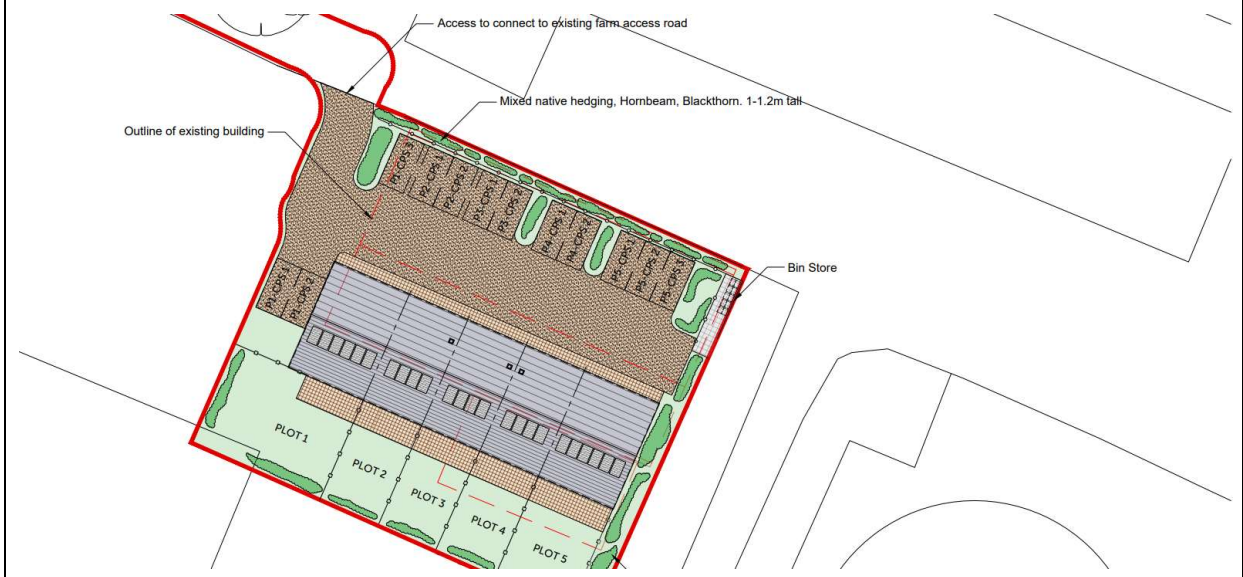
Assessment / Overview:

This proposal involved the demolition of an existing agricultural barn which was proposed to be replaced by 5 no. dwellings. This was assessed as inappropriate development in the Green Belt as it did not meet any of the exception criteria for new buildings under paragraph 149 of the NPPF.

However, the Council gave weight to a fallback position. This was that the Council had already approved under reference 21/00678/PAC for the change of use and conversion of the existing agricultural barn on site to five new dwellings. The Council confirmed that the fall-back position would be no more harmful to openness than the existing barn but would be of a greater scale, size, footprint, volume and height than the development proposed.

In regard to the weight to be given to the fallback depends upon the reasonable likelihood of the fall-back being exercised. In addition, the fall-back position should be considered on the balance on probability, not possibility.

The Council assessed the applicant had gone to the expense, both in terms of time and money, to separately gain prior approval and planning permission to convert the barn to five dwellings. If this application was refused the Council were of the view that on the balance of probability the fall-back position would be implemented. On this basis the Council gave substantial weight to the unimplemented fallback position to convert the barns, which justified the demolition of the barn under very special circumstances in this instance.



<p>Planning Application: 22/01913/HYB</p>
<p>Site: Charton Manor Farm Gorse Hill Farningham Dartford Kent DA4 0JT</p>
<p>Proposal: Hybrid planning application for a phased residential development comprising (1) Application for full planning permission for the demolition of existing barns and office/workshop including sand school and associated development, and the erection of 4no. dwellings with associated parking, amenity, landscaping and access and (2) Application for outline planning permission (with some matters) for the erection of up to 3no. self-build dwellings.</p>
<p>Assessment / Overview: This proposal involved the demolition of an agricultural barn which would be excluded from the definition of previously developed land. As a result, the demolition of the agricultural barn and the erection of 7 dwellings would be inappropriate development in the Green Belt by definition. In order to justify the development, the following very special circumstances were forwarded:</p> <ul style="list-style-type: none"> • Fall-back position - 21/00770/PAC - Prior approval for the change of use part of the agricultural building to five dwellings; 21/03698/FUL - Partial demolition of an existing barn and for the change of use and conversion of the remaining barn to provide 4no. dwellings, amenity space and parking. • Reduction in built form, footprint and volume when compared to the existing development on site and the fall-back position. • Enhancements to biodiversity <p>In terms of the fallback position, the Council recognised that the proposal would result in a reduction of built development and hardstanding. They also noted that the applicant had invested significant time and resources into designing and separately gaining prior approval and planning permission to convert the barn into a total of nine dwellings. If this application is refused the Council assessed that on the balance of probability the fall-back position would be implemented</p> <p>Weight was also given to biodiversity enhancements.</p>



Tourism

3.10. The following examples elsewhere in the District were approved under very special circumstances where weight was given to the delivery of tourism projects:

- 20/01304/FUL - Temporary provision of 3 glamping pods and a semi-permanent marquee for weddings and events at Hoath House for 5 years - Hoath House Chiddingstone Hoath KENT TN8 7DB

- 22/01280/FUL Installation of 6no. glamping pods, access, drainage and biodiversity / landscaping works - Land South West Of Gaywood Lodge Gaywood Farm Hole Lane Edenbridge Kent TN8 6SL

4. THE APPLICATION PROPOSAL:

4.1. Planning permission is sought for the following development:

“Demolition of 2no. existing barns (approved as apart hotels under 20/02590/LDCPR & 21/01388/FUL); erection of 1no. holiday let with associated works”.

4.2. The application proposal is to demolish the two existing barns which have lawful apart hotel use on the western parcel of the site. In their place, it is proposed to erect 1no. holiday let in the eastern parcel of the site close to Blueberry Lane.

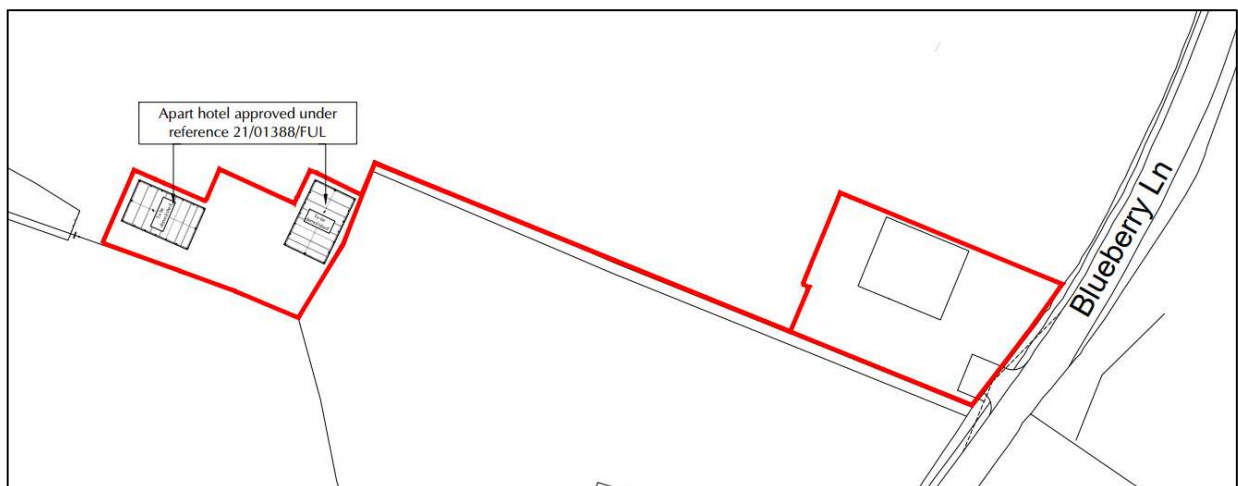


Figure 10: Proposed Site Plan.

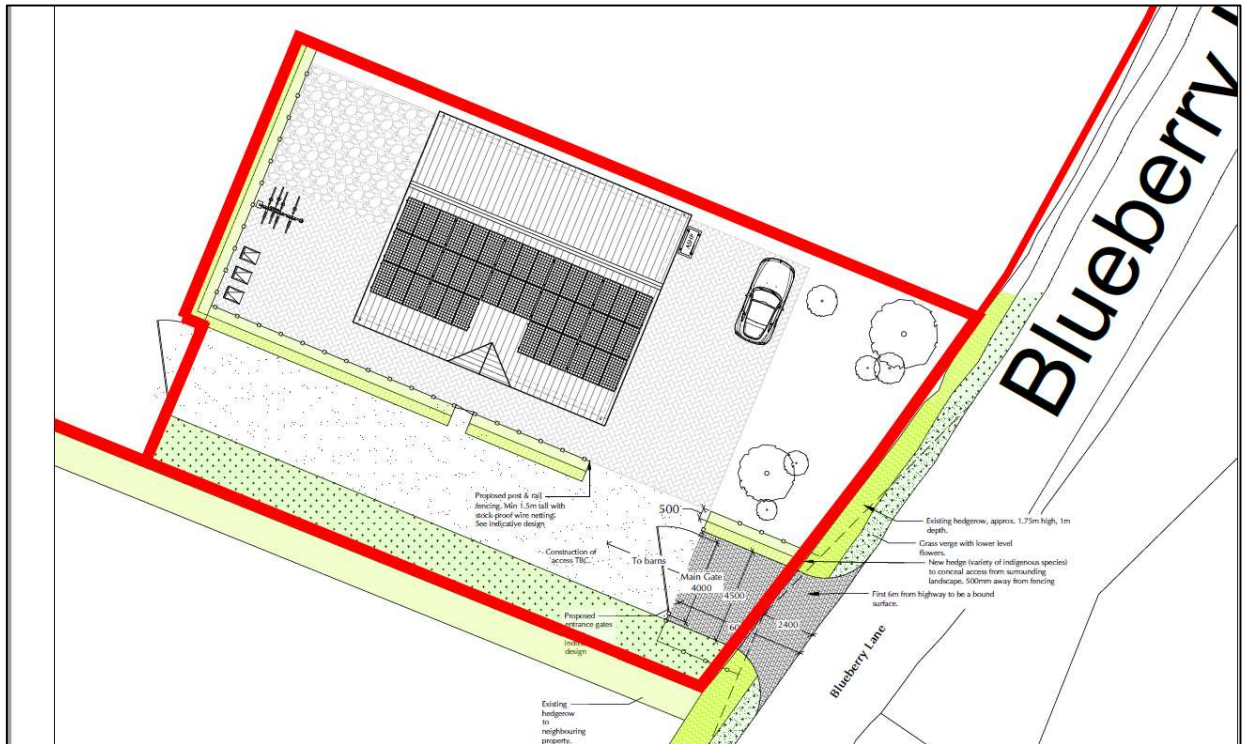


Figure 11: Proposed site plan.

- 4.3. The proposed holiday let will be situated much closer to Blueberry Lane and will be accessed off the access approved under **20/01804/LDCPR** and **21/01388/FUL**. There will be a gate set back from the highway to allow cars entering the site to wait off the highway.
- 4.4. There will be a small parking area on the eastern side of the building with front amenity area. There will be a rear garden which will be enclosed by indigenous hedging and post and rail fencing. The property will have refuse and cycle storage in the rear garden.
- 4.5. Internally, the proposed holiday let will be single storey with 3no. bedrooms, bathrooms, kitchen and living room.

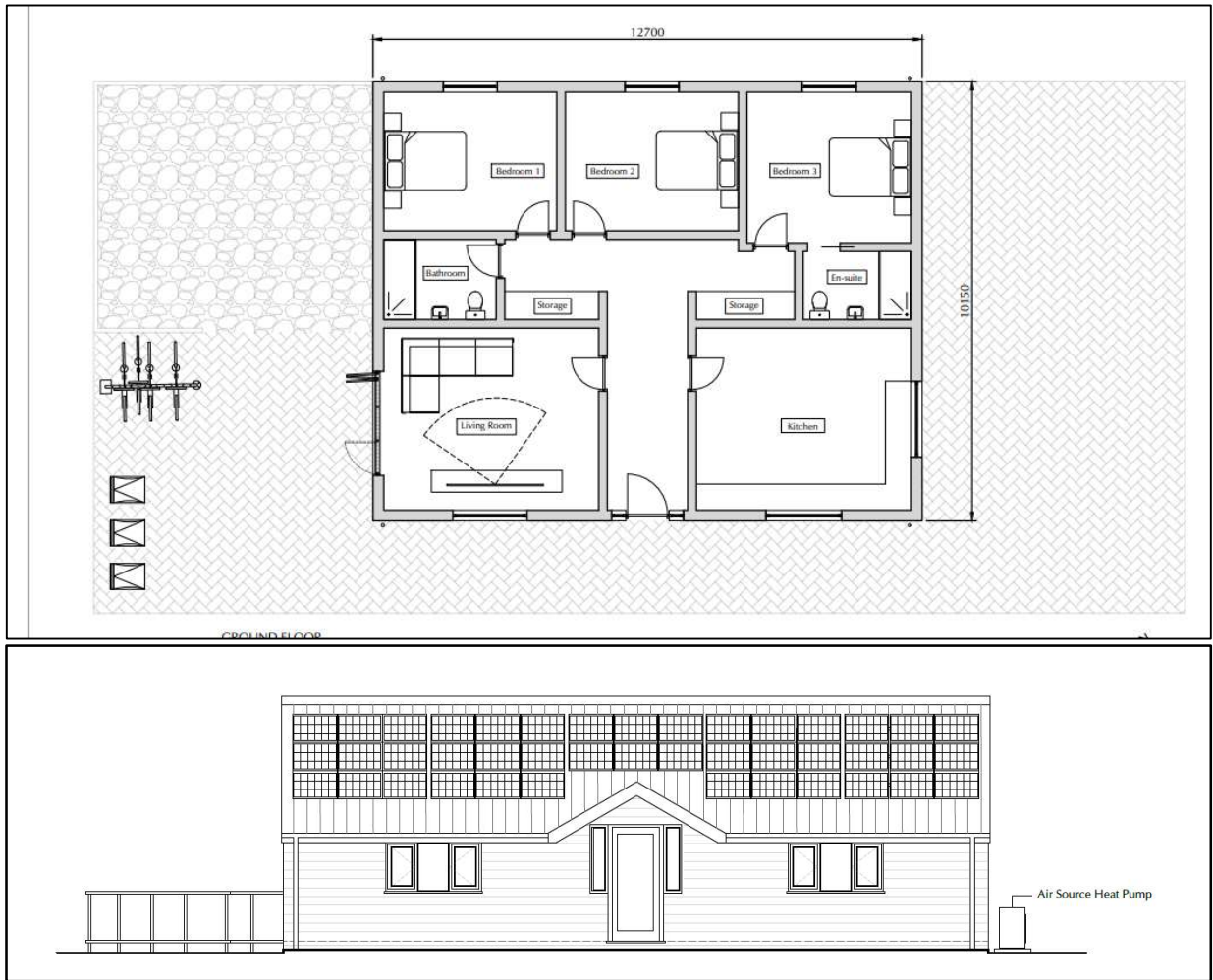


Figure 12: Proposed floor plans and elevations.

- 4.6. With regard to elevations the proposed building will reflect the design and mass of the existing barns. Solar panels will be situated on the southern roofscape of the building. An air source heat pump will serve the building and will be situated on the eastern flank of the building.
- 4.7. The proposed landscaping scheme has been informed by a Biodiversity Net Gain statement which includes the planting of new trees and hedgerows. The curtilage of the property will be defined by post and rail fencing with stock-proof wire netting.

5. PLANNING POLICY:

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 Act states that applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2. For the purposes of this planning application, I have reviewed the Council's Development Plan which consists of the Sevenoaks Core Strategy and the Sevenoaks Allocations and Development Management Plan (ADMP). The Green Belt Supplementary Planning Document (SPD) has also been assessed as part of the preparation of this submission.
- 5.3. The relevant sections of the NPPF (2021) and Planning Practice Guidance are also outlined below.

National Planning Policy Framework (NPPF) (2021)

Section 2 - Achieving Sustainable Development

- 5.4. Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 5.5. Paragraph 8 outlines that the planning system has three overarching objectives to achieve sustainable development:
- a) an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and

future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

5.6. So that sustainable development is pursued in a positive way, paragraph 10 states that at the heart of the Framework is a presumption in favour of sustainable development.

Section 6 – Building a strong competitive economy

5.7. Planning decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;

c) sustainable rural tourism and leisure developments which respect the character of the countryside;

Section 12 – Achieving well-designed places

5.8. Paragraph 126 states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

5.9. Section 130 outlines that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;

Section 13 – Protecting Green Belt Land

5.10. Paragraph 137 states that 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.

5.11. Paragraph 138 outlines that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 5.12. Paragraph 147 advises that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 5.13. Paragraph 148 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 5.14. Paragraph 151 states that certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes the re-use of buildings provided that the buildings are of permanent and substantial construction.

Planning Practice Guidance

- 5.15. Paragraph 001 Reference ID: 64-001-20190722 states that in assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:
- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
 - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
 - the degree of activity likely to be generated, such as traffic generation.

Sevenoaks Core Strategy

- 5.16. Policy SP1 states that all new development should be designed to a high quality and should respond to the distinctive local character of the area in which it is situated.
- 5.17. Policy SP11 states that the biodiversity of the District will be conserved and opportunities sought for enhancement to ensure no net loss of biodiversity.
- 5.18. Policy LO8 of the Core Strategy echoes that of the NPPF, stating ‘development that supports the maintenance and diversification of the rural economy, including development for agriculture, forestry, small scale business development and rural tourism projects, and the vitality of local communities will be supported provided it is compatible with policies for protecting the Green Belt, conserves and enhances the value and character of the District’s woodland and the landscape character of other rural parts of the District and that it takes account of infrastructure requirements’.
- 5.19. Policy LO8 also outlines that the countryside will be conserved and the distinctive features that contribute to the special character of its landscape will be protected and enhanced. The policy asserts that the extent of the Green Belt will be maintained.

Sevenoaks Allocations and Development Management Plan (ADMP)

- 5.20. Policy SC1 states that when considering development proposals the Council will take a positive approach that reflect the presumption in favour of sustainable development contained in the NPPF.
- 5.21. Policy EN1 outlines general development criteria for development in the District.

5.22. Policy EN2 states that proposal will be permitted where they would 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.

5.23. Policy GB7 outlines the Council's criteria for reusing building within the Green Belt. Proposals for the re-use of a building in the Green Belt which would meet the following criteria will be permitted:

a) the proposed new use, along with any associated use of land surrounding the building, will not have a materially greater impact than the present use on the openness of the Green Belt or harm the existing character of the area; and

b) the applicant can demonstrate through a detailed structural survey and method statement that the buildings are of permanent and substantial construction and are capable of conversion without major or complete re-construction that would detract from their original character.

5.24. Policy LT1 states that the benefits to the local economy will be recognised in considering proposals for tourist accommodation or facilities.

5.25. Policy T2 sets out the Council's parking standards.

6. PLANNING MERITS:

6.1. In light of the above planning policy review, the following main issues will be considered as part of this planning assessment:

- Principle of Development / Green Belt
- Design / Landscape / Right of Way
- Residential Amenity
- Ecology / Biodiversity Net Gain (BNG)
- Other planning considerations

Principle of Development / Green Belt

(i) Land Use / Tourism

6.2. The principle of tourist facilities within the District has substantial policy support under paragraph 83 of the NPPF and Policy LT1 of the Sevenoaks ADMP.

6.3. The proposal would comply with paragraph 84 of the NPPF which provides significant weight to supporting the diversification of the rural economy. It states that planning policies and decisions should enable:

- The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.
- The development and diversification of agricultural and other land-based rural businesses.
- Sustainable rural tourism and leisure developments which respect the character of the countryside.

- 6.4. Policy LO8 of the Core Strategy echoes that of the NPPF, stating ‘development that supports the maintenance and diversification of the rural economy, including development for agriculture, forestry, small scale business development and rural tourism projects, and the vitality of local communities will be supported provided it is compatible with policies for protecting the Green Belt, conserves and enhances the value and character of the District’s woodland and the landscape character of other rural parts of the District and that it takes account of infrastructure requirements’. Furthermore, Policy LT1 of the Allocations and Development Plan supports tourist accommodation and echoes that of the NPPF. It states that the benefits to the local economy will be recognised in considering proposals for tourist accommodation or facilities.
- 6.5. The Sevenoaks District Tourist Accommodation Study 2015 shows potential for tourist accommodation development opportunities in Sevenoaks District.
- 6.6. The proposed site will offer contemporary accommodation to visitors. There is a huge catchment area near to the proposed site comprising London, Greater London, Kent, Surrey and Sussex. The application site is well located to allow occupiers to enjoy the surrounding tourism assets, which include beauty spots within Kent and Surrey,
- 6.7. Indeed, Sevenoaks has seen the highest rise in spending on recreation since pre-pandemic levels compared to the other 11 districts in Kent, according to a study by gambling.com (10 August 2021).
- 6.8. Significant weight was given to the rural diversification to similar tourism projects under reference 20/01304/FUL and 22/01280/FUL. The applicant would accept a restrictive condition requiring the building to be used solely as a holiday let.
- 6.9. In my view the diversification of the rural economy and tourism benefits should be attributed substantial weight in favour of the scheme.

(ii) **Green Belt**

6.10. The applicant undertook pre-application advice (reference PA/22/00359). This confirmed that in policy terms, the starting point is that the proposal would represent a new building in the Green Belt. It would not fall within any of the exceptions listed under paragraph 149 of the National Planning Policy Guidance. The proposals would therefore represent inappropriate development, which by definition is harmful to the Green Belt.

6.11. Para 148 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.

6.12. An assessment of whether there are very special circumstances in any particular case involves a balancing exercise of weighing the benefits of the application proposal against the harm to the Green Belt which arises by definition from inappropriate development and the actual harm to the purposes and objectives of Green Belt policy. (*Pehrsson v Secretary of State for the Environment [1991] 61P.and CR266*). Such a balancing exercise necessarily involves a consideration of the weight of the planning harm in whatever form it exists. If the benefits clearly outweigh the harm, then very special circumstances exist. In addition to the notional/definitional harm, if the extent of actual harm to the Green Belt is slight then the countervailing benefits need only to be proportionate and commensurate to outweigh such harm. The weight to be given to Green Belt policy and to the benefits of a proposal is a matter for the decision maker.

6.13. In my view, the very special circumstances which I believe justify planning permission being granted are:

Very Special Circumstance	Assessment	Weight Given				
<p>Enhancement to Openness / Fallback position</p>	<p>As shown in this statement the proposed development seeks to demolish two existing barns on the site which have lawful C1 use. By relocating the lawful apart hotels from the western to eastern parcel of the site, it will benefit openness to the Green Belt in the following ways:</p> <ul style="list-style-type: none"> • Relocated position of 1no. holiday let closer to the road will reflect the spatial grain of development facing onto Blueberry Lane. • The revised location will reduce the spread of development further into the countryside and respond positively to the many comments received under planning permission 21/01388/FUL. • By relocating the holiday let closer to the public highway, it will reduce the length of the access road by a considerable amount. • The proposal for 1no. holiday let as opposed to 2no. apart hotels will reduce the intensity of the use in the Green Belt which includes noise and vehicular movements along the access road. • Combining the 2no. existing buildings will consolidate built form on site and reduce the level of residential paraphernalia and curtilages into one standalone dwelling. <p>Quantitatively the lawful floor area of the apart hotels against the application proposal is outlined below:</p> <table border="1" data-bbox="459 1503 1259 1619"> <thead> <tr> <th data-bbox="459 1503 839 1576">Lawful Floor Area – 2no. apart hotels</th> <th data-bbox="839 1503 1259 1576">Floor area of application proposal</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 1576 839 1619">132.17sqm</td> <td data-bbox="839 1576 1259 1619">128.9sqm</td> </tr> </tbody> </table> <p>The Planning History section has outlined that the Council have given significant weight to fallback positions which are comparable to this proposal. As with these the applicant has invested significant time and resources into designing and separately gaining prior approval and planning permission to convert the barns into a total of 2no apart hotels. If this application is refused these would be implemented.</p>	Lawful Floor Area – 2no. apart hotels	Floor area of application proposal	132.17sqm	128.9sqm	<p>Significant</p>
Lawful Floor Area – 2no. apart hotels	Floor area of application proposal					
132.17sqm	128.9sqm					

	In this regard, it is my view that there are clear benefits to approving the current application when compared to the fall-back position.	
Right of Way	The relocated holiday let will be situated away from the public right of way. The proximity of the consented development under 21/01388/FUL to the right of way was raised as a concern by local residents.	Significant
Tourism Use	The need and benefits of tourism development in the District have been outlined in this statement. There is significant support both in national and local plan policy for such initiatives. The Council have approved at least two other examples of tourism development under very special circumstances elsewhere in the District.	Significant
Biodiversity Enhancements	The submitted BNG report outlines that the proposal has resulted in an overall net gain of 0.0330 habitat units, the equivalent increase of 3.44%, with a net gain of 0.2484 hedgerow units, the equivalent increase of 398.03%. This substantial increase in biodiversity enhancements should be attributed moderate weight.	Moderate
Sustainable technologies / renewables	The proposed holiday let will be served by solar panels and an air source heat pump. The Council have committed to achieving net zero carbon by 2030. This means that they have pledged to reach net zero carbon emissions produced by the Council and their assets by 2030. The proposed actions of the Council's climate plan include: <ul style="list-style-type: none"> • Improving energy and water efficiency measures in our buildings • Engaging with landowners, businesses and our partners • Encouraging and supporting sustainable new buildings and renewable energy generation The proposal will provide renewable energy to the property avoiding the need on relying on unsustainable energy sources (national grid electricity).	Moderate

6.14. In reviewing the extent of harm and the potential very special circumstances, it is therefore concluded that the substantial weight attached to the very special circumstances would clearly outweigh the harm to the Green Belt that the development represents in accordance with the tests of the NPPF.

Design / Landscape / Right of Way

6.15. The consented apart hotels on the site, which will be demolished as part of the proposals, give a depth of development which is at odds with the prevailing character of Blueberry Lane, which comprises buildings which are situated close to, and visible from the highway.

6.16. The revised position of the apart hotel will rectify this anomaly and respect the building line of Blueberry Lane and therefore the wider grain of development. The proposal reflects the loose knit character of the area. Whilst the proposed building will be more visible from the highway it will be familiar and in keeping given the built form along Blueberry Lane. Compared to the extant approvals, the proposal will reduce the spread of development further into the countryside.

6.17. In terms of design and appearance, the application scheme is reflective of the lawful and approved barns in terms of form and materials. The low roof pitch and eaves height of the apart hotel minimises the mass and scale of the building ensuring that views through to the landscape beyond will be maintained.

6.18. Importantly, the revised location is set away from the right of way, which was the cause for concern for local residents, albeit not for Kent County Council's Rights of Way team, under planning permission 21/01388/FUL. By relocating the built form off the right of way, users of the footpath will benefit from peace and tranquillity in the countryside.

6.19. The proposal will also result in the reduction of hardstanding and access deeper into the field and will therefore be beneficial to the rural character of the area. The substantial reduction in

the amount of development associated with the road access will ensure that the countryside is preserved.

6.20. For the above reasons, the proposal will be in accordance with Policies SP1 and LO8 of the Sevenoaks Core Strategy and Policy EN1 of the Sevenoaks ADMP.

Residential Amenity

6.21. The proposed building is not situated near nearby dwellings and therefore there will not be any impact on adjoining residents by way of loss of light, outlook or privacy. The location of the building close to the road will reduce noise and disturbance compared to the extant schemes 20/02590/LDCPR & 21/01388/FUL. This is because noise from vehicular movements across the field will be reduced, and the amenity area will not be as close to the right of way or the rear gardens of the properties in Blueberry Lodge.

6.22. The application proposal will therefore be in accordance with Policy EN2 of the Sevenoaks ADMP.

Ecology / BNG

6.23. AA Environmental Ltd have prepared an ecological survey of the eastern and western parcels of the site. This represented an update of a 2021 survey which supported planning application **21/01388/FUL**.

6.24. Overall the findings of the ecological surveys would indicate that there are no over-riding ecological constraints to the development proposals that would preclude planning permission being granted. A range of standard controls are available and deliverable to ensure that there would be no adverse impact on local wildlife that are using the site with a series of controls to be implemented to avoid contravention of current legislation. In addition, a range of enhancement measures could be included as part of the scheme, and if implemented effectively,

would increase the nature conservation value of the site in the long term in accordance with Government guidance. For this reason, the proposal is in accordance with Policy SP11 of the Sevenoaks Core Strategy.

6.25. As well as an ecological survey, AA Environmental Ltd have prepared a BNG assessment. The assessment has resulted in an overall net gain of 0.0330 habitat units, the equivalent increase of 3.44%, with a net gain of 0.2484 hedgerow units, the equivalent increase of 398.03%. In addition, non-tangible enhancement measures such as the provision of wildlife boxes and log piles, which are not factored in on the DEFRA Metric, could provide alternative opportunities and benefits for local wildlife. These can be secured via condition and can include:

- Nest boxes
- Bug hotels
- Bat boxes
- Log piles
- Pollinator nest sites

Other Planning Considerations

(i) Community Infrastructure Levy

6.26. The relevant CIL paperwork has been completed as part of this submission.

(ii) Highways / Parking

6.27. The proposed use will utilise the lawful access approved under lawful development certificate **20/01804/LDCPR** and planning permission **21/01388/FUL**. These have established that the development is acceptable in terms of highways safety and convenience.

- 6.28. The proposal incorporates a parking area for 2no. cars and will allow sufficient space to turn on site to allow vehicles to exit the site in forward gear.
- 6.29. Refuse collection can be made from the highway.
- 6.30. The proposals include cycle storage to the rear of the plot to encourage active travel from the site. The building will be fitted with an electric vehicle charging point as required by policy.

7. CONCLUSION

7.1. This Planning, Design and Access Statement has outlined a Green Belt balancing exercise which outlines that the benefits of the proposal clearly outweigh the harm by reason of inappropriateness and any other harm such that very special circumstances can be said to exist.

These are:

- Enhancement to Openness / Fallback position
- Further away from Right of Way
- Tourism Use
- Biodiversity enhancements
- Sustainable technologies / renewables

7.2. This statement has shown other examples elsewhere in the district where the Council have given significant weight to both fallback positions and tourism development.

7.3. Through detailed analysis it has outlined that the proposal will respect the building line of Blueberry Lane and therefore the wider grain of development. The proposal reflects the loose knit character of the area. In terms of design and appearance. Importantly, the revised location of the proposal is set away from the right of way which was the cause for concern for local residents. The proposal will also result in the reduction of hardstanding and access deeper into the field and will therefore be beneficial to the rural character of the area. For the above reasons, the proposal will be in accordance with Policies SP1 and LO8 of the Sevenoaks Core Strategy and Policy EN1 of the Sevenoaks ADMP.

7.4. Given the distance of the holiday let away from nearby residents, there will be no impact on neighbours in regard to light, outlook, privacy, noise or disturbance.

- 7.5. Following the preparation of an ecology report, it has been outlined that the proposal is acceptable in terms of this technical matter.
- 7.6. Appropriate parking is proposed on site to ensure there will be no impact on highways safety or convenience.
- 7.7. In view of the above, it is concluded that the development proposed in this application is consistent with the aims and detailed requirements of the National Planning Policy Framework and as such, should be given planning permission.