

planning
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Planning Design and Access Statement
Lucks Lake Fishery, Lucks Lane, Paddock Wood, Kent TN12 6PA

January 2024



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1 Introduction

1.1 Purpose of Statement

1.1.1 This Statement has been prepared to accompany a part retrospective application for the construction of a new moat/lake, erection of 4 No. holiday cabins/shepherds huts, landscaping and ecology enhancements at Lucks Lake Fishery, Lucks Lane, Paddock Wood TN12 6PA.

1.2 Application Documents and Drawings

1.2.1 The table below lists the documents and drawings which have been prepared to support the application.

Drawing No.	Description
DHA/32107	Covering Letter
DHA/32107	Planning Design and Access Statement
DHA/32107	Heritage Statement
DHA/32485/01	Site Location Plan
DHA/32485/02	Existing Site Layout
DHA/32485/10	Proposed Site Layout Plan
DHA/32485/11	Proposed Biodiversity Enhancement Plan
DHA/32485/12	Proposed Holiday Cabin Elevations and Floor Plan
DHA/32485/13	Shepherds Hut Elevations and Floor Plan
DHA/32485/14	Proposed Moat and Cabin Cross Section

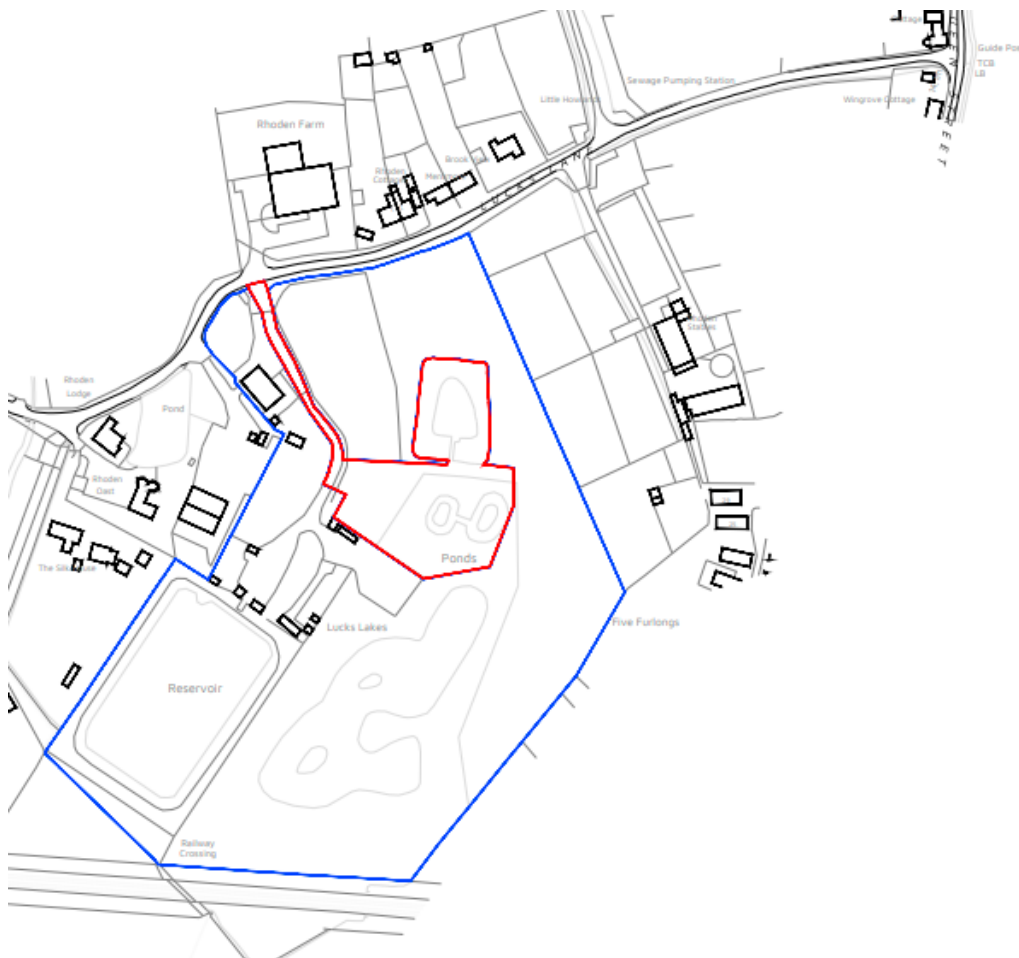
1.2.2 A Flood Risk Assessment has been incorporated into this document.

2 The Site

- 2.1.1 The site is located on the south side of Lucks Lane at Lucks Fishery Paddock Wood and lies approximately 1 mile (1.6 Km) to the southwest of Paddock Wood.
- 2.1.2 Lucks Lake Fishery comprises a number of fishing lakes and associated development, holidays cabins and a residential mobile home.

2.2 Surrounding Area

- 2.2.1 The surrounding area is characterised by arable land, open fields and orchards. To the north and northwest are neighbouring residential properties and a short distance to the southeast is a residential site which is known as Five Furlongs. Immediately to the south of the site is the main London to Ashford railway line.
- 2.2.2 The application site is shown edged in red and the other land owned by the applicant is shown edged in blue on the OS map below.



Above: The location of site is shown edged in red

3 Development Proposal

3.1 The Proposal

3.1.1 This is a part retrospective application for the construction of a new moat/lake, erection of 4 No. holiday cabins/shepherds huts, landscaping and ecology enhancements.

3.2 Moat/Lake

3.2.1 The moat/lake is located on land on the south side of Lucks Lane, and to the north of the fishing lake constructed in 2020/2021 under planning permission 19/00452/FULL. The moat/lake is roughly rectangular in shape and measures approximately 48 metres in length by 34 metres in width and covers an area of approximately 1146 sq. metres.

3.2.2 The moat/lake has been excavated at existing ground level and measures approximately 600mm in depth in the middle of the moat/lake.

3.2.3 The design/layout of the moat/lake includes a triangular shaped island in the centre which covers an area of approximately 457 sq. metres and a small holiday cabin. The cabin is accessed via a timber walkway/bridge.

3.3 Holiday Cabins/Shepherd Hut

3.3.1 The location of the moat/lake and the of 4 No. fishing holiday cabins/huts are shown on drawing DHA/32485/10. The proposed 4 No. holiday cabins/huts will provide limited but comfortable accommodation for anglers and others for short stays of 1 or 2 nights or extended stays of up to 7 nights.

3.3.2 It is proposed that the holiday cabins/huts will be available for use/occupation throughout the entire calendar year depending upon demand and will include Bank Holidays. Details of the holiday cabins/huts is shown on drawing DHA/32485/12 and DHA/32485/13.

3.4 Landscaping/Biodiversity Enhancement

3.4.1 All of the existing boundary trees and the existing orchard trees will be retained as shown on drawing DHA/32485/02 and new native species tree and hedge planting will be carried out as shown on drawings DHA/32485/11. This will include Oak (*Quercus robur*), Field Maple (*Acer campestre*) and Hornbeam (*Carpinus betulus*) and Beech (*Fagus Sylvatica*).

3.4.2 Biodiversity enhancement include the creation of above-ground hibernacula, log piles, a marsh/wet area, a wildflower meadow and the erection of bat boxes as shown on drawing DHA/32485/11.

3.5 Parking

- 3.5.1 Parking to serve the development will be provided on the existing hard surface area as shown on drawing DHA/32485/10. This will also include a storage area for recycling and refuse bins.

3.6 Access

- 3.6.1 Access to the site will be via the existing track from Lucks Lane as shown on site location plan DHA/32485/01 and DHA/32485/10.

4 Planning History

- 4.1.1 The site has a lengthy planning history, but the most relevant applications are as follows:
- 4.1.2 23/02701/FULL Replacement of existing mobile home with a larger prefabricated residential structure – Approved 7 December 2023
- 4.1.3 22/03127/LDCEX Lawful Development Existing - Change of use of land for the stationing of a residential mobile home – Certified 20th December 2022
- 4.1.4 21/03848/FULL Change of use of land and the erection of 4 No holiday let fishing pods/cabins and associated landscaping – Approved 28 January 2022
- 4.1.5 19/00452/FULL Change of use of land to construct a fishing lake with associated landscaping – Approved 23rd December 2019

5 Planning Policy

5.1 Introduction

- 5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. Set out in this section are the policies of the statutory Development Plan and other material considerations that should be taken into account in determining this application.
- 5.1.2 The development Plan in this case is the Local Plan 2006 and Core Strategy June 2010. The NPPF and the NPPG are also relevant to the application and in addition, the adopted Borough Landscape Character Area Assessment is a material consideration.
- 5.1.3 The emerging New Local Plan 2020-2038 is also a material consideration but at this stage the draft plan and policies are still at a relatively early stage, therefore, limited weight can be attached to it at this stage.

5.2 Tunbridge Wells Local Plan 2006

- 5.2.1 The table below sets out the saved policies of the Local Plan that are most relevant to the proposal. These include policies relating to development in the countryside.

Policy	Description	Compliance
LBD 1	Development Outside the limits of the built development	Outside the Limits to Built Development, as defined on the Proposals Map, development will only be permitted where it would be in accordance with all relevant policies contained in this Local Plan and the Kent Structure Plan 1996 and the Kent & Medway Structure Plan 2006 rural settlement and countryside policies
EN18	Flood Risk	<p>Within those developed areas identified by the Environment Agency as being at high risk from flooding, built development and conversions will only be permitted if both of the following criteria are satisfied:</p> <p>1 Practicable and effective flood protection and mitigation measures would be proposed and maintained for the lifetime of the development; and</p> <p>2 Practicable and effective measures would be included as part of the development proposals to prevent the increased risk of flooding elsewhere</p>
EN25	Development control criteria for	Outside of the Limits to Built Development, as defined on the Proposals Map, all proposals for

<p>all development proposals affecting the rural landscape</p>	<p>development will be required to satisfy all of the following criteria:</p> <ol style="list-style-type: none"> 1 The proposal would have a minimal impact on the landscape character of the locality; 2 The development proposal would have no detrimental impact on the landscape setting of settlements; 3 The development proposal would not result in unsympathetic change to the character of a rural lane which is of landscape, amenity, nature conservation, or historic or archaeological importance; 4 Where built development is proposed, there would be no existing building or structure suitable for conversion or re-use to provide the required facilities. Any new buildings should, where practicable, be located adjacent to existing buildings or be well screened by existing vegetation; <p>and</p> <ol style="list-style-type: none"> 5 Where an extension or alteration to an existing building is proposed, it would respect local building styles and materials, have no significant adverse impact on the form, appearance or setting of the building, and would respect the architectural and historic integrity of any adjoining building or group of buildings of which it forms part.
<p>TP5 Vehicle Parking Standards</p>	<p>Vehicle parking in connection with development proposals other than those covered by POLICIES TP6, TP7 and TP8 will be restricted to the maximum necessary having regard to local highway conditions. Kent County Council’s Vehicle Parking Standards, adopted by the Council, will be applied to such development proposals.</p>

5.3 Core Strategy 2010

5.3.1 Core Policy 7 (7) promotes “the development and retention of, and enhancing the quality and attractiveness of, tourism accommodation and attractions across the borough”.

- 5.3.2 Core Policies 7 (6) and 14 (4) further promote the strengthening of the rural economy and its long-term sustainability, albeit through reusing existing surplus rural buildings.
- 5.3.3 Core Policy 14 (6 & 7) states that the countryside will be protected for its own sake in order to maintain the landscape character and quality of the countryside, and that the interrelationship between the natural and built features of the landscape will be preserved, enhanced, and, where necessary, restored.
- 5.3.4 Core Policy 4 (1) also requires that rural landscapes will be conserved and enhanced.

5.4 Borough Landscape Character Area Assessment

- 5.4.1 The SPD was adopted in December 2017. This describes the character of the landscape types to be found in the borough and seeks to retain and enhance the identified the valued landscape of the borough.
- 5.4.2 The site in this case is located in area 13 Low Weald Farmland which is described as follows:

Flat or gently undulating small-scale lowland clay vale landscape. Mixture of permanent pasture with some larger arable fields studded with small ponds and water ditches set within a framework of mature trees and derelict hedgerows. Around Paddock Wood the agricultural landscape opens with extensive arable fields, local areas of hops and dwarf orchards.

5.5 The National Planning Policy Framework (December 2023)

- 5.5.1 The overarching principle of the replacement NPPF remains unchanged and places a clear presumption in favour of sustainable development. In terms of determining applications, this means approving development proposals that accord with the development plan without delay and granting permission in cases where the development plan is absent or out of date, providing the development is in accordance with the policies contained within the NPPF (Para 11).
- 5.5.2 Paragraph 8 of the NPPF states:

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

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.”

Building a Strong Economy

- 5.5.3 Paragraph 85 states “planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”
- 5.5.4 Paragraph 87 goes on to state “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”
- 5.5.5 Paragraph 88 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; and
 - the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 5.5.6 Paragraph 89 outlines that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport. Paragraph goes on to advise that it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads.

Promoting sustainable transport

- 5.5.7 Paragraph 115 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.

Design

- 5.5.8 The NPPF attaches great weight to the importance of high-quality design in all development proposals and states at paragraph 131 that:

The creation of high quality 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.

Natural Environment

- 5.5.9 Paragraph 180 advises that 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;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate

5.6 Tunbridge Wells Submission Local Plan 2020-2038

- 5.6.1 The following policies of the Draft New Local Plan are relevant to the proposal.
- 5.6.2 **Policy EN1 Sustainable Design** All proposals for development within the borough will be required to satisfy the following criteria, as applicable to the type of development proposed, and consideration of the criteria should be demonstrated in supporting statements submitted with an application. It is expected that any

departure from this policy, including its individual criterion, must be robustly justified in information submitted in support of the application.

5.6.3 **Policy EN4** Historic Environment requires that all new development shall contribute to the overall conservation and, where possible, enhancement, of the historic environment of the borough

5.6.4 **Policy ED7** supports small-scale tourist-related initiatives that support the rural economy.

5.6.5 **Policy EN18** Rural Landscape Development will be required to:

1. Conserve and enhance the unique and diverse variety and juxtaposition of the borough's landscape and the special features that contribute positively to the local sense of place;

2. Include appropriate mitigation to ensure against significant harm to the landscape setting of settlements, including historic farmsteads and hamlets;

3. Not result in unsympathetic change to the character of a rural lane, which is of landscape, amenity, nature conservation, or historic or archaeological importance;

4. Restore landscape character where it has been eroded;

5. Preserve intrinsically dark landscapes in accordance with Policy EN 8: Outdoor Lighting and Dark Skies

5.6.6 **Policy EN20** Agricultural Land – this seeks to protect best and most versatile agricultural land from significant, inappropriate, or unsustainable development.

5.6.7 **Policy EN 25** Flood Risk this seeks reduce flood risk.

Proposals for new development should contribute to an overall flood risk reduction, and development will only be permitted where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere.

5.7 Summary

5.7.1 The proposed development is very similar in character, scale and design to the approved holiday/fishing let accommodation and importantly it will not result in any material change or harm to the character of the site or the surrounding area. Furthermore, no harm will be caused to the amenity, outlook or the privacy of neighbouring residential properties.

5.7.2 The proposal will help enhance the holiday/recreational offer and the viability of this established rural business which in turn will help support the local rural economy through the use of shops and services. Furthermore, the development will help enhance the biodiversity of the site through the introduction of a marsh/wetland habitat, new native tree and hedge planting and other measures as detailed on drawing DHA/32485/11.

- 5.7.3 The minor increase in traffic movements associated with the expansion of the business will not result in a serve impact on the local highway network nor will it cause a danger to the safe and free flow of traffic on the public highway.
- 5.7.4 It is considered that the proposal is compliant with the policies of the Local Plan 2006, Core Strategy, the NPPF and the policies of the emerging Local Plan Review.

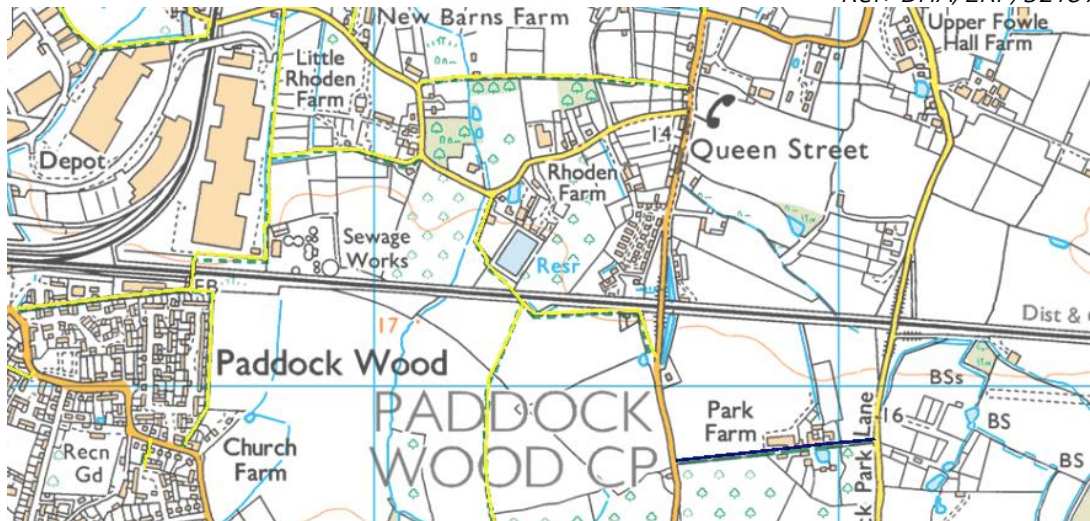
6 Consideration of the Planning Issues

6.1 Principle of the Development

- 6.1.1 It will be noted from the planning history above, that use of the land at Lucks Lake for recreational fishing and holiday use in the form of the holiday cabins has been established.
- 6.1.2 This proposal is seeking to expand the recreational use of the site by creation an additional moat/lake and through the provision of 4 No additional holiday cabins/shepherds huts.
- 6.1.3 The NPPF (December 2023) at paragraph 85 outlines that planning policies and decisions should enable the sustainable growth of rural-based businesses and rural tourism/leisure development, including through diversification, provided that they respect the character of the countryside.
- 6.1.4 In addition, paragraph 87 of the NPPF also notes that "sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport" while ensuring "that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable".
- 6.1.5 It is also noted that TWBC Core Strategy (2010) Core Policy 7 (7) promotes "the development and retention of and enhancing the quality and attractiveness of tourism accommodation and attractions across the borough". Core Policies 7 (6) and 14 (4) also promote the strengthening of the rural economy and its long-term sustainability.
- 6.1.6 It is also noted that the emerging Local Plan includes Policy ED7 supports small-scale tourist-related initiatives that support the rural economy and reflects the advice set out in the NPPF.
- 6.1.7 We conclude, therefore, that the principle of the development accords with the policies of the Local Plan, the NPPF and the policies of the emerging Local Plan. Having regard to the above, it is considered that the following matters are material to the consideration and determination of the application.

6.2 Impact on the Character and Appearance of the Countryside

- 6.2.1 The site is screened from Lucks Lane by the existing boundary fence, orchard trees and by the intervening buildings. Furthermore, the site is not visible from public rights of way WT256 or WT255 which are located to the west and southwest of the site and to the south of the London to Ashford railway line. An extract from the KCC Public Footpath Map is shown over the page, which show the footpaths in a yellow pecked line.



Above An extract from KCC Public Rights of Way Map

- 6.2.2 Although the site and the surrounding landscape is relatively flat, as noted above the application site is well screened and is located within the centre of the larger fishery site. It is considered, therefore, that the proposal would not appear out of place or be intrusive within the landscape setting/character of the area. Importantly it is noted that the local landscape is not considered to be highly sensitive and has very limited views from the surroundings given the relatively flat character of the area. Furthermore, the fishery site is also screened by the adjoining commercial yard to the northwest and also by the properties to the west which were approved under planning permission 16/504406/FULL.
- 6.2.3 The site is located some distance from the built up part of Paddock Wood the new residential development at Church Farm. Given the distances involved and the small scale nature of the development it is considered that the development will have no impact on the landscape setting of Paddock Wood.
- 6.2.4 As noted above, the site is well screened from Lucks Lane and it should be noted that Lucks Lane is characterised by a number of rural business/activities, which include equestrian use, commercial uses and also agricultural uses. Given the small scale and temporary nature of the holiday units there would be no change to the character of the rural lane and the access would be via existing access to Lucks Lane.
- 6.2.5 Having regard to all of the above, we conclude that proposal satisfies all of the relevant tests Policy EN25 and Core Strategy Policies 4, 5, and 14

6.3 Landscaping

- 6.3.1 All of the existing tree and hedge planting will be retained as part of the development and new native species tree and hedge planting will be carried out as shown on drawing DHA/32485/10. This will help converse and enhance the Landscape character of the area and thus will meet the overarching aims of the adopted Landscape Character Assessment.

6.4 Biodiversity Enhancement

6.4.1 Biodiversity enhancement of the site will accord with the details approved under planning permission 21/03848/FULL and 22/01080/SUB. This includes:

- Native species tree and hedge planting. The approved tree and hedge planting will provide a habitat and resources for wildlife, including food, navigation, connectivity and also potential nesting and breeding sites. The hedge planting will also provide a safe way for wildlife to move through the landscape in addition, the hedgerows will also help support populations of pest predators and provide a home for pollinators and insects.
- Once established the hedges will not be trimmed during the peak nesting season for birds, between March and September. Any necessary cutting/trimming will be carried out in January to February, to ensure that the berry crop will remain and provide a valuable source of food for wildlife. The trimming/cutting will be carried out sensitively and with minimal damage to create cleaner cuts to encourage better re-growth.
- The area of land immediately surrounding the holiday fishing let pods/cabins will be sown with a wildflower and native grass mix, which will also help enhance wildlife habitats including butterflies and other insects.
- The grassed/wildflower area will be the subject of minimal maintenance (grass cutting) i.e., twice a year in early spring and at the end of the summer.

6.4.2 In addition, as part of this proposal additional ecology enhancements are proposed in the form 4 No. Hibernacula and 7 No. log pyramids, a wildflower meadow and marsh/wetland area as shown on drawing DHA/32485/11 and as illustrated below.



Hibernacula

- 6.4.3 The above-ground hibernacula's will be a mounded design to prevent water ingress and will be constructed from piled up rocks, logs, dead wood and suitable rubble. Soil will be used to loosely fill between layers and a geotextile membrane placed over and beneath a capping layer of topsoil, turf or moss.

Log Piles

- 6.4.4 The proposed log piles will be formed from salvaged wood from trimmed trees. Logs will be simply part buried with bark attached and located in areas of partial shade and least disturbance. A buffer zone will be created around the log piles so the soil and vegetation are protected, and the surrounding vegetation will not be cut between May-September.

Wildflower Meadow/Marsh/Wetland Area

- 6.4.5 A small wildflower meadow and a marsh/wetland area created within the site as shown on drawing DHA/32485/11. These measures will help enhance the biodiversity of the site by creating habitats for a wide range of flora and fauna.

6.5 Impact on Residential Amenity

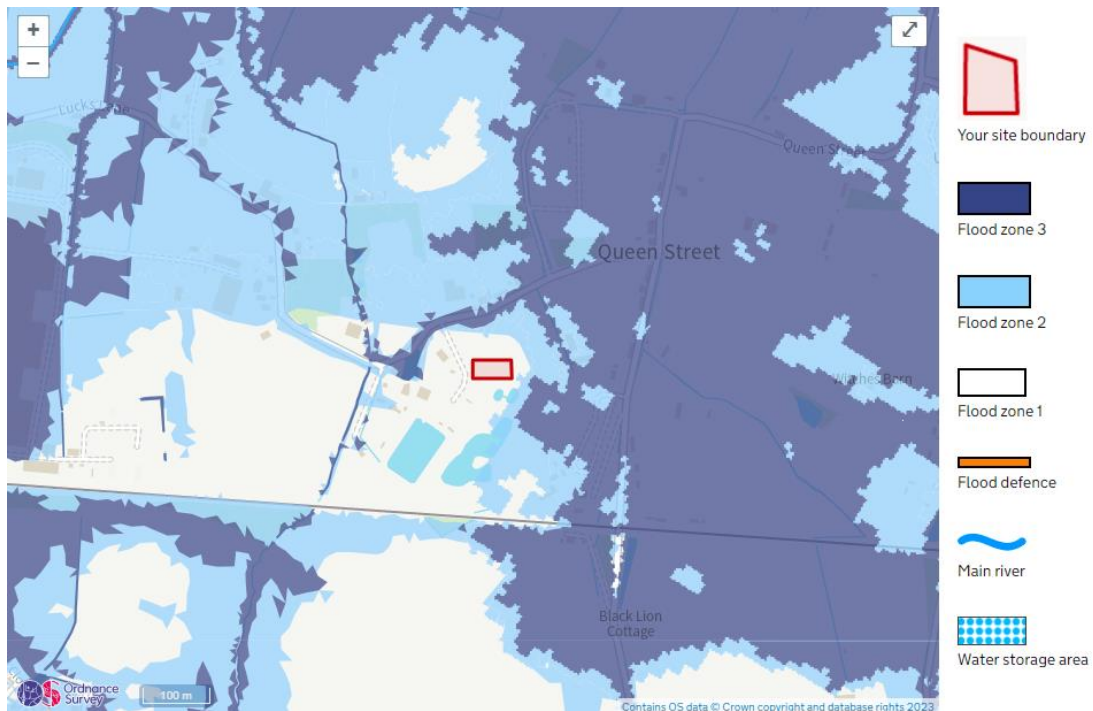
- 6.5.1 The closest neighbouring properties are located at The Silk House and Rhoden Oast which are located approximately 80 – 100 metres to the northwest and beyond Lucks Lake Fishery. The neighbouring properties are enclosed and screened by trees on the boundary with the fishery site and taking into account the degree of separation the proposal will have no impact on the amenity, privacy or the outlook of the neighbouring properties.
- 6.5.2 There are also a number of residential properties located to the southeast of the site at Five Furlongs in Queens Street. However, these are located over 170 metres from the site and are partly screened by the intervening vegetation and fishing lake. In the circumstances, the proposal will have no impact on the amenity, privacy or the outlook of the properties at Five Furlongs.
- 6.5.3 The development may however be visible from 1 and 2 Lucks Lake Barn. These, however, are owned by applicant and in any event the proposed holiday cabins and shepherds hut are single storey structure with limited openings and given the screening and separation distances there will be no impact on the amenity, privacy or the outlook of 1 and 2 Lucks Lake Barn.
- 6.5.4 The cabins and shepherds hut will used solely by those using the site, therefore, there will be no noticeable increase in the level of noise/disturbance beyond that which is already existing. Furthermore the site is located some distance from the neighbouring residential properties and in the circumstances it is considered that the development will not result in any noise disturbance or harm to the amenity of the occupiers of the neighbouring residential properties.
- 6.5.5 The proposal, therefore, accords with the aims of Policy EN1 of the Local Plan 2006.

6.6 Loss of Agricultural Land

- 6.6.1 The proposed development would result in the loss of a small area of land that has historically been used for agricultural use (orchard). However, the land has not been used for agricultural purposes for many years and in this case it is not considered to be high quality agricultural land. Furthermore, the development is small scale and involves in part, the erection of temporary structures that could be removed if the business use ceases, and the land could revert to agricultural use.
- 6.6.2 In the circumstances, it is considered that the proposed development would not result in a significant loss of agricultural land and would not conflict with the NPPF.

6.7 Flood Risk Assessment

- 6.7.1 According to the Environment Agency Flood Map the site is located in Flood Zone 1 and therefore a low probability of flooding of less than 0.1% annual probability of flooding from rivers or sea.
- 6.7.2 An extract of the EA Flood map is shown below.



- 6.7.3 The National Planning Policy Framework provides guidance on assessing flood risk and seeks to guide development away from areas at risk of flooding from all sources. Planning Practice Guidance defines several Flood Zones based on the probability of flooding and provides guidance on the most appropriate form of development within each zone. The flood risk can be summarised in table below:

Zone	Annual probability in any year	
	River Flooding	Sea Flooding
Zone 1 : Low probability	Less than 1:1000 (<0.1%)	Less than 1:1000 (<0.1%)
Zone 2: Medium probability	Between 1:1000 and 1 in 100 (0.1% -1%)	Between 1:1000 and 1 in 200 (0.1% - 0.5%)
Zone 3a : High probability	Greater than 1:100 (>1%)	Greater than 1:200 (>0.5%)
Zone 3b: Functional floodplain	Greater than 1 in 20 (>5%)	N/A

Table 1 – NPPF Guidance

- 6.7.4 As noted above reference has been made to the Environment Agency flood risk map and this indicates that the proposed development is situated entirely within Flood Zone 1. This Flood Zone comprises of land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (<0.1% in any year).
- 6.7.5 The National Planning Policy Framework requires that a risk based Sequential Test should be applied at all stages of planning with the aim of steering new development to areas at the lowest probability of flooding (Flood Zone 1). In this case the site is located entirely within Flood Zone 1 and as such it is considered to satisfy the Sequential Test.
- 6.7.6 Planning Practice Guidance Table 3, "Flood Risk Vulnerability and Flood Zone Compatibility", confirms that all development situated in Flood Zone 1 are appropriate and an exception test is not required for this development.
- 6.7.7 The site is not considered to be at risk of flooding from ground water or reservoirs. Based upon the above the development is not considered to be at risk of flooding.

6.8 Drainage

Surface Water

- 6.8.1 Surface water run-off from the cabins/shepherds hut will drain to the ground and disperse naturally at greenfield rates. Therefore, there will be no surface water run-off or flooding outside of the farm site as a result of the development.

Fowl Drainage

- 6.8.2 Wastewater from 4 No. cabins/shepherds hut is collected by a series of below ground pipis and drained to a below ground treatment plant. The treated water is then discharged to the moat/lake and wetland area.

6.9 Heritage Impact

- 6.9.1 A separate Heritage Statement is submitted in support of the application. This concludes that although the site is located adjacent to a designated the historic

farmstead (Rhoden Farm Historic Farmstead) the development will have no impact on the historic farmstead.

- 6.9.2 There has been a marked change in the character of the historic farmstead and the land which once formed part of the historic farm by the establishment of a commercial/storage use on the land in the 20th century. Furthermore, the application site at Lucks Lake Fishery and indeed the commercial storage/industrial site are now clearly separate entities and are no longer used for agricultural purposes.

6.10 Highway Considerations

Access

- 6.10.1 Vehicular access to the site is via the existing private drive/access from Lucks Lane and the existing hardsurface parking and turning area. The access and parking/turning area are considered to be entirely suitable to serve the development.

Traffic Movement

- 6.10.2 The proposed development will result in a minor increase in traffic movements, and it is estimated that this is likely to be approximately 12 additional trips during a weekday and on Saturday and Sunday. The trips associated with the proposal are likely to take place outside the network peak hours, it is therefore considered that any minor increase in additional trips per day would not lead to a detrimental impact on the local highway network or result in any severe highway impact.

Parking

- 6.10.3 The existing car park, which contains 30 No. parking spaces, is more than adequate to meet the current needs of the site. However, it is proposed that 4 No. additional parking spaces will be provided to serve this development as shown on drawing DHA/32485/10.

Conclusion

- 6.10.4 The proposal has been found to accord with the relevant Government and local transport planning policy objectives. Despite the rural setting of the site, bus services can be accessed on foot. We conclude that the proposal will have no impact or cause a danger to the safe and free flow of traffic on the public highway and therefore are no sound highway reasons to refuse the application.

7 Conclusion

- 7.1.1 The site is located outside of the built confines of Paddock Wood. However, the proposal is considered to be sustainable on the basis that it would support an established rural business as well helping to support the local rural economy. Importantly, the development for the reasons set out above, will have no impact on the visual amenity or cause harm to the character of rural landscape and will have no impact on the character or setting of the adjacent historic farmstead and will have no impact on residential amenity.
- 7.1.2 Furthermore the development will not have any impact on the safe and free flow of traffic on the public highway or cause any other highway impacts. In addition, no flooding issues raised by the proposal.
- 7.1.3 For the reasons set out above, it is considered that the proposal is fully compliant with the policies of the Tunbridge Wells Plan 2006, Core Strategy the adopted Landscape Character Area Assessment 2017, the NPPF and the policies of the emerging Local Plan.
- 7.1.4 It is, requested, therefore, that planning permission be granted subject to any appropriate conditions.

8 Design and Access

8.1 Amount

8.1.1 The proposal is for the erection of 4 No. holiday cabin/shepherds huts and the construction of a fishing moat/lake as shown on drawing DHA/32485/10.

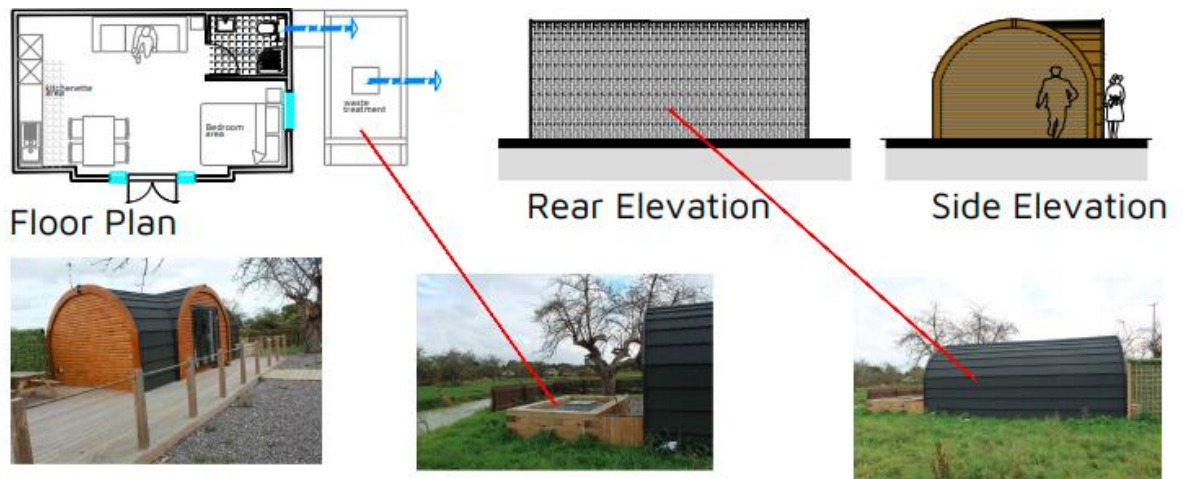
8.2 Layout

8.2.1 The proposed holiday cabin/shepherds huts will be located closed to the holiday cabins approved under planning permission 21/03848/FULL on the 28 January 2022.

8.2.2 The existing site layout is shown on drawing DHA/32485/02 and the proposed layout showing the 4 No. holiday cabins/shepherds huts are shown on drawing DHA32495/10 and as illustrated below.



Above: Existing Site Layout



8.5 Shepherds Hut

- 8.5.1 Proposed Shepherds Hut measures 6.10m x 2.44m and is built on a steel chassis with a turnable draw bar for manoeuvrability. The accommodation provides a double bed sleep area, bathroom with shower tray, wash basin, w/c and a main living area with kitchenette and log burner





8.6 Materials

Holiday Cabins

- 8.6.1 The holiday cabins will be clad shiplap boarding with a natural finish. The roof will be covered in profiled composite Metrotile coloured grey. The windows and external door will be grey coloured Upvc units.

Shepherds hut

- 8.6.2 The shepherds hut is constructed of timber framework with plywood lining and external timber cladding. The roof covering is insulated profiled curved steel. The exterior will be cream coloured painted finish softwood joinery, double glazed casement windows and split ledge and braced stable entrance door. The rain-water goods will be Upvc guttering and downpipe.