



Appeal Decision

Inquiry Held from 26 October – 5 November 2021

Site visit made on 2 November 2021

by Stephen Wilkinson BA BPI DIP LA MBA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 31 January 2022

Appeal Ref: APP/G2245/W/21/3273188

Former Broke Hill Golf Course, Sevenoaks Road, Sevenoaks, TN14 7HR

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Quinn Estates Ltd against the decision of Sevenoaks District Council.
 - The application Ref 19/02616 OUT, dated 11 September 2019, was refused by notice dated 29 January 2021.
 - The development proposed is residential development of up to 800 dwellings, including affordable housing units and self build plots, retirement care community for up to 180 C2 units, primary school hub with associated sports facilities/outdoor space, sports hub including rugby and hockey pitches with separate car park and club house areas, 2ha of commercial B1 use, local centre including commercial, retail and community facilities and undercroft car parking for Knockholt station, country park/open space including landscaping, infrastructure and ground works with all matters reserved except for access.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. The application is submitted in outline with all matters reserved apart from access. I accepted as part of the appeal a series of indicative plans which cover matters such as the extent of open space, the location and use of development platforms, their indicative height and densities. These are consistent with the submitted Design and Access statement. The matters addressed in these plans are not prejudicial to any future determination of reserved matters.
3. The Inquiry was managed as a blended event with the majority of evidence being heard via internet link with a single day to hear representations from interested parties in person.
4. After the Inquiry I received completed Statements of Common Ground dealing with the substantive issues involved in this appeal. I also received a draft Section 106 (S106) agreement during the Inquiry. Following discussion during the Inquiry, I received completed bi and tri lateral Agreements, dated 23 November 2021. These two agreements were submitted to account for differences in funding between the County and District Council involving CIL¹. I refer to these agreements later in this decision.

¹ Community Infrastructure Levy

5. During the Inquiry, in consultation with the parties, I deleted a main issue which had been agreed during the Case Management Conference in August relating to the provision of affordable housing as there was agreement between the parties on this matter.
6. In addition to the main parties, there were 2 Rule 6 (R6) parties. Whilst one of these, the Halstead Parish Council and Green Belt Futures Group made representations throughout the Inquiry, the other, Tarmac Trading Limited, was not actively involved in the proceedings following completion of Statements of Common Ground with the Council and appellant.
7. During the Inquiry I was referred by the Council to an email from a local bus operator regarding the difficulties in setting up new bus services. I did not accept this because this raised new evidence and could have been prejudicial to the appellant's case.
8. Given the size of the proposed development the appeal was accompanied by an Environmental Statement as required by Regulation 5(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Main Issues

9. The appeal raises the following main issues:
 - the effect of the proposal on the Green Belt, including any effects on openness and the purposes of including land within the Green Belt;
 - the effect of the proposal on the character and appearance of the area;
 - the effect of the proposal on transport networks and the extent to which it would support the objective of promoting sustainable transport;
 - the nature and extent of any economic, social and environmental benefits which would result from the proposal; and
 - whether the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations such as to provide the very special circumstances required to justify development in the Green Belt.

Policy background

10. The Council's Local Plan includes its Core Strategy (2008) and its Allocations and Development Management Plan (ADMP) 2015. Policies L01 and L08 of its Core Strategy which relate to Settlement Strategy and Green Belt respectively are the only policies identified in its reason for refusal. Together they seek to direct new development to existing settlements and protect the countryside and the Green Belt. I regard these as the most important policies for this decision.

11. The Council's Regulation 19 draft Local plan was withdrawn in 2020 following comments by the Examining Inspector² (EI). Work is currently underway on a new draft plan, although at the time of writing a new Local Development Scheme has not been agreed by the Council. Many of the background papers used in the preparation of the withdrawn plan were referred to by each main party during the Inquiry.
12. Given the withdrawal of the Plan I do not accord its draft policies weight.

Reasons

The effect of the proposals on the Green Belt

13. It is not disputed by the parties that the site is inappropriate development within the Green Belt as defined by the National Planning Policy Framework (the Framework).
14. The major part of the appeal site was occupied by the former Broke Hill golf course which closed in 2012. Apart from an area of previously developed land located around the site of the former club house, since demolished, and a parking area, the whole site is open land. The alignment of fairways marked by incidental bands of deciduous and evergreen trees are still discernible. At the northwest of the site is a belt of Ancient Woodland (0.6ha) and open fields are located along Stonehouse Lane.
15. Although submitted in outline the DAS³ identifies a series of parameters for the proposed scheme with suggested heights of up to 22m for the commercial centre, 15m for the C2 retirement complex and 12.5m for the sports hub located along Stonehouse Road. Each of the residential development platforms would have heights of between 10-13m height and the employment site on London Road would have a height of 9m. The appeal scheme would have a density at around 35-50dha⁴.
16. It is estimated that around 47% of the total site area would be fully developed with the remainder laid out as public open space including a Green Grid of spaces and a Green Belt Park.

Impact on Openness

17. Although there is no definition of 'openness' within the Framework, the Guidance⁵, refers to assessments of openness as being informed through consideration of spatial and volumetric aspects, the duration of the development and the degree of activity likely to be generated. Whilst only a suggested framework for consideration it is useful to inform consideration of issues involved in this appeal.
18. The scale of development proposed in terms of both its spatial and visual impacts would be significant on the site and by extension the surrounding Green Belt when compared to the extent of previous development which comprised a single club house with parking area.

² CD E19

³ Design and Access statement

⁴ Dwellings per hectare

⁵ Planning Practice Guidance 001 reference ID:64-001-020190722

19. The immediate geography of the site is determined by its proximity to 3 settlements, Pratts Bottom, Halstead and Badgers Mount. These are located outside the Green Belt. However, Pratts Bottom to the west partially coalesces with Chelsfield around the junction of the A21, Sevenoaks Road and Chelsfield Hill. Chelsfield is a suburban extension to Orpington which itself forms part of the London conurbation.
20. A Green Belt study⁶ prepared for the withdrawn local plan identifies that the appeal site forms part of Parcel 76. This scores the parcel against the 5 purposes of the Green Belt included in Paragraph 138 of the Framework. The study concludes that the overall score for the parcel in Green Belt terms is 'strong'. The study recognises that the parcel checks the unrestricted sprawl of large built up areas (Paragraph 138a) and scores 3, 4 and 5 respectively for criteria 138b)-d) on a scale of 0-5 with 5 being the greatest impact.
21. The appellant's study submitted with the application⁷ focusses on the Green Belt function of the site using a different nomenclature and concludes that the site makes a 'contribution' to each of the criteria included in Paragraph 138 a-c).
22. For the appellant, the identification of the 3 surrounding settlements as 'towns' by the Arup study, despite them being described by the Council as 'villages', is evidence that the study cannot be relied on and is particularly suspect in respect of its conclusions regarding Paragraph 138b).
23. The appellant points to the letter of the EI which, amongst other matters, seeks further evidence on the Green Belt assessment, its methodology and the range and sizes of the parcels. However, in the absence of evidence to the contrary, I treat this as a request for further evidence which should not be used to completely undermine the study's findings.
24. Parcel 76, included in the Arup study, is one of several, identified by the assessment, which lie on the north or north west edge of the district, closest to Greater London. The appeal site lies towards the western edge of the parcel. Given this context the Arup study provides a sound assessment of the role of the Green Belt in this location.
25. In my view, the critical point is not that appeal site area makes up around 8.9% of the whole parcel area (the built up proportion of the scheme being only 4%) but the geography of the site in relation to Pratts Bottom and Greater London to its north west. Chelsfield Lakes Golf Club which forms part of the Green Belt lying north of the A21 does not extend sufficiently west to break the extent of development in this area as the appellant states⁸.
26. The eastern edge of the appeal site would extend to the existing strip of housing along Cadlocks Hill. The site would have a separation distance of around 410m to Halstead to the south.
27. Although amendments to the appeal scheme have involved reducing the extent of the development platforms on the west side of the site to broaden the gap to around 300m between the housing parcels and Pratts Bottom, this separation distance is not significant given the scale of the proposed scheme and does not

⁶ Arup Green Belt study 2019

⁷ CD B.27 Green Belt Assessment for Stonehouse Park Wood 2019

⁸ CD B27

- adequately account for the intensively developed sports hub located on the site's western edge which would abut the existing settlement.
28. The sports hub would comprise 2no. 2 storey club houses (of up to 12.5m height) each served by 100 parking spaces with both natural and artificial floodlit pitches. Whilst Paragraph 149b) of the Framework identifies sports facilities as not inappropriate development within the Green Belt, the extent of the proposed sports hub is significant and would, in my opinion, if considered as a standalone development, fall outside the provisions of Paragraph 149b).
 29. The sports hub would have a highly urbanised character extending the whole scheme to Pratts Bottom. The result would be that the whole development represents a finger of development from London into the heart of this part of the Green Belt. It represents inappropriate development which would not preserve openness. It is a form of development which Green Belts were established to prevent.
 30. Whilst Inquiry time was spent in debating the use of the words 'town', 'village' or 'hamlet' with reference to the Arup report as a means of coming to an understanding of Paragraph 138b), a holistic view of the proposed scheme is that its overriding impact would be to morph the settlement pattern to the detriment of openness. In my opinion this is something which the Framework's Green Belt policies seek to resist.
 31. Although a large part of the site was a golf course it still retains the essential character of its former use as fields, apart from the site of the clubhouse and car park. The site retains perimeter hedgerows and tree belts within the site. This is in contrast to the scale and massing of development proposed which represents significant encroachment into the countryside.
 32. Whilst the appellant places weight on the conclusions of the Green Belt report, even this recognises 'that a combination of factors including the former use, the extent of urbanising influences along London Road and existing sprawl along Stonehouse Lane, London Road and Caldocks Hill would detract from the rural nature of the site'⁹. These concerns would be exacerbated by the scale of the appeal scheme in leading to further reductions in openness.
 33. I do not agree with the appellant's¹⁰ description on the extent of the scheme's impact on the physical openness of the Green Belt as 'moderate to limited'. The appeal scheme would result in definitional harm to the Green Belt and by reason of its inappropriateness to other harms through the activities which would arise on the site. There would be substantial harm.
 34. For the above reasons, I conclude on this main issue that the appeal scheme would be in conflict with Policy L01 which seeks to direct new development to existing settlements and Policy L08 which seeks to preserve the extent of the Green Belt. Furthermore, the nature of the proposal is in conflict with Paragraph 137 of the Framework which identifies that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Of the 5 purposes included in Paragraph 138, the scheme would undermine a) and c) which seek to restrict the sprawl of large built up areas and assist in safeguarding of the countryside from encroachment.

⁹ CD B.27 Section 4.4

¹⁰ Evidence of Mr Burley-paragraph 5.34

Character and appearance of the area

Landscape

35. The appeal site is located just beyond the western edge of the North Downs National Character Area (NCA 119) and is within the setting of the Kent Downs AONB. The site itself lies within the Halstead Wooded Down (LCA) and the County Character Area, Knockholt Downs. It is not within a protected landscape.
36. The site occupies a broad plateau of land which rises steeply by around 35m from London Road on its northern edge. There is a gentle downward slope southwards towards Halstead. The site is almost entirely occupied by the former golf course, apart from the agricultural land and land on the escarpment. Within the site there are areas of hardstanding, the site of the demolished club house and car park.
37. Within the wider landscape, the settlement pattern is low density and reflects an organic form of development. Halstead is a long established settlement.
38. Despite the site's previous use it still retains important features reflecting the national and local assessments, cited above, including a well wooded dip slope at its northern edge which includes a belt of ancient woodland, hedgerows interspersed with mature trees and on its western edge, agricultural land.
39. I accept that the appellants use of a ZTV¹¹, that is the distance over which the scheme would be seen, of around 2kms, is appropriate given the constraints placed on longer views resulting from both local topography and the location of tree belts. The limited intervisibility which the site currently has with its surroundings would be significantly altered by the scale of the appeal scheme.
40. Both parties broadly acknowledge that the construction phase would have the greatest landscape impact but they differ on the extent to which these would diminish overtime as the effects of the proposed mitigation measures take effect.
41. Mitigation measures include 'strategic open spaces'¹² developed as part of a 'Green Grid' of open space across the site and a Green Belt Park on the dip slope and a range of enhancement measures including additional tree planting and strengthened landscaped boundaries. These measures should be balanced against the loss of around 30 tree groups (17 of which would be category B) with a further 7 partially affected¹³.
42. Although built development would occupy around 47% of the site area, there would be a substantial impact on its landscape. Many of the landscaping features threaded throughout the site would be secondary resulting in the creation of landscape belts around each development platform.
43. The impact of new development platforms for housing, the commercial centre and care home would be extensive in area extending across the whole site with a major impact on its existing topography. The whole character of the site

¹¹ Zone of Theoretical Visibility

¹² Mr Williams PoE para 4.10

¹³ D Webster PoE para 4.21

would change. In this respect the magnitude of change on landscape would be moderate/adverse as the introduction of strategic accessible open space throughout the site could not fully mitigate for the extent of change even after 15 years.

44. For these reasons the extent of change resulting from the appeals scheme would be moderate/adverse impacts.

Visual

45. Around 36 viewpoints which lie both within and around the site have been agreed by the parties for the visual assessment.
46. There are 3 public footpaths which extend across parts of the site including SR61, SR62, SR63. These are the most sensitive receptor points to assess visual impacts. Given how each of these thread their way through the site the impacts would be considerable on these receptors. Mitigation in the form of additional planting as suggested in the parameter plans could not alter the extent of impact which would, even after 15 years, be substantial adverse.
47. I acknowledge that the landscape proposals, designed to strengthen the existing perimeter hedges, would apart from several exceptions, prevent distant views into the site from surrounding roads and from along footpaths to the south along footpaths SR65 and SR67. Harm arising from visual effects would be minor adverse from along these footpaths.
48. Given the elevation of viewpoints located in the Kent Downs AONB¹⁴, Chelsfield Lakes Golf Course (footpath 262) both the proposed care home and commercial centre would be seen due to their proposed height and location at the northern edge of the site. The existing belt of deciduous trees located close to the ridge edge, just north of the former car park, of between 18-26m in height would not have sufficient canopy thickness to allow adequate cover for these aspects of the appeal scheme. The effect of the scheme on these views would be moderate adverse.
49. There would be considerable adverse impacts arising from the location of the proposed club houses and flood lighting located along Stonehouse Lane. Although there is already an extensive boundary hedge which would be enhanced by a broad landscaping strip of around 8m depth, this would not allow sufficient mitigation given the height of these proposals. The predicted visual effects along PROW SR64 and Stonehouse Road would be moderate/substantial adverse even with the proposed embedded mitigation.
50. Whilst the phasing programme includes the development of landscape features in Phase 1, to ensure planting becomes established, I do not consider that given the scale of development by Year 15 this would have provided sufficient cover to provide adequate mitigation to address the impacts on all visual receptors.

Conclusions

51. Given the scope of Policy L08, there is an implicit objection to the proposal on landscape grounds. I acknowledge the conclusions contained within the officer's report in respect of the appearance of the area and its wider landscape¹⁵ and

¹⁴ Area of Outstanding Natural Beauty

¹⁵ Officers report to Committee 27 January 2021

that the extent of harm was not considered so great as to warrant a reason for refusal in itself. However, there would be harms to both landscape and visual receptors arising from the appeal scheme which could not be sufficiently mitigated for. This is considered further in the planning balance.

Transport infrastructure

52. There is no issue between the parties on road capacity but only the extent to which the proposed measures would provide genuine choice in transport modes.
53. The location and scale of proposed development would result in around 2,300 people living on the site who would require a range of services to support their every day needs. Given the outline nature of the scheme it is unclear exactly what services would be part of the commercial centre although reference was made during the Inquiry to a possible small food store and leisure offer. However, it is unclear whether a GP surgery would be located on site although this was assumed in the TA¹⁶. Given the limited services available on site there would be a considerable demand for services located beyond the site requiring a large number of trips.

Private transport

54. The Transport Assessment (TA) indicates that the proposed scheme would generate traffic of around 459 and 504 2 way trips¹⁷ in the morning and evening peaks respectively. I accept that at the time these figures were produced the scheme was still assumed to be 850 dwellings and so proportional adjustment is required.
55. In contrast, the number of rail trips generated would be around 152 and 125, 2 way trips and for buses the figure would be around 118 and 105, 2 way trips for the morning and evening peaks respectively.
56. The TA assumes a proportion of linked trips between the different uses on the site and that the primary school would serve the proposed scheme involving few if any trips by car. However, whilst the assessment does not account for the extent of modal adjustment which may arise from the measures included in the S106 agreement, the figures included in the TA are indicative of the relative scale of private transport compared to other modes likely to be generated from the site. This would be considerable.
57. It is instructive to note that the S106 agreement includes a range of measures to address capacity issues at local road junctions including that of Sevenoaks Road/London Road and Hewitt's Roundabout¹⁸. The provision of around 200 parking spaces serving the proposed hockey and rugby clubs and the relocation of station parking in the undercroft of the commercial centre is indicative of the large number of private vehicle trips which would arise from this scheme.
58. These matters point to dependence on private transport.

¹⁶ Clinical Commissioning Group

¹⁷ CD B34 Peter Brett Transport Assessment para 7.13.6

¹⁸ Appendices to Mr Heard's PoE

Rail

59. The proposed residential areas across the site would lie between 3-11 minutes walking distance of Knockholt Station. The appellant's¹⁹ research demonstrates that the site's Green Belt location is almost unique given its proximity to this station²⁰.
60. The station is served by 2 services an hour rising to 3 in each direction during the peak hours to/from central London allowing a door to door travel time of around 40 minutes. Services to Sevenoaks would take around 8 minutes or a door to door time of around 27 minutes assuming a location in the centre. Travelling to Bromley via rail would take between around 33 or 28 minutes depending on the R6 and appellant's evidence respectively. At peak times these journeys compare favourably with travel by car.
61. The R6 party's evidence identifies that around 34% of journeys to work are made to destinations within Greater London²¹. Although this evidence disregards a proportion of the total sample, I consider that it represents a broad picture of where residents of the MSOA²²_008 travel to work.
62. The proximity of the station to the appeal site and its location within Zone 6 of London's fare zoning where I understand, fares are relatively cheaper than for other stations in the MSOA_008, would result in a higher proportion of residents using the station for their daily commute into Greater London in comparison to other parts of the MSOA_008.
63. For these reasons, I accept that the percentage of residents of the proposed scheme who are likely to use rail would be higher than the 23% of commuters identified in the MSOA_008 area²³. However, drawing on the figures included in the TA there would be around 152, 2 way rail trips in the morning and just 125 in the afternoon peaks respectively.
64. It is likely that private transport would still be the dominant form of transport for commuters to destinations other than central London given the reliance on the car by residents in the District to local centres²⁴. This is demonstrated by the peak hour figures included in the TA.
65. I regard the appellant's suggestion that additional commuters arising from the proposed scheme together with those from the recently permitted scheme for 635 dwellings at Fort Halstead to the south of the appeal site, could result in increased rail services to address congestion as speculative.
66. The proposals in the station included in the S106 agreement involving capital investment in lighting, CCTV, fencing, cycle parking, cycle parking signage and customer information would allow for localised improvements but, in my judgement, would be unlikely to lead to a significant shift in modal use for occupiers of the appeal site. Of greater significance in this respect would be those measures identified in the appellant's evidence regarding how capacity

¹⁹ Evidence of Paul Cheshire

²⁰ CD E15

²¹ Mr Giles PoE Table 5.1

²² Middle Layer Super Output Area - an area used for reporting small area statistics

²³ Sustainability Appraisal for the withdrawn plan

²⁴ PoE M r Giles Table 5.2

could be addressed by rail operators²⁵. These matters remain outside their control.

Bus Services

67. There are just 4 bus services which each operate 2 times a day each weekday. The 431 service between Sevenoaks and Orpington was cancelled during the C-19 pandemic although it was included in the TA. I understand that there are no plans to reinstate this.
68. The phased development of the site would be supported by new investment in public transport through planning obligations. In the initial stages of the development, a demand responsive transport (DRT), effectively a form of taxi service, would operate until 100 dwellings are completed.
69. Between 100-400 dwelling completions, an hourly service from 07:00 – 10:00 and 15:00 – 20:00 Monday to Saturdays would be introduced and beyond the completion of 400 dwellings, this service would be extended hourly to 20:00-22:00. The route would be taken through the site.
70. The appellant has given some consideration to the route of the new service which would run between Sevenoaks and Orpington²⁶, connecting to other stations, services and amenities. Given that the proposed service could be a substitute for that withdrawn (which the TA assumed was still in operation), its impacts would be unlikely to significantly reduce dependence on private transport.

Active travel modes

71. Whilst the commercial centre would be developed as part of the first phase of development, residents would require a broader range of services than could be offered on site or in Pratts Bottom and Halstead²⁷. There are few services²⁸ within the 800m -2km of the site defined by Manual for Streets²⁹ as 'walkable', although this would be determined by quality of footways and street lighting.
72. Accordingly, a broad variety of services would continue to be accessed in the main centres of the District, including Sevenoaks but this is around 5 miles from the appeal site.
73. The proposed investment in cycleways included in the S106 Agreement would have only a localised impact being unconnected to routes which connect to settlements which include a broader range of services. Many of the roads in the local area do not have footways on each side and/or are unlit. This situation will not change markedly despite the capital investment included in the S106 agreement.

Conclusions

74. To conclude on this matter the appeal scheme includes a range of measures within the S106 agreements for improvements to local transport infrastructure.

²⁵ Mr Heard's evidence - 3.4.17-19

²⁶ CD B57 Technical Note

²⁷ Mr Heard PoE paras 3.2.21

²⁸ Mr Giles PoE Figure 2

²⁹ Department of Transport 2007

75. The main advantage of the site's location is its proximity to the rail station. Many of the obligations included in the S106 agreement would improve the attractiveness of the station for commuters, public transport and by active travel. A larger percentage of commuting trips would be made by train from the site when compared to the rest of the district because of the ease of access by walking and potentially cycling to the station. The rail station, managed by TfL³⁰ benefits from the zonal fare system which would further encourage rail travel.
76. However, the typical household makes many more journeys than the daily commute. Under cross examination the appellant's witness agreed that genuine choice requires a qualitative assessment of issues such as journey times, convenience, reliability and frequency.
77. When assessed against these factors the proposed measures for active travel and bus services would be limited in the degree to which they would offer genuine choice. The suggested measures included in the S106 agreement would be unlikely to materially increase their use.
78. The appellant acknowledges that outside peak times car journeys are quicker than public transport³¹. Whilst this is caveated with reference to the additional time required to park and walk, it does not undermine my conclusions on this matter given the number of trips that would be made in addition to those for work.
79. The impact of the travel plan, outlined in the TA, designed to reduce the anticipated amount of vehicular traffic generated from the site by 10% over 5 years would not be effective in reducing reliance on private transport, even if they could be achieved, given the lack of genuine choice in alternative modes.
80. In my view, it is doubtful whether an hourly bus service would be sufficient to create the right conditions to increase patronage to such an extent that it would be an attractive option when compared to the convenience of the car.
81. The obligations included in the S106 agreement would, in my view, be insufficient to overcome the site's poor location in relation to existing services and facilities. Although Paragraph 105 of the Framework identifies that different conditions can apply between rural and urban locations in how 'genuine choice' should be measured, the appeal scheme represents a major urban development which is counter to Paragraphs 73 and 105 of the Framework which require the active management of patterns of growth to ensure that new housing is well located to allow a genuine choice.
82. The large amount of traffic generated results reflects the site's location away from existing settlements contrary to Policy L01. Furthermore, the additional traffic generated by the appeal scheme would be in conflict with Policy L08 which seeks to protect openness as defined by the Guidance.

Economic, social and environmental benefits of the appeal scheme

83. The appellant's case is predicated on the range of benefits arising from each distinct element of the proposed scheme. I address each of these in turn.

³⁰ Transport for London

³¹ Mr Heard PoE Paragraph 2.3.23

Housing

84. Foremost amongst the benefits ascribed to the scheme by the appellant is the provision of 800 new homes which include 320 affordable homes which comply with adopted policy. Both parties acknowledge that there is chronic under provision of housing supply within the District; a situation which continues to decline³².
85. Furthermore, it is evident that this undersupply has persisted for many years exacerbated by an out of date local plan which includes housing targets based on the Core Strategy requiring 165dpa (dwellings per annum), a point made by the appellant and not challenged by the Council³³. This contrasts with the LHN³⁴ of 698dpa for the period 2015-2035. In the period 2010-20, the District had the lowest figure for net additions to stock when compared to other Kent districts. The HDT figures indicate that this has been a matter of concern for the last 3 years.³⁵
86. The parties diverge on the extent of likely future land supply over the next 5 years. These range from around 2.8 and 1.9 years supply³⁶ for the Council and appellant respectively. Whilst these figures were not the subject of a forensic analysis during the Inquiry, they indicate a serious and chronic undersupply which undermines the Government's objective of securing 300,000 dwellings per annum.
87. This has led to a situation where the median affordability ratio³⁷ for the period 2018-20 is around 13.53³⁸. This is considerably higher than for some other districts in the County, cited by the appellant which also have high levels of designated Green Belt. The Council accept that the number of affordable housing units needed is around 422dpa³⁹. Delivery continues to average around 70dpa.
88. The Council acknowledges that the situation is 'unacceptable'⁴⁰. Although at the time of writing the Council does not have an agreed local development scheme for the new plan, it maintains that the only way to address this issue is through a plan led approach⁴¹. However, the programme for the production of the new plan has yet to be agreed and so a new plan is some years away⁴².
89. There is little doubt that the Council's difficulties in identifying housing allocations largely stem from the high percentage of protected land in the District with around 93% designated as Green Belt and 60% AONB. This represents one of the highest figures for a Kent District. To address undersupply, it recognises that the site allocations included in the ADMP⁴³ will have a higher number of units than originally envisaged.

³² Housing Delivery Test results 2021 (issued January 2022)

³³ Paul Cheshire PoE

³⁴ Local Housing Need in CD ED23

³⁵ Housing Delivery Test 2019-2021

³⁶ Rebuttal of Ms Henshaw and Mr Burley as amended though XX

³⁷ Defined as the ratio of median earnings to house prices

³⁸ Table 4 PoE Cheshire

³⁹ Mrs Henshall PoE para 4.4

⁴⁰ Mrs Henshall in XX

⁴¹ Mrs Gooden PoE

⁴² Ms Gooden XX

⁴³ Ms Henshall PoE para 5.4

90. Furthermore, the Council acknowledges that a route to addressing undersupply is through the release of sites from the Green Belt⁴⁴. The withdrawn plan included sites at Sevenoaks Quarry, land at Pedham Place (which also lies within the AONB) near Swanley and Fort Halstead with the latter having recently been granted planning permission.
91. Key parts of the appeal scheme formed the suggested housing allocation (MX41) included in the Regulation 18 draft plan. Following further consideration through the Sustainability Appraisal (SA) the site was not included in the Regulation 19 draft because its infrastructure requirements did not outweigh the harm to the strongly performing Green Belt⁴⁵. This is despite it being recognised as 'deliverable' within the SA.
92. For the appellant, the exclusion of the appeal site from the housing allocation points to a postponement of the inevitable demonstrated by the permissions at Fort Halstead and Four Elms Road, Edenbridge. Whilst references were made in the appellant's evidence to other housing allocations included in the withdrawn plan, it is not my role to inform comparison and determine future policy.
93. Given these circumstances, I acknowledge that the appeal scheme could make a significant contribution to addressing the under provision of both market and affordable housing across the District.

Self build and custom-made housing

94. The provision of this form of housing is included in statute⁴⁶ and requires Councils to establish and publish a local register of custom house builders who wish to acquire suitable land on which to build their own home. There is a requirement that authorities must give suitable permissions to allow a supply of serviced plots to meet demand. These requirements have been given greater impetus by the recommendations of the Bacon Report⁴⁷.
95. Although the Council does not have a specific planning policy for this form of housing or clear knowledge of future demand, it has granted planning permission for 111 plots and at March 2020 there were 114 persons registered.
96. However, the absence of an adopted policy and understanding of demand is a similar situation from that identified in the the Colney Heath appeal⁴⁸. Although it is unclear in that decision whether any units had been granted permission, this is not the situation in respect of this Council. However, I still recognise that the provision of 25 units would be a considerable benefit of the scheme.

Specialist housing for older people

97. Both parties agreed that the starting point for the calculation of specialist housing for older people starts with the particular demographic of the local population although they differ in the forecasting models to determine future demand.
98. The District's population is ageing with the percentage of those aged over 65 years significantly higher than other Kent Districts. The SHMA⁴⁹ identifies that

⁴⁴ Ms Gooden XX

⁴⁵ Ms Henshall PoE Appendix

⁴⁶ Self Build and Custom Housebuilding Act 2015

⁴⁷ CD E41

⁴⁸ ID4

⁴⁹ Strategic Housing Market Assessment

- this age group would grow from 20% in 2021 to 25% by 2035⁵⁰ with a significant growth in the over 75 years cohort. With an ageing population care needs become increasingly complex caused for example, by an increase in dementia and infirmity. This places greater demand than in the past for extra care⁵¹ provision.
99. Across the District, levels of home ownership are around 80% for those of 65 years and above. This continues to be a major driver for those wishing to stay in their homes, adapted to address their personal needs or seeking other forms of market care accommodation⁵².
100. The SHMA⁵³ estimates a need for 66 dwellings and 25 units of specialist older persons accommodation each year.
101. The appellant identifies that the high levels of owner occupation across the District point to considerable demand for market extra care whereas the Council's provision is concentrated on affordable units. This is despite the County Council identifying that that it is keen to work with a range of providers in the provision of this form of accommodation⁵⁴.
102. The Council have identified an existing supply of around 2,874 units across the whole District of which 34% are in the Sevenoaks urban area and 24% in the north west of the District⁵⁵ where the appeal site lies. The Council's evidence demonstrates that the North west area has the greatest choice of provision.⁵⁶
103. The appellant's witness⁵⁷ identified that demand for market care provision is increasingly being met by large scale developments for around 150 units. This form of development involves high initial capital costs resulting from the provision of a range of services which can include beauticians, pools, bars and shops as well as care facilities. The levels of care/facilities at these sites marks a maturing of the market in this sector and can be compared to the average number of bed spaces for C2 care which has in the past included only around 60 beds⁵⁸.
104. The appellant's evidence identifies to the difficulties which such schemes have in competing for sites with house builders given the amounts of upfront capital investment required. For this reason, the allocation of a site for C2 use as part of a larger scheme is particularly attractive to operators.
105. It is unclear the extent to which the County has up to date evidence on the true picture of demand for market extra care. The Market Position Statement 2021-26⁵⁹ doesn't distinguish between affordable and market sectors making the County's assessment of demand for market extra care unclear⁶⁰ as referenced in its Social Care Accommodation Strategy⁶¹.

⁵⁰ CD E03 Regulation 19 draft Local Plan

⁵¹ A bespoke form of accommodation for elderly people involving the provision of range of services which can be drawn on as personal needs change

⁵² CD D25 LHN 2017

⁵³ Strategic Housing Market Area

⁵⁴ CD E39 Market Position Statement

⁵⁵ PoE Ms Henshall para 6.4 with an uplift of 100 from the Edenbridge appeal decision APP/G2245/W/21/3271595

⁵⁶ Mr Henshall PoE para 6.7

⁵⁷ Mr Garnett

⁵⁸ CD E38

⁵⁹ CD E39

⁶⁰ KCC Adult Care and accommodation strategy

⁶¹ E38 page 21

106. The County's assessment is based on the SHOP@TOOL which for a short time in 2019 was advocated by the Housing LIN⁶². This still forms part of the Planning Practice Guidance. This was withdrawn by the Housing LIN given concerns that it understates future demand due to its reliance on current supply increased by an anticipated rise in cohort population. This ignores existing need. The County's updated position⁶³, based on data from the ONS⁶⁴ identifies a need for a further 132 units above existing supply from 2021-31 for both the affordable and market sectors above the annual requirement identified in the SHMA.
107. In contrast the appellant's witness drawing on considerable experience in the sector, adopts a rule of thumb based on 3% and 1.5% for the market and affordable sectors for extra care⁶⁵. This identifies an unmet need of around 375 units which rises to around 480 units by 2040 for market extra care for those aged over 75 years. Whilst it is unclear exactly how these percentages have been derived from the published material presented by the appellant, they point to a level of demand more in line with the District's demographic.
108. The Council identifies that there is a pipeline of extant permissions of around 65 extra care market units⁶⁶. In this context the appeal scheme would make a significant contribution to meeting demand. Even allowing for some leeway in how the application of the appellants 'rule of thumb' operates, in my opinion the Council's latent supply figure is well short of the likely demand.
109. The proposed home could free up around 180 dwellings from the existing housing stock as people transfer accommodation, although given that all these units are likely to come on the market in what is likely to be a short period of time, residents of the new home are likely to be drawn from beyond the District's boundaries⁶⁷. However, freeing up of a proportion of existing dwellings should be factored into the broader planning balance given the state of the housing land position.
110. It is instructive to note however, that whilst the proposed C2 scheme has many benefits its location would still result in development which does not allow easy access to services despite the dedicated 'village' transport service⁶⁸ proposed by the appellant. This is still an important factor despite the nature of the proposed scheme involving a range of on site services designed to support a retirement community.
111. It is my understanding that the scheme suggested by the appellant's witness⁶⁹ in this appeal would operate on a similar basis to that suggested in the Edenbridge appeal⁷⁰ which includes services provided on site with a 'village' transport service. However, in contrast the appeal site would be even further away from existing local centres than the Edenbridge site and for this reason the degree of weight in support of this aspect of the appeal scheme is reduced.

Sports facilities

⁶² Housing Learning Improvement Network

⁶³ Market Position Statement (MPS)

⁶⁴ Office for National Statistics

⁶⁵ CD E34

⁶⁶ Ms Henshall revised table included at paragraph 6.8

⁶⁷ Mrs Henshall PoE

⁶⁸ Mr Garnett PoE

⁶⁹ Mr Garnett

⁷⁰ APP/G2245/W/21/3271595

112. The appeal scheme would provide additional facilities for Sevenoaks Hockey and Rugby clubs.
113. Both clubs are thriving. The Hockey Club has 1,000 playing members, 11 Men's teams, 8 Women's teams and over 700 junior members coached by over 100 coaches. The Rugby Club has 5 adult teams, 5 academy squads and 7 mini and junior squads. Both clubs have outgrown their respective facilities with waiting lists for membership. The proposed facilities would allow expansion of their current offer to better cater for their present needs and future demand. For example, the Hockey Club has aspirations to become a 'centre of excellence' and the Rugby club to develop wheelchair rugby.
114. With growing membership, facilities for both clubs are at breaking point. The Hockey Club has a club house shared with a local cricket club, located away from its pitches on Holly Bush Lane in Sevenoaks. The clubhouse lacks adequate shower, changing facilities and floodlighting and the club uses pitches located at other locations in the District. Holly Bush Lane does not have sufficient parking to accommodate demand.
115. The Rugby Club presents a similar picture with its club house located at Knole Paddock with 3 full size pitches of which one half of one pitch is floodlit. The club has to use facilities in local schools to accommodate existing demand.
116. The appeal scheme includes 4 England Hockey standard artificial grass pitches (AGP) including a Category 1 pitch, and with artificial lighting for 3 of them. There would be 2 RFU⁷¹ size compliant pitches of which one would be grassed and one AGP, 2no. junior sized pitches which would be shared with the proposed primary school. Two club houses of 4,000 sq.ft. and 2,500 sq.ft are proposed for the hockey and rugby clubs respectively. Each club house would be served by 100 parking spaces.
117. I heard from representatives of both clubs during the Inquiry who confirmed the importance of the proposed scheme to meet the growing unmet demand for each sport. The advantages of new facilities is identified by the appellant's Needs Assessments⁷² for each sport.
118. Both local and national policy recognises the importance of sport and recreation to support health and well being⁷³. These benefits are consistent with Sport England's⁷⁴ drive to increase participation. There is no dispute between the parties on the importance for young people of recreational opportunities in terms of improving their mental and physical well being and combatting anti-social behaviour. In these circumstances the provision of new facilities at no capital cost to each club would be significant and would allow each of them to increase revenue.
119. The Council's Playing Pitch Strategy (PPS)⁷⁵ identifies that there will be continued demand for both sports in the Sevenoaks area to the extent that the shortage of pitch provision would be exacerbated. However instead of seeking additional pitches as the only solution, the strategy identifies that existing capacity issues could be better addressed through both improved drainage and

⁷¹ Rugby Football Union

⁷² CD B83

⁷³ Paragraph 98 of the Framework and CS Key Issues and Policy 5.6

⁷⁴ Planning for Sport Guidance 2019

⁷⁵ Paragraph 5.8.2

maintenance. The Council considers that the demand for new facilities is in the Sevenoaks area and not in the north west of the District where the appeal site lies.

120. Despite these findings, I do not entirely accept the Council's case. Both clubs rely on pitches in a number of locations around the District with club houses divorced from pitches located around the District. For this reason, if only existing pitches were improved, operations would continue in only a marginally improved situation when compared to existing. Provision would continue to frustrate the ambitions of each club to deliver on their plans which are consistent with the Government's drive to improve 'well being'.
121. Set against these advantages are a number of issues which lead me to question the extent to which the scheme would fully address the needs of each club. Both would continue to operate on several sites around the District. For example, the existing Rugby club house would be retained for the first team on its existing site. Furthermore, the appeal scheme would not result in improvements to existing facilities.
122. The draw of each club extends beyond the District boundary⁷⁶ and at weekends the attraction of private transport is likely to appeal, given that roads would be likely to be less congested compared to rail travel. The TA does not include the numbers of traffic movements for those times when the 2 clubs would experience greatest demand, for example, at weekends and in the evenings. At these times car dependency would be likely to be high given that increased participation will arise in part from school age children who require chaperoning by parents. For this reason, the site's location close to Knockholt rail station is unlikely to be as attractive as the appellant states for parents and children who are more likely to use private transport.
123. The purported advantages arising from the co-location of the 2 clubs on a single site is undermined by the fact that one club house would have had less spatial impact. I am not convinced by the appellants arguments why this would not be possible⁷⁷. The opportunities for car sharing are overstated by the appellant.
124. I recognise, however, that the provision of both hockey and rugby pitches in this location would be of considerable benefit to both clubs and in turn, through the community use obligation included in the S106 agreement to the health and well being of the wider community. The measures identified by the Council regarding improved management and drainage for the supply of existing pitches in the District would be insufficient to address the demand being experienced by both clubs.

Education

125. The appeal scheme includes a single form entry primary school given the anticipated child yield of around 224 children from 800 dwellings. It is agreed between the parties that the school is only required to service the proposed development.
126. The appellants have included within the primary school site, Specialist Resource Provision (SRP) to partly address the significant growth in the last 5

⁷⁶ Mr McColgan PoE

⁷⁷ Mr Burley XX

years across the County of children with Education, Health and Care Plans (EHCP) and in particular of children identified with the autistic spectrum condition (ASP). Around 31% of EHCPs for ASP across the County concern children within the 5-10yrs age group. The proposed ASP would allow a dedicated resource co-located within the setting of a mainstream school to prevent children with the condition being isolated which would in turn support their integration into school life.

127. Over the next 5 years the Education Authority estimates that demand for such units will increase by around 78% from 35 to 62 pupils within Sevenoaks District. Presently, there is no provision although it is understood that some schools plan to develop such units. However, there was an absence of clarity on this point from both the County and Council and no clear understanding of which schools would be able to accommodate the SRPs and in what timeline. The commitment within the appeal scheme to provide a units is of significant benefit.

The business hub

128. The appeal scheme includes a small business centre for starter units located on the north east edge of the site, accessed from London Road.
129. The withdrawn Local Plan identified the need for additional employment uses across the District and included 3 potential sites all of which lie in the Green Belt.
130. This further emphasises a point made earlier that for the Council to adequately address future growth there may have to be selective release of Green Belt land. I am satisfied that the proposed site would be well located close to the station and the local road network and for these reasons could be developed to accommodate small starter units.

Planning Obligations

131. The appeal includes completed bi-lateral and tri lateral S106 agreements. These differ to the extent to which obligations would be met either through developer contributions or through the CIL. Both the County and the District Councils included CIL compliance schedules identifying how each obligation is in accordance with adopted policy and the Regulations. The main provisions are outlined below.
132. The S106 agreements cover the transfer of land to the County Council, contributions for the development of the primary school and the provision of places, the cost of land transfer for secondary education at another site in the District. Other provisions address community learning, libraries, social care and waste disposal.
133. The S106 agreement covers the transfer of land to the sports clubs and the redevelopment of the club houses, facilities and parking areas.
134. Other matters include the provision of affordable housing, station improvements, measures to support active travel and the establishment of a Management Company for the open space, car club, a Travel plan, marketing of the commercial centre and measures around the operation of the 'retirement

village'. Finally, as the scheme involves the loss of an existing sports facility, the appellant has agreed a contribution of £970k in line with Sport England's metric towards community sports projects which I understand, could be directed to the redevelopment of the Swanley leisure centre.

135. As I am dismissing this appeal, I do not have to consider these agreements in any greater detail.

Whether very special circumstances exist

136. Both parties agree that the proposed scheme amounts to inappropriate development in the Green Belt as stated at Paragraph 149 of the Framework. I agree with that position. National policy is clear, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight should be given to any harm to the Green Belt and 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.

137. The appellant cites a range of matters which they consider represent the very special circumstances to warrant an exception to normal policy in this regard. Whilst the appellant's case is represented by weighing every aspect of the proposed scheme with finely balanced nuance⁷⁸, the Courts have made clear that a mathematical exercise is not required. Rather a single exercise of judgement is required to assess whether the very special circumstances exist to warrant the grant of planning permission.

138. This is a large residential led, mixed use scheme with a location primarily determined by its proximity to an existing rail station. The proposed scheme would partly address the severe under supply of housing land and contribute to the stock of market and affordable housing in the District.

139. There is a need for both C2 housing and self-build and custom built housing included in the scheme to address existing under supply and future demand. The C2 accommodation would address the growing demand from the District's ageing population. Given the size of the scheme, the primary school would be an essential component but the inclusion of the SRP would be of particular benefit to the District. The employment area is modest in scale but could in part serve the development and address future demand for such space.

140. To my mind the inclusion of the 2 sports clubs would support health and well being. However, the proposed pitches and club house would serve only to exacerbate some of the club's existing problems such as their operation across a range of sites within the District. The large number of parking spaces proposed belies the lack of sustainable travel options as required by the Framework for this use.

141. I acknowledge that the appeal scheme would result in a net gain in biodiversity of around 11%; this would be significantly higher than current requirements.

⁷⁸ PoE of Mr Burley

142. However, these benefits have to be balanced against the harms which would arise from the scheme. These undermine the appellants arguments in favour and relate to the principle of a major scheme located away from existing settlements and its adverse impact on the essential purposes of the Green Belt.
143. Although there is no definition of 'openness' within the Framework, the Guidance⁷⁹, refers to assessments of openness being informed through consideration of spatial and volumetric aspects, the duration of the development and the degree of activity likely to be generated. Whilst only a suggested framework it is a useful guide given the issues involved in this appeal.
144. The scale of proposed development involving 30ha is significant. The appellant in cross examination acknowledged that alone the provision of housing is not in itself an argument that overcomes the harm to the Green Belt⁸⁰. The site's location is critical given how it would morph the settlement pattern in this location. The separation distances so carefully calibrated by the appellant would be insufficient to prevent the strategic significance of the Green Belt being undermined in this area.
145. The scale and massing of the development suggested by the parameter plans, involving heights of up to 15m and 22m on the highest part of the site, would be visible from surrounding areas, particularly from the north including from receptor points within the North Downs AONB. These impacts would be particularly intrusive. Other harms would arise from the scale of the sports hub; this would be intensively developed and there is insufficient mitigation included in the scheme to overcome the resultant landscape harm.
146. Other harms to openness would arise from the amount of traffic and domestic activity associated with around 2,300 people which would occur across the site. Given its location within walking distance of the station modal choice would be provided for commuters to London. However, a typical household makes many other trips for shopping, leisure and to access essential services. These services and facilities lie beyond the site and private transport would be the more convenient option even accounting for the new investment included in the S106 agreement and those measures for active travel. The conclusions of the TA in respect of dependence on private transport are telling in this regard.
147. Although the Council accepts that the release of Green Belt land will be necessary to fulfil its housing land requirements and has in fact already made some decisions in this regard, the appeal scheme conflicts with both its Green Belt and settlement policies which require that new development is located in existing settlements where services are located.
148. I find that the other considerations including the recent HDT score, in this case do not clearly outweigh the harm that I have identified. Consequently, the very special circumstances necessary to justify development do not exist.

⁷⁹ Planning Practice Guidance 001 reference ID:64-001-020190722

⁸⁰ Mr Burley XX Mr de Feu

Planning balance and Conclusions

149. Both parties recognise that there is a severe deficit of housing land as required by the Framework. These circumstances, together with the age of the most important policies deems that they are out of date. The tilted balance is not invoked, however, because the Framework at Paragraph 11d(i) and footnote 7 protects both areas and assets of particular importance, which include the Green Belt, and provides a clear reason to dismiss the appeal.
150. The fact that policies have to be considered as out of date does not mean that they carry no weight. To carry weight policies must be consistent with the Framework, as explained in Paragraph 219, which amongst other things, states that the closer that local policies are to policies in the Framework, the greater weight that may be given to them. As such it is perfectly possible for policies which are deemed out of date for reason of an inadequate land supply to still carry significant weight.
151. Policy L01 still carries significant weight as it is predicated on the principles underpinning the Framework in seeking to direct new development to sites in line with the hierarchy of existing settlements in the District. The fact that it was predicated on a smaller housing target does not undermine its importance in this regard. For this reason, I accord the degree of conflict between the appeal scheme and the policy substantial weight.
152. Policy L08 seeks to protect the Green Belt and AONB from new development. These aspects are in line with the Framework although it seeks to go beyond Paragraph 174 in seeking to protect the countryside for its own sake. Whilst these aspects of the policy are only partially consistent with the Framework those regarding the Green Belt are. For this reason, I accord the degree of conflict between the appeal scheme and the policy significant weight.
153. The scheme would have many benefits. These would include market and affordable housing which would in part address the Council's housing land supply position and affordability. The proposed C2 accommodation would cater for the District's ageing population. The inclusion of custom and self build housing would accord with local demand. I recognise that the scheme could potentially commence on site within the next 5 years to address these matters.
154. Social benefits would include a dedicated education resource in the SRP. Furthermore, the sports hub would address to some degree the issues of sports provision for the rugby and hockey clubs. The money for the local sports centre could also be a social benefit.
155. Economic benefits would include the 200 construction jobs available each year during the 8 year build programme together with permanent employment at the care home, retail and employment hub. There would be increased spend in existing local services and shops, arising from the new residents
156. Environmental benefits include biodiversity net gain. This would be achieved through the range of planting schemes to create habitats and through ecological management. However, there would be adverse impacts from the scale of the development arising from its visual impacts from Stonehouse Lane and to the north.
157. However, set against these benefits would be harms to the Green Belt including definitional harm, harm to its essential purposes and harm to

openness arising from the proposed scheme. These would result in conflict with the development plan and with Paragraphs 138 a) and c) of the Framework which aim to check the unrestricted sprawl of large built up areas and assist in safeguarding the countryside from encroachment.

158. Furthermore, the scheme would result in a significant rise in traffic movements by private vehicles which would be counter to Paragraph 105 of the Framework. This requires that new development is focussed on locations which are or can be made sustainable through reducing the need to travel. The limited range of services/facilities for such a large number of residents would result in the majority of journeys being made by car. This is despite its location close to Knockholt rail station and the proposed measures included in the S106 agreement.
159. Overall, I conclude that the harm caused in this case would significantly and demonstrably outweigh the benefits identified when assessed against the policies in the Framework taken as a whole. As such the proposed development does not benefit from the Framework's presumption in favour of sustainable development.
160. Bearing all of the above in mind, there are no material considerations, including the Framework, that would indicate that the decision in this case should be taken otherwise than in accordance with the Development Plan. Accordingly, and having regard to all other matters raised, I conclude that the appeal should be dismissed.

Stephen Wilkinson

INSPECTOR

Documents received during the Inquiry

ID 1	Appellant openings
ID 2	Council openings
ID 3	Rule 6 party openings
ID 4	Appeal decisions APP/B1930/W/20/3625925 and 3225926
ID 5	Brochure extract on Emerson Park retirement apartments
ID 6	E mail of 28 October 2021 from Kent County Council to Montagu Evans
ID 7	HLIN re SHOP@TOOL note sent by the appellants
ID8	Revised table re future supply from Ms Henshall's proof of evidence
ID 9	GLVIA 3 extracts
ID 10	Summary of Landscape assessment
ID 11	Securing Developer Contributions for Education – Department of Education 2019
ID 12	Inspector's site visit itinerary
ID 13	Representations from interested parties
ID 14	Appeal decision APP/G2245/W/21/3271595
ID 15	Completed Statement of Common Ground 3 November 2021
ID 16	Broke Hill local plan submission
ID 17	KCC compliance schedule
ID 18	Suggested planning condition re ecological surveys
ID 19	Council Closings
ID 20	R6 Closing Statement
ID 21	Appellant Closing statement
ID 22	Section 106 Agreement

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Nigel J. W. Appleton	Executive Chairman of Contact Consulting (Oxford) Ltd
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FOR THE RULE 6 PARTY: Halstead Parish Council and Green Belt Futures Group

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(representations presented by	
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Nigel Britten	Trustee CPRE Kent
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