

# Site Appraisals - Impact on the Green Belt

Sites within and bordering Fawkham Parish

Interim Report



June 2022

**Tony Fullwood Associates**

Chartered Town Planners



## **Introduction**

This report appraises the Green Belt purposes fulfilled by sites included in the Sevenoaks District Council Strategic Housing & Economic Land Availability Assessment (SHELAA) December 2018 which are located within and bordering Fawkham Parish and assesses the impact that development would have on these purposes. It is recognised that a further Call for Sites may result in a requirement to appraise different sites, and therefore this is an interim report in response to published information.

The Sevenoaks District Council Green Belt Assessment, 2017 appraised all existing Green Belt land in Sevenoaks District by subdividing the District into large land parcels which did not allow a close assessment of how smaller sites contributed to the purposes of the Green Belt. By considering at a sufficiently detailed scale (the extent to which) a site contributes to Green Belt purposes, conclusions can be drawn regarding the potential harm to Green Belt purposes that could result from release of Green Belt land and consequent development. The Sevenoaks District Green Belt Assessment was taken into account in this appraisal but the difference in scale and more recent advice and practice mean that its conclusions are not directly applicable to the specific sites assessed.

## Methodology

The appraisal assesses which of the Green Belt purposes each site fulfils and the impact of development on these purposes using a common set of criteria. The criteria are consistent with the NPPF; NPPG; PAS Guidance<sup>1</sup> and best practice.

The NPPF (Paragraph 138.) details five purposes of the Green Belt:

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

Paragraph 137 stresses openness and permanence as essential characteristics of the Green Belt stating that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.

Each site was visited and assessed by applying the common set of criteria set out in this methodology. The surrounding area was also assessed to understand the wider context of each site.

Relevant appeal decisions have been taken into account but their relevance to the site assessments must be qualified as they refer to specific development proposals, sometimes at a time when a different planning policy context applied.

The impact of development on Green Belt purposes will ultimately depend on the scale, layout, design and landscaping proposed. Nevertheless, the sites have been promoted through the SHELAA for housing development and the NPPF urges that efficient use be made of land (Paragraph 125) and potential of sites be optimised to accommodate and sustain an appropriate amount of development (Paragraph 130). The re-use or redevelopment of existing buildings for housing purposes may already be in conformity with NPPF and development plan policies and therefore it is reasonable to assume that the sites have been promoted to intensify and expand any existing built form on the site and to optimise development potential. The precise level of impact therefore cannot be determined but development of larger areas clearly has more potential to weaken the integrity of the Green Belt by extending into land that has a greater distinction from urban edges, by diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside.

As each purpose of the Green Belt is considered to be equal (the NPPF does not give greater importance to one purpose over another), no weighting is applied between any of the purposes.

The methodology recognises that a site could be considered to make a strong contribution to the Green Belt through fulfilling only one purpose but to a high degree.

---

<sup>1</sup> Planning on the Doorstep: the Big Issues, PAS, 2015

The following Paragraphs set out how each of the purposes of the Green Belt, and the impact of development on that purpose, have been assessed.

**Purpose 1: To check the Unrestricted Sprawl of Large Built Up Areas Definition of 'built up areas**

Large built up areas are not defined in national planning policy guidance. The original strategic purpose of the Green Belt was to check the sprawl of London. The outer edge of the Metropolitan Green Belt is marked by the A2, some 4km to the north of Fawkham Parish. In Sevenoaks District large built-up areas for the purpose of this assessment may be defined as Sevenoaks and Swanley and, Hartley, Longfield and the clusters of development which make up Fawkham Parish are not considered large built up areas. For this reason, sites on the periphery of these settlements are not considered to fulfil this Green Belt purpose. This approach is consistent with the Sevenoaks District Green Belt Assessment, January 2017.

**Purpose 2: To prevent neighbouring towns merging into one another**

There is no definition of towns in national planning policy guidance. Fawkham Parish comprises some 220 dwellings (which are dispersed in clusters and isolated properties through the parish), is served by few facilities and cannot be considered to be a town. The adjoining Hartley and New Ash Green both have populations of over 5,000, have a physical scale, form and service provision and can be defined as 'neighbouring towns' for the purposes of this Green Belt purpose. This is entirely separate from the classification of the settlements in the hierarchy of settlements which may be used in the emerging Local Plan which relies on a wider set of criteria and an appraisal of the relative sustainability of each settlement.

Sites which contribute to the gap between Hartley and New Ash Green are therefore appraised for their impact on this purpose.

In appraising the impact of development, a 'scale rule' approach has not been taken as the identity of a settlement is not determined solely by the distance to another settlement as the character of the place and the openness of the land in between must be taken into account.

Green Belt openness relates to lack of 'inappropriate built development'. Undeveloped land which is screened from view by landscape elements (e.g. tree cover) may still be considered 'open' in Green Belt terms.

The NPPG advises on what factors can be taken into account when considering the potential impact of development on the openness of the Green Belt stating the courts have identified a number of matters which may need to be taken into account in making this assessment.

These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

In assessing whether a site contributes to Purpose 2, this appraisal reviews:

*The existing land uses and openness of the Green Belt site*

*The potential impact of development of the site on the openness of the gap between Hartley and New Ash Green and the sense of merging into one another.*

### **Purpose 3: to assist in safeguarding the countryside from encroachment**

This assessment considers, in particular, the extent to which a site might reasonably be identified as part of the 'countryside' / 'rural' (in line with the NPPF)

The NPPF (Paragraph 149) does not regard the following development as inappropriate in the Green Belt:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Paragraph 150 also states that certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, including the re-use of buildings provided that the buildings are of permanent and substantial construction and material changes in the use of land (such as changes of use for outdoor sport or recreation).

The presence of such development may affect the openness of sites, but the principle of their acceptability within the Green Belt should not preclude sites from being part of the countryside and performing Green Belt purposes.

The presence of a well defined Green Belt boundary close to the site with no or few urban influences extending beyond the boundary means that there is no, or limited, existing encroachment into the countryside. If boundaries are less well defined and development has extensive influence on the countryside, encroachment into the countryside may already have occurred.

In assessing whether a site contributes to Purpose 3, this appraisal reviews:

*The proximity of the site to a settlement defined by the Green Belt*

*Whether there are well defined boundaries close to the site which contain a settlement defined by the Green Belt and prevent encroachment*

*The openness of the site and its contribution to the openness of the wider countryside*

*Whether there are strong urban influences on the site*

*The nature of the land use in the parcel and whether it is classified within the NPPF as 'not inappropriate' within the Green Belt*

*The potential impact of development of the site on the openness of the Green Belt*

#### **Purpose 4: To preserve the setting and special character of historic towns**

New Ash Green may be considered an historic planned settlement due to its unique historical identity as a prototype for a new way of living from the 1960s onwards. The nineteen 'neighbourhoods' of New Ash Green comprise groups of some 100 to 150 houses built in varying densities and are designed along 'Radburn' lines, separating roads from pedestrian paths. As well as housing, the layout includes a shopping centre, offices, community centre, church, library, clinic and primary school. The Sevenoaks District Council Green Belt Assessment, 2017, considered New Ash Green to be an historic town due to its unique historical identity

The assessment of this purpose relates to very few settlements in reality as later development usually envelopes the original historic town. This is not the case with New Ash Green as the original layout is largely in tact due to the Green Belt designation around the original settlement.

In assessing whether a site contributes to Purpose 3, this appraisal reviews:

*Whether the site forms part of the setting of New Ash Green*

*The potential impact of development of the site on the setting and special character of New Ash Green*

#### **Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

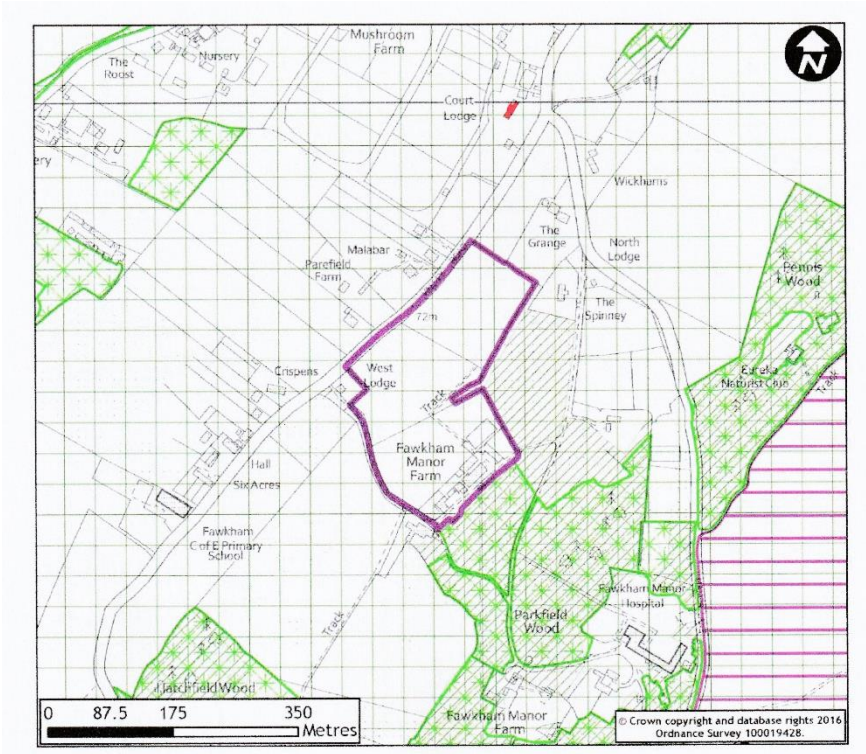
The NPPF (Paragraph 141) stipulates that as much use as possible should be made of suitable brownfield sites and underutilised land before Green Belt sites are considered for release.

PAS Guidance indicates that it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land and that all Green Belt sites will fulfil this purpose.

The greater the restriction at the edge of settlements, the greater becomes the ingenuity of landowners and developers to recycle derelict and other often more sustainably located land within urban areas, particularly in areas of high land values. The consistent and continued supply of housing windfall sites outside the Green Belt within Sevenoaks District is a strong indication that this is an important Green Belt purpose.

All sites are considered to strongly fulfil this Green Belt purpose.

# Grange Park Farm, Manor Lane, Fawkham



Site outlined in purple (extract from SHELA, Sevenoaks District Council, 2018)

## Site Description



Grange Park Farm viewed from Valley Road



The 5.5ha site comprises open farmland in use as a livery business with a single storey dwelling, stables and ménage set at the south eastern extremity of the site. The site is bounded by Valley Road to the north west and woodland to the east and south east.

## **Green Belt Appraisal**

The site is situated within the Green Belt and an appraisal has been undertaken as to how it fulfils the Green Belt purposes together with the impact development would have on those purposes.

### **To check the unrestricted sprawl of large built-up areas**

As none of the sites within this Appraisal are situated next to a large built-up area, none are considered to fulfil the purpose of checking the unrestricted sprawl of large built-up areas.

### **To prevent neighbouring towns merging into one another**

The site is not located between neighbouring towns and does not fulfil this purpose.

### **To assist in safeguarding the countryside from encroachment**

This site is isolated from settlements with a Green Belt boundary and is set in open countryside. The site currently includes very limited built development which is clustered at the south eastern extremity of the site. The limited built development comprises a typical small cluster of single storey former agricultural buildings together with stables. This development is located on the valley slope and its scale and location make it visually inconspicuous.

The site is located within the Fawkham valley which generally has an open character with landform and vegetation dominating the limited number of buildings in this area. Those buildings abutting the site on Valley Road are loosely knit detached properties.

The site is open (with the exception of the limited built form at the south eastern edge of the site). The surrounding countryside is generally open with limited loose knit development and displays a strong rural character. With the exception of the existing limited built form, the site contributes significantly to the openness of the countryside.

Given the isolated nature of the site within an open landscape this site strongly assists in safeguarding the countryside from encroachment.

Housing development and the resultant activity generated on this site would have a severe adverse impact on the spatial and visual openness of this site and the wider open countryside and represent encroachment on the countryside. Redevelopment of the existing low key former farm buildings and stables with a more intense development of a greater scale and mass and greater degree of activity would also be likely to adversely affect the openness of the Green Belt.

### **To preserve the setting and special character of historic towns**

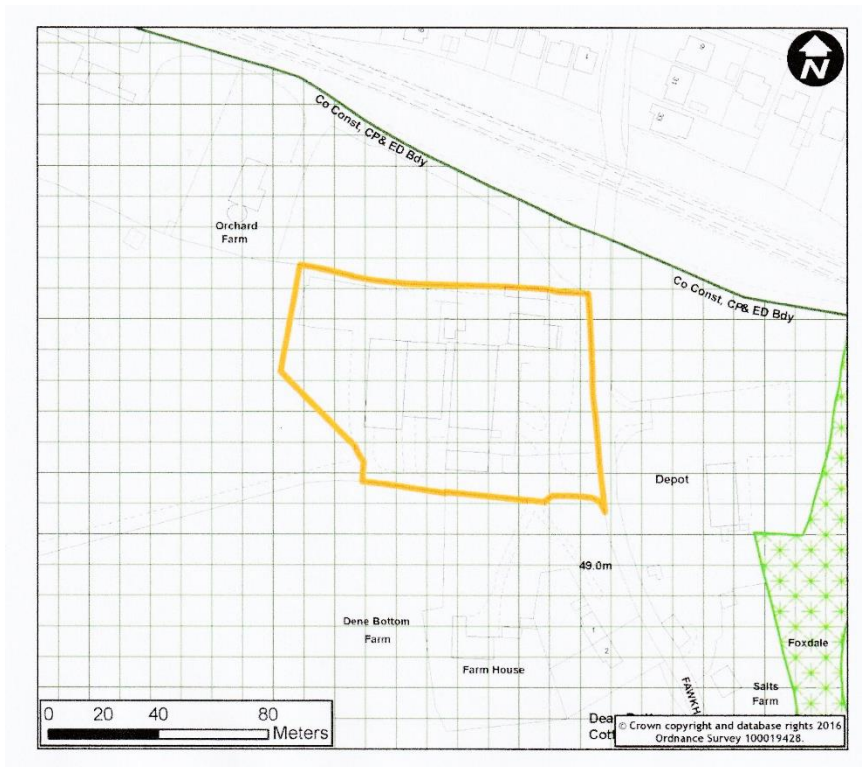
The site is not located close to, or within the setting of an historic town and does not fulfil this purpose.

**To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

Although partially a brownfield site, this site is not derelict and is not located within an urban area.

All sites within this Appraisal are therefore considered to fulfil this Green Belt purpose.

# Fawkham Business Park, Fawkham Road, Fawkham



Site outlined in orange (extract from SHELAA, Sevenoaks District Council, 2018)

## Site Description

The 0.78ha site comprises a cluster of single storey former agricultural buildings now in business use, and a single site manager's dwelling. Buildings occupy a limited part of the site. The site also comprises associated servicing and parking areas. The buildings are well set back from Fawkham Road behind a wide grass verge and service road. The buildings to the west of the site are cut into a rising valley slope.



*Fawkham Business Park from Fawkham Road*



*Fawkham Business Park behind road frontage*



*Fawkham Business Park looking north towards railway*

## **Green Belt Appraisal**

The site is situated within the Green Belt and an appraisal has been undertaken as to how it fulfils the Green Belt purposes together with the impact development would have on those purposes.

### **To check the unrestricted sprawl of large built-up areas**

As none of the sites within this Appraisal are situated next to a large built-up area, none are considered to fulfil the purpose of checking the unrestricted sprawl of large built-up areas.

### **To prevent neighbouring towns merging into one another**

The site is not located between neighbouring towns and does not fulfil this purpose.

### **To assist in safeguarding the countryside from encroachment**

The site is located to the south of the railway line which marks a distinct change in character between the built up area of Longfield and the more open and sporadic development along Fawkham valley to the south. The railway embankment which crosses Fawkham Road forms a permanent, readily recognisable feature which defines the boundary between Longfield to the north and the countryside to the south. By definition, development south of the railway line may cause encroachment into the countryside.

The site fronts the head of the Fawkham valley and rises up the slope towards the Horton Wood Ridge which generally has an open character with landform and vegetation dominating the limited number of buildings in this area.

The generally single storey former agricultural buildings now in operation as a business site are not inappropriate development, in accordance with the NPPF. Existing buildings are set well back from Fawkham Road which has a generally open character and occupies only approximately 20% of the site area.

In the absence of a five year housing land supply, the Salts Farm site opposite was granted outline planning permission for 26 dwellings with all matters reserved for future consideration (apart from access) despite encroachment into the countryside. The development permitted at the Salts Farm site opposite will cause substantial harm to the openness of the Green Belt.

As with the Salts Farm site opposite, the Fawkham Business Park site forms part of the countryside which is readily appreciated travelling south once Fawkham Road passes under the railway. Redevelopment of the existing former farm buildings with a more intense development and extending built form of greater mass and scale towards Fawkham Road, up the valley side or closer to the adjoining low density residential properties set in large gardens would affect the openness of the Green Belt and represent encroachment into the countryside. As with Salts Farm, development could cause substantial harm to the openness of the Green Belt.

**To preserve the setting and special character of historic towns**

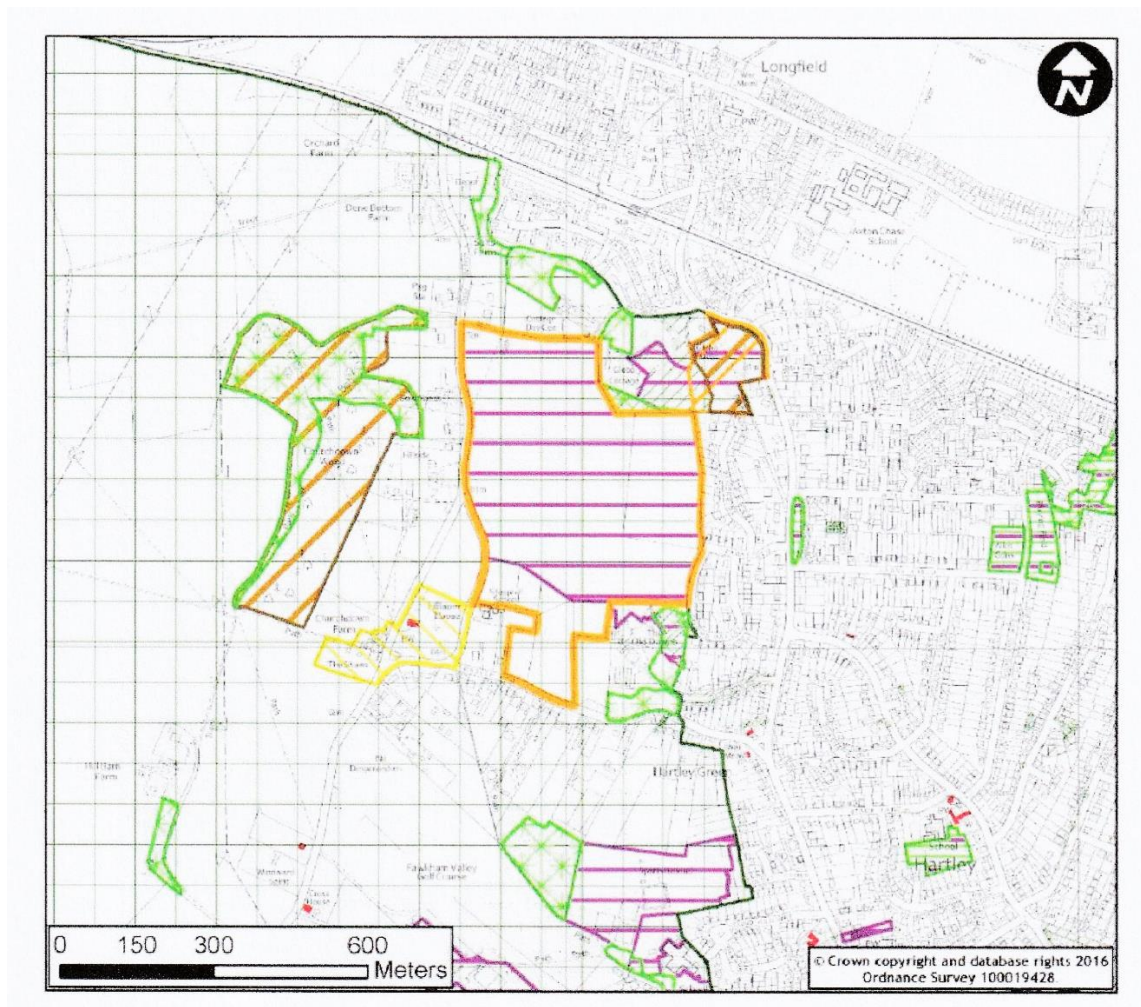
The site is not located close to, or within the setting of an historic town and does not fulfil this purpose.

**To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

Although partially a brownfield site, this site is not derelict and is not located within an urban area.

All sites within this Appraisal are therefore considered to fulfil this Green Belt purpose.

# Land West of Parkfield, Hartley



Site outlined in orange (extract from SHELAA, Sevenoaks District Council, 2018)

## Site Description

The majority of the site is located in Fawkham Parish. The 22.8 ha site comprises open farmland which forms the eastern side of the upper Fawkham valley. The land rises from Fawkham Road towards a plateau which abuts the Banckside and Downs Valley housing estate accessed via Parkfield. The site also extends to Castle Hill to the south.



*Land West of Parkfield, Hartley viewed from footpath SD160 close to Churchdown Wood*





*Eastern part of site abutting Banckside*

## **Green Belt Appraisal**

The site is situated within the Green Belt and an appraisal has been undertaken as to how it fulfils the Green Belt purposes together with the impact development would have on those purposes.

### **To check the unrestricted sprawl of large built-up areas**

As none of the sites within this Appraisal are situated next to a large built-up area, none are considered to fulfil the purpose of checking the unrestricted sprawl of large built-up areas.

### **To prevent neighbouring towns merging into one another**

The site is not located between neighbouring towns and does not fulfil this purpose.

### **To assist in safeguarding the countryside from encroachment**

The eastern boundary of the site forms the edge of the Green Belt and comprises the recognisable boundary of a road (Downs Valley) and the fenced rear boundaries of properties fronting Banckside.

There are no other permanent, readily recognisable features within the site by which to define a Green Belt boundary other than Fawkham Road to the west; Castle Hill to the south and Rectory Meadow/ adjoining ancient woodland to the north. For this reason, it is appropriate to evaluate the entire site.

The site currently includes no development and comprises the eastern side of the open Fawkham valley where landform and vegetation dominate the limited number of buildings in the wider area.

Castle Hill is a narrow, winding, enclosed lane which retains a rural character with woodland, open fields and occasional larger properties in grounds to the northern side abutting the site. The generally discrete detached houses on the southern side are set within plots with long back gardens. The properties do not have a strong urban influence on the site or the wider area.



*The Banckside, Parkfield and Downs Valley housing estate viewed from the plateau*

The Banckside, Parkfield and Downs Valley housing estate is visible from the plateau and has a limited urbanising influence on this part of the site. However, this influence does not extend to the valley side as local topography means that it cannot be viewed from Fawkham Road in the valley bottom and only the rooftops, chimneys and upper walls of some properties in Downs Valley can be seen from footpath SD160 close to Churchdown Wood. Overall the development does not have a strong urban influence on the whole site or the wider area.



*Land West of Parkfield, Hartley viewed from footpath SD160*

The site is entirely open. The surrounding countryside is generally open with limited loose knit development along the valley bottom and Castle Hill. The site is located along an open valley slope and, with the slopes of the opposite side of the valley, contributes significantly to the openness of the Green Belt. There is only limited urban influence on the upper plateau. The site therefore strongly assists in safeguarding the countryside from encroachment.

Housing development and the resultant activity generated on this extensive site would have a severe, permanent adverse impact on the spatial and visual openness of the site and the wider open countryside and would represent significant encroachment on the countryside.

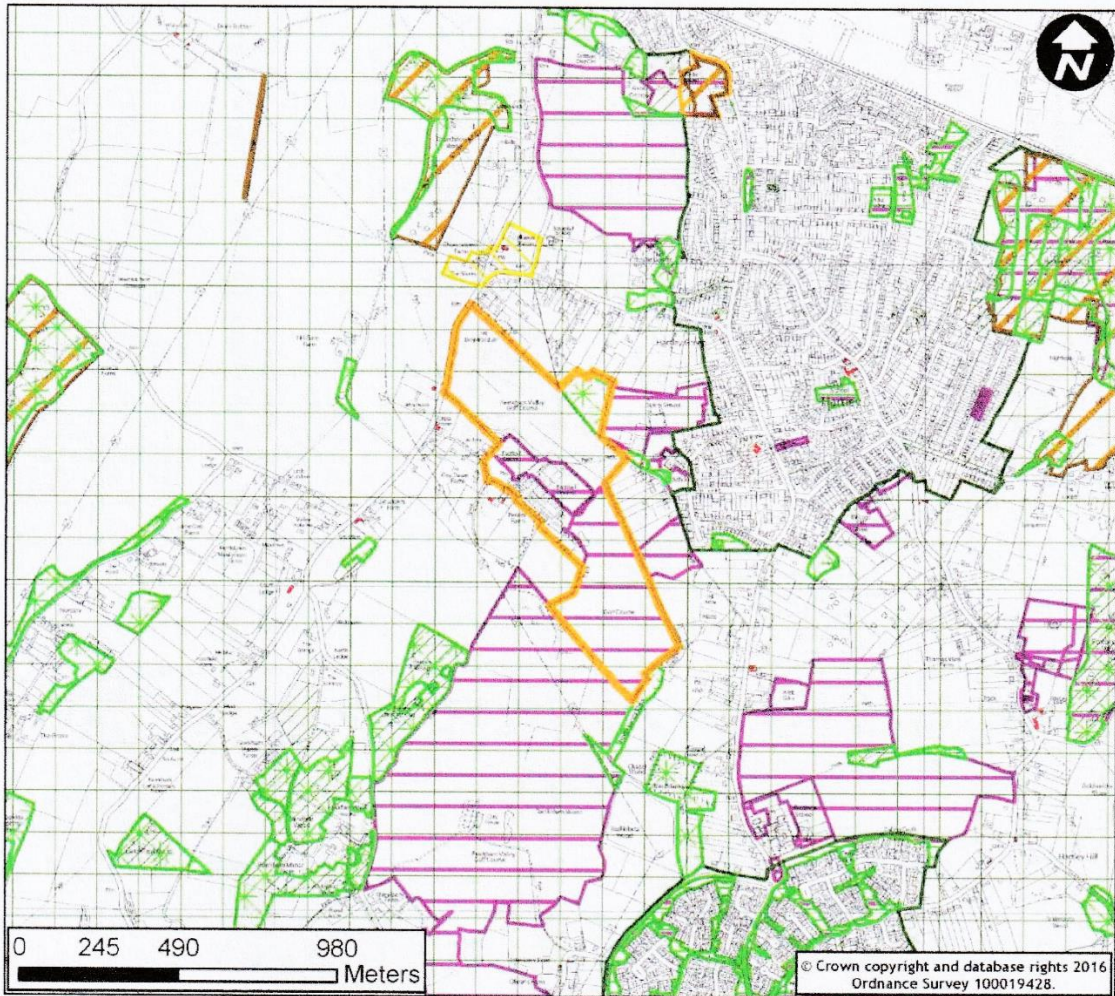
**To preserve the setting and special character of historic towns**

The site is not located close to, or within, the setting of an historic town and does not fulfil this purpose.

**To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

All sites within this Appraisal are therefore considered to fulfil this Green Belt purpose.

# Land at Corinthians Sports Club, Valley Road, Fawkham



Site outlined in orange (extract from SHELAA, Sevenoaks District Council, 2018)

## Site Description

This 33.18ha site comprises a golf fairway and sports pitches with a single cluster of existing and former agricultural buildings (now in sports, business and agricultural uses) set within the floor of Pennis valley.



*Corinthians Sports Club within Pennis valley viewed from Footpath SD163 near Churchdown Wood*



*Corinthians Sports Club and Gay Dawn farm buildings viewed from Footpath SD222*



*Corinthians Sports Club with Gay Dawn farm buildings (right) viewed from Footpath SD222*



*Gay Dawn Farm existing and former agricultural buildings with residential building to left, viewed from Footpath SD222*

## Green Belt Appraisal

The site is situated within the Green Belt and an appraisal has been undertaken as to how it fulfils the Green Belt purposes together with the impact development would have on those purposes.

### **To check the unrestricted sprawl of large built-up areas**

As none of the sites within this Appraisal are situated next to a large built-up area, none are considered to fulfil the purpose of checking the unrestricted sprawl of large built-up areas.

### **To prevent neighbouring towns merging into one another**

The southern part of this site is occupied by a golf course and is open in character with no buildings present. In accordance with the NPPF, the use of the site is not inappropriate development. This part of the site is located at the head of the Pennis valley and is in the area which separates the settlements of Hartley and New Ash Green.

The Hartley Green Belt boundary marks a distinct change from the built up estate of Chantry Avenue, Hartley to the sporadic, lower density linear development and open space along Ash Road. Similarly, the New Ash Green Green Belt boundary marks a distinct change from the Chapelwood Road orbital road enclosing the neighbourhoods of New Ash Green to the sporadic, lower density linear development, school and open space along Ash Road.



*Land separating Hartley and New Ash Green*

The southern part of this site plays an important role in preventing neighbouring Hartley and New Ash Green merging into one another. Development of this part of the site would result in the loss of openness of this part of the site and significantly reduce the gap between the settlements and increase the sense of the two settlements merging.

### **To assist in safeguarding the countryside from encroachment**

This cluster of buildings within the Pennis valley floor is isolated from other development and is surrounded by open recreational uses. The site currently includes very limited built development comprising a typical small cluster of single storey existing and former agricultural buildings. In accordance with the NPPF, the re-use of existing permanent buildings is not inappropriate development provided this preserves the openness of the Green Belt. The location and scale of existing built development and surrounding vegetation make it a visually contained pocket of development within an area in which openness predominates.

The site is located within the Pennis valley which generally has an open character with landform and vegetation dominating the limited number of buildings in this area. Those buildings abutting the site on Fairby Lane and Ash Road to the east and south east are generally loose knit detached properties, as are the six buildings on Pennis Lane to the west.

The site is open (with the exception of the limited built form at the Corinthians Sports Club/Gay Dawn farm complex). The surrounding countryside is generally open. With the exception of the existing limited built form, the site contributes significantly to the openness of the countryside.

Given the location of the site within the open countryside this site strongly assists in safeguarding the countryside from encroachment.

Housing development and the resultant activity generated on this extensive site would have a severe, permanent adverse impact on the spatial and visual openness of this site and the wider open countryside and represent encroachment on the countryside. Redevelopment of the low key existing and former farm buildings with a more intense development of a greater scale and mass and greater degree of activity would also be likely to adversely affect the openness of the Green Belt.

### **To preserve the setting and special character of historic towns**

The edge of New Ash Green is marked by Chapelwood Road orbital road which encloses the neighbourhoods of New Ash Green. Development within the southern part of this site would be sited some distance from the northern edge of New Ash Green, which is itself enclosed by mature vegetation.

The open southern part of the site forms part of the wider setting of New Ash Green.

The distance, topography and intervening vegetation are likely to limit the potential impact of development of this site on the setting and special character of New Ash Green.

Nevertheless, subject to the type of development proposed, development may have some limited impact on the setting of this distinctive edge of the settlement.

### **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

Although partially a brownfield site, this site is not derelict and is not located within an urban area.

All sites within this Appraisal are considered to fulfil this Green Belt purpose.



## **Conclusion**

This report represents an interim appraisal of the Green Belt purposes fulfilled by sites included in the Sevenoaks District Council Strategic Housing & Economic Land Availability Assessment (SHELAA) December 2018 which are located within and bordering Fawkham Parish and assesses the impact that development would have on these purposes. It is recognised that a further Call for Sites may result in a requirement to appraise different sites, and for this report to be updated.

It should be noted that the report only assesses the potential impact of development on the purposes of the Green Belt and that many other planning matters need to be taken into account in determining the suitability of potential housing sites.