

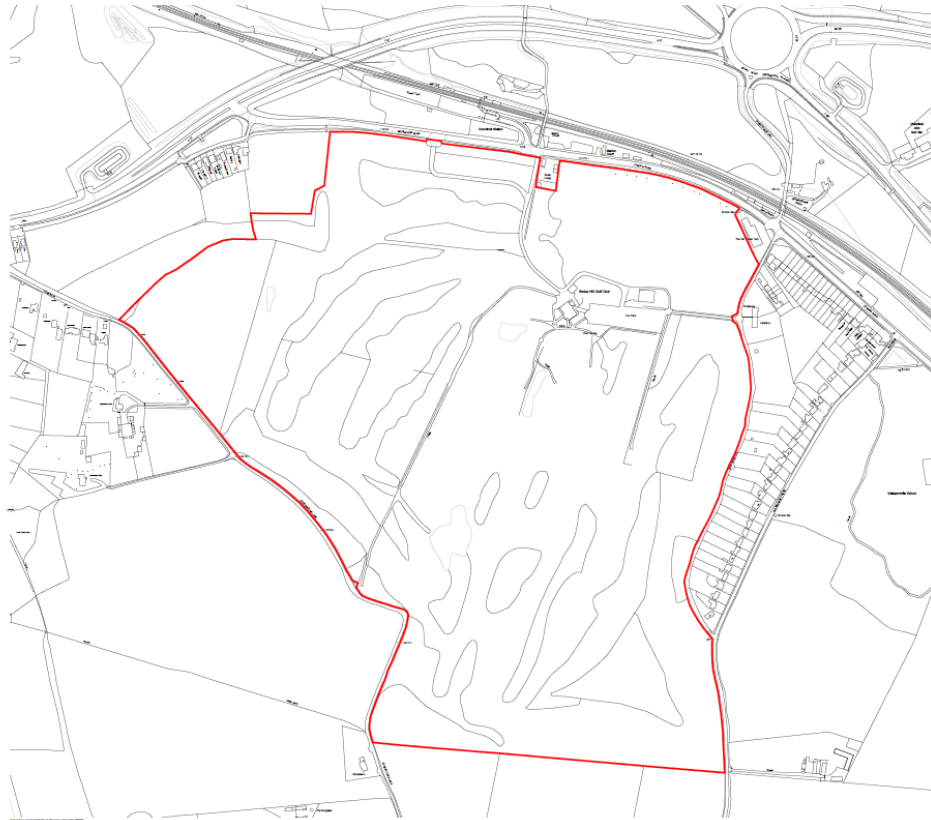
Committee Date	14.07.2020	
Address	Former Broke Hill Golf Course Sevenoaks Road Halstead Sevenoaks Kent TN14 7HR	
Application number	20/00984/ADJ	Officer: Suzanne Lyon
Ward	Adjacent Local Authority	
Proposal	Outline application for residential development of up to 800 dwellings, incl. affordable housing 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 incl. rugby and hockey pitches with separate car park and clubhouse areas; 2 ha of commercial B1 use; local centre incl. commercial, retail & community facilities and undercroft car parking for Knockholt station; country park/open space incl. landscaping, infrastructure & groundworks; with all matters reserved except for access	
Applicant	Agent	
Quinn Estates	Montagu Evans LLP	
Reason for referral to committee	Previous Case went to DC Committee	Councillor call in No
RECOMMENDATION	Raise Objection	

1 SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The location and scale of the proposed development undermines the purposes of the Green Belt.
- The proposed development would have the potential to add significant pressure to existing medical practitioner facilities within Bromley.
- The proposal is likely to result in a number of impacts on transport services and local roads in Bromley.

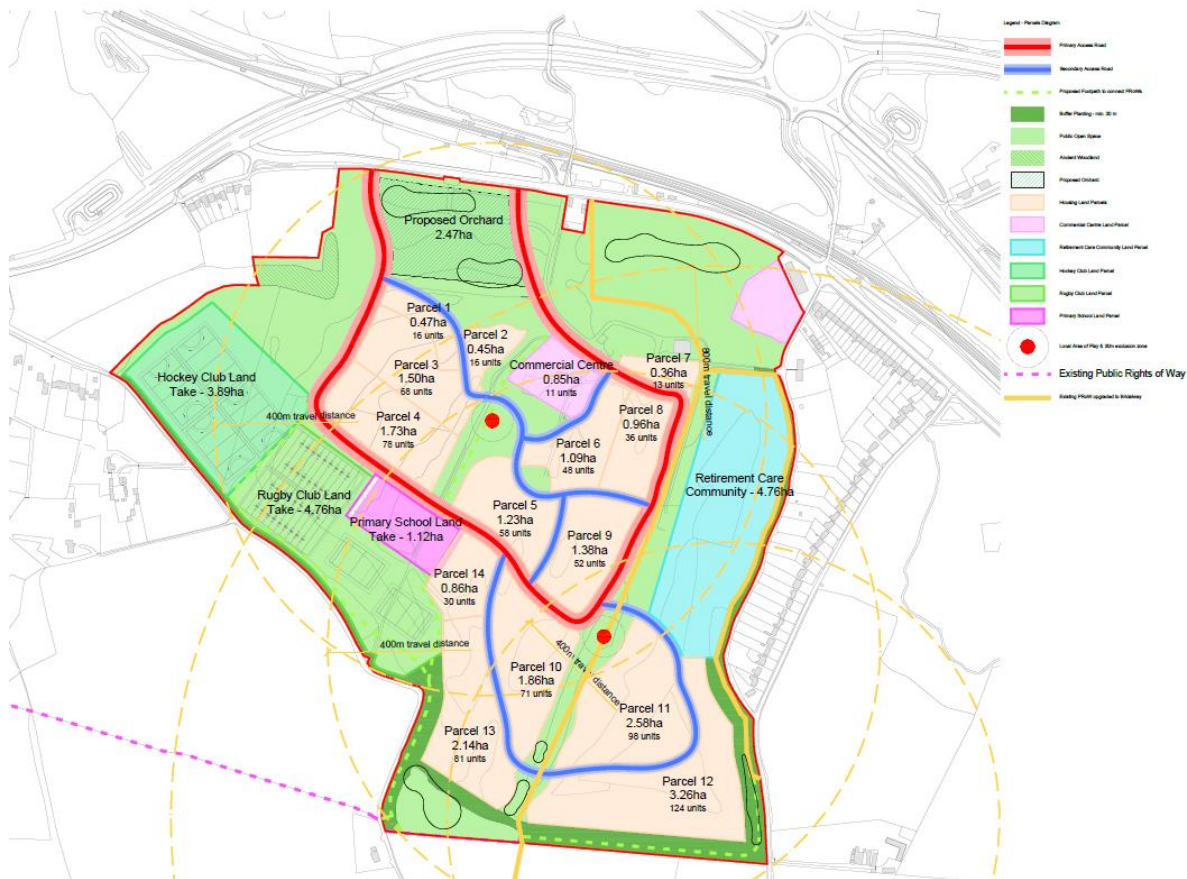
2 LOCATION

- 2.1 The site is located on the southern side of Sevenoaks Road and comprises the Broke Hill Golf Course. The site is located within the Metropolitan Green Belt



3 PROPOSAL

- 3.1 Outline application for residential development of up to 800 dwellings, incl. affordable housing units and self-build plots; a retirement care community for up to 180 C2 units; primary school hub with associated sports facilities/outdoor space; sports hub incl. rugby and hockey pitches with separate car park and clubhouse areas; 2 ha of commercial B1 use; local centre incl. commercial, retail & community facilities and undercroft car parking for Knockholt station; country park/ open space incl. landscaping, infrastructure & groundworks; with all matters reserved except for access
- 3.2 Amendments were received (11th March 2020) to reduce the number of dwellings from 850 to 800, clarify the number of retirement units (180) and change the site layout
- 3.3 The application is an Adjoining Authority Consultation and requires the Council to provide comments on the impacts of the development on the London Borough of Bromley, as set out below.



4 RELEVANT PLANNING HISTORY

4.1 No recent and relevant planning history

5 CONSULTATION SUMMARY

5.1 Highways - Objection

- The previous application, 19/03935, had a highway refusal ground. The change in the description seems slight although there is a reduction from 850 to 800 dwellings. Therefore these comments are still applicable.
- The London Borough of Borough has a number of concerns about the transport impact of this proposed development. Whilst noting that the report sets out the ambition for the Garden Village to be a 'self-sustaining and vibrant village for new residents' the reality of this and how it will be achieved is questionable in terms of transport.
- Noting the reference to the site's 'unrivalled accessibility and public transport credentials', much seems to be being made of the adjacent Knockholt station, whilst no doubt this will be useful for commuting to the CAZ a 2tph service cannot be described as unrivalled when general aspirations in London are for a very minimum of 4tph. At 2tph the service is unlikely to make an attractive travel option given the wait time when compared to private cars. This development will not have been taken into consideration as part of the Kent

Route Study which identified capacity issues on services through Knockholt, therefore the pressure on service this would bring is of concern but is for Network Rail to fully appraise and recommend mitigations for the developer to fund. Equally there are also concerns about rail heading into Bromley to take advantage of lower fares from other fare zones close to London.

- In addition to rail, high frequency local bus services to town centres and schools will be required to reduce the impact of traffic on local roads. These buses should be able to serve the whole of the new village therefore streets should be able to accommodate movement buses. Further details of the cycle links are required to ensure they serve corridors of demand.
- The development will have some impact on roads in Bromley; however in order to assess the impact more accurately the following items will need to be addressed.
- Junction capacity assessments will be required for access to London Road/ Sevenoaks Road Primary & Secondary in addition to any other access points. Careful consideration would need to be given to a construction logistics plan to minimise the impact on road safety and peak time congestion. Furthermore the station car park (for commuter) should also be assessed separately as it would have a significant impact during the morning and evening peak hours.
- Whilst the investment in the Primary School is welcome, it will require a Primary school- Transport Assessment (TA). Furthermore the lack of Secondary School facilities on site is a concern and may lead to car borne trips to school in the surrounding area; therefore consideration should be given to school bus provision school.
- Whilst the mixed use nature of the development is a welcome step towards creating a sustainable community, the employment centre i.e. Gin Distillery, Care home and start up business will lead to trip generation if employees are commuting to the site, given the catchment of these employment sites it is unlikely that all trips will be made by train or from within the Garden Village. It is also concerning that the case for employment centres is being supported by the good highway access 'it has unrivalled access to the District's main arterial roads, including the A21 and the M25, meaning that accessibility to the highway network for business operations is quick' which indicates that the trip generation for these sites may have an impact on local roads. Therefore further details of modes of travel for staff members, access, car parking, public transport access, cycle parking facilities etc. should be discussed and indicated on the plan.

5.2 **Town Centre Regen Team – No objection**

- It is considered that the proposal has no negative impacts on Bromley town centres and therefore no objections are recommended.

5.3 **NHS Bromley Clinical Commissioning Group (CCG) - Objection**

- Objection is raised on the basis that the development would add pressure to existing busy GP practices in Bromley. GP practices in Bromley would not be able to take on the extra capacity required by the development and no options for an on-site branch or new practice have been planned for as a viable option by the Commission.

5.4 **Bromley Biodiversity Partnership - Objection**

- Regarding the above planning application Orpington Field Club members are very concerned about development in this area. While it is not within London Borough of Bromley, in practical terms it is part of Bromley's green belt. Development will link Bromley and Halstead contributing to urban sprawl, and merging Halstead with Bromley. This is contrary to the NPPF section 13, paragraphs 133 and 134.

5.5 **Education – Objection**

- The 6% drop in units is not going to have a significant impact on education need locally. Therefore the original comments are still applicable.
- The development lies approximately 0.5 mile from the edge of Pratts Bottom community and 0.8 miles from Pratts Bottom Primary School. According to KCC the proposed development has an expected yield of 202 pupils. As part of their response to the application the KCC have requested that a 1FE primary school to be provided via S106 contributions as part of the development. This will provide 210 places which is closely matched to expected yield from the development. However, the information provided by KCC also indicates that with a 5% surplus included in their planning for primary school places there is currently a 100 place surplus which equates to a 18.6% surplus in total in the Sevenoaks Northern Villages Primary School Planning Group area.
- Whilst this is a significant overprovision based on the pupil yield projections of the proposed development, the provision of a new 1FE primary school would not significantly worsen the current situation and is likely to have minimal/limited impact on school in Bromley's Planning Area 8 (Orpington). It is useful to note that our closest school Pratts Bottom is currently at capacity (80 out of 81 places filled). However, the timing of the availability of any new places is a concern as the addition of the new places in advance of the yield being realised could cause over provision and create short term excess capacity in school places.
- However, the KCC have also asked that land is set aside for the school to expand to 2FE (420 pupils) if needed later for the wider local area (Sevenoaks Northern Villages Primary School Planning Group). This would be a concern for Bromley as Pratts Bottom Primary School is closer in proximity than any of the existing schools in the Sevenoaks Northern Villages Primary School Planning Group and is likely to be most affected by any over provision. It is also unclear from KCC's evidence how the potential creation of a new school at Fort Halstead would impact on need for school places across the Sevenoaks Northern Villages Primary School Planning Group.

6 **POLICIES AND GUIDANCE**

6.1 *NPPF (2019)*

6.1.1 The site is within the Green Belt and not previously developed, excepting golf course buildings. The proposed development is not appropriate in the Green Belt and is by definition, harmful to the Green Belt. Para 143 advises that such development should not be approved except in very special circumstances.

6.1.2 The NPPF requires local Plans to include strategic policies which set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for development, including infrastructure and housing. (para 20).

6.1.3 It also advises that Local planning authorities are under a Duty to Co-operate with each other on strategic matters that cross administrative boundaries (para24).

6.2 *Sevenoaks Emerging Local Plan*

6.2.1 Sevenoaks District Council has begun Judicial Review proceedings after the Government Planning Inspector refused to endorse its new Local Plan

7 **ASSESSMENT**

7.1 The main issues relating to the application are as follows:

- The impact on the Green Belt and character of the London Borough of Bromley
- The effect on the vitality and viability of Bromley and Orpington Town Centres
- The impact on local residents in the London Borough of Bromley
- The impact on the highway network in the London Borough of Bromley
- The impact on healthcare provision in the Borough
- The impact on education provision in the Borough

7.1.1 According to Sevenoaks' emerging Local Plan the site is not allocated for housing. The applicant argues that the Council is failing to deliver the homes that are needed or provide adequate sites for housing. This is the basis for the application, promoting the site for housing on these grounds.

7.2 Green Belt

7.2.1 The Bromley Local Plan strongly protects the Green Belt and resists inappropriate development unless very special circumstances clearly outweigh the harm by reason of inappropriateness or any other harm.

7.2.2 NPPF para 134 sets out the 5 purposes of the Green Belt. The location and scale of the proposed development at Broke Hill Golf course undermines the purposes of the Green Belt within which it is set.

- 7.2.3 The emerging Sevenoaks Plan assesses the necessary infrastructure to bring forward development sustainably. The plan does not include the proposed development and therefore infrastructure requirements arising from, but not met within, the proposed development will result in the need to travel to access services. This will, produce unanticipated increases in demand for services in nearby settlements both within Bromley and Sevenoaks, as has been highlighted in respect of GP facilities.
- 7.2.4 It will be important to ensure that other potential harms are effectively mitigated, such as visual harm, the impacts on the adjacent SINC and any adverse drainage implications.

7.3 Impact on Town Centres

- 7.3.1 The Town Centre Regeneration Team raises no objections in terms of the economic impact of the development on Bromley or Orpington Town Centres. Therefore it is not considered that the development would give rise to a significant impact on the vitality and viability of the area.

7.4 Residential Amenity

- 7.4.1 With regard to the impact on residents in the Borough, the development is located some distance away and is unlikely to affect the nearest properties. There are no properties immediately to north of site and none adjoining site to west.

7.5 Highways

- 7.5.1 The amendment includes a slight reduction from 850 to 800 dwellings. Bromley has a number of concerns about the impact of this proposed development on transport services and local roads in Bromley. Whilst much is made of the sites 'unrivalled accessibility and public transport credentials' with reference to the proximity of Knockholt station, this development will not have been taken into consideration as part of the Kent Route Study which identified capacity issues on service going through Knockholt. The 2 trains per hour service is unlikely to make an attractive travel option in comparison to car use in this suburban location. The capacity of the commuter station car park would need to be assessed by Network Rail as the proposed development would have a significant impact during the morning and evening peak hours. Equally there are also concerns about rail heading into Bromley to take advantage of lower fares from other fare zones close to London.
- 7.5.2 The employment centre proposed may lead to trip generation by train and road from outside the village and impact local roads, despite the claims made to "unrivalled access to the District's main arterial roads including the A21 and the M25." The development may also lead to car borne trips to secondary schools in the surrounding area and to and from the primary school proposed as part of the development.

7.6 Healthcare Provision

7.6.1 The proposal includes no on-site healthcare facilities. The nearest GP practices are in the London Borough of Bromley and it is considered that the proposal would add pressure to these facilities which are already near full capacity. The NHS Bromley Clinical Commissioning Group (CCG) has raised objections on the basis that the increase in patient numbers cannot currently be supported and therefore Members may consider that the proposal would add a concerning strain on existing medical practitioner facilities on the Borough.

7.7 Education Provision

7.7.1 The 6% drop in units is not considered to have a significant impact on education need locally.

7.7.2 The proposal includes a one form entry primary school provision and no secondary school provision. In the absence of evidence to demonstrate how the creation of new schools in Sevenoaks would impact on local school needs, the projected expansion of the on-site primary school may have the potential to impact on the capacity of a nearby primary school within the Borough.

7.8 Conclusion

7.8.1 Having had regard to the above it is considered that the raising of objections in this case would be warranted.

RECOMMENDATION: Raise Objection

- 1 The location and scale of the proposed development undermines the purposes of the Green Belt within which it is set.
- 2 In the absence of new on-site medical practitioner facilities, the proposed development would have the potential to add significant pressure to existing medical practitioner facilities within Bromley which are already near or at full capacity.
- 3 The proposal is likely to result in a number of impacts on transport services and local roads in Bromley, including concerns relating to the local rail capacity, car parking demand (including on-street demand) at Knockholt Station and the future car trip generation created from the on-site commercial centre and lack of secondary school.