

**Tonbridge and Malling Borough Council**

**LOCAL DEVELOPMENT FRAMEWORK  
DEVELOPMENT LAND ALLOCATIONS DPD**

**RESPONSE STATEMENT No DLA05**

**Major Developed Sites in the Green Belt  
New House Farm, Wrotham**

Mr A Westlake [Matter 05/70.01/WR]



# TONBRIDGE AND MALLING LOCAL DEVELOPMENT FRAMEWORK

## Response Statement DLA 05

### New House Farm, Wrotham

#### 1. Introduction

- 1.1 This Response Statement addresses whether New House Farm should be identified as Major Developed Site (MDS) in the Green Belt in order to enable the redevelopment for employment purposes of buildings within the site that already have permission for business and storage use. It deals with the specific outstanding issue as to whether Para 19 of PPS7 is overridden by the provision of PPS2.

#### 2. The Borough Council's Response

- 2.1 Paragraph 26 of PPS7 says explicitly that the policies in PPG2 continue to apply in green belts. It is therefore correct to say that the policy (in para 19 of PPS7) relating to replacement of existing buildings only applies outside the green belt, since new buildings constitute inappropriate development in the green belt unless they are for one of the limited categories identified in paras 3.4 – 3.6 of PPG2.
- 2.2 The objector's case relates mainly to the benefits to the economy of redeveloping the existing buildings for employment purposes. In this context reference has been made variously to paragraphs 2, 4, 5 and 19 of PPS7. Some of these quotes appear somewhat selective and there is a danger that they may be read out of context. For example, although para 4 does give some support for allowing limited development next to rural settlements that are not designated as local service centres, this should be read in the context of para 3:

*Away from larger urban areas, **planning authorities should focus most new development in or near to local service centres** where employment, housing (including affordable housing), services and other facilities can be provided close together. This should help to ensure these facilities are served by public transport and provide improved opportunities for access by walking and cycling. These centres (which might be a country town, a single large village or a group of villages) should be **identified in the development plan as the preferred location for such development.***

***Planning authorities should set out in LDDs their policies for allowing some limited development in, or next to, rural settlements that are not designated as local service centres, in order to meet local business and community needs and to maintain the vitality of these communities.** In particular, authorities should be supportive of small-scale development of this nature **where it provides the most sustainable option in villages that are remote from, and have poor public transport links with, service centres.** [emphasis added].*

- 2.3 There is a strong pointer that local service centres should be the first port of call for new development. It is worth noting that Core Policy CP12 (unlike CP13) does acknowledge the potential for new development on sites adjacent to the rural service centres (subject to meeting the "very special

circumstances” test in the Green Belt). In the context of a district so severely constrained by Green Belt designation, and bearing in mind the relatively close proximity to both rural service centres and larger towns of most of the Borough, this is a balanced and reasonable approach.

2.4 LDDs are required to contain policies allowing limited development in and next to “other” rural settlements (where there is a need to do so) to meet local business and community needs and to maintain vitality. New House Farm is not actually next to the built-up area of the village of Wrotham. Wrotham itself is not in a remote location being within reasonable walking distance of the rural service centre of Borough Green. No evidence has been put forward that there are local business and community needs, specific to Wrotham, that this site could contribute to, nor has there been any suggestion that Wrotham is in danger of losing its vitality.

2.5 Insofar as MDSs are concerned, Annex C to PPG2 says in para C4:

*Whether they are redundant or in continuing use, the complete or partial **redevelopment of major developed sites may offer the opportunity for environmental improvement** without adding to their impact on the openness of the Green Belt and the purposes of including land within it. **Where this is the case**, local planning authorities may in their development plans identify the site, setting out a policy for its future redevelopment. [emphasis added]*

2.6 It is therefore a **pre-requisite** to the identification of a MDS, that there should be the “opportunity for environmental improvement” which signifies that it is necessary for there to be something that is in need of improvement. Whilst the objector has identified business aspirations that might be fulfilled through a redevelopment, there is nothing that points to a need or opportunity for environment improvement in a way that relates to the broader, public interest, such as might amount to a material planning consideration. This site is not visually intrusive in the Green Belt. It still has the appearance of a farmstead appropriate to its rural setting. The fact that some of the buildings are old and maybe a bit dilapidated is not in itself a reason for accepting their redevelopment.

2.7 This is important because identification as a MDS would remove the requirement to demonstrate very special circumstances when promoting a specific redevelopment proposal. In effect, it could be said that in order to justify designation as a MDS it is necessary to be able to demonstrate something akin to very special circumstances at the designation, stage. The Borough Council does not think the objector’s case has fulfilled that test.

2.8 Finally, it should be borne in mind that CP21.1 says that new employment provision will be met *inter alia* through the intensification or redevelopment of existing employment sites. Being in the Green Belt, any such redevelopment of this site would still need to demonstrate very special circumstances, but the principle of redevelopment of existing sites to meet employment objectives is acknowledged.

### 3. Conclusion

3.1 The Council is satisfied that the DPD is sound without the designation of New House Farm as a Major Developed Site in the Green Belt.