

4.2 – SE/13/03596/FUL Date expired 21 March 2014

PROPOSAL: Construction of a residential led mixed use scheme comprising 39 flats (5x one bed and 34 x two bed), 4x retail (A1/A2) units and car parking, service yard, landscaping and associated works.

LOCATION: Former Site Of The Farmers, London Road, Sevenoaks, Kent

WARD(S): Sevenoaks Town & St Johns

ITEM FOR DECISION

This application has been referred to Development Control Committee by Councillor Fleming on the grounds of overdevelopment, uninspiring design, and lack of affordable housing.

RECOMMENDATION (A): That planning permission be GRANTED subject to completion of a S106 agreement to secure affordable housing within a 2 month period following the date of this Committee and subject to the following conditions:-

1) The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

In pursuance of section 91 of the Town and Country Planning Act 1990.

2) No development shall be carried out on the land until samples of the materials to be used in the construction of the external surfaces of the buildings hereby permitted have been submitted to and approved in writing by the Council. The development shall be carried out using the approved materials.

To ensure that the appearance of the development is in harmony with the existing character of the area as supported by Policy EN1 of the Sevenoaks District Local Plan and Policy SP1 of the Sevenoaks Core Strategy.

3) The development hereby permitted shall achieve a BREEAM "Very Good" rating, and shall include at least a 10% reduction in total carbon emissions through the on-site installation and implementation of decentralised, renewable or low-carbon energy sources. Evidence shall be provided to the Local Authority -

- i) Prior to the commencement of development, of how it is intended the development will achieve a BREEAM "Very Good" rating and a 10% reduction in total carbon emissions or alternative as agreed in writing by the Local Planning Authority; and
- ii) Prior to the occupation of the development, that the development has achieved a BREEAM "Very Good" rating and a 10% reduction in total carbon emissions or alternative as agreed in writing by the Local Planning Authority.

In the interests of environmental sustainability and reducing the risk of climate change, as supported by Policy SP2 of the Sevenoaks Core Strategy

4) Before development commences, full details of hard landscaping works shall be submitted to and approved in writing by the local planning authority. The details shall include -

- full details and surface finishes of all hard surfaces proposed within the development, including access roads and car parking areas
- full details of any retaining walls or structures required as part of the development
- full details of any boundary enclosures

The development shall be carried out in accordance with the approved details

To safeguard the visual appearance of the area as supported by Policy EN1 of the Sevenoaks District Local Plan and Policy SP1 of the Sevenoaks Core Strategy.

5) Notwithstanding the details submitted, no development shall commence until full details of soft landscaping works have been submitted to and approved in writing by the local planning authority. The details shall include

- soft planting plans, identifying existing planting, plants to be retained and new planting, and a schedule of new plants, (noting species, size of stock at time of planting and proposed number/densities). .
- a programme of implementation for the landscaping works.

The development shall be undertaken in accordance with the approved details. If within a period of 5 years from the completion of the development, any of the trees or plants that form part of the approved details of soft landscaping die, are removed or become seriously damaged or diseased then they shall be replaced in the next planting season with others of similar size and species.

To safeguard the visual appearance of the area as supported by Policy EN1 of the Sevenoaks District Local Plan and Policy SP1 of the Sevenoaks Core Strategy.

6) The development shall be carried out in full accordance with the tree protection measures as set out in the Quaife Woodlands document dated 2nd December 2013. No development shall be carried out until the tree protection fencing has been fully installed and no works, storage or other activities shall take place within this fenced area unless agreed otherwise in writing by the Local Planning Authority. The tree protection measures shall remain in place for the duration of the development.

To retain existing trees and in the interests of visual amenity, in accordance with Policy EN1 of the Sevenoaks District Local Plan and SP1 of the Sevenoaks Core Strategy.

7) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

To protect groundwater and to comply with the requirements of the National planning Policy Framework (NPPF).

8) No infiltration of surface water drainage into the ground at the site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

To protect groundwater and to comply with the requirements of the National planning Policy Framework (NPPF).

9) Before development commences, details of ecological enhancements to be incorporated into the scheme shall be submitted to and approved in writing by the Local Planning Authority. Such enhancements shall be provided in full prior to first occupation of the development in accordance with the approved details.

In the interests of biodiversity, in accordance with Policy SP11 of the Sevenoaks Core Strategy

10) The development hereby permitted shall incorporate measures to minimise the risk of crime. No development shall take place until details of such measures, according to the principles and physical security requirements of Crime Prevention Through Environmental Design (CPTED) have been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is occupied and thereafter retained.

Reason; In the interest of security and crime prevention and to accord with Policy EN1 of the emerging Sevenoaks District Council Allocations and Development Management Plan.

11) Before the occupation or use of any part of the development hereby permitted, the vehicle parking, turning and servicing areas shown on the approved plans shall be provided and kept available at all times for their specific purposes. All residential parking spaces shall be provided as communal spaces and shall not be allocated to specific units.

To ensure the retention of suitable parking and servicing facilities for the development, in accordance with Policy EN1 of the Sevenoaks District Local Plan and in accordance with the Kent County Council Interim Parking Guidance note 3.

12) No aerials or satellite dishes, air conditioning plant, equipment or ducting shall be erected, placed or fixed externally on or to any part of the roof or external faces of the building hereby approved.

To ensure a satisfactory appearance to the development, in accordance with Policy EN1 of the Sevenoaks District Local Plan and SP1 of the Sevenoaks Core Strategy.

13) No deliveries shall be taken at or despatched from the non-residential units outside the hours of 08:00 to 20:00 on Mondays to Saturdays (inclusive), nor at any time on Sundays or Public Holidays.

To protect residential amenity, in accordance with Policy EN1 of the Sevenoaks District Local Plan.

14) The retail units shown on the approved plans shall be used for Use Class A1 or A2 purposes only and for no other purpose of the Town and Country Planning (Use Classes) Order (as amended).

In order than any other proposal for the use of the ground floor units is the subject of a separate application to be determined on its merits, having regard to the interests of highway safety and residential amenity as supported by EN1 of the Sevenoaks District

Local Plan.

15) The development hereby permitted shall not be used or occupied until works to integrate access to the retail units with the public highway have been completed in accordance with details to be submitted to and approved in writing by the Council.

In the interests of road safety as supported by EN1 of the Sevenoaks District Local Plan.

Informatives

- 1) Please note that there should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater.
- 2) Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system.
- 3) Please be aware that the use of shallow soakaways in the Hythe Beds are not recommended as they can promote instability of the geology via washout of the sandier horizons, leading to the opening and enlargement of fissures within the Hythe Beds, and subsequent collapse.
- 4) Any facilities for the storage of oils, fuels or chemicals shall be provided with secondary containment that is impermeable to both the oil, fuel or chemical and water, for example a bund, details of which shall be submitted to the local planning authority for approval. The minimum volume of the secondary containment should be at least equivalent to the capacity of the tank plus 10%. If there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest. All fill points, vents, gauges and sight gauge must be located within the secondary containment.
- 5) The secondary containment shall have no opening used to drain the system. Associated above ground pipework should be protected from accidental damage. Below ground pipework should have no mechanical joints, except at inspection hatches and either leak detection equipment installed or regular leak checks. All fill points and tank vent pipe outlets should be detailed to discharge downwards into the bund.

Note to Applicant

In accordance with paragraphs 186 and 187 of the NPPF Sevenoaks District Council (SDC) takes a positive and proactive approach to development proposals. SDC works with applicants/agents in a positive and proactive manner, by;

- Offering a duty officer service to provide initial planning advice,
- Providing a pre-application advice service,
- When appropriate, updating applicants/agents of any small scale issues that may arise in the processing of their application,

- Where possible and appropriate suggesting solutions to secure a successful outcome,
- Allowing applicants to keep up to date with their application and viewing all consultees comments on line (www.sevenoaks.gov.uk/environment/planning/planning_services_online/654.asp),
- By providing a regular forum for planning agents,
- Working in line with the NPPF to encourage developments that improve the improve the economic, social and environmental conditions of the area,
- Providing easy on line access to planning policies and guidance, and
- Encouraging them to seek professional advice whenever appropriate.

In this instance the applicant/agent:

- 1) Was provided with pre-application advice.
- 2) Was updated on the progress of the planning application.
- 3) The applicant was provided the opportunity to submit amendments to the scheme/address issues.
- 4) The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

RECOMMENDATION (B): That in the event the S106 Agreement is not completed within the period referred to above, that permission be REFUSED on the grounds that the development would fail to make adequate provision towards affordable housing in the District, contrary to Policy SP3 of the Sevenoaks Core Strategy.

Description of Proposal

- 1 This application seeks permission for a mixed use development on the site, consisting of 39 flats (5 x 1 bed and 34 x 2 bed) and 4 x A1/A2 units, with associated parking, servicing and landscaping.
- 2 The development would be split into two buildings on site. The larger building would front London Road and would be six storeys in height at the corner of London Road and Hitchen Hatch Lane, with the 6th floor isolated to one recessed unit set back from the main building line. The building would then drop to five storeys in height along the majority of the London Road frontage, before stepping down to two storeys on the east facing boundary. The proposed retail (A1/A2) units would be sited on the ground floor of this building, fronting London Road.
- 3 The smaller building would face towards Hitchen Hatch Lane. It would also be 6 storeys in height, with a recessed top floor. However given changes in ground levels, the lower floor would largely sit below the pavement level of Hitchen Hatch Lane. The effect of this is that this building would appear one storey lower in height than the larger building fronting London Road.

- 4 Access to the site would be from the rear and via the adjacent public car park. This would provide access both to a lower ground / basement parking area containing 33 car parking spaces, and to a ground floor parking / servicing area containing a further 4 car parking spaces and an area for retail deliveries / parking.
- 5 The general height of the main building fronting London Road would be between 16-17 metres, although the recessed top floor would raise this height to 19 metres. The height of this building would drop to 6 metres on the eastern boundary. The building would occupy all of the London Road frontage, at around 45 metres in length.
- 6 The main face of the smaller building fronting Hitchen Hatch Lane would be 17.5m in height, increasing to 20 metres when the recessed top floor is included. However due to the drop in levels between the site and the pavement on Hitchen Hatch Lane, the heights of the building from road level would be perceived as 15.5m (to top of main face) and 18.2m (to recessed top floor) respectively. In addition, due to the further drop in levels from London Road to Hitchen Hatch Lane, the roofline of this building would effectively appear one storey lower (2.4m) than the main building proposed on London Road.

Description of Site

- 7 The application site was formerly occupied by the Farmers Public House. This building was demolished some years ago following permission to redevelop the site. The site was cleared and foundation piling work took place. However building work subsequently ceased and the site has been left in an undeveloped state since, surrounded by temporary hoardings.
- 8 As members will note doubt be well aware, the site is in a prominent location on a main approach road into Sevenoaks and opposite the railway station. It is also located opposite the retail / residential development that has been completed at the former Railway and Bicycle Public House site. The large modern BT office complex is sited on the opposite side of Hitchen Hatch Lane, the public car park to the north of the site, and a row of single storey retail / commercial units are sited to the east of the site. Further to the north east of the site are terraced dwellings at St Botolphs Avenue and a mews development to the north of the public car park off Hitchen Hatch Lane.

Constraints

- 9 Area of Archaeological potential

Policies

Sevenoaks District Local Plan

- 10 Policies– EN1, EN25A, VP1, ST9,

Sevenoaks Core Strategy

- 11 Policies – L01, L02, SP1, SP2, SP3, SP5, SP7

Other

- 12 The emerging Sevenoaks District Allocations and Development Management Plan (ADMP) – SC1, EN1, EN2, EN6

Note

- 13 In respect of the ADMP, the National Planning Policy Framework states that the weight to be given to emerging policies should depend on the following factors –
- The stage of preparation of the plan (the later the stage the more weight to be given to policies)
 - the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
- 14 The ADMP has been through examination and is in its final stages of preparation and therefore, in relation to the first bullet, its policies should be given due weight. The policies are all considered to be in compliance with the NPPF and therefore, should also be given weight in accordance with the third bullet above. With regard to the second bullet point, some policies will be subject to modifications following the examination and currently have limited weight, others are subject to objections with no main modifications proposed and can be given moderate weight, and other policies have attracted no objections or main modifications and these can be afforded significant weight. Members should note that all the above policies are subject to objections with no main modifications proposed and should be afforded moderate weight.

Planning History

- 15 SE/01/01620 - Demolition of existing buildings and erection of 3 storey building for class B1(a) Offices with self-contained class A1 or A2 unit at ground floor with 75 car parking spaces at lower ground and basement level - Refused
- 16 SE/04/00526 - Demolition of existing buildings and construction of a mixed use development including 18 flats, 5 maisonettes, 3 no retail (A1/A2) units, car parking, servicing and associated works – Refused. Allowed on appeal
- 17 SE/10/03271 - Application to establish that the development permitted under Appeal ref: APP/G2245/A/04/1158099 of SE/04/00526/FUL has been lawfully commenced - Granted

Consultations

Sevenoaks Town Council

- 18 Sevenoaks Town Council unanimously recommended refusal on the following grounds:

1. The design of the proposed building is inappropriate and is not of sufficient quality for a prominent gateway to the Town. The Town Council noted that while the NPPF does state that specific architectural styles or particular tastes should not be imposed on applications (as raised by the applicant in the supporting planning statement as justification for dismissing certain pre application advice) it does place emphasis on the need to secure high quality design.
2. The application seeks a 70% increase in dwellings on the site compared to the extant application 05/00526 which would constitute overdevelopment of the site
3. The excessive bulk and size of the proposal is inappropriate and would have a detrimental effect on the streetscape.

Kent Highways

- 19 The proposals clearly raise concern about congestion, lack of parking and access for deliveries to the proposed shops.
- 20 The tracked path drawing for delivery lorries shows an HGV using the access through the car park as a two-way route. However the aerial photo in the application (and also Google Street View) show the route through the car park as one-way, in which case the delivery lorry would need to make a complete circuit of the car park. Can a tracked path drawing please be provided to show that this would be possible? Or are the managers of the car park to change the signs and road markings?
- 21 It appears to be relatively straightforward to provide at least two additional parking spaces to bring the provision up to one space per dwelling. I would strongly recommend that plans are changed to achieve this.

Could you please forward me the applicants' response to the above and any amended drawings for further consideration?

Further comments –

- 22 As mentioned previously, the proposals raise concern about congestion, lack of parking and access for deliveries to the proposed shops.
- 24 Nevertheless parking guidelines (IGN3 and SPG4) do not provide any realistic basis for refusing planning permission in this edge-of-town-centre location. Neither does the National Planning Policy Framework appear to provide opportunity for any objection on highways grounds.

I therefore do not intend to raise any objection to the proposals. A standard condition for wheel washing during construction would be appropriate.

Tree Officer

- 25 I would have expected a more itemised and detailed landscape list of plants other than the Landscape Proposal provided. It is very important to ensure that suitable landscaping is assigned to this site and that it works for the long term and not just for the immediate period of the build.

- 26 I followed the provided detail to a certain extent but lost my way as the full and required facts have not been supplied. I question the need to plant Hedera helix within beds as this will just cover and climb every other plant that is to be planted within the beds. I need to know where in the beds the proposed tree planting is to be located and that they have enough room to grow and not cause harm to the surrounding built form by root action.
- 27 I generally have no objection to this proposal but the details of the soft landscaping needs to be provided and agreed. It may be that this could be conditioned.

SDC Planning Policy -

- 28 The previous proposal (04/00526/FUL permitted on appeal) for a smaller number of residential units than this proposal (18 flats and 5 maisonettes) did not include any provision for affordable units. Whilst this permission began to be implemented, development was ceased due to the prevailing economic conditions at the time. Since this time, the Core Strategy (2011) has been adopted, requiring a provision of affordable units.
- 29 Policy SP3 of the Core Strategy sets out the Council's stance on the provision of affordable housing. For residential development proposals providing 15 dwellings or more gross 40% of the total number of units should be affordable. The applicant has stated that no affordable housing will be provided as part of this proposal as it will render the scheme unviable, despite an increase in the total number of residential units to be provided from the previous permission, contravening Policy SP3.
- 30 The Policy (SP3) further states that in exceptional circumstances where it is demonstrated to the Council's satisfaction through an independent assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted or, failing that, a financial contribution towards provision off-site will be required. In order to comply with this policy, assessments to test the viability of a reduced level of provision should be demonstrated to satisfy the Council that all options have been explored, before agreeing an off-site contribution.
- 31 It is also important to highlight at this stage that this site is adjacent to, and shares highway access with, a proposed residential allocation (Policy H1(a)) within the emerging Allocations and Development Management Plan (ADMP). This submitted Plan is due to commence independent examination in March 2014. The District Council would welcome comprehensive redevelopment encompassing both sites, as outlined in the development guidance for emerging Policy H1(a), and would encourage the applicant to liaise with the Council's Property Team, acting on behalf of the (District) Council as landowners of the adjacent site (Policy H1(a)).
- 32 In any case, Policy EN1 of the Saved Local Plan (2008), and Policy EN2 of the emerging ADMP need to be considered. These require proposals to adequately safeguard the amenities of neighbouring existing and future occupants, therefore not to prejudice the potential for future residential development to be delivered on the adjacent proposed allocation site.

Thames Water

Waste Comments

- 33 Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason: to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.
- 34 Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
- 35 Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.

South East Water –

- 36 No comments received

Network Rail

- 37 After careful consideration of the above planning application Network Rail has no further observations to make.

Environment Agency

- 38 We consider that planning permission could be granted for the proposed development as submitted if the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application.
- 39 Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reasons: To protect groundwater and to comply with the requirements of the National planning Policy Framework (NPPF).

- 40 This site lies on the Hythe Beds formation which is classified as a major aquifer and within a Source Protection Zone II. Therefore potable supplies could be at risk from activities at this site, and all precautions should be taken to prevent discharges and spillages top ground, both during and after construction.

Drainage

- 41 The application form indicates that foul will go to mains. If this changes then we should be consulted.
- 42 Condition: No infiltration of surface water drainage into the ground at the site is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reasons: To protect groundwater and to comply with the requirements of the National planning Policy Framework (NPPF).

Informatives

- 43
1. Please note that there should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater.
 2. Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system.
 3. Please be aware that the use of shallow soakaways in the Hythe Beds are not recommended as they can promote instability of the geology via washout of the sandier horizons, leading to the opening and enlargement of fissures within the Hythe Beds, and subsequent collapse.

Fuel, Oil and Chemical Storage

- 44
- 4 Any facilities for the storage of oils, fuels or chemicals shall be provided with secondary containment that is impermeable to both the oil, fuel or chemical and water, for example a bund, details of which shall be submitted to the local planning authority for approval. The minimum volume of the secondary containment should be at least equivalent to the capacity of the tank plus 10%. If there is more than one tank in the secondary containment the capacity of the containment should be at least the capacity of the largest tank plus 10% or 25% of the total tank capacity, whichever is greatest. All fill points, vents, gauges and sight gauge must be located within the secondary containment.
 - 5 The secondary containment shall have no opening used to drain the system. Associated above ground pipework should be protected from accidental damage. Below ground pipework should have no mechanical joints, except at inspection hatches and either leak detection equipment installed or regular leak checks. All fill points and tank vent pipe outlets should be detailed to discharge downwards into the bund.

KCC Archaeology

- 45 Thank you for consulting me on the above application but I have no comments on these proposals.

KCC Ecology –

- 46 We have reviewed the ecological information (ecological scoping survey and reptile survey) which has been submitted in conjunction with the desk top data we have available to us (including aerial photos and biological records). We are satisfied with the ecological information which has been provided which has assessed that there is limited potential for protected/notable species to be present within the site. We do not require any additional information to be provided prior to determination of the planning application.

Reptile

- 47 Suitable habitat for reptiles was recorded within the site but no reptiles were recorded during the survey. We recommend that if planning permission is granted the vegetation on the site is cleared to ensure that no reptiles colonise the site prior to works starting.

Bats

- 48 The survey has highlighted that there is potential for foraging and commuting bats to be present. Lighting can be detrimental to roosting, foraging and commuting bats and as such we advise that the Bat Conservation Trust's *Bats and Lighting in the UK* guidance is adhered to in the lighting design (see end of this note for a summary of key requirements).

Breeding Birds

- 49 There is vegetation within the site which may be used by breeding birds. All nesting birds and their young are legally protected under the Wildlife and Countryside Act 1980 (as amended) and we advise that the vegetation is removed outside of the breeding bird season (March – August inclusive). If that is not possible an ecologist must survey the site prior to works starting and if any nesting birds are recorded all works within that area must cease until all the young have fledged.

Enhancements

- 50 One of the principles of the National Planning Policy Framework is that *“opportunities to incorporate biodiversity in and around developments should be encouraged”*.
- 51 Details of ecological enhancements which are appropriate and can be incorporated must be submitted for comments.

Natural England

- 52 Natural England's comments in relation to this application are provided in the following sections.

Statutory nature conservation sites – no objection

53 Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

Protected landscapes

54 Having reviewed the application Natural England does not wish to comment on this development proposal.

55 The development however, relates to the Kent Downs AONB. We therefore advise you to seek the advice of the AONB unit. Their knowledge of the location and wider landscape setting of the development should help to confirm whether or not it would impact significantly on the purposes of the designation. They will also be able to advise whether the development accords with the aims and policies set out in the AONB management plan.

Protected species

56 We have not assessed this application and associated documents for impacts on protected species.

57 Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

58 You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

59 The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

60 If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us at with details at consultations@naturalengland.org.uk .

Local wildlife sites

61 If the proposal site is on or adjacent to a local wildlife site, eg Site of Nature Conservation Importance (SNCI) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local wildlife site, and the importance of this in relation to development plan policies, before it determines the application.

Biodiversity enhancements

62 This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper*

exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.

Landscape enhancements

- 63 This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

Kent Police –

- 64 As the planning application stands I would like to object I refer to the above planning application and on the principle of the proposal in regard to crime prevention and Crime Prevention through Environmental Design (CPTED) matters, in accordance with the ODPM (CLG) / Home Office guide – Safer Places, The Planning System and Crime Prevention

- 65 However I would like the following comments and recommendations to be taken into consideration if planning approval is given for this application and no further contact has been made to us by the applicant/ agent

- 66 We would suggest that a condition worded something similar to the below is used:

The development hereby permitted shall incorporate measures to minimise the risk of crime. No development shall take place until details of such measures, according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED) have been submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the development is occupied and thereafter retained.

Reason: In the interest of security and crime prevention and to accord with Policies of Maidstone Borough Council Draft Core Strategy Plan.

And Also

In the interests of crime prevention and reduction in accordance with Policy CC6 of the South East Plan 2009.

Maidstone CS6 Draft Core Strategy 2012

5.3.22 Policy CS6 steers development proposals to take account of sustainable design and development. This includes achieving a BREEAM 'Very Good' rating from April 2013 for non residential development proposals

- 67 We would also be grateful if you could draw the applicant attention to the Kent Design Initiative (KDI), Design Out Crime Prevention document dated April 2013 which will also assist them when Designing out of Crime. We would welcome a meeting to discuss crime prevention in more detail any notes from a meeting would then be passed back to you for information.

- 68 If the applicant fails to contact us then this may have an effect on the Secure By Design (SBD) and Code for Sustainable Homes (CfSH) and BREAM application stage

Representations

- 69 16 letters received, including letters from the Sevenoaks Conservation Council and the Sevenoaks Society –
- Unoriginal design
 - Excessive scale
 - Will dwarf neighbouring shops
 - Lack of car parking spaces
 - Lack of opportunities for biodiversity
 - Most people want a pub on the site again
 - Inappropriate access arrangements through car park
 - “Croydonisation” of station area is not in keeping with Sevenoaks
 - Traffic generation
 - Overdevelopment of site
 - The height should be no greater than the Railway and Bicycle site
 - The developer should provide context drawings to show the development in relation to surrounding buildings
 - Design is uninspiring and lacks articulation
 - Sceptical of need for further retail units
 - 40% of units should be affordable
 - Concern over extent of pre-application discussions that have taken place
 - Loss of light / overshadowing
 - Creation of a visual corridor on London Road
 - Loss of trees
 - Does Sevenoaks need extra dwellings? / There are many flats for sale in the area.
 - Additional high rise development is not in keeping with Sevenoaks
 - The façade of the building should be set back from London Road
 - This is a gateway to Sevenoaks
 - Out of character with cottage / mews style developments in Hitchen Hatch Lane
 - Concern over water supply
 - Inadequate responses from consultees
 - Supportive of some development on site but consider that size, scale, lack of parking and use of materials is inappropriate.
 - The Railway and Bicycle is not a good precedent to use and flats / commercial premises within this unit remain unsold
 - It would set a precedent for the public car park site
 - The developer has not demonstrated that the approved scheme is unviable
 - A Design Brief for the site should be produced
 - Lack of information to justify no affordable housing

Chief Planning Officer’s Appraisal

Background

- 70 Members will note from the planning history section that permission was granted, on appeal, for redevelopment of the site under SE/04/00526. The permission granted was for the demolition of the Farmers Public House and construction of a mixed use retail (A1 and A2 uses) / flatted development scheme. The approved

scheme was similar in footprint/layout to the application now being presented to members, consisting of a main building with retail units and flats above fronting onto London Road, and a smaller building consisting of flats fronting onto Hitchen Hatch Lane. However the approved scheme proposed 23 flats in total and as a result the number of storeys within the development were lower than are now proposed. The main building as approved comprised 5 storeys, dropping to three storeys along a large proportion of London Road. The smaller building was also designed over 5 storeys, with the lower floor sunk into the site and generally below the pavement level of Hitchen Hatch Lane. The general design finish to the approved scheme was very similar to the design approach adopted in the current application.

- 71 Members should note that construction of the development did commence on site within the time frame of the permission granted on appeal. As this permission was lawfully implemented, it can be re-commenced in the future without the need for a further planning permission. Therefore development of the site under the terms of SE/04/00526 provides a fallback position for the developer, and should carry weight in the consideration of the current application.

Principle of the development

- 72 The core principle of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development. In determining planning applications, the NPPF states that this should mean –
- Approving developments that accord with the development plan without delay
 - Where the development plan is absent, silent, or where policies are out of date, granting permission unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the NPPF
 - Where specific policies in the NPPF indicate that development should be restricted.
- 73 The NPPF further states that the supply of housing should be boosted significantly, to meet assessed needs for market and affordable housing in an area, that housing applications should be considered in the context of the presumption in favour of sustainable development and that LPA's should identify the size, type, tenure and range of housing required in particular locations. It states that encouragement should be given to the effective use of previously developed land.
- 74 Policy LO1 of the core strategy seeks to direct development to built confines, with Sevenoaks as the principle focus for such development. Policy LO2 relates specifically to Sevenoaks and states that in bringing forward sites for development, particular emphasis will be given to suitable sites for housing on locations within the town centre or within easy walking distance of the centre or main line railway stations. Policy SP5 of the Core Strategy states that new development should contribute to a mix of different housing types in residential areas, and seeks the inclusion of small units (less than 3 bedrooms) to increase

the proportion of smaller units in the District housing stock. These are up-to date policies that do not conflict with the NPPF.

- 75 Policy ST9 of the Local Plan relates specifically to the development of the Farmers site, and states that a mixed use development consisting of Class A1/A2 retail on the ground floor and residential or office use above will be permitted. It further states that access must be secured from Hitchen Hatch Lane and car parking requirements met in full. Whilst the local plan was adopted in 2000, this policy remains consistent with the Core Planning Principles within the NPPF, and is not out of date therefore it can still be afforded weight.
- 76 The site is located in a sustainable urban location, directly opposite the train station, and on a main bus route into and out of Sevenoaks, and a short distance from the town centre. The site is brownfield and previously developed land, and already benefits from planning permission for a mixed use retail and residential development. The proposed layout and floor area for the retail units (635 sqm) would be very similar to that previously approved (622 sqm), and the retail element would provide a natural extension to the Tubbs Hill and Station Parade neighbourhood centre as a local shopping facility (as defined in the local plan and ADMP). It would provide small units of residential accommodation for which there is an identified need under policy SP5 of the Core Strategy. On this basis, I am satisfied that the principle of a mixed retail and residential development on the site would accord with the guidance within the NPPF and local plan policies, and that such principle has in any case been accepted through the previous grant of permission.
- 77 The success of such a scheme is however very much dependant on how it would integrate into the local environment and this is considered in the sections below.

Design / layout of the development and impact upon the character and appearance of the area

- 78 The NPPF states that development should function well and add to the overall quality of the area, create a strong sense of place, optimise the potential of sites to accommodate development, respond to local character and history, and be visually attractive as a result of good architecture.
- 79 Policy LO2 of the Core strategy states that in bringing forward development in Sevenoaks, such development should protect the setting of the urban area and the distinctive character of the local environment. Policy SP1 states that all development should be designed to a high quality and respect distinctive local character. Policy SP7 states that all housing should be developed at a density consistent with achieving good design that would not compromise distinctive character, and that subject to this overriding consideration development in Sevenoaks should achieve a density of 40 dwellings per hectare, and in suitable locations close to the town centre higher densities will be encouraged.
- 80 The development site is located in a mixed character area and is immediately surrounded by a variety of developments, including the railway station, large office building, public car park, single storey retail / commercial units and a 5 storey mixed retail / residential development. Members should note that as this area is mixed in character, it is not included within the Sevenoaks Residential Character Area Appraisal. Slightly further away to the east of the site is the Tubbs Hill building, consisting of 9 and 10 storeys, and the more recently developed Oak

House building, containing up to 6 storeys, sited opposite more traditional two and three storey buildings. As is evident from this, part of the established local character of the area consists of high density and high rise developments.

- 81 The density of the proposed development would equate to 166 dwellings per hectare. Members will note that flatted developments containing small units of accommodation naturally result in high densities. As a comparison, the development at the former Railway and Bicycle site opposite (24 units) equates to 122 dwellings per hectare, whilst the development at Oak House (20 units) equates to 120 dwellings per hectare. As such it can be seen that the local area supports high density developments. Whilst the proposed development would be higher than these existing surrounding densities, I do not consider that this, as a figure in itself, could be said to be out of keeping or harmful to the character of the area. Instead it is indicative that large flatted developments generate particularly high density figures.
- 82 The footprint and site coverage proposed by the development would be very similar to the layout / footprint approved under the appeal scheme. Given these similarities to an approved scheme that can be built out, and the policy support to make best use of urban brownfield land, I do not consider that any objection to this layout and coverage and the uses proposed could be justified. The two buildings proposed respond to the road frontages and in the case of London Road, the development would continue the existing building line of adjacent premises against the pavement edge.
- 83 In my opinion, the main issue for consideration by Members is the increase in the scale, mass, height, as well as the aesthetic design of the development in comparison to the approved scheme, and whether this would respect and relate well to the surrounding area.
- 84 Taking the main building fronting London Road first, the approved scheme was for a 3 storey building, rising to 5 storeys on its western side. The proposed development would be for a predominantly 5 storey building, with a sixth floor on its western side. This increase on the western side of the building would add a further 2.5 metres to its height compared to the approved scheme, although members should note that the 6th floor would be recessed back from the face of the building, which would reduce the perception of the scale of the building. The increase in the height of the remainder of the building from three to five storeys would increase this part of the building by a further 6 metres in height, although it should be noted that the proposal would step down in height on the eastern boundary.
- 85 The height of this building would generally be between 16 and 19 metres. As a comparison, I would advise Members that the building opposite on the former Railway and Bicycle site stands at up to 15.5 metres in height, the BT office building is approximately 17 metres in height, and the Oak House development is up to 19 metres in height. Taken together with the Tubbs Hill development, I am of the opinion that one of the distinctive local characteristics of the area is of large scale buildings that feature prominently in the townscape.
- 86 The proposed development would add to this local characteristic. Whilst it would be taller than the development opposite the site by one storey, there is no set building height that characterises the area. In addition, the top floor proposed is recessed from the main front face of the building, thus reducing its visual impact.

The scale of the building is further broken down through recessing the easternmost units on the third, fourth and fifth storeys from the main face of the building, which breaks up this face and provides a visual contrast through the use of different materials. The stepped building line on the east side of the building helps reduce its scale as it meets the single storey retail units adjacent to it.

- 87 The scale of the building would clearly be markedly different to the single storey parade of shops adjacent to the site. However this parade is, in itself, out of character with the general scale of development in the area and this point was made by the inspector in determining the approved scheme. As such I do not consider that the single storey parade should be given any significant weight as a townscape feature. In any case, I consider the stepped design of the development would pay sufficient respect to this parade.
- 88 In my opinion, this site is capable of accommodating the scale of development proposed without harm to the distinctive character of the area, where large and high density developments form part of such character.
- 89 The smaller building fronting Hitchen Hatch Lane would effectively appear one storey lower than the main building and in my opinion this properly reflects its status as a smaller and subservient building to the main building. It would be sited opposite the BT building which is clearly much larger in scale. Whilst Hitchen Hatch Lane is of more modest scale than London Road, there is a significant gap to the nearest residential properties across the adjacent public car park. As such the building would be separated from these dwellings by some 40-50 metres. In my opinion, given its subservient scale to the main building proposed fronting London Road and to the BT building opposite, together with the significant distance to neighbouring dwellings, I consider this to be acceptable.
- 90 The applicant has provided street elevations to demonstrate the scale of the proposed building in relation to surrounding buildings. In my opinion, these drawings further confirm my assessment above that the scale of the building as proposed would relate acceptably with the other large scale buildings in the immediate vicinity.
- 91 The design principle of the building is contemporary, and this would again be in keeping with the recent larger scale developments in the area. The use of a rendered corner feature and contrasting timber cladding is very similar to the design finish of the approved scheme. The current proposal also includes the use of contrasting timber cladding to units on the eastern side of the London Road frontage, and these units would be physically recessed from the main building frontage, as well as stepping down at the eastern boundary of the site. The effect of this can best be seen on the Computer Generated Images that have been submitted by the applicant. The use of a contemporary design approach was considered to be appropriate by the appeal inspector who allowed the approved scheme, and I agree with this, more so given the recent development at the Railway and Bicycle site opposite. I consider the design to be of good quality and interest, maximising the best use of this site.
- 92 Overall, I consider that the scale, layout and design of the proposal would relate well to its surroundings and in particular to the more recent larger scale buildings erected in the locality. I consider the design to be of good quality which would enhance the local townscape. In this respect I consider the development would accord with development plan policies and the NPPF.

Impact on amenities of surrounding properties

- 93 The closest residential properties to the development are the flats at the former Railway and Bicycle site on the opposite side of London Road. A minimum distance in the region of 21 metres would be maintained between the buildings. In addition, the buildings do not sit directly opposite one another – the existing units at the Railway and Bicycle site would face towards the lower part of the proposed building. The development would maintain a light angle of 25 degrees to windows serving residential units within the Railway and Bicycle site, and this would be in accordance with guidance from the Building Research Establishment. Likewise I consider the distance between buildings to be sufficient to maintain privacy and outlook.
- 94 The single storey buildings on London Road to the east of the site are in commercial use with a main outlook onto London Road. I do not consider the development would cause harm to the amenity or conditions of these commercial properties.
- 95 The residential dwellings in St Botolphs Avenue would be sited around 45 metres from the proposed flats and at this distance I consider that the impact upon light, privacy and outlook would not be harmful. A similar, if not greater separation distance would be maintained to the mews buildings on Hitchen Hatch Lane and for the same reason I consider this acceptable.
- 96 Policy EN1(3) of the local plan seeks to ensure that development does not harm the amenities of a locality. Likewise, ADMP Policy EN2 seeks to safeguard the amenities of existing and future occupants of nearby properties. In my opinion the development would safeguard such amenities.

Highways and parking

- 97 Policy EN1 of the local plan states that developments should not create unacceptable traffic conditions on local roads and where possible should be located to reduce the need to travel. Policy T2 of the ADMP states that vehicle parking provision for non-residential developments should be made in accordance with advice from KCC, or until such time that standards are adopted. Paragraph 32 of the NPPF states that development should only be refused on transport grounds where residual cumulative impacts are severe.
- 98 Vehicular access to the site would be provided via the adjacent public car park and this is part of a historic right of access that existed when the site was occupied by a public house. The access arrangements are also the same as approved on appeal under SE/04/00526. The entrance to the site from the public car park provides access to two levels of car parking – the lower ground car parking would contain 33 parking spaces for use by residents of the development. The upper ground floor level would provide access and circulation space to a delivery yard serving the retail units, and four further parking spaces for use in connection with the retail units.
- 99 The layout of the access and the use of two levels of parking are the same as previously approved. The main difference with this scheme is that the amount and ratio of car parking spaces is lower – the scheme would provide 33 spaces for 39 residential units and a ratio of less than 1 space per unit, and there would be no

visitor parking for the retail units, whereas 10 spaces were provided under the approved scheme.

- 100 Taking these matters in turn, the Kent Interim Guidance note 3 sets out parking standards. This states that a maximum of 1 parking space per unit should be provided for 1 and 2 bed flats in an edge of centre location such as this site. The applicant considers the provision of 33 spaces to be acceptable in this location as it is close to the town centre, on a main bus route and opposite the train station. The car parking provided for the residential flats would accord with the Interim Guidance Note provided such parking was unallocated, and this is acceptable to Kent Highways.
- 101 The Council does not have any parking standards relating to parking for retail units. The application states that these units would be likely to be occupied by small traders and a small supermarket and these would attract the majority of their trade from users of the train station and passers by. In addition, surrounding roads are heavily restricted under parking controls, which would prevent street parking. I have also noted that the retail units permitted as part of the Railway and Bicycle development similarly have no visitor parking. The lack of such parking has not generated objection from Kent Highways, and I consider that the sustainable location of the site and nature of the units proposed is such that the lack of customer parking would not cause highways safety issues.
- 102 The applicant has provided a transport assessment which sets out likely trip rates associated with the development. The assessment predicts that the 39 residential units would generate a total of 96 trips over a 12 hour period. Given the lack of customer car parking, the transport assessment predicts that new trips in connection with the retail use would be restricted to 8 movements for staff. It states that the majority of trips to the retail units would be by foot, or would be linked trips (e.g people already on highway network who would stop to visit the retail units) and are therefore not new trips. Kent Highways do not raise objection that the predicted traffic generation would cause any harmful impacts on local roads.
- 103 Taking the above into account, I consider that the highways impacts relating to the proposal would not be in conflict with adopted and emerging development plan policies, or the NPPF.

Affordable housing

- 104 Policy SP3 of the Core Strategy requires new housing developments to make provision for affordable housing. The proposal for 39 residential units would normally generate a requirement for 40% of these units to be affordable. The policy does state that, in exceptional circumstances, a reduced level of provision will be accepted where viability issues arise and are accepted.
- 105 The existing permission provides no affordable housing, on the basis that the 23 residential units permitted fell below the local plan policy threshold on affordable housing in force at the time the decision was made.
- 106 This application was submitted with a viability appraisal which initially set out that it would not be viable to provide any affordable housing on the site. Following input from the Council's viability consultant, it has now been established that a surplus of £351,000 would exist to contribute towards affordable housing

requirements. The Council's viability consultant advises that this could support two units of rented affordable housing on the site (1 x 1 bed and 1 x 2 bed unit), together with a small surplus of £3,000 which could be secured as a financial contribution. The applicant is currently in discussions with local Housing Associations to agree such arrangements. Whilst the clear preference is to provide these units on site, if such agreement cannot be made then the Council would consider securing the full amount as an off-site contribution. Either way, this would be secured via a S106 agreement.

- 107 On the basis that the Council's viability consultant has confirmed that full affordable housing provision is not possible on this site and that the policy does allow reduced provision where viability is demonstrated, I am of the opinion that the development would be in accordance with Policy SP3 of the Core Strategy provided this is secured via a S106 agreement.

Trees

- 108 The main landscaping within / adjacent to the site is along the north and east boundary. Some existing trees would be removed to facilitate the development, although these are categorised as Class C trees, whereas the more important category B trees are retained. The tree officer has raised no objection to the proposal subject to the imposition of a landscaping condition.

Other matters

- 109 Members will note that the adjacent public car is allocated within the ADMP as a housing site. The ADMP states that development on this site must achieve a good relationship with any development on the application site, and that there may be opportunities to develop a revised scheme that encompasses both sites.
- 110 The applicant has shown a willingness to consider the potential for a joint development on both sites. However the applicant has also made clear that this application should be determined on its own merits and that the layout and impacts upon the car park site are very similar to the approved scheme. I would agree with this.
- 111 Ecology – the KCC Ecologist is satisfied that the site has limited ecological value and that no harm would arise to biodiversity. Ecological enhancements are sought via a planning condition.
- 112 Objectors have raised a variety of concerns over the development, much of which is covered in the assessment above. Other outstanding concerns are addressed below:
- That most people want a pub on the site again – the site was identified under the adopted local plan as a development site and did not require retention of a pub. Nor did the approved scheme retain a pub on site. I do not consider that the Council can reasonably withhold permission on this basis.
 - Scepticism over need for retail units – it is noted that the retail units on the Railway and Bicycle development are largely unoccupied although the financial circumstances relating to these units is unknown. The Farmers site already has permission for retail units of very similar size to those now

proposed, and the site is adjacent to an identified shopping area. The applicant is clearly confident that the inclusion of retail units in the scheme would be successful.

- Concern over the extent of pre-application discussions that have taken place – Council Officers have engaged with the applicant in pre-application discussions prior to submission of this application. The NPPF (paragraphs 188 – 190) makes clear how the Government considers such discussions to be advantageous. Pre-application discussions are made on the basis that any advice is not binding on the Council.
- Does Sevenoaks need extra dwellings in the form of flats? Members will be aware that the Council is required, as a minimum, to meet projected housing targets and to develop land in an efficient and sustainable way. The Council’s Strategic Housing Market Assessment identified a need for smaller units of accommodation in the District. The development would help address this shortfall.
- Concern over water supply – the Council has consulted South East Water but has received no comments or objections to this proposal.
- Inadequate responses from consultees – an objector is concerned at the adequacy of some consultee responses. I do not consider any of the responses received to be inadequate, and these responses address their areas of expertise. In any case, the Council can only act upon the responses it receives.
- The developer has not demonstrated that the approved scheme is unviable – there is no requirement for this to be proved and the application should be considered on its planning merits.
- A design brief for the site should be produced – this is not a reason to withhold permission. The Council has earmarked this site for development since at least 2000 and has not considered a design brief to be necessary.
- Lack of information to justify lack of affordable housing – the applicant has provided comprehensive information on development viability, however as this contains detailed financial information it is deemed as sensitive and is not in the public domain.

Conclusion:

113 I consider that the scale, layout and design of the proposal would relate well to its surroundings and in particular to the more recent larger scale buildings erected in the locality. The development would be unlikely to cause unacceptable impacts on the amenities of surrounding properties and the traffic impacts are considered to be acceptable by Kent Highways. The applicant has demonstrated that the scheme cannot viably accommodate 40% affordable housing, but will make a small contribution towards the provision of such housing in the District. Subject to the completion of a S106 agreement to secure affordable housing, I consider that the development would accord with adopted and emerging development plan policies and the NPPF, and that permission should be granted.

Background Papers:

114 Site and Block plans

Contact Officer(s):

Mr A Byrne Extension: 7225

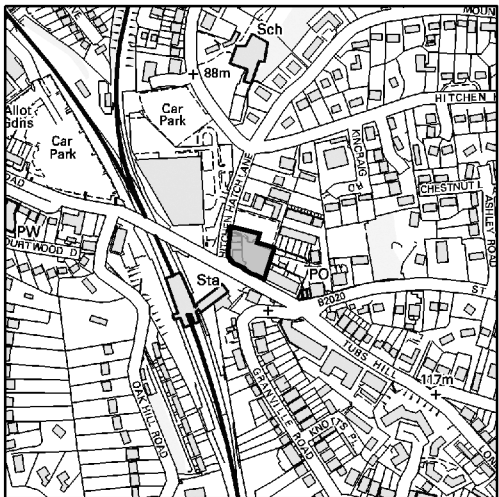
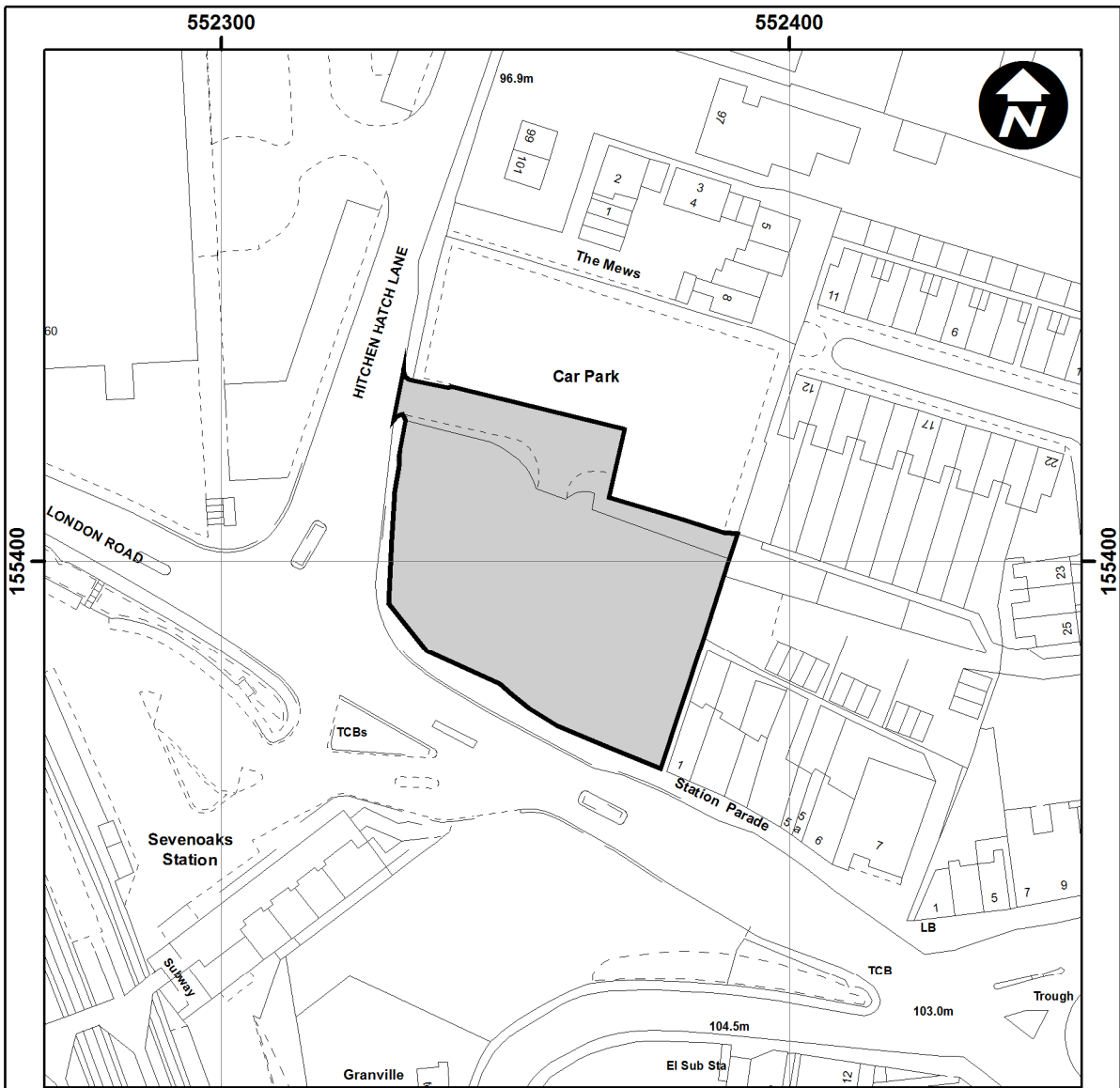
Richard Morris
Chief Planning Officer

Link to application details:

<http://pa.sevenoaks.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=MX9VOWBK8V000>

Link to associated documents:

<http://pa.sevenoaks.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=MX9VOWBK8V000>



Site Plan

Scale 1:1,250

Date 06/05/2014



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Ordnance Survey 100019428.

Block Plan

