

Home Builders Federation

ID:2007

Matter 2

SEVENOAKS LOCAL PLAN EXAMINATION

Matter 2: Soundness of the Local Plan

Issue 4: Is the strategy for growth in the Local Plan justified and effective? [Policy ST1]

Q23. Is the strategy for growth, which focusses growth in existing settlements, including building at a higher density on non-Green Belt land; encourages the redevelopment of previously developed 'brownfield' land, including land in the Green Belt, in sustainable locations; and promotes sustainable patterns of development by permitting development in the Green Belt only in exceptional circumstances, particularly where social and community infrastructure is being proposed, justified in a District which is 93% Green Belt and 60% AONB?

Whilst we consider there is justification to support amendments to the Green Belt boundary the approach we are concerned that some aspects of ST1 are unjustified and ineffective.

Firstly, the approach fails to meet housing needs. The Council except that there are exceptional circumstances to amend Green belt boundaries and then fails to remove sufficient land from the Green belt in order to meet needs. As we suggest in our representations the acuteness of the need for market and affordable housing faced by Sevenoaks are sufficient to warrant housing needs are met in full especially when set against the minimal impact on the fundamental aim of the Green belt given the amount of land designated as Gren Belt in the Borough.



Secondly, the positive and negative effects of meeting needs in full have not been robustly considered within the Sustainability Appraisal. Not meeting housing needs will potentially impact on the health and well-being of the community, impact on economic growth and reduce the community benefits that could be delivered from the increased funding due to S106, CIL and the New Homes Bonus. We would also suggest that the potential negative impacts compared to the Council's preferred approach have also been exaggerated. Achieving the most sustainable patterns of development will not be possible based on the Council's spatial strategy.

Thirdly, including the requirement that for exceptional circumstances to exist a site must propose the delivery of infrastructure to help address evidenced infrastructure deficiencies in the area is unjustified. This approach fails to recognise that the Council can secure contributions from any development to mitigate against the impacts of that development on local and strategic infrastructure where they are necessary to make the development acceptable in planning terms and which are directly related in scale and kind. In reality all new development will contribute to the delivery of the necessary strategic infrastructure whether this is directly on site or via a financial contribution. The approach taken by the Council therefore limits their options and reduces the number of sites they consider suitable for allocation despite such sites being in sustainable locations on the edge of settlements.

Finally, by focusing greenfield Green Belt boundary reviews at those settlements considered most sustainable, namely Sevenoaks, Swanley, Edenbridge and Westerham overlooks the development needs and housing supply potential of smaller sustainable settlements.

Q24. Does Policy ST1 offer sufficient flexibility to support growth in the District?

No. ST1 fails to deliver the appropriate level of development to meet needs within Sevenoaks and offers no flexibility. The policy does nothing more than set out the Council's approach to identifying sites allocated within the Local Plan. It must also be noted that the wording in ST1 in relation exceptional circumstances is wrong. Exceptional circumstances are required to amend Green Belt boundaries and as such do not permit development in the Green Belt. As set out above we consider the circumstances faced by Sevenoaks to allow for further amendments that would allow

the Council to meet need and enable the Council to have a more flexible strategy with regard how and where development can come forward.

Q25. Is the focus for development in the four towns of Sevenoaks, Swanley, Edenbridge and Westerham, with more moderate development within the settlements further down the Settlement Hierarchy, justified and effective?

No comment

Q26. Is the balance between meeting housing need and Green Belt protection consistent with national policy?

Paragraph 11 of the NPPF sets out that the fundamental principle of the balance between meeting development needs whilst recognising that the application of policies, such as Green Belt, set out in the Framework may restrict the overall scale, type or distribution of development. However, part i of paragraph 11(b) establishes that there must be a strong reason why the application of these policies should be used to restrict development. This therefore requires Local Planning Authorities to undertake detailed considerations as to whether these policies, and their application by the Local Planning Authority, provide a strong reason for not meeting development needs. We would argue that whilst the Council have undertaken an assessment of its Green Belt and have proposed amendments to the Green Belt boundary that the circumstances faced by Sevenoaks District Council are sufficiently exceptional to require the Council to meet development needs in full and that the application of Green Belt policy should not prevent the Council from achieving that aim.

We have set out in our representation why we consider the circumstances faced by the Council are sufficient to warrant further amendments to the Green Belt boundary. The acuteness of need and the limited harm to the extent and nature of the Green Belt within Sevenoaks mean that needs could have been met in full providing significant benefits without affecting the fundamental aim of Green Belt policy to prevent urban sprawl.

Q27. Is sufficient weight placed on the promotion of the reuse and redevelopment of suitable brownfield sites within the District?

No comment

Q28. As well as looking at previously developed land in the Green Belt, is the consideration of other developed land in the Green Belt, including agricultural complexes, plant nurseries and minerals workings, provided they are situated in a sustainable location, justified, in order to maximise the potential of land that has been subject to some form of development?

No comment

Q29. Is the distribution of development within the District appropriate?

No comment

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