

**Home Builders Federation**

**ID:2007**

**Matter 2**

## **SEVENOAKS LOCAL PLAN EXAMINATION**

### **Matter 2: Soundness of the Local Plan**

**Issue 5: Is the approach to the Green Belt justified, effective and consistent with national policy?** [Policies ST1 and GB1]

*Q30. Has the assessment of the Green Belt been undertaken in a robust manner?*

No. As set out in our representations we do not consider the approach taken in assessing coalescence to be consistent with national policy. The assessment considers all settlements in relation to this purpose regardless of whether they are considered to be towns or villages. This is a fundamental flaw and could have led to sites being excluded from further consideration and allocation in the plan.

*Q31. Should a full Green Belt Review be undertaken?*

Yes. The approach taken by the Council in the Green Belt Assessment has been to assess the degree to which identified parcels of land meet the purposes of Green Belt. In identifying these parcels, the study uses identifiable boundaries that are consistent with national policy, but which inevitably lead to these parcels being very large and potentially overstating the impact of development should a fraction of one of these parcels be released from the Green Belt. For this reason, it is important to then consider whether there is scope for subdivision. The Green Belt Assessment does this in part by focussing on where it considers smaller parcels of land to function weakest against the purposes of the Green Belt. However, this approach is based on existing characteristics and could exclude some sites from consideration where appropriate



mitigation could be used to ensure that the strength to which the overall parcel contributes to the purposes of the Green Belt is maintained.

However, no further assessment of parcels appears to have been undertaken despite such a process being suggested in the Green Belt Assessment which states that the study only provides an: "... *initial and high-level review of sites against a select range of policy constraints*". We would recommend that consideration is given to all sites in the Green Belt that have submitted for allocation and the degree to which they would impact on the purposes of the Green Belt. This assessment should include consideration as to whether any impacts could be effectively mitigated.

*Q32. Where the Local Plan proposes to alter Green Belt boundaries, in accordance with paragraph 136 of the NPPF, what are the exceptional circumstances for doing this?*

As set out in our representations we consider the exceptional circumstances to be:

- Acuteness of need for both market and affordable housing;
- The inability of any neighbouring authorities to deliver housing above and beyond their own needs;
- The limited impact on the aim and purposes of Green Belt from meeting housing needs in full given the amount of land in Sevenoaks under this designation;
- The social and economic benefits of meeting housing needs
- Need to secure sustainable patterns of development.

We would suggest that these circumstances provide sufficient justification to amend Green Belt boundaries to provide sufficient land to meet housing needs in full.

*Q33. Is the Council's definition of 'exceptional circumstances' justified?*

In part. As set out earlier in this statement we regard the consideration by the Council that exceptional circumstances must include the delivery of infrastructure to meet an existing need to be unjustified. It would appear that this particular consideration is being used to limit the number of sites coming forward and in particular for excluding the release smaller sustainable sites on the edge of settlements from the Green Belt. To discount such sites on this basis is unjustified and ignores the benefits they can

bring to infrastructure delivery through financial contributions towards strategic infrastructure improvements but may not provide additional on-site infrastructure to meet an identified need. We consider the acuteness of the need for market and affordable housing, the lack of additional supply in neighbouring boroughs, the difficulties in achieving sustainable development without Green Belt release and the limited consequential impacts of on the purposes of Green Belt to be sufficient to support the release of sufficient land from the Green belt to meet needs.

Q34. Is the approach to new development in the Green Belt, included in Policy GB1, consistent with national policy?

No comment

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