

**STRATEGIC, PLANNING,
SUSTAINABILITY &
TRANSPORTATION COMMITTEE**

**11 September
2018**

Sevenoaks District Draft Local Plan Consultation July 2018

Final Decision-Maker	Strategic Planning, Sustainability & Transportation Committee
Lead Head of Service/Lead Director	Rob Jarman, Head of Planning & Development
Lead Officer and Report Author	Anna Houghton, Planning Officer (Strategic Planning)
Classification	Public
Wards affected	All

Executive Summary

Sevenoaks District Council is consulting on an early version of the Sevenoaks District Draft Local Plan (Regulation 18). This report outlines the matters for inclusion in the Council's consultation response. The key points raised in the consultation relate to the housing approach, options for accommodating housing need within neighbouring authorities, affordable housing targets, gypsy and traveller need and employment need.

This report makes the following recommendations to this Committee:

1. That the response to the Sevenoaks District Draft Local Plan Consultation July 2018 set out in Appendix 1 is approved.

Timetable

Meeting	Date
Strategic Planning, Sustainability & Transportation Committee	11 September 2018

Sevenoaks District Draft Local Plan Consultation July 2018

1. INTRODUCTION AND BACKGROUND

- 1.1 Sevenoaks District Council is consulting on the Sevenoaks District Draft Local Plan (Regulation 18). This is the second early stage Regulation 18 consultation and follows the Sevenoaks District Local Plan: Issues and Options Consultation in July 2017 (a formal response was submitted on behalf of Maidstone Borough Council). The Regulation 19 version of the Local Plan will be published later this year.
- 1.2 The Sevenoaks District Draft Local Plan (Local Plan) puts forward a strategy that goes part way to meeting the required needs for the Sevenoaks District over the plan period of 2015 to 2035. There is a need for 13,960 dwellings (based on the standardised methodology), 11.6ha of employment land and 32,000m² of retail floorspace.
- 1.3 Currently the Local Plan indicates that Sevenoaks District Council (SDC) is unable to meet its 13,960 objectively assessed need (OAN) in full. The Local Plan proposes a strategy of focusing development within existing settlements; re-using previously developed land (including Green Belt land); and using greenfield land within the Green Belt. The Local Plan indicates that discussions with neighbouring authorities are required to understand if they can accommodate any of the unmet need.
- 1.4 Under the new NPPF (paragraphs 136 and 137) Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, and demonstrate that full consideration has been given to the use of suitable brownfield sites and underutilised land, as well as optimising the density of development in line with Chapter 11 of the NPPF.
- 1.5 To further help towards meeting its housing need, SDC has identified Green Belt exceptional circumstance sites. There is no national definition for exceptional circumstances and so these have been defined within the Local Plan as sites that, in addition to housing, provide social and community infrastructure which meets an evidenced need. The assessment of the exceptional circumstance sites is ongoing and therefore it is not known how many sites will pass the tests. The total number of dwellings which can contribute to the OAN from these sites is therefore unknown. However, if all of the exceptional circumstance sites passed the tests and came forward, a total of 6,800 dwellings would be provided. The Council's response reiterates points that were made to the Issues and Options Consultation last year, in which it suggested a second stage Green Belt review was undertaken to address the unmet housing need.

Proposed response

- 1.6 In summary, the response raises the following key points.
- 1.7 The housing strategy proposed within the Local Plan can provide a total of 13,382 dwellings over the plan period. Therefore, SDC will fail to meet its OAN target. As the current strategy for housing delivery does not meet the OAN, it would be justified to look again at brownfield sites and look to optimise the density of development in line with paragraph 137 of the NPPF, as well as further land in the Green Belt.

- 1.8 There is a Statement of Common Ground between the two councils. The Statement of Common ground noted that Sevenoaks District Council was unable to confirm if its OAN would be met within the District at the time. Since it was produced in November 2016, the Sevenoaks Local Plan has progressed and there is a clearer position on whether the OAN can be met within the District. To accommodate the full OAN need, Sevenoaks District Council have expressed a need to discuss with neighbouring authorities the prospect of them accommodating some of that need. MBC would expect discussions to take place with neighbouring authorities in the first instance as they share the strongest functional links.
 - 1.9 Policy 9 – Provision of affordable housing proposes a financial requirement for affordable housing from small sites. It would not be appropriate to require contributions in this way if it would mean sites were unviable and as a result could affect the delivery of the OAN. Any such approach would need to be supported with up to date viability evidence.
 - 1.10 MBC supports the strategy proposed within the Local Plan for meeting the additional gypsy and traveller need over the plan period. The need will be met within the borough through additional permanent pitches on or adjacent to existing sites.
 - 1.11 There is a need for 11.6ha of employment land over the plan period and the Local Plan demonstrates that this need can be met. The Local Plan states an Article 4 direction on all office accommodation on allocates sites will be served to prevent the loss of further office floorspace to residential. However, considering SDC has not met its OAN a critical and focussed approach must be taken to ensure the Article 4 direction does not inhibit a positive contribution towards OAN through permitted development changes from office to residential use.
 - 1.12 The proposed response can be found in full at Appendix 1.
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2. AVAILABLE OPTIONS

- 2.1 Option 1 – The Committee decides not to submit a response to the Consultation
- 2.2 Option 2 – The Committee agrees the consultation response

3. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS

- 3.1 The preferred option is Option 2 as this will allow Sevenoaks District Council to consider the Council's viewpoint.
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4. RISK

- 4.1 The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's Risk Management Framework. We are satisfied that the risks associated are within the Council's risk appetite and will be managed as per the Policy.
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5. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION

- 5.1 Subject to agreement by Committee, the consultation response will be submitted on 12 September 2018. The consultation closes on 10th September, but agreement has been sought from Sevenoaks District Council that Maidstone Borough Council's response can be submitted after the closing date. The consultation comments received will be considered and a final draft of the Local Plan will be published later this year.

6. CROSS-CUTTING ISSUES AND IMPLICATIONS

Issue	Implications	Sign-off
Impact on Corporate Priorities	We do not expect the recommendations will by themselves materially affect achievement of corporate priorities.	Rob Jarman, Head of Planning and Development
Risk Management	Already covered in the risk section	Rob Jarman, Head of Planning and Development
Financial	There are no direct financial implications arising from the recommendations within the report.	Ellie Dunnet, Head of Finance
Staffing	We will deliver the recommendations with our current staffing.	Rob Jarman, Head of Planning and Development
Legal	There are no specific legal implications arising from the report.	Cheryl Parks, Mid Kent Legal Services (Planning)
Privacy and Data Protection	There are no implications arising from the report	Cheryl Parks, Mid Kent Legal Services (Planning)
Equalities	The recommendations do not propose a change in service therefore will not require an equalities impact assessment	Equalities and Corporate Policy Officer

Crime and Disorder	N/A	Rob Jarman, Head of Planning and Development
Procurement	N/A	Rob Jarman, Head of Planning and Development & Section 151 Officer

7. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix 1: Maidstone Borough Council response to Sevenoaks District Draft Local Plan Consultation July 2018

8. BACKGROUND PAPERS

The Sevenoaks District Draft local Plan Consultation July 2018 can be found here <http://planningconsult.sevenoaks.gov.uk/consult.ti/dlp2018/consultationHome>