

Planning Policy  
Sevenoaks District Council  
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## Maidstone Borough Council

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Date 12<sup>th</sup> September 2018

Dear Planning Policy,

### **Re: Sevenoaks District Draft Local Plan Consultation 2018**

Thank you for consulting Maidstone Borough Council on the Sevenoaks District Draft Local Plan Consultation July 2018. The response has been agreed (TBC) by the council's Strategic Planning, Sustainability and Transportation Committee at its meeting on 11<sup>th</sup> September 2018.

#### Housing

Based on the standardised methodology, Sevenoaks District has an OAN of 13,960 over the plan period (2015-2035). Policy 1 – A Balanced Strategy For Growth in a Constrained District and supporting text outlines that development will be focused within existing settlements, including building at higher density on non-Green Belt Land; the re-use of previously development land, including land in the Green Belt, where situated in sustainable locations, will be encouraged; and development will be permitted on greenfield sites in the Green Belt only in exceptional circumstances, in the most sustainable locations where employment, key services and facilities and a range of transport options are or will be available.

The Sevenoaks Local Plan indicates that, when looking at the potential Green Belt amendment, the Council has looked at the direction of growth from the four main settlements of Sevenoaks, Swanley, Edenbridge and Westerham. The Sevenoaks Local Plan states that, based on this consideration of 'directions of growth' and land availability, through sites that have been submitted through the 'call for sites', exceptional circumstance sites are under consideration. Under the NPPF the Green Belt boundary can only be amended in exceptional circumstances. MBC note that exceptional circumstances have been locally defined as, in addition to housing, providing social and community infrastructure which meets an evidenced need.

It is observed that the assessment of the exceptional circumstance sites is ongoing and at this stage it is unknown which sites will be taken forward to the final draft of the Local Plan. If all of the sites identified as exceptional circumstances come forward for development it would create 6,800 dwellings, a significant contribution to the District's need. It would mean a total of 13,382 dwellings would be delivered. Therefore, Sevenoaks District would still fall short of the 13,960 OAN figure.

The new NPPF (paragraph 136) indicates that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The Council should be able to demonstrate that it has examined fully 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 (paragraph 137). As the current strategy for housing delivery does not meet the OAN, it would be appropriate to look again at sites in line with paragraph 137. Furthermore, it would not be unreasonable for the Council to release more Green Belt land in order to meet the housing need. Sevenoaks would not be the only authority to release green belt land, Tonbridge and Malling are proposing Green Belt release to meet its OAN.

MBC notes that the Sevenoaks District Council Green Belt Assessment (2017) reviews the performance of a total of 101 Green Belt areas against the five purposes of Green Belt. In total, 31 sub-areas have been identified as performing weakly and therefore suitable for further consideration known as 'recommended areas'. These recommended areas are all adjacent to settlements in the Sevenoaks Settlement Hierarchy. As such, these areas could be sustainable locations for growth and should be fully explored. MBC reiterates its comments made to the Issues and Options Consultation in July 2017 – further assessment of the sub areas could reveal additional, smaller parcels of land which perform weakly, or not at all, against the Green Belt functions. It appears that this further review has not been undertaken. Considering there remains a shortfall, such additional review would appear justified.

Policy 1 outlines that discussions with neighbouring authorities, about whether they can accommodate some of the identified need, will continue. MBC acknowledges that there is a Statement of Common Ground between Maidstone Borough Council and Sevenoaks District Council (November 2016). The Statement of Common ground noted that the Council was unable to confirm if its OAN would be met within the District at the time. The Sevenoaks District Local Plan has since progressed and there is a clearer position on whether the OAN can be met in full within the District. As the Local Plan shows SDC cannot meet its need in full, MBC would expect discussions to take place with neighbouring authorities as a priority. Sevenoaks District has strong functional links with its neighbours which is evidenced by the fact that it shares a housing market area, travel to work area and functional economic market area with them.

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.

### Gypsy and travellers

The Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2017) states that there is a need for further pitches over the plan period. The need is between 11 and 51 pitches. MBC supports the strategy outlined in the Local Plan which demonstrates how the need can be met in full within the Borough. The Local Plan proposes additional permanent pitches on:

- 1) Existing temporary pitches on suitable sites that can be made permanent
- 2) Additional permanent pitches on suitable sites with existing pitches within the current site boundary to achieve higher density

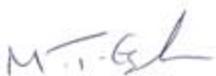
- 3) Additional permanent pitches on suitable sites within existing pitches with small scale minor boundary amendments in consultation with Local Members.

### Employment

There is total need for 11.6ha additional employment land over the plan period. MBC supports Policy 13 – Supporting a Vibrant and Balanced Economy which demonstrates the Council can meet its employment need. MBC notes that considerable office space has been lost to residential conversion as a result of permitted development rights. The Local Plan states that Article 4 directions will be served on all office accommodation on allocated sites to remove permitted development rights in regard to office to residential conversions. Whilst it is acknowledged that Article 4 directions are an effective way to protect existing good quality office stock. MBC would reiterate our comments made to the Issues and Options Consultation – Article 4 directions should only be used where it is necessary to retain the best quality office stock. A critical and focused approach should be taken to ensure that the directions do not inhibit a positive contribution towards the OAN. The conversion of poor quality office stock to residential reflects paragraph 137(a) of the NPPF, which requires local authorities, in releasing Green Belt through exceptional circumstances, to demonstrate they have utilised brownfield sites.

I look forward to continuing to working collaboratively in the future on key cross-boundary issues.

Yours sincerely,



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