

NO **Hartley Expansion**

Sevenoaks Local Plan: Examination in Public First week of the Inspector's hearings

These are formal discussions led by the Inspector (Karen Baker) who seems matter of fact; focussed; thorough; fair and in control. Her role is to determine whether the Local Plan has been prepared in accordance with the relevant legal requirements and that it is 'sound' i.e. positively prepared, justified, effective and consistent with national policy. Discussion is based around questions raised by the Inspector about the content of the submission version of the Local Plan (the subject of the Regulation 19 consultation in early 2019). Sites which are not included in this version (e.g. MX52/53 and MX61) will not be discussed.

SDC's participants are their Strategic Planning Manager and senior Planning Officers, supported by a Queen's Counsel and another legal adviser.

Other participants include:

- All major landowners and developers, represented by their agents or, in some cases, legal advisers
- The Campaign to Protect Rural England (CPRE) Kent
- Kent Downs AONB
- NHE and other local residents' groups
- Parish and Town Councils (including Hartley, Fawkham and Ash-cum-Ridley), some represented by planning consultants
- Planning team staff from Tonbridge and Malling and Tunbridge Wells Borough Councils

Tuesday 24 September (Legal Compliance and the Duty to Co-operate)

- There were concerns about the short time between the Regulation 18 consultation on the Draft Local Plan (Summer 2018) and the Regulation 19 consultation (Winter 2018/9). SDC felt they had sufficient time to review the Reg 18 responses and wanted to get a Plan in place as soon as possible.
- Tonbridge and Malling and Tunbridge Wells Borough Councils felt that the terms of the Duty to Cooperate had been met by SDC.

Wednesday 25 September (Sustainability Appraisal)

- SDC refuted suggestions that the policies in the Plan appeared to be protecting the Green Belt by preventing development, rather than achieving sustainable development to meet the assessed need. The Government and the National Planning Policy Framework (NPPF) attach great importance to the Green Belt.
- They also refuted suggestions that the policies had been designed to fit the sites they wished to include in the Plan. SDC were asked to submit a document setting out their process for making the decision as to their strategy for growth.
- Some parties suggested that SDC had not tested sufficient “reasonable alternatives” that meet a higher percentage of the housing need.

Thursday 26 September (Strategy for Growth)

- CPRE Kent felt that many sites were unsustainable as they required the use of cars because of the lack of public transport. SDC believes that the sites are either adjacent to existing settlements; are self-contained or are within reasonable walking distance of public transport services. CPRE asked whether there were good footpaths (lit at night) to access these services.
- There were suggestions that SDC had relied on the social and community infrastructure offered by developers without assessing the need for the proposed infrastructure. SDC confirmed that they had consulted with infrastructure providers such as KCC and Clinical Commissioning Groups, as well as meeting local councillors and community groups.
- It was suggested that infrastructure to meet existing needs could be funded by the Community Infrastructure Levy (CIL) from all sites, rather than requiring Green Belt sites to provide such infrastructure as a condition of inclusion. SDC do not believe CIL would provide sufficient funding for new schools etc. Also, raising funds for infrastructure does not help if there is no site available on which to build it.
- It was also suggested that there was no requirement in the NPPF to meet existing infrastructure deficiencies in order to build on Green Belt and that some unsustainable sites had been allocated in the Plan just because they were offering infrastructure.
- Some participants believed SDC’s definition of exceptional circumstances artificially restricts development. SDC believes it is important that each local authority should be able to define its own exceptional circumstances as every authority has different needs.
- Some participants felt that the allocated sites did not follow the policies in the Plan.
- There was discussion regarding the sustainability of the sites allocated on brownfield land and SDC’s definition of previously developed land (PDL), which has been widened

(from the definition in the NPPF) in order to use as much PDL as possible before looking at greenfield sites.

- There was discussion about whether there is an inappropriately high proportion of developments in some settlements in the lowest tiers of the settlement hierarchy, including Fawkham.
- SDC defended the inclusion of Pedham Place in the Plan as a 'broad location for growth' for the later years of the Plan period as this is in accordance with the NPPF. Some participants suggested that it should either be removed from the Plan due to uncertainty (which could result in sites currently excluded from the Plan being revisited in order to meet the housing target) or that a specific development should be allocated now and the area removed from the Green Belt to ensure that the development could go ahead.
- The inclusion of Pedham Place as part of Swanley was queried as the site is separated from Swanley (although adjacent to it) and is within the boundary of Farningham. SDC has focussed development in the four main towns but if Pedham Place is not part of Swanley this would significantly reduce the proportion of development related to towns and mean that this policy was not being followed.
- Detailed issues regarding Pedham Place will be addressed at the dedicated hearing on 6 November.

No Hartley Expansion and Hartley, Fawkham and Ash-cum-Ridley Parish Councils will also be participating in further sessions in Week 2 of the hearings when Green Belt, Housing Need, Housing Requirement and Housing Distribution will be discussed.

Detailed issues re The Manor House site in New Ash Green will be addressed on 6 November and the Fawkham sites on 7 November.

Full details of times and locations of hearings can be found on SDC's website www.sevenoaks.gov.uk/downloads/download/434/examination_documents.

All other documents can be found at

www.sevenoaks.gov.uk/info/20069131/local_plan_examination/454/examination_library.

We will provide updates as and when these are available so please keep visiting nohartleyexpansion.com.