

NO **Hartley Expansion**

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

Please see the previous update (Week 1 of the hearings) for details of the procedure and participants.

Tuesday 1 October (Green Belt (GB) Policies)

- SDC introduced discussions by saying that the fundamental aim of GB policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. They had no choice but to release 220 hectares of GB for development under the proposed Plan towards meeting the housing need.
- This was one of several topics where there were so many participants that the session was held twice, with different participants. The session at which No Hartley Expansion was due to lead the discussion on the definition of exceptional circumstances ran out of time before this topic was reached and the session was adjourned to a later date, to be agreed.
- Many participants suggested that the 2016 GB Assessment was not sufficiently robust. Discussion focussed on the methodology around land parcel size: it was suggested that large 'parcels' should have been broken into smaller plots, as the content and characteristics were not consistent across these large areas. One of the key purposes of GB is to assist in safeguarding the countryside from encroachment: large parcels of GB have been assessed by SDC as meeting this purpose and therefore rejected for development. SDC continually countered that the GB Assessment was just one part of the evidence base and that they had assessed the GB in the most expedient fashion as part of the Plan-making process. GB boundaries must be defined clearly, using physical features that are readily recognisable and likely to be permanent. Parcels in rural areas are therefore normally larger. Where there were smaller, weakly performing areas with identifiable boundaries within a parcel, these had been identified as Recommended Areas (RAs) for further consideration.

- Developers highlighted inconsistencies in the GB Assessment: some strongly performing sites had still been taken forward. SDC said there were many reruns of the process.
- Some participants believed that the proposed releases of GB were not in proportion to the housing need, i.e. not enough GB was being proposed for release. In SDC's view the releases were adequate and proportionate.
- Some participants were in favour of undertaking a full GB Review. However, most seemed to feel that the existing approach simply needed to be more robust – i.e. that a finer grain approach should be taken.
- One participant pointed out that one of the key purposes of GB is to prevent neighbouring towns merging into one another. SDC appears to have created its own definition of 'towns' for the GB Assessment but should adhere to national policy. National policy does not say neighbouring **villages** should be prevented from merging into one another. However, some sites seem to have been rejected for this reason.
- SDC says it was made clear to developers that strategic infrastructure was a requirement for developments in GB and that there was a definition in the Infrastructure Delivery Plan. One participant requested that existing infrastructure deficiencies should be identified in the Plan, rather than relying on the developers' offers. SDC has since added a note on this topic to the online Examination Library.
- Some participants felt that the definition of exceptional circumstances was not justified. The requirement for strategic infrastructure (to fulfil an existing need) was too restrictive: the release of sustainable sites which do not include strategic infrastructure would enable the housing need to be met.
- A number of developers criticised SDC for their inclusion of Pedham Place as a "Broad Location for Growth". They wanted SDC to be clear about clarifying GB boundaries for such sites now for the whole Plan period rather than waiting until the Plan is reviewed, which might not be for 5-6 years unless an early review is undertaken.

Wednesday 2 October (Housing Need, Housing Requirement and Housing Distribution)

- The Housing Land Supply position has been updated by SDC to count housing provided for older people, to reflect July 2019 changes in the Planning Practice Guidance (PPG). The revised supply of 9,996 units covers a revised Planning period of 2019-2035 (previously 2015-2035) and is equivalent to 88% of the total local housing need figure of 11,312 (707 units per year, calculated in accordance with the Government's standard methodology). SDC proposes to submit Main Modifications to the Plan (MMs) to update these figures and to state that 11,312 is the minimum housing need. SDC feel it is

reasonable to use this capped figure. Some participants felt the actual need could be much higher and that housing supply is likely to be less than in the Plan, increasing the unmet need. It was also suggested that the uncapped housing figure of 839 pa and the unmet need of some 1,300 both be referenced in the Local Plan.

- The changes to the Planning period were criticised. SDC believes the figures in the Plan should be re-based to 2019 as working from 2015 would be planning for the past and the PPG does not require past under-delivery to be addressed. Some participants said that remaining aspects of the Plan would therefore also have to be based on the revised period and that there was no basis for changing the Plan period.
- Only 0.6% of Green Belt has been released. Some participants felt this was not enough as (i) the Plan does not set out a strategy for meeting unmet housing need; (ii) the shortfall will have to be addressed when the plan is reviewed (within a maximum of five years) and that Green Belt will have to be released at that point to meet the shortfall; (iii) other authorities with high percentages of Green Belt had released more Green Belt than SDC. The impact of removing land from the Green Belt can be offset through compensatory improvements to remaining Green Belt land.
- SDC believe that they have strong reasons for not being able to meet the assessed housing need. The Inspector asked SDC to consider why the housing need cannot be met and explain how it can be met going forward. It was reiterated that national policy allows for the housing need not to be met in full if there are constraints, and that Sevenoaks is 93% Green Belt.
- There was much discussion about how the unmet need should or could be addressed and whether a review should happen more immediately than the planned five-year review. The Inspector said that SDC should consider why the need can't be met and explain how it can be met going forward and that this should be signposted in the Plan.
- Some participants believed that the inclusion of some sustainable edge of settlement Green Belt sites which were omitted from the Plan (because they did not provide the infrastructure required by SDC) should be included to provide a buffer. Some commented that other Green Belt sites (not included in the Plan) had been put forward with less harm to the Green Belt than those included. In the case of Warwick's Local Plan the Inspector did not accept that the shortfall could be addressed when the Plan underwent a future review.
- Neighbouring authorities cannot assist with meeting the unmet housing need as they have similar constraints. Those authorities (e.g. Tonbridge & Malling BC) which were assessed under the earlier National Planning Policy Framework (NPPF) will have an even higher housing need when their Plans are reviewed as the new NPPF uses a different method of calculation.

- There was further discussion over the distribution of site allocations with reference to the Settlement Hierarchy. 78% of sites are across the top tier settlements, although if Pedham Place is removed from that calculation, it falls to 37%.

Thursday 3 October (Housing Supply)

- SDC need to amend their housing supply figures as it seems that on a number of existing care home sites, where new builds were proposed, the units to be demolished had not been counted - this would reduce the net new build.
- The Housing Trajectory and timescales for delivery were discussed. The Inspector stressed that she would expect to see evidence in the Plan to support the delivery of each proposed site and that it appeared that many of the sites in the Plan were currently only in control of the landowner with no developer or promoter identified, so that delivery times were called into question. SDC will provide a document which shows the evidence for each allocated site to demonstrate a 5-year supply of deliverable housing land. The Inspector will produce a Note for Guidance which will identify exactly what she needs to see.
- One planning consultant questioned the trajectory proposed for Pedham: The Plan suggests a build start in 2025 and a rate of 300dpa which, based on a similar historical site in another part of the country, would not be achievable. The Inspector will include in her Note for Guidance a review of the trajectory of similar sites to Pedham.
- Some of the Inspector's questions were unable to be addressed as the session ran out of time and these were adjourned to a future session, to be arranged.

Hearings will resume on 5 November.

Detailed issues regarding Pedham Place will be addressed on 6 November.

Detailed issues regarding 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 and the **No Hartley Expansion** Facebook page.