

## LOCAL PLAN ISSUES AND OPTIONS

### PLANNING ADVISORY COMMITTEE - 22 JUNE 2017

Report of	Chief Planning Officer
Status	For consideration
Also considered by	Cabinet - 13 July 2017 (for decision)
Key Decision	Yes

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**This report supports the Key Aim of Protecting the Green Belt.**

Portfolio Holder	Cllr. Robert Piper
Contact Officers	Antony Lancaster, Ext. 7326 Hannah Gooden, Ext. 7178

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**Recommendation:** That the Planning Advisory Committee recommend to Cabinet that the Sevenoaks District Local Plan 2015 - 2035 Issues and Options document be agreed for public consultation.

#### **Recommendation to Cabinet: To**

- (a) agree the Sevenoaks District Local Plan 2015 - 2035 Issues and Options document for public consultation; and
  - (b) delegate the finalisation of consultation questions and any non-substantive text amendments required in the document to the Chief Planning Officer following consultation with the Planning Portfolio Holder and Chairman of Planning Advisory Committee.
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**Reason for recommendation:** To enable progression of the first stage of public consultation for the new Local Plan

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#### **Introduction and Background**

- 1 Sevenoaks District Council is preparing a new Local Plan to replace the Core Strategy 2011 and Allocations and Development Management Plan (ADMP) 2015. The first document in this process, the Sevenoaks District Local Plan 2015 - 2035 Issues and Options document is attached as appendix A to this report. The requirement for producing a new Local Plan stems from a change in Government planning policy via the introduction of the National Planning Policy Framework (NPPF) in 2012.

- 2 Over the past ten years, 2,509 homes have been completed (or 250 homes per year) against a target of 165 homes per year in the Core Strategy and last year 115 affordable homes were completed (against a target of 66 per year), In addition, the Council's planning department is the busiest in Kent, with 2,101 planning applications received in 2016. The plan has been successful in protecting the Green Belt.
- 3 Local Plan work since 2015 has focussed on the preparation of a substantial evidence base to help inform policy making. This evidence is supplemented by the strategies, plans of other authorities and agencies together with views acquired through early consultations in putting the evidence together, via workshops with Town and Parish Councils, landowners, agents and via other stakeholders (particularly those identified as prescribed bodies under the Duty to Co-operate). The next stage towards the new Local Plan is to identify key issues arising out of the early work and the options for addressing them.
- 4 **The Issues and Options document is strategic in nature, focussing on getting 'high level' objectives agreed and a strategic approach to addressing issues by topic and by location. It is therefore not driven by the identification of sites for housing. Details of appropriate sites will naturally follow as part of the draft Local Plan consultation in early 2018 once the strategic approach is confirmed. It sets out Council preferences for dealing with issues whilst welcoming comments on all considerations that should be taken into account.**
- 5 In assembling the Issues and Options document views expressed by the portfolio holders for housing and health, economic development as well as planning have been co-ordinated and represented. In particular, meetings held in early April and early May have helped ensure alignment with emerging Council strategies for housing and for economic development. More specifically the Local Plan Issues and Options and the Housing Strategy have been timetabled for consideration at the same Planning Advisory Committee and Cabinet meetings. The strategies set out 'high level' priorities and actions whilst the eventual Local Plan policy will facilitate, as far as possible, delivery through the planning system.
- 6 To allow for the summer holiday period it is being recommended that an extended eight week consultation be undertaken. The summary details for proposed public consultation are as follows:

Thursday 3rd August 2017 Issues and Options Consultation Starts

w/c 14th August 2017 Agents Forum (including any commercial agents)

w/c 21st August 2017 Duty to Co-operate sessions

w/c 4th September 2017 Place-making workshops (6 events to be organised across the District)

w/c 11th September 2017 Public “drop-in” sessions organised in key District locations (Sevenoaks/Swanley/Edenbridge/Westerham)

w/c 18th September 2017 School consultation sessions (Years 9-13 at state secondary schools)

Thursday 28th September 2017 Issues and Options Consultation Finishes

- 7 The July edition of In Shape will contain a page highlighting the forthcoming consultation. A Local Plan special edition of In Shape in August will provide an easy to read non-technical summary of the Issues and Options document together with easily understood questions inviting a public response. It will also provide full details of public engagement opportunities during September and set out how the main Issues and Options document and more technical questions can be viewed.
- 8 Consultation will be in accordance with the Council’s adopted Statement of Community Involvement. A high response rate will be encouraged and consultants employed to record responses and analyse data. Following public consultation responses will be assembled and assessed and will help in forming the draft Local Plan timetabled for further public consultation in the Council’s Local Development Scheme for early 2018.

### **Executive Summary**

- 9 The Local Plan is clear that the Green Belt will continue to be protected. In order to do so, new housing will need to be accommodated , at higher densities, within existing settlement boundaries (or under the existing rural exceptions sites policy) other than in the following cases:
  - Where the development will result in the sustainable reuse of brownfield land in the Green Belt (use of the term brownfield for Local Plan purposes goes wider than the NPPF definition and is being set out in the glossary to the Local Plan).
  - Where a convincing ‘exceptional circumstances’ case can be made. The Government does not define exceptional circumstances, but this may occur, for example, where new housing development achieves the sustainable reuse of brownfield land; ensures the delivery of new and needed key infrastructure; is needed to achieve regeneration and helps achieve significant compensatory improvements in the Green Belt.
- 10 Evidence for potential supply of housing land estimates that about 5,000 new homes can be built in existing settlement boundaries (or under the existing rural exceptions sites policy) and 1,500 new homes built on brownfield land in the Green Belt.
- 11 Current potential exceptional circumstance cases undergoing separate consultation processes are at Sevenoaks Northern, as part of the Sevenoaks (Town) Neighbourhood Plan (area regeneration, brownfield land in the Green

Belt and approximately 800 new homes (within the plan period)) and at Westerham as part of the privately led Which Way Westerham initiative (a new relief road and approximately 600 new homes). Sevenoaks District Council currently remains neutral on this initiative. Neighbourhood Plans are subject to endorsement through examination and local referendum.

- 12 At Edenbridge, whilst there is also a Neighbourhood Plan process ongoing it is not currently promoting an exceptional circumstance case for Green Belt release for housing. Provision of new health and secondary education are likely to be important if any case were to be made. At Swanley, the potential for a new garden village has been fully explored as a potential option via extensive Master Vision public consultation and Cabinet have agreed this option will not form part of Swanley's regeneration. Work on the Hextable Neighbourhood Plan is now continuing again and the Local Plan will consider any exceptional circumstance cases arising through this work. The Ash Neighbourhood Plan is not proposing any exceptional circumstances to justify Green Belt land release.
- 13 **The objectively assessed housing need for the District is 12,400. In paragraph 10 above, evidence of potential supply identifies sites for 6,500 new homes (This excludes any emerging exceptional circumstances where cases still need to be made and/or finalised numbers confirmed). Providing for 6,500 new homes over 20 years would represent a doubling of existing required delivery in the adopted Core Strategy but still well short of meeting identified need.**
- 14 Alongside continuing engagement with emerging potential 'exceptional circumstances' cases cooperation with other local planning authorities will continue in order to explore capacity options in other less constrained areas of the sub-region.
- 15 Choices for housing are strongly influenced by the new housing strategy. Priorities include measures for balancing the housing market via more 1-2 bedroom affordable houses, particularly for young people and first time buyers, more 2-3 bedroom market units, more options for older people including opportunities to right-size, extra care housing and allowing more opportunities for other forms of low cost housing such as custom and self build. Differences emerge for place-making areas. Provision to meet identified need for Gypsies and Travellers can be identified on existing sites or via small extensions without the need for new sites. The report for the Housing Strategy elaborates further on housing choice.
- 16 Economic priorities from the emerging economic development strategy have been represented in the Local Plan. Of high importance are ensuring that new development is 'technology ready' and that lobbying of Government and relevant infrastructure providers leads to substantial improvement in high speed broadband coverage. The rural and visitor economies are highlighted as key areas of focus for the future ensuring that the District's tourism assets are promoted and new visitor accommodation is provided.

- 17 Options for finding additional employment land include intensifying uses and small expansions of existing employment areas. In total about 11ha of new employment land needs to be identified, 7ha of which is to be for offices. New land and premises will need to be attractive to both inward investment and cater for the growth and expansion plans of local businesses. Ensuring new premises actually get built on allocated employment land and that they remain in employment use is a particular issue.
- 18 Evidence identifies over 30,000m<sup>2</sup> of new retail provision being needed during the plan period in order to ensure the District's High Streets remain competitive with other nearby centres, particularly Bluewater and Tunbridge Wells. The location of new provision is likely to be particularly influenced by progress with the regeneration of Swanley town centre.
- 19 Further work will be required to ensure that the requirements for housing, employment and retail are in balance when the final plan is being drafted.
- 20 Having sufficient infrastructure is identified as one of the most important issues for the new Local Plan. The plan is accompanied by an infrastructure plan (previously reviewed by planning advisory committee) which identifies the items that are either desirable or more importantly critical to delivery of the Local Plan. Key items relate to transport, education and health. Whilst Council officers continue to meet with partners responsible for different items of infrastructure (particularly Kent County Council, the NHS and Clinical Commissioning Groups) the Local Plan and infrastructure Plan will themselves provide important evidence for Members when lobbying Government and relevant infrastructure providers for the funding needed by the District.
- 21 The Issues and Options document sets out the District Council's preferred options for addressing needs and issues, but in order to ensure all reasonable options are considered, representations on alternatives will be invited as part of the public consultation and these will be assessed prior to drawing up a draft Local Plan.

### **Structure of the Local Plan**

- 22 The Issues and Options consultation document has the following structure:
  - A District Profile
  - B Sub-regional/Cross Boundary issues
  - C Vision of the District in 2035
  - D Local Plan Objectives (for achieving the Vision)
  - E Strategic Spatial Options
  - F Issues and Policy Options by Topic
  - G Issues and Policy Options by Area
  - H Delivery Targets and Monitoring
- 23 The **District Profile** provides a context and summary of the current state of the District, using updated Census information, local data and the evidence

base gathered so far. This represents a starting point from which Sevenoaks District will be developing and growing over the next twenty years.

24 The consideration of **Sub-regional/Cross Boundary Issues** references key influences likely to be impacting on the District either currently or over the plan period. These include:

- Ebbsfleet - a new garden town of 15,000 homes
- Paramount development at Swanscombe peninsula
- Bluewater - growth of a major retail and leisure attraction
- Housing provision and London's growth
- Significant growth south of the River Thames from Greenwich to Medway - over 120,000 new homes and 100,000 new jobs
- Green Belt role in separating London and major growth in mid Kent
- Employment provision (including links to Bromley)
- Transport infrastructure
  - Lower Thames crossing
  - M25 - serious congestion and no eastbound option at junction 5
  - Gatwick expansion
  - Rail services, particularly into London
- Health provision
- Education provision
- Flood Risk - upstream flood storage areas on the River Eden for Tonbridge
- Ashdown Forest - wider development impacts on an internationally important area

25 The **Vision** seeks to provide an aspirational, locally-specific and concise picture of what Sevenoaks District will be like in 2035 by responding to the key issues identified for the District. The Vision will be further refined and shaped by local stakeholders as part of the public consultation. It sets the scene for a direction of travel summarised through objectives.

26 The scope of the Local Plan is very wide ranging. Having a small number of strategic objectives helps to provide a clear structure and sets the scene for positive outcomes for the district. The objectives can be readily monitored to see if the eventual agreed Local Plan is effective. The six **Objectives** being put forward for the Plan are derived from the three strands of sustainable development (environmental, social and economic) as set out in the NPPF. Importantly they also align with the Councils Corporate Plan, the Community Plan, new housing strategy and emerging economic development strategy in order to be locally relevant. Again, these will be open to public comment. They are:

**1. Provide housing choice for all.** Includes housing need, housing supply and accommodation types - including affordable options, singles, families, older

people, vulnerable people, people with disabilities, Gypsies and travellers and a specific focus on rural housing.

**2. Promote well designed, safe, places and safeguard and enhance the District's distinctive high quality natural and built environments.** Includes Green Belt, Landscape and natural environment, Nature Conservation, Biodiversity, Design and Heritage/ Conservation.

**3. Support a vibrant local economy both urban and rural.** Includes needs by use class, employment land supply, measures to support skills improvement, the rural economy, the visitor economy and super fast broadband.

**4. Support lively communities with well performing town and village centres which provide a range of services, facilities and infrastructure.** Includes infrastructure priorities, retail provision and the leisure uses of town centres.

**5. Promote healthy living opportunities.** Includes open space and leisure.

**6. Provide for a greener future.** Includes climate change mitigation, water usage, climate change adaptation, flood risk, pollution issues (including air quality) and responses to new technology.

27 The **Strategic approach** has two strands The first of these considers ways in which the identified needs of the District, including land for housing, employment, retail, community facilities and infrastructure may be met, or partially met. The constrained nature of the District very much sets the context for the strategy and means that genuine options are limited. Whilst options for meeting key needs for employment land and retail uses can be readily set out and explained, options for providing new homes are much more challenging.

28 The second strand is concerned with ensuring local identity is maintained or enhanced. To help achieve this, place-making areas, comprising small groupings of adjoining parishes or towns have been identified and used in the gathering of evidence. A series of workshops have been held at which Town and Parish Council representatives have discussed what is important to their different areas and what could be better. The Local Housing Needs Study 2017, which is an evidence base to both the new housing strategy and emerging Local Plan provides data at place-making level.

29 Having such a comprehensive strategic approach should help to ensure that the eventual plan:

- Is appropriate within the sub-regional setting of south-east London, Kent and the Surrey and Sussex borders;
- Provides a clear direction for the sustainable development of Sevenoaks District up to 2035;

- Allows for local ambitions to be recognised in different parts of the District and where appropriate treated differently in policy.
- 30 The main part of the Issues and Options document is therefore concerned with considering issues by both topic and area and the key issues are summarised in the Executive Summary section above.
  - 31 The Local Plan will need to be supported by information on **delivery, targets and monitoring**. This will help ensure that the policies are deliverable and that the effectiveness of policy can be monitored (through the annual Authority Monitoring Report).
  - 32 A **Sustainability Appraisal** is also in preparation, starting with a scoping report, to support and inform the production of the Local Plan. This will be used to evaluate alternatives and select preferred options. It enables plans and policies to be tested to see how well they perform against economic, social and environmental objectives.
  - 33 The Local Plan will also be accompanied by assessments of **Health Impact and Equalities Impact**. When submitted for examination the Local Plan must be accompanied by a Duty to Cooperate Statement. At this stage it is intended that a progress report accompanies the Issues and Options consultation documenting dates of meetings held and summarising the main cross boundary matters arising through Duty to Cooperate processes so far.
  - 34 Finally the Local Plan must also undergo **Appropriate Assessment** under the Habitat Regulations. This is to ensure that any new development being considered through the Local Plan has no adverse impacts on sites of international importance or that sufficient mitigation measures can be guaranteed. Whilst there are no such sites in Sevenoaks District there are a few in areas nearby and one, the Ashdown Forest, currently impacts on the extreme south of Sevenoaks District (an area where virtually no development is currently envisaged).

### Other Options Considered and/or Rejected

- 23 The option not to progress a new Local Plan would leave the Council open to reputational damage and likely Government intervention to produce a Local Plan for the District Council.

### Key Implications

#### Financial

Production of the Local Plan will be funded from the Local Plan reserve.

#### Legal Implications and Risk Assessment Statement.

Preparation of a Local Plan is a statutory requirement. There are defined legal requirements that must be met in plan making which are considered when the plan is examined by a Government Planning Inspector. Risks associated with Local Plan

making are set out in the Local Development Scheme.

### Equality Assessment.

Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The preparation and adoption of a Local Plan will directly impact on end users. The impacts will be analysed via an Equalities Impact Assessment (EqIA) to be prepared alongside each key stage of plan making.

### **Conclusion**

The Sevenoaks District Local Plan 2015 - 2035 Issues and Options document represents the first public consultation in the process of preparing a new Local Plan to replace the adopted Core Strategy 2011 and Allocations and Development Management Plan 2015. The document reflects other strategic documents of the Council in particular the Corporate Plan, Community Plan and the emerging housing and economic development strategies. It is backed by a substantial evidence base assembled over a two year period. An eight week consultation will be followed by a period when responses are assessed and a draft Local Plan prepared for a further round of public consultation.

### **Appendices**

Appendix A - Sevenoaks District Local Plan 2015 - 2035 Issues and Options

### **Background Papers**

#### [PAC key progress reports](#)

7 July 2015	Local Plan Work Programme
19 April 2016	Local Plan Work Programme
21 June 2016	Local Plan Update
22 September 2016	Local Plan Update
16 May 2017	Local Plan Update

**Richard Morris**  
**Chief Planning Officer**