

## LOCAL PLAN - INFRASTRUCTURE DELIVERY PLAN UPDATE

Planning Advisory Committee - 2 October 2018

Report of	Chief Planning Officer
Status	For comment / consideration
Key Decision	No

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**Executive Summary:** National policy and guidance states that Local Plans should look beyond the needs for housing and should consider future requirements for infrastructure for the local area. The Infrastructure Delivery Plan forms part of the evidence base to support the preparation of the Local Plan. It identifies any deficiencies in infrastructure across the District, who would deliver the infrastructure, any associated costs (if known) and the timescales for delivery.

The Infrastructure Delivery Plan shall be treated as a “live” document, allowing it to be updated where new information is made available to the Council. The Infrastructure Delivery Plan will also aid the review of the Council’s Regulation 123 List (where appropriate). The preparation of the evidence will also account for sites that have put forward “exceptional circumstances” cases for consideration.

It is anticipated that the final version of the Infrastructure Delivery Plan will be published alongside the pre-submission Local Plan (Regulation 19) consultation, which is scheduled for the end of the year.

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**This report supports the Key Aim** of ensuring that Sevenoaks District remains a great place to live, work and visit and that development is supported by the relevant infrastructure

Portfolio Holder	Cllr. Robert Piper
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### Recommendation to Planning Advisory Committee:

- a) To note the progress made on the Infrastructure Delivery Plan as an evidence base for the new Local Plan 2015-2035;
  - b) To note that the IDP is now a live document and any subsequent updates will be made by the Chief Planning Officer in consultation with the Portfolio Holder for Planning.
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## Reason for recommendation:

To ensure that the Infrastructure Delivery Plan is considered as a sound evidence base for the new Local Plan 2015-2035.

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## Introduction and Background

- 1 The new Local Plan will replace the Core Strategy and the Allocations and Development Management Plan (ADMP). It will be used to determine planning applications, as well as setting out the strategic land allocations which will help meet the needs of the District over the plan period, up to 2035. The Local Plan is based on local evidence and will be examined in public by an independent Inspector, who will need to determine whether the Plan is sound and has been positively prepared.
- 2 Meeting our development needs, particularly housing needs, within a constrained District is clearly a defining factor of the Plan. We are committed to creating healthy and vibrant communities through the Local Plan, not just providing housing. We recognise that communities need to be supported by the necessary services and infrastructure, so people and future generations will choose to live and work in sustainable locations across Sevenoaks District.
- 3 We recently carried out a Draft Local Plan consultation over the summer, which set out draft policies and potential development sites to be allocated in the Local Plan. Potential development sites were included in the consultation where they met the Council's preferred development strategy:
  - Maximising densities in existing settlements;
  - Redeveloping sustainable brownfield sites in the Green Belt; and
  - Developing greenfield sites in the Green Belt only where there are convincing "exceptional circumstances".
- 4 Exceptional circumstances are not defined under national policy. This means that local authorities must set their own parameters on what they could consider under "exceptional circumstances". We have been consistently clear with our approach to using greenfield Green Belt sites where "exceptional circumstances" are demonstrated, since our Local Plan Issues and Options consultation in 2017. For clarity, this has been locally defined as:
  - *The development of greenfield Green Belt land only in "exceptional circumstances" where social and community infrastructure is being proposed in addition to housing which could help address evidenced infrastructure deficiencies in the area.*

- 5 As such, a number of sites have been consulted on during our Draft Local Plan consultation. A number of infrastructure improvements have been offered which include (but not limited to):
- 3 new primary schools, as well as improvements to 3 existing primary schools;
  - 1 new secondary school;
  - New GP surgeries and other associated health facilities;
  - New community facilities;
  - New sports facilities and pitches;
  - Improved road infrastructure, including new accesses and junction improvements.
- 6 All “exceptional circumstances” sites are currently being assessed, to determine whether a locally evidenced need has been demonstrated.
- 7 Throughout the consultation period, we received a number of representations relating to how current infrastructure is at capacity in places across the District, including medical facilities, schools and roads. We must seriously consider the ramifications of future development to meet the needs of the District against the infrastructure improvements required to ensure that any future development is deliverable.
- 8 The Infrastructure Delivery Plan forms part of the local evidence base for preparing the Local Plan, to ensure that any future development proposed in the Local Plan can be serviced by adequate infrastructure to meet the existing and future needs of the local community. It will allow the Council to seek infrastructure improvements as part of the Local Plan, as well as providing Officers information when considering planning applications.

### **Infrastructure Planning**

- 9 Infrastructure can be identified as the various services and facilities that are necessary to help build sustainable communities, which include the delivery of new infrastructure or upgrading of the existing facilities to accommodate additional capacity from either new or existing developments.
- 10 The Planning Act 2008 defines infrastructure to include roads and other transport facilities, flood defences, schools and other educational facilities, medical and health facilities, sporting and recreational facilities and open space. This list is reflected in the Council’s Community Infrastructure Levy (CIL) Charging Schedule and Regulation 123 List.
- 11 The National Planning Policy Framework (NPPF) is clear that infrastructure should be integrated with future development and that should be considered

as part of the plan-making process and should include the provision of infrastructure and community facilities at the local level.

- 12 National guidance emphasises the importance of engaging with infrastructure providers throughout the plan-making process. The guidance is also clear that Local Plans should set out what infrastructure requirements are needed during the first five years of the plan period, how it will be funded, who will be responsible for delivering the infrastructure and how it relates to the anticipated phasing of development.

### **Infrastructure Delivery Plan**

- 13 In October 2015, Members were presented with a revised Infrastructure Delivery Plan. This document was used to monitor infrastructure delivery against the Core Strategy as well as considering any deficiencies in infrastructure across the District. Infrastructure providers submitted responses based on the District's housing requirements in the Core Strategy (3,300 units) up to 2026.
- 14 Since then, the District's housing needs have increased significantly. Our Strategic Housing Market Assessment (SHMA) published in late 2015, suggested that 12,400 homes (620 units per annum) were required over the new plan period up to 2035. This has been since superseded by the revised NPPF and the Government's standardised methodology for calculating housing need (July 2018) which has increased the District's housing need to 13,960 homes (698 units per annum) over the new Local Plan period.
- 15 It is expected that the revised population projections from the Office of National Statistics will be published imminently. This may cause the Government's standardised methodology figure (13,960) to either increase or decrease. This will be reflected in the Local Plan moving forward.
- 16 Therefore, a revision to the Infrastructure Delivery Plan is essential to reflect the revised housing needs of the District and identify any potential deficiencies in local infrastructure, and any potential costings that might be associated to its delivery.
- 17 To prepare the Infrastructure Delivery Plan, the Plan must define the types of infrastructure which are considered important to the development of the Local Plan. The current Regulation 123 List formed the starting point and includes the following infrastructure categories:
  - Transport schemes
  - Flood defences
  - Water quality schemes
  - Education
  - Health and social care facilities

- Police and emergency services facilities
  - Community facilities
  - Communications (including broadband)
  - Blue Green infrastructure
- 18 The draft text of the Infrastructure Delivery Plan can be reviewed in **Appendix A** of this report.
- 19 The Council contacted infrastructure and service providers, when the Draft Local Plan was released for public consultation on Monday 16<sup>th</sup> July, as technical stakeholders. A further letter was sent to infrastructure and service providers on 1<sup>st</sup> August, asking them for further information on any potential infrastructure improvements, which would be required to meet the needs of future development in the District. This could be site-specific or District-wide improvements.
- 20 Any responses received as part of the Draft Local Plan consultation were included as considerations for the Infrastructure Delivery Plan.
- 21 A summary of organisations and key messages from responses received can be found below:
- **Transport**
    - **Transport for London** - responsible for cross-boundary bus services and manage the Transport for London Road Network (TLRN). While there are no specific infrastructure improvements, TfL support future devolution of rail services, while looking for financial contributions for bus and rail services from developments located close to the Greater London boundary.
    - **Highways England** - responsible of managing and operating the Strategic Road Network (i.e. the Trunk Road and Motorway Network in England). It was noted in the response that improvements to M23 Junctions 3-5, M20 Junctions 1-3 and the A21 (from M25 to A225 junction) would need to be considered if development were to go ahead.
    - **Network Rail** - the statutory organisation that maintains and upgrades the physical railway infrastructure. Network Rail recognise the scale of development proposed in the Draft Local Plan and the impact that it might have on current railway infrastructure (i.e. requirements for new infrastructure, station improvements and increasing capacity through better rolling stock). Network Rail also noted that the Department for Transport will be announcing the winner of the new South Eastern rail franchise in late 2018. Further rail capacity improvements are also likely to come through the new franchisee.

- **Flooding and water quality**
  - **Environment Agency** - statutory body that has responsibility over managing the environment and flooding from main rivers, reservoirs and estuaries. A number of projects have been identified over the new Plan period including increasing floodplain storage, remedial works to flood relief channels and scoping for the construction of floodwalls in key locations to protect residents and businesses.
  
- **Education**
  - **KCC Education** - the local education authority for Sevenoaks District. KCC Education recognises the significant growth that is planned across the District, especially with regards to the larger potential development sites. A number of new schools (both primary and secondary education) would be required, as well as a number of expansions to existing schools, should the proposed developments be allocated in the Draft Local Plan.
  - **KCC Community Learning & Skills Services** - while there are no specific projects identified to meet the potential demand from proposed development in the Draft Local Plan, it would expect funding to come from S106 and CIL receipts to meet the demands.
  
- **Health and social care**
  - **West Kent Clinical Commissioning Group** - the body which has delegated co-commissioning responsibilities with general practices and takes a strategic role in planning for medical services across the south of the District. WKCCG recognise the pressures that increased development will bring to their 7 GP practices in the District. Further work is being carried out to assess the impacts of the proposed development sites in the Draft Local Plan.
  - **Dartford, Gravesham and Swanley Clinical Commissioning Group** - the body which has delegated co-commissioning responsibilities for general practices and takes a strategic role in planning for medical services across the north of the District. DGS CCG is looking to expand medical/health services to address the pressure that increased development will create for their 7 GP practices in the North District. Particularly they are wanting to create of a “health and wellbeing centre” in Swanley and further expand existing GP facilities where required. Further details to be provided once available.
  - **Bromley Clinical Commissioning Group** - while the Bromley CCG area does not fall within the boundaries of Sevenoaks District, the organisation recognises that a number of potential development sites proposed in the Draft Local Plan would impact a number of Bromley GP practices. Further information might become available as the Local Plan advances.

- **KCC Social Care Services** - while there are no specific projects identified to meet the potential demand from proposed development in the Draft Local Plan, it would expect funding to come from S106 and CIL receipts to meet the demands.
- **Police and emergency services**
  - No comments have been received to date
- **Community infrastructure**
  - **KCC Libraries** - while there are no specific projects identified to meet the potential demand from proposed development in the Draft Local Plan, it would expect funding to come from S106 and CIL receipts to meet the demands.
  - **KCC Youth Services** - while there are no specific projects identified to meet the potential demand from proposed development in the Draft Local Plan, it would expect funding to come from S106 and CIL receipts to meet the demands.
- **Communications (including broadband)**
  - No comments have been received to date
- **Blue green infrastructure**
  - No comments have been received to date
- **Other (including utilities)**
  - **National Grid** - operates the high voltage electricity transmission system in England and Wales, as well as the gas transmission system. No infrastructure improvements were indicated.
  - **UK Power Networks** - a distribution network operator for electricity covering South East England, the East of England and London. The organisation states that there are no improvements
  - **Historic England** - statutory body for the historic environment in England. It was noted that no infrastructure requirements are necessary but support the Infrastructure Delivery Plan. Where infrastructure improvements are necessary in historic environments, appropriate assessments are required before works are carried out.
  - **Southern Water** - statutory wastewater undertaker for the south of the District. Indicated that some additional investment into the wastewater network in Edenbridge would be required, should the “exceptional circumstances” sites proposed in Edenbridge area go forward in the Local Plan.

- **South East Water** - submitted comments through the Draft Local Plan consultation. Published their Draft Water Resources Management Plan in May 2018 which looks at water resources up to 2080. It is noted that little infrastructure will be required as projected housing growth in the District falls broadly within their projected growth forecasts.
- 22 At the time of writing this report, information has not been received by the following organisations:
- Bus operators and other public transport bodies
  - Thames Water and other utility providers
- 23 Where information has been provided, the Infrastructure Delivery Plan will provide full project details and project costings.

### **Next Steps**

- 24 The Infrastructure Delivery Plan requires engagement of infrastructure and services providers to fully understand potential deficiencies in infrastructure across the District and how the delivery of necessary infrastructure can be realised.
- 25 Furthermore, following the close of the Draft Local Plan consultation, further work is required to assess sites where “exceptional circumstances” are being proposed. Further assessment and engagement with infrastructure and service providers will be required if no information has been provided during the Draft Local Plan consultation stage. It is important that we receive any outstanding information before any recommendations are made on which sites will advance to the next stage of the Local Plan.
- 26 It should be noted that the Infrastructure Delivery Plan will be treated as a “live” document, being periodically updated where new information is made available. This also includes the post-adoption of the Local Plan (anticipated Autumn 2019). Therefore, it is recommended that any future updates to the Infrastructure Delivery Plan be delegated to the Chief Planning Officer, in consultation with the Portfolio Holder for Planning.
- 27 It is anticipated that the Infrastructure Delivery Plan will be finalised in line with the publication of the pre-submission Local Plan (Regulation 19) consultation at the end of the year.

### **Other Options Considered and/or Rejected**

Members may consider the option not to provide an updated evidence base for infrastructure. However, this option would leave the Local Plan being found unsound at public examination by the Planning Inspector and open to challenge.

## **Key Implications**

### Financial

There are no financial implications regarding this report.

### Legal Implications and Risk Assessment Statement

There are no legal implications regarding this report.

### Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

## **Conclusions**

The Sevenoaks District Local Plan 2015-2035 will replace the adopted Core Strategy (February 2011) and Allocations and Development Management Plan (February 2015). A sound evidence base, based on local needs, supports the preparing of the Local Plan. The Infrastructure Delivery Plan is an evidence base that shows infrastructure deficiencies across the District, and the measures that can be taken to provide new or improved infrastructure. Further work will need to be carried out on the Infrastructure Delivery Plan in relation to sites that are demonstrating “exceptional circumstances” which remain to be tested.

## **Appendices**

Appendix A - Draft Infrastructure Delivery Plan wording

## **Background Papers**

[Infrastructure Delivery Plan 2015 - PAC October 2015 \(Minute 20\)](#)

[SDC Community Infrastructure Levy \(CIL\) Charging Schedule \(February 2014\)](#)

[SDC Regulation 123 List \(November 2014\)](#)

**Richard Morris**

**Chief Planning Officer**