

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Introduction

1. This note flags up some initial questions and requirements for further information that would benefit from early clarification. In answering these questions could the Council please consider whether it might be necessary to advance any potential Main Modifications to the Plan?

The attached Schedule of Amendments: Addendum 1 sets out additional main modifications to the Plan resulting from the Council's answers to these Initial Questions.

Potential Changes and Modifications

2. I note the Schedule of Amendments [SUP010a] which the Council has submitted as one of its supporting documents. Could the Council please confirm whether or not it wishes me to consider proposing any Main Modifications in order to make the Plan sound?

The Council confirms that it wishes the Inspector to propose main modifications to make the Plan sound. The Schedule of Amendments [SUP010a] and attached Schedule of Amendments: Addendum 1 set out the proposed Main Modifications, including those resulting from these Initial Questions.

Format of the Local Plan

3. Is it appropriate that Appendices 2-6 are only available electronically despite forming part of the Local Plan?

Appendices 2-6 are maps showing the Local Plan allocations and designations, which are also shown on the policies map. These documents are available electronically and in hard copy format.

A printed copy of the Proposed Submission Version of the Local Plan and all appendices continue to be available to view at the Council Offices and in all libraries across the District.

A printed copy of the Local Plan and appendices can also be purchased from the Council. The Council is happy to provide further clarification on the availability of these documents if this would assist.

4. Appendices 2, 3 and 4 to the Local Plan include 'design guidance' in respect of the housing, mixed use, employment and gypsy and traveller allocations. Would this be effective or should the requirements for each allocated site be included in a policy?

The allocation maps and design guidance at Appendices 2, 3 and 4 of the Local Plan form part of Policies ST2, EMP1 and H4 respectively. It is suggested that this is clarified within these policies, as set out in the text below and that references to 'development/design guidance' are replaced with 'development criteria'.

- ST2 – Please see the Housing and Mixed Use Allocations Maps and Development Criteria at Appendix 2, which form part of this policy.

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

- EMP1 – Please see the Employment Allocations Maps and Development Criteria at Appendix 3, which form part of this policy.
- H4 - Please see the Gypsy and Traveller Allocations Maps and Development Criteria at Appendix 4, which form part of this policy.

These proposed changes have been added to the Schedule of Amendments: Addendum 1.

Strategic and Non-Strategic Policies

5. Does the Plan clearly identify which policies are strategic in accordance with paragraph 21 of the revised National Planning Policy Framework (NPPF)?

The two policies within Chapter 1 are labelled as strategic (ST) policies, namely ST1 (A balanced strategy for growth in a constrained District) and ST2 (Housing and mixed use site allocations).

NPPF paragraphs 20-21 outline the extent of strategic policies concerning housing (and affordable housing), employment, retail and leisure, infrastructure, community facilities, natural/built/historic environment and climate change.

These elements are also covered in policies H1 (Housing Mix), H2 (Affordable Housing), EMP1 (Economy), EMP2 (Town/Local Centres), T1 (Transport and Infrastructure), LA1 (Landscape and AONB), EN1 (Design), HEN1 (Historic Environment) and CC1 (Climate Change, Flooding and Water Management).

It is suggested that the strategic elements of the above policies (as opposed to the more detailed development management aspects) are set out in the policy text as **bold type**, to distinguish them from the non-strategic elements. The Council would be willing to consider any alternative approaches to distinguish the strategic elements of these policies.

Supporting Evidence

6. The Local Plan refers to 'Supporting Evidence' at the start of each chapter. Please could the Council ensure that all documents referred to are placed in the Examination Library?

The Council has actioned this request. An Examination Documents Index will be available on the Council's Local Plan Examination webpages.

Green Belt

7. Where the Local Plan proposes to alter Green Belt boundaries, in accordance with paragraph 136 of the NPPF, could the Council please set out the exceptional circumstances for doing this?

For Housing and Mixed Use Allocations:

The Council's approach to exceptional circumstances is set out in the Development Strategy Topic Paper (SUP008a). Section 3.3 of the Topic Paper sets out how the Council has first explored all potential non-Green Belt sources of housing supply and

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

section 3.4 outlines engagement with neighbouring authorities, under the Duty to Co-operate.

Although there is no national definition of 'exceptional circumstances', our interpretation has developed through the Plan-making process. We consider that the test should be considered both at the strategic district-wide and at the site-specific level. Strategically, the District is unable to meet its housing need on the 7% of land in the District that is not classified as Green Belt and to date, no other authority has been able to assist with this unmet need. Therefore, the scale of the need, including the need for affordable homes, is such that we would suggest that there are 'exceptional circumstances' for considering Green Belt amendments. The following considerations have been identified as being relevant in the determination of exceptional circumstances at the site-specific level:

- The extent to which land meets the purposes of inclusion in the Green Belt, as set out in the Green Belt Assessment (2017); and
- Whether the release of land will result in the delivery of infrastructure to meet an existing evidenced-based need; and
- The overall sustainability of the proposals, as assessed by the Sustainability Appraisal of the Local Plan, including whether it is previously developed or brownfield land.

In considering the contribution of Green Belt land, we have first looked at previously developed or brownfield land, as directed by the NPPF, provided it is situated in a sustainable location. We have also taken a broader, more inclusive stance to maximise the potential of land that has been subject to some form of development. These sites (see Appendix 1 of this document) would provide 1,038 brownfield units on 34 sites across the District, plus a 300 unit extension to the consented scheme at Fort Halstead. Further information is available in the detailed site appraisals, which set out where the sites are situated in the settlement hierarchy, the proximity to public transport and services, existing uses, site constraints and deliverability.

It is considered, for these developed sites, that the district-wide scale of housing need, including the need for affordable homes, combined with the previously developed nature of the sites, which are situated in sustainable locations, is sufficient to constitute the 'exceptional circumstances' required to allow Green Belt amendment.

In terms of the selection of strategic Green Belt sites and the justification of their 'exceptional circumstances', the sites were assessed against the conclusions of the Council's Green Belt Assessment, Sustainability Appraisal and other material considerations. In addition, the infrastructure offer was discussed with infrastructure providers to determine if the proposals met an existing need and consideration was given to the results of the Local Plan consultation process.

The submission version of the Local Plan includes two strategic Green Belt sites:

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Site Ref	Site Name	No. of units
ST2-13	Sevenoaks Quarry, Bat and Ball Road, Sevenoaks	600
ST2 – 33&34	Land South of Four Elms Road and Land East of Bray Road, Edenbridge	340

Further information on these sites is contained in the site appraisals. Both the proposed strategic sites meet the following considerations:

Consideration	Sevenoaks Quarry, Bat and Ball Road, Sevenoaks (ST2-13)	Land South of Four Elms Road and East of Bray Road, Edenbridge (ST2-33&34)
Next to a town – i.e. a top tier settlements	Adjacent to Sevenoaks urban confines	Adjacent to Edenbridge urban confines
Fully/partially on weak performing green belt (as assessed through Green Belt Assessment 2017)	Weak performing Green Belt RA18	Partially weak performing Green Belt RA3
Not in an Area of Outstanding Natural Beauty (AONB)	Outside AONB	Outside AONB
Provide infrastructure that is sought by the local community to meet an existing need	Recreation/leisure lake and open space Transport and connectivity improvements Social infrastructure	Integrated health facility Land for educational use Transport and connectivity improvements Social infrastructure
Provide compensatory environmental improvement	Provision of extensive green-blue infrastructure. Developed Land (quarry)	Public open space, ecology enhancement and allotments
Considered deliverable or developable	Yes – Site promoted by Tarmac with supporting studies and phasing plan	Yes – Statement of collaboration from joint landowners

For Employment Allocations:

The Local Plan Strategy for meeting the economic land needs of the District is set out in the Employment and Retail Topic Paper (SUP008d).

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

In summary, the Policy EMP1 retains the existing employment land within the District. However, additional land is required to meet future needs. The Council has identified that future employment need cannot be fully met in the 7% of the District not within the Green Belt. The Duty to Co-operate process concluded that no neighbouring authorities were able to assist in meeting the employment need. Therefore, it was necessary to consider sites within the Green Belt.

Three sites on the edge of Sevenoaks Urban Area have been allocated within the Local Plan to meet the employment land need. These sites met the employment strategy as follows:

Consideration	EMP1 – 27 Sevenoaks Garden Centre, Main Road, Sundridge	EMP1 – 28 Bartram Farm, Old Otford Road, Sevenoaks	EMP1 – 29 Former Park and Ride, Otford Road, Sevenoaks
Next to a town – i.e. a top tier settlements	Approx. 500m from Sevenoaks urban confines	Adjacent to Sevenoaks urban confines	Adjacent to Sevenoaks urban confines
Existing land use and development	Existing built form	Some existing built form	Hardstanding and existing building
Proximity to the existing transport network	Site lies very close to M25 Junction 5 on the A25 Bus stop adjacent to site with 2 bus services	Site lies on the A225 Close proximity to 2 Railway Stations on separate train lines Bus stop close to the site with 3 bus services	Site lies on the A225 Close proximity to 2 Railway Stations on separate train lines Bus stop close to the site with 3 bus services
Proximity to existing protected employment land	Not adjacent to existing employment allocation but close to other local employment	Adjacent to the Vestry Estate (EMP1 – 1)	Close to the Vestry Estate (EMP1-1)
Considered deliverable or developable	Yes – Site promoted by landowner with a proposed scheme	Yes – Site is actively promoted Likely to come forward 1-10 years	Yes – owned by SDC
Area of Outstanding Natural Beauty (AONB)	Developed site within the AONB	Outside AONB	Outside AONB
Other Factors	Site has some existing commercial use due to	Partially lies within Weakly Performing	Currently used for storage

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector’s Initial Questions
June 2019**

	the diversification of the Garden Centre	Green Belt Parcel (RA20)	Previously used as a temporary car park
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For the above three employment sites, a combination of the following factors:

- the need for employment land;
- the location and sustainable nature of the sites close to services and facilities;
- the existing and previous uses of the sites; and
- the proximity of the sites to the transport network

is sufficient to constitute the ‘exceptional circumstances’ required to allow Green Belt amendment.

For Gypsy and Traveller Allocations:

The Gypsy and Traveller (G&T) strategy is set out in the Gypsy and Traveller Topic Paper (SUP008e).

In summary, Policy H4 identifies land allocations for new pitches to meet the need for 40 additional pitches. All existing G&T pitches within the District lie within the Green Belt and there are currently 30 unauthorised and 5 temporary pitches. No sites outside of the Green Belt were promoted and there are existing needs directly arising from the existing sites. Therefore it is clear that new pitches cannot be accommodated within the 7% of the district not within the Green Belt. The Duty to Co-operate process also concluded that no neighbouring authorities were able to assist. Therefore, it was necessary to consider sites within the Green Belt.

The allocated pitches are all on or adjacent to 12 existing sites:

- 16 pitches through regularising existing unauthorised pitches on suitable sites;
- 14 new pitches on developed areas within existing site boundaries;
- 10 new pitches on land within or adjacent to existing sites;

The G&T sites allocated within the Plan have factors that are sufficient to constitute the exceptional circumstances needed for a Green Belt amendment. These are:

- the district-wide scale of G&T accommodation need;
- much of the need for new pitches arising directly from existing sites;
- the developed nature of each site; and
- the lack of previous allocations for G&T accommodation resulting in a high number of established unauthorised pitches many of which have had multiple temporary permissions that have now expired.

Housing Need

8. You will be aware that the Government published a revised NPPF in February 2019, as well as publishing revised Planning Practice Guidance (PPG) on

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Housing and Economic Needs Assessment. Reference is made throughout the Local Plan to the NPPF (July 2018) and I note that the **Sevenoaks Strategic Housing Market Assessment (SHMA) (September 2015) [HOU001]** used the **2012-based household projections as the basis for calculating the Council's housing requirement.**

The Regulation 19 Proposed Submission Version Local Plan was published in December 2018. The Schedule of Amendments [SUP010a] includes updates to ensure consistency with the February 2019 version of NPPF.

The Strategic Housing Market Assessment (SHMA) [HOU001] was completed in 2015 at the beginning of the Local Plan preparation process under the 2012 NPPF and associated Planning Practice Guidance (PPG). The study used the 2012-based household projections as the basis for calculating the objectively assessed housing need of 620 dwellings per annum.

The SHMA provides an important local evidence base to determine the extent of the housing market area, the need for different sizes and types of homes for both market and affordable tenures, affordable housing need and the housing needs of older people. Further evidence set out in the Local Housing Needs Study undertaken in 2017 [HOU015] supplements the SHMA.

9. Paragraph 60 of the revised NPPF states that a local housing needs assessment using the standard method in national planning guidance should be used to determine the minimum number of homes needed. The revised PPG states that Step 1 for setting the local housing need figure (using the standard method) is to set the baseline using the 2014-based household projections (paragraph 04).

The Council has followed the method set out in the revised NPPF and PPG to calculate its local housing need and has used the 2014-based household projections.

10. The Local Plan says (paragraph 1.5) that, taking account of the standardised assessment methodology, the identified housing need is 698 dpa or 13,960 homes over the Plan period 2015-2035, based on the latest published household projections. The proposed changes put forward by the Council in the Schedule of Amendments [SUP010a] suggest that the need is 707 homes each year. Has the local housing need been calculated using the 2014-based household projections and, if so, where can I find this updated calculation of housing need - has a Local Housing Need Assessment, conducted using the standard method in national planning guidance, been undertaken by the Council?

The local housing need has been calculated using the standard methodology for calculating housing need and the 2014-based household projections.

The calculation is not set out in the document but is as follows:

Step 1 – setting the baseline

Projected average annual household growth 2019-2029 = 505 (taken from 2014-based Household projections for England and local authority districts, published July 2016)

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Step 2 – an adjustment to take account of affordability

Local affordability ratio = 14.54 (taken from House price to workplace-based earnings ratio, published March 2019)

Adjustment factor = (local affordability ratio – 4) / 4 x 0.25 = 0.659

Minimum annual local housing need figure = (1 + adjustment factor) x projected household growth = 838

Step 3 – capping the level of any increase

Sevenoaks District Council adopted the Core Strategy in 2011 (more than 5 years ago) and has not reviewed its housing requirement figure since then. Therefore the cap is set at 40% above the higher of the most recent annual housing requirement figure (165) or household growth (505).

Capped annual local housing need = 505 + (40% x 505) = 707

The local housing need has been updated from 698 dpa (in the submitted plan) to 707 dpa (in the schedule of amendments) based on the projected household growth for 2019-2029, rather than 2018-2028. The Government's Planning Practice Guidance sets out that, when setting the baseline, the projected average annual household growth over a 10 year period should be calculated and that "this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period". The Schedule of Amendments [SUP010a] sets out that all references to the local housing need being 698 dwellings per annum should be updated to 707 dwellings per annum, in order to reflect the most recent projected household growth (2019-2029).

11. Does the Local Plan set out clearly the Council's objectively assessed housing need and, as this is not proposed to be met in full, the Plan's housing requirement and the level of unmet need?

The local housing need of 707 dwellings per annum, calculated using the standardised methodology set out in the 2019 NPPF and PPG and based on the 2014-based household projections, forms the Local Plan housing need, subject to the Schedule of Amendments [SUP010a].

The annualised housing need is set out at paragraph 1.5 on page 22 of the Proposed Submission Version Local Plan [SDC001]. The subsequent paragraphs 1.6-1.17 then explain the process the Council has undertaken to make every effort to meet the local housing need, but that ultimately, following the duty to cooperate and consideration of a number of greenfield Green Belt sites, a degree of unmet need remains.

The table on page 33 of the Proposed Submission Version Local Plan [SDC001] sets out the housing requirement, subject to the Schedule of Amendments [SUP010a]. In accordance with the NPPF (para 65) the housing requirement "shows the extent to which [the District Council's] identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period".

The Local Plan proposes to deliver a total of 9,410 dwellings over the revised plan period 2019-2035, equivalent to 588 dwellings per annum. Thus leaving an unmet

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

housing need of 1,902 dwellings over the period 2019-2035, equivalent to 119 dwellings per annum.

12. The Plan period referred to in the Local Plan is 2015-2035, however, the Council's 5 year Supply of Deliverable Housing Sites [SDC008] refers to the Plan period being 2019-2035, with a 'requirement' for 11,312 dwellings over this time. This is confirmed by the proposed changes put forward by the Council in the Schedule of Amendments [SUP010a]. Please could the Council clarify why it is proposing to amend the Plan period and if the 11,312 dwellings referred to is the 'need' or 'requirement' for the plan period?

Preparation of the Local Plan began in 2015 and the plan period was originally set to reflect this. However, the revised NPPF introduced the requirement to assess housing needs using the standardised methodology, which applies an affordability adjustment to take account of any past under-delivery.

Specifically, the 'housing and economic needs assessment' section of the PPG sets out that "the affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately" (paragraph:011 Reference ID:2a-011-20190220).

Therefore, the Plan period has been amended to start at the current year (2019-20). During the PINS advisory visit in February 2019, the District Council sought advice from the visiting Inspector on whether the plan period could be re-based given the above guidance in the PPG. The visiting inspector confirmed that this was an acceptable approach and could be considered as a minor modification. On this basis, the Council has re-based the plan period from 2015-2035 to 2019-2035.

The local housing need using the standardised methodology and 2014-based household projections is 707 dwellings per annum. Multiplied by 16 (reflecting the length of the plan period) the overall housing need is 11,312 dwellings. This figure represents the overall housing need.

The housing requirement is 9,410 dwellings – the amount of housing the Local Plan will deliver over the plan period, in accordance with para 65 of the NPPF.

The 5 Year Supply of Deliverable Housing Sites [SDC008] refers to the Plan period being 2019-2035, with a 'requirement' for 11,312 dwellings over this time. The Council acknowledges that this figure is, in fact, the housing need and will amend document SDC008 accordingly. As the Core Strategy (2011) is more than 5 years old, the 5 Year Supply of Deliverable Housing Sites [SDC008] at this point in time measures housing supply against the local housing need of 11,312 dwellings, in accordance with the 2019 NPPF (paragraph 73). This is set out at paragraph 1.4 of the 5 Year Supply of Deliverable Housing Sites [SDC008]. Once the Local Plan is adopted, the 5 year housing supply will be measured against the housing requirement set out in the Plan.

Housing Supply

13. The Council's 5 year Supply of Deliverable Housing Sites [SDC008] says (in paragraph 2.1) that the Local Plan seeks to deliver approximately 10,500 units over the Plan period 2019-35. However, the Local Plan says that this number will be delivered over the period 2015-2035. Please could the Council clarify how

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

many dwellings the Plan will deliver over the period 2019-2035 – is it the 9,410 dwellings included in the Schedule of Amendments [SUP010a]?

The Local Plan will deliver 9,410 dwellings over the plan period 2019-2035. The figure of 10,500 dwellings referred to in paragraph 2.1 of the 5 Year Supply of Deliverable Housing Sites [SDC008] should be replaced with 9,410 dwellings.

14. Please could the Council prepare a position statement on each of the allocated sites? This should include:

- a) Whether or not the site benefits from OPP/PP/RM;**
- b) Whether the site has been allocated in a previous Plan;**
- c) Whether the site would be subject to a S106 Agreement and what the obligations within it would be likely to be;**
- d) The level of affordable housing to be provided;**
- e) Any constraints to development;**
- f) The likely start date, build out rate and completion date (and what these figures are based on); and,**
- g) Whether the site is in the control of a landowner, developer or housebuilder.**

Answer to follow as agreed.

The 5 Year Supply of Housing Land

15. With regards to paragraph 73c) of the revised NPPF, does the evidence base on the 5 year housing land requirement and supply reflect the Government's HDT results and the revised definition of 'deliverable' included in the glossary of the revised NPPF?

The Government's Housing Delivery Test results, set out in the 'Housing Delivery Test: 2018 Measurement' and published in February 2019, confirms that the Council has delivered 94% of the number of homes required over the past three years 2015/16 to 2017/18. Therefore, in accordance with paragraph 73 of the 2019 NPPF, a 5% buffer has been applied to the 5 year housing land supply requirement. As delivery is below 95%, the Council is preparing an action plan, in accordance with paragraph 75 of the 2019 NPPF.

The 5 Year Supply of Deliverable Housing Sites [SDC008] shows that the Council can demonstrate a supply of 3,720 dwellings against the 5 year requirement (including a 5% buffer) of 3,711 dwellings. Consideration was given to the definition in the 2019 NPPF glossary when determining which sites are 'deliverable' and therefore should be included in the 5 year supply. Appendix 1 of the 5 Year Supply of Deliverable Housing Sites [SDC008] sets out the individual sites that make up the 5 year supply, along with site phasing and evidence of expected delivery. An explanation of the evidence is set out below.

Current planning permissions – small sites (1-9 dwellings) with extant planning permission where there is no evidence that homes will not be delivered within five years and large sites (10+ dwellings) with outline and/or full planning permission where

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

the applicant/site promoter has confirmed that housing completions will begin on site within five years.

Applications being prepared – pre-application advice obtained and/or architect/other specialists appointed to prepare a planning application. In these cases the applicant/site promoter has confirmed that housing completions will begin on site within five years.

The phasing rules applied to the sites in the 5 year supply and housing trajectory are set out in the Delivery Topic Paper [SUP008c] at paragraph 5.4.

Unmet Need

16. Paragraph 11.b) of the NPPF says that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless i. or ii. applies. The submitted Local Plan identifies the requirement as 13,960 dwellings over the period 2015-2035 (which the Council proposes to change to 11,312 over the period 2019-2035 as set out in the Schedule of Amendments [SUP010a]). Given that the supply of 10,568 dwellings in the submitted Local Plan (which the Council proposes to change to 9,410 dwellings in SUP010a) would not meet the objectively assessed need for the District, does the Council consider that Paragraph 11.b) i. or ii applies in this case? If so, what is the evidence of factors which prevent the full housing need from being met within the plan area and should the housing requirement (as opposed to the housing need) in the Local Plan reflect this?

Paragraph 11. b) (i) of the NPPF primarily applies. The evidence of factors that prevent the Council's full housing need from being delivered relates to the application of policies referred to in footnote 6 of this paragraph. Details of how these policies apply in Sevenoaks District is contained in the following evidence base documents:

- ENV001 and ENV002: Sevenoaks District Green Belt Assessment (January 2017)
- ENV003: Biodiversity Analysis of Sevenoaks District (February 2018)
- ENV007 Strategic Flood Risk Assessment (February 2017)
- HE001 Sevenoaks District Historic Environment Review (December 2017)
- HOU002 Strategic Housing & Economic Land Availability Assessment (SHLEAA) (Dec 2018)
- OS002 Sevenoaks Open Space Study (June 2018)
- OS003 Sevenoaks Sports Facility Strategy (July 2017)
- OS004 Playing Pitch Strategy - Main Report (April 2018)

An explanation of the factors that have influenced the housing requirement is contained in paragraphs 1.1 – 1.17 of the Proposed Submission Version of the Local Plan. The Council is happy to include additional wording to explain the factors that have influenced the requirement, if this is helpful.

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Housing Trajectory

17. Should the Local Plan include a Housing Trajectory in order to accord with the requirement in paragraph 73 of the revised NPPF which says that 'strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period'?

The Local Plan Housing Trajectory [SDC009] was prepared and submitted alongside, rather than as part of, the Proposed Submission Version Local Plan [SDC001]. The Council agrees that the housing trajectory should be included in the Local Plan itself. An additional modification is therefore proposed to include the housing trajectory at Appendix 7 of the document and set out in the attached Schedule of Amendments: Addendum 1.

18. It would also be useful to include the anticipated rate of development for the allocated sites within the Housing Trajectory.

The Local Plan Housing Trajectory [SDC009] sets out the total number of dwellings to be delivered each year during the plan period 2019-2035.

Appendix 1 and 2 of the 5 Year Supply of Deliverable Housing Sites [SDC008] sets out an itemised list of the deliverable and developable sites that make up the 9,410 dwellings to be delivered over the plan period 2019-2035, along with site phasing and evidence of expected delivery.

Employment Need

19. Has the Council considered what impact, if any, the revised PPG would have on employment need in the District?

The methodology used by the Economic Needs Study to identify the employment need of the District up to 2035 remains consistent with the PPG.

The 11.6 ha employment land need identified by the Economic Needs Study is based on a Labour Demand scenario. This scenario is based on sectoral and employment forecasts and projections derived from Oxford Economics' 2014 East of England Forecasting Model. The employment land need is not directly related to housing need or delivery but is derived from national trends and models. Further detail on this matter is contained in the Council's Economic Needs Study.

There is no impact from the revised PPG on the employment need in the District and it remains up to date and reasonable.

Employment Land Supply

20. Please could the Council prepare an employment land trajectory which indicates when each site is anticipated to come forward for development?

Policy EMP1 sets out the sites designated for employment use across the district.

Sites EMP1 – 1 to 26 are **existing employment sites** outside of the Green Belt to be retained, intensified and regenerated for continued employment use.

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Sites EMP1 – 30 & 31 are **existing major developed employment sites in the Green Belt** to be retained in employment use but do not include new employment land. These sites remain within the Green Belt.

Sites EMP1 – 27 to 29 are **new employment sites** to be allocated by the Local Plan for employment use. These sites have been allocated in the Local Plan and are to be removed from the Green Belt.

Further detail on this point is contained in the Council's Employment and Retail Topic Paper (SUP008d).

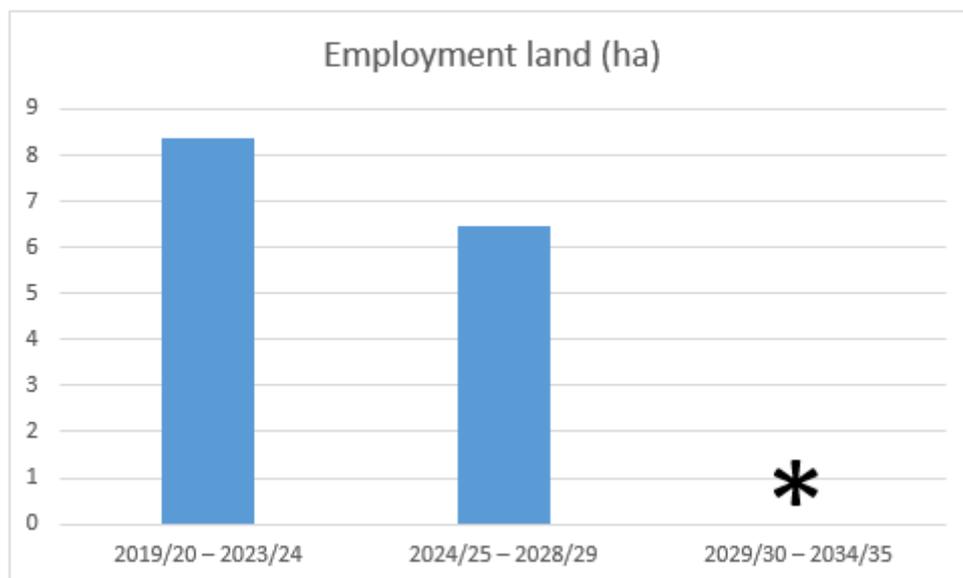
Local Plan Employment Land Trajectory 2019-2035

	2019/20 – 2023/24	2024/25 – 2028/29	2029/30 – 2034/35	TOTAL
	Yrs 1-5	Yrs 6-10	Yrs 11-16	
EMP1 – 27 Sevenoaks Garden Centre, Main Road, Sundridge	1.68ha	0	0	1.68ha
EMP1 – 28 Bartram Farm, Old Otford Road, Sevenoaks	5.96ha	5.96ha	0	11.92ha
EMP1 – 29 Former Park and Ride, Otford Road, Sevenoaks	0.75ha	0	0	0.75ha
New employment land from mixed Use allocations	0	0.49ha	*	0.49ha
TOTAL	8.39ha	6.45ha	*	14.84ha**
Employment Need				11.6ha

* New employment land will be delivered at ST2 – 28 Pedham Place towards the end of the plan period.

** A proportion of this land will be used for access roads, landscape and biodiversity buffers, sustainability drainage and retention of some existing uses.

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**



Minerals Safeguarding Areas

21. Has the Council considered the impact of the development of the Strategic Site at Sevenoaks Quarry on the Sandstone Mineral Safeguarding Area identified in the Kent Minerals and Waste Local Plan?

Yes, the Council has been working with Kent County Council (KCC) as mineral planning authority and Tarmac (as the site owner) to ensure that any development on the site does not sterilise the minerals resource. Tarmac has produced an Interim Statement regarding Mineral Safeguarding (April 2019) (attached) which was presented to the South East England Aggregate Working Party (SEEAWP) in April. A Statement of Common Ground is in preparation with KCC which sets out the agreed position on this site and the additional wording to be added to the Development Criteria of the site ST2-13.

22. Has the Council considered the impact of the other allocations on Minerals Safeguarding Areas in the District?

Yes, as previously set out in the Schedule of Amendments, the Council has suggested, to respond to representation LPS1930 from KCC, that additional wording be added to the Development Criteria of the ten sites in minerals safeguarding areas, as set out below:

Due to the minerals safeguarding area, a Minerals Assessment will be required as part of any subsequent planning application.

It should be noted that just over 25% of the District is subject to mineral safeguarding areas.

23. Would the development of any of the allocated sites sterilise any mineral deposits and prevent their extraction?

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

In relation to the Strategic Site at Sevenoaks Quarry (ST2-13), Tarmac's Interim Statement regarding Mineral Safeguarding (April 2019) states that:

'there is no intention to curtail the currently permitted scheme or sterilise the economic reserves. Tarmac is first and foremost a building materials company and intends to continue with operations under permission SE/08/675. Residential and supporting mixed use development (notably leisure and recreation uses) are proposed as alternative after-uses subject to allocation in the Sevenoaks Local Plan'.

This is also detailed in the draft Statement of Common Ground with KCC.

In relation to the ten sites in minerals safeguarding areas, as requested by KCC, additional wording will be added to the Development Criteria to require a Minerals Assessment to be submitted. It should be noted that all but one of these sites are either developed sites or allocated sites within our existing Allocations and Development Management Plan (ADMP), which are being carried forward into the new Local Plan.

24. Would the extraction of minerals prevent any of the allocated sites coming forward as planned?

The development at Sevenoaks Quarry (ST2-13) is proposed in two phases – an early phase development on land currently not subject to sand extraction and a second phase of development, following the completion of sand extraction. Tarmac is currently undertaking further technical and design work to demonstrate that an adequate early phase development residential environment and amenity can be achieved, while quarrying operations continue. This includes noise attenuation/air quality review/structural planting/separate access/relocation of operational plant.

The Statement of Common Ground with KCC and the Schedule of Amendments: Addendum 1 set out the additional wording to be added to the Development Criteria on this site ST2-13, including a requirement that sufficient information is submitted with any planning application to demonstrate that in the early phase of development, acceptable residential amenity is achieved and there is no detriment to the continued operation of the quarry. Any application should also be accompanied by a Minerals Assessment.

Transport, Design, Historic Environment, Air Quality and Flooding Policies

25. A number of policies in the Local Plan (Policies T1, EN1, HEN1, HEN2, HE1 and CC1) appear to defer important policy matters relating to design, car parking, heritage matters, air quality, SuDS and flood risk, to other documents such as the Kent Design Guide, Conservation Area Appraisals and Management Plans, Neighbourhood Plans, KCC PRoW Good Design Guide and relevant AONB Management Plans, and associated design guidance, the Sevenoaks District Historic Environment Review, and relevant guidance, the Air Quality Action Plan, the KCC guidance for SuDS and the Lead Local Flood Authority drainage guidance and policy statements, amongst other documents.

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

26. Regard should be had to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which prescribe, in effect, that the following is a Local Plan, rather than any form of supplementary planning document:

'(a) any document prepared by a local planning authority ... which contains statements regarding one or more of the following –

(i) the development and use of land which the local planning authority wish to encourage during any specified period;

(ii) the allocation of sites for a particular type of development or use;

(iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and,

(iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission;

(b) where a document mentioned in sub-paragraph (a) contains policies applying to sites or areas by reference to an Ordnance Survey map, any map which accompanies that document ...'

The Council confirms that the submitted document meets the definition of a Local Plan as set out in these regulations.

27. Where the documents referred to in Policies T1, EN1, HEN1, HEN2, HE1 and CC1 contain important policy matters which are relevant to the attainment of the development and use of land they should be before the Examination for testing. How does the Council intend to address this matter?

Policy	Referred Document in the Policy	Approach Suggested
T1 – Transport & Infrastructure	Interim Guidance Note 3 (Kent Design Guide) (Parking Standards)	The Council does not set its own parking standards, and instead uses those set by Kent County Council (KCC). Appropriate references to the standards is included in policy T1 and an electronic link is available on the Council website.
EN1 – Design Principles	SPDs, Kent Design Guide, Conservation Area	Conservation Area Appraisals and

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

	Appraisals & Management Plans, Neighbourhood Plans, KCC PRow Good Design Guide and relevant AONB Management Plans and associated design guidance	<p>Management Plans are existing SDC documents and referred to in policies LA1, EN1 and HEN1. The Council is happy to consider further references in the Local Plan, if the Inspector considers this to be appropriate.</p> <p>It is suggested that electronic links to these documents are made available in the Examination Library on the Council website.</p>
HEN1 – Historic Environment	Kent Design SPD, Kent Historic Environment Record, Local List SPD	<p>The Local List SPD is a material consideration in decision making. The document should be referred to directly in the Local Plan and included as an electronic link in the Examination Library.</p> <p>Other documents are not owned by SDC but are material considerations planning decisions. It is suggested that electronic links to these documents are made available in the Examination Library on the Council website.</p>
HEN2 – Heritage Assets		
HE1 – Health, Wellbeing & Air Quality	SDC Air Quality Action Plan	<p>The AQAP is produced by SDC and is reviewed periodically by the Council's Environmental Health team.</p> <p>It is a background document to the Local Plan and is also used for planning purposes, to inform mitigation measures associated with new development.</p>

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

		It is suggested that an electronic link to the documents is made available in the Examination Library on the Council website.
CC1 – Climate Change, Flooding and Water Management	Water Framework Directive, Thames River Basin Management Plan, River Darent and Eden Management Plans	<p>These are background documents to Local Plan and material considerations in the determination of planning applications.</p> <p>It is suggested that electronic links are made available in the Examination Library on the Council website.</p>

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

Appendix 1 – Green Belt sites on Developed Land

Site Ref	Site Name	No. of units
ST2-15	Chaucers of Sevenoaks, London Road, Dunton Green	11
ST2-22	Former Birchwood Primary School, Russett Way, Swanley	39
ST2-23	Upper Hockenden Farm, Hockenden Lane, Swanley	25
ST2-24	Harringtons Nursery, Highlands Hill, Swanley	71
ST2-25	Swanley Village Nursery, Swanley Village Road, Swanley Village	6
ST2-26	Land rear of Cedar Lodge, Wood Street, Swanley Village	6
ST2-27	Land south of Wood Street, Swanley Village,	10
ST2-31	Kent & Surrey Driving Range, Crouch House Road, Edenbridge	7
ST2-40	Oast House Nursery, Ash Road, Ash	20
ST2-42	Land south of Orchard House, Ash Road, Hartley	10
ST2-43	Chelsfield Depot, Shacklands Road, Badgers Mount	100
ST2-44	Land west of the roundabout, London Road, Badgers Mount	27
ST2-45	Calcutta Club and Polhill Business Centre, London Road, Badgers Mount	66
ST2-46	Highways Depot, Tonbridge Road, Chiddingstone Causeway	8

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

ST2-47	Land rear of Brickyard Cottages, Tonbridge Road, Chiddingstone Causeway	18
ST2-48	Middle Farm Nursery, Cray Road, Crockenhill	30
ST2-49	Wested Farm, Eynsford Road, Crockenhill	10
ST2-50	Gorse Hill Nursery, Gorse Hill, Farningham	55
ST2-51	Maplescombe Farm, Maplescombe Lane, Farningham	35
ST2-52	Fawkham Business Park, Fawkham Road, Fawkham	31
ST2-53	Grange Park Farm, Manor Lane, Fawkham	32
ST2-54	Highfield Farm and Knocka Villa, Crow Drive, Halstead	20
ST2-55	Deer Leap Stud Farm, Knockholt Road, Halstead	13
ST2-56	Oak Tree Farm, London Road, Halstead	37
ST2-57	Fort Halstead, Crow Drive, Halstead	300 (plus 450 existing planning permission)
ST2-58	College Road Nurseries, College Road, Hextable	9
ST2-59	Egerton Nursery, Egerton Avenue, Hextable	30
ST2-60	Oasis Academy, Egerton Avenue, Hextable	190
ST2-61	Rowhill Farm, Top Dartford Road, Hextable	16
ST2-63	Gills Farm, Gills Road, South Darenth	16
ST2-64	Land at Oakview Stud Farm, Lombard Street, Horton Kirby	42
ST2-65	The Cottage, Holmesdale Road, South Darenth,	9

**Sevenoaks District Council Local Plan Proposed Submission Version
Responses to Inspector's Initial Questions
June 2019**

ST2-66	Land south of West End, Kemsing	20
ST2-68	Meadow Cottage, Goathurst Common, Ide Hill	14
ST2-72	Terrys Lodge Farm, Terrys Lodge Road, Wrotham	5