Gladman Hearing Statement
Sevenoaks District Local Plan Examination

Matter 2: Soundness of the Local Plan

Issue 5: Green Belt

Representation ID: 5337

September 2019
MATTER 2: SOUNDNESS OF THE LOCAL PLAN

Issue 5: Is the approach to the Green Belt justified, effective and consistent with national policy? [Policies ST1 and GB1]

Q30. Has the assessment of the Green Belt been undertaken in a robust manner?

1. Gladman provided a comprehensive assessment of ENV001 Sevenoaks District Green Belt Assessment (July 2017) as Appendix 2 to our Regulation 19 consultation response. The review undertaken by Wardell Armstrong concluded that the findings of the 2017 assessment were generally robust, however that it was undertaken at a strategic level and as such, did not consider land in a fine enough grain of detail in order to fully support the potential release of land as part of the Local Plan preparation process. The following key issues were identified by Wardell Armstrong:

   • The assessment criteria for purpose 2 (to prevent neighbouring towns merging into one another) looked at the distance between settlements, despite the PAS guidance stating that maintaining the separation of small settlements is not strictly the meaning of this purpose; that a ‘scale rule’ approach should avoided; and the “identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account”;
   
   • The assessment criteria for purpose 3 (to assist in safeguarding the countryside from encroachment) considers the percentage of built form within a parcel, which restricts the ability to consider land uses such as golf courses, which may contain limited built development but still comprises a man-made structure which may not necessarily be rural in character;
   
   • Purpose 5 (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered as it is assumed all Green Belt land meets this purpose. However, the Vision Document for Swanley and Hextable states that Green Belt is a key barrier to growth in Swanley, and growth is required in order to support the regeneration of the town centre. Therefore Purpose 5 is of relevance to Green Belt land on the edge of Swanley; and
   
   • The overall scoring of parcels is dependent on whichever purpose the parcel scores most strongly against. This is considered to be flawed, as a parcel’s contribution to the Green Belt is not dependent on any single purpose.

2. In order to illustrate this point Section 5 of Appendix 2 to our Regulation 19 representation considers parcel 77 in greater detail than the Green Belt review. Parcel 77 includes Pedham Place which is identified as a broad location for growth through the Local Plan and is being promoted by Gladman. Parcel 77 covers a large area extending from Swanley to Otford. Due to the size of the parcel, it is considered that the potential for the Site to be released from the Green Belt was not fully or robustly examined within the 2017 Assessment.

3. As such, Wardell Armstrong undertook an assessment of Pedham Place, as Parcel 77a, applying the methodology set out within the 2017 Assessment as far as possible. Differences in methodology, such as the consideration of the fifth NPPF purpose, are detailed where relevant within the Wardell Armstrong report. It is concluded that Parcel 77a performs weakly against Green Belt purposes overall and should be considered for release within the emerging Local Plan.
The full assessment of Parcel 77a is included in Section 5.4 of the Wardell Armstrong report included as Appendix 2 to the Regulation 19 consultation response.

**Q31. Should a full Green Belt Review be undertaken?**

4. ENV001 makes recommendations for Sevenoaks District Council to take forward within their Local Plan process, but there does not appear to have been any further progress on detailed analysis of land which could potentially be released from the Green Belt. Gladman therefore consider that in order to fully assess whether certain assessments of Green Belt parcels are robust there should be a revisiting of the Green Belt review in order to assess if when some of the larger parcels are considered in finer detail the assessment would arrive at different conclusions with regard the contribution particular parcels make to the Green Belt.

5. Gladman therefore consider that whilst the Green Belt review provides a reasonable basis for taking decisions with regard to allocations, there is considerable further information available, in the form of the Wardell Armstrong assessment referenced above, which considers parcels at a more appropriate scale and grain and which therefore should be take into consideration when assessing soundness. The plan should remove site ST2-28, Pedham Place from the Green Belt. The precise Green Belt removal should be as indicated in Appendix 3 to our Regulation 19 representation and addressed through the site allocation policy for Pedham Place.

**Q32. Where the Local Plan proposes to alter Green Belt boundaries, in accordance with paragraph 136 of the NPPF, what are the exceptional circumstances for doing this?**

6. The context for the question in relation to Sevenoaks District is of some importance in addressing this question. Given that 93% of the district is within the Green Belt and the remainder largely existing urban and built areas, it is clear that in order for any meaningful level of housing need to be delivered the removal of land from the Green Belt will be necessary.

7. The evidence of exceptional circumstances is set out in documents SUP008a Development Strategy Topic Paper and ED3 Sevenoaks District Council’s response to Inspector’s initial questions. These documents outline the need for Green Belt release and confirm the position that brownfield sites within the Green Belt are considered to have passed the exceptional circumstance test by virtue of the extreme need for housing within Sevenoaks and the affordability problem within the district. Gladman endorse the case for exceptional circumstances for Green Belt release set out by the Council in these documents.

8. The exceptional circumstances for the release of Green Belt land for the green field strategic sites takes a more nuanced approach considering a range of factors including the provision of infrastructure, compensatory environmental improvement, relationship to top tier settlements, Green Belt assessment and factors relating to the AONB. Gladman consider that these provide a robust framework for identifying the release of Green Belt land in Sevenoaks and justify that exceptional circumstances exist for the release of non-brownfield Green Belt sites. The assessment of site ST2-28 in ED4 Site Position Statement clearly identifies the site as developable, this is reflected in the Council’s inclusion of the site in the overall housing numbers to be delivered from the plan, starting on the Pedham Place site in 2025/26. Clearly therefore the exceptional circumstances identified in ED3 should apply to site ST2-28.
9. However, document ED3 does not reference site ST2-28 Land at Pedham Place. As discussed in relation to our answers to questions 30 and 31 we consider that this parcel was not thoroughly assessed through document ENV001 and it is concluded that should this assessment be revisited the role the site plays within the Green Belt would be reduced adding weight to the argument that Pedham Place should not be a broad location of growth, but an allocation removed from the Green Belt. Section 7.2 of our Regulation 19 representation sets out in detail the exceptional circumstances that Gladman consider apply uniquely to Pedham Place. This includes:

- Education provision including a new 6FE secondary school, primary school provision, early years education, and special needs education;
- Highways improvements including the junction of the A20 and Button Street (which is a known accident blackspot) and works to the M20/M25 junction including enhanced pedestrian links;
- Sustainable transport improvements including improved bus, cycle and walking links to Swanley town centre and Swanley station,
- Leisure investment including the potential to renew existing provision in Swanley and onsite Hotel Leisure provision available to residents;
- Strategic employment land with capacity to accommodate 1,250 FTE permanent jobs;
- AONB enhancement with new landscaping and landscape management, planting, promoting access to the countryside;
- Heritage benefits by delivering improvements to the condition and accessibility of the on-site scheduled ancient monument;
- Sufficient housing to meet around a significant proportion of the assessed local housing need of the District. Provision of a range of housing types, sizes and tenure inclusive of market housing, affordable housing, specialist homes for older people;
- Promotion within the site of healthy and active living with green space, walking and cycling routes and a range of socio-economic benefits.

10. The current position of the Council is that the site should remain a broad location of growth to be further considered through a review of the Local Plan. Whilst there are a range of delivery reasons which illustrate the need for the release and allocation of this land now as outlined in other hearing statements, it must be outlined that the Council’s approach applied towards Pedham Place is not consistent with paragraph 136 of the NPPF (2019). Paragraph 136 states that ‘Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.’ Gladman consider that through the evidence submitted at the Regulation 19 consultation the Council now has all the evidence necessary to arrive at the conclusion that Pedham Place (ST2-28) should not be a broad location of growth but removed from the Green Belt and allocated now. We therefore conclude that the site should be allocated through this Local Plan examination process by way of Main Modification. As identified within our response to question 48, the Pedham Place site would need to be released now from the Green Belt in order to achieve the first delivery of housing in year 7 of the plan as indicated in the current iteration of the Local Plan.

**Q33. Is the Council’s definition of ‘exceptional circumstances’ justified?**

11. See answer to question 32 above.