

Louise St John Howe
PO Services
PO Box 10965
Sudbury
Suffolk
CO10 3BF

14th November 2019

Dear Louise,

Sevenoaks Local Plan

Following the recent publications from the Planning Inspectorate regards the emerging Local Plan for the District I thought it would be useful if I wrote to you and set out Berkeley's current position on the Local Plan.

As you are aware, Berkeley have been actively participating in each stage of the Local Plan process including appearing at the Examination in Public (EiP). Our representations and subsequent case made at the EiP was that although we believe that there are issues of soundness relating to the overall housing requirement and Green Belt these areas can be addressed through modifications to the Plan. This solution is opposed to withdrawing the Local Plan as a whole as was suggested by the Inspector in her letter to the Council of 31st October 2019.

I have set out below our reasoning for the above;

Duty to Cooperate

In terms of legal compliance of the Plan Berkeley believe that the Council has duly discharged the Duty to Co-Operate. As the Council set out in the published Duty to Co-operate Statement we believe that effective and ongoing joint working between the surrounding Councils was ongoing. Through the multiple meetings that took place we believe that adequate discussion on strategic matters that cross administrative boundaries such as additional infrastructure and unmet housing need had been addressed. Critically, the surrounding local authorities are akin to Sevenoaks in that they also operate within a constrained District, which has made meeting their housing requirement a challenging yet achievable procedure. In light of this we believe that regardless of any additional time that the surrounding authorities may have had in deciding whether or not they could meet Sevenoaks' unmet housing needs it was highly unlikely that a surrounding authority would have been capable of doing so. As such, we believe that in line with the Planning and Compulsory Purchase act 2004 and the NPPF the Local Plan is legally compliant.

Housing Requirement & Green Belt

As I mentioned earlier in this letter Berkeley's main concern with the Plan surrounds the housing requirement and the Councils approach to the Green Belt. We believe that there are issues of soundness surrounding the exceptional circumstances towards releasing land from the Green Belt. If the Inspector was to agree with this view there would be an unjustified housing shortfall in terms of the overall Plan requirement. However, a clear solution to meeting the overall housing requirement could be achieved through main modifications to the Plan. The Council had identified at Regulation 18 stage that there were a total of ten potential Green Belt sites that had been identified through the ARUP Green Belt Study that together along with existing commitments, past completions and brownfield provision would practically meet the full housing needs of Sevenoaks. In addition, there were four separate sites that were deemed potentially suitable that were consulted upon alongside the Regulation 19 Plan that could also contribute to meeting the Districts housing needs.

It is Berkeley's view that the Plan is capable of being found sound and adopted through some modifications to the Plan using the Councils existing evidence base. Therefore the Council would not need to withdraw the Plan as is currently proposed by the Inspector and a clear and obvious way forward is established towards gaining an adopted Local Plan for Sevenoaks in 2020.

I trust the above is helpful and in the meantime I will continue to monitor the examination website for any further updates. However, please do not hesitate to contact me if you require any further information. I look forward to continuing to participate in the Sevenoaks Local Plan process generally and, in particular, continuing to work in partnership with Sevenoaks District Council.

Yours sincerely



Ronan T. Kirrane
SENIOR LAND MANAGER