

Ms Hannah Gooden Planning Policy Team Leader, Sevenoaks District Council Council Offices, Argyle Rd, Sevenoaks TN13 1HG

## BY EMAIL ONLY

## **Growth, Environment & Transport**

Room 1.62 Sessions House County Hall MAIDSTONE Kent ME14 1XQ

Phone: 03000 415981 Ask for: Barbara Cooper

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14 September 2018

Dear Hannah,

## Re: Sevenoaks District Council - "Draft Local Plan" Consultation July 2018

Thank you for inviting Kent County Council (KCC) to comment on the draft Local Plan for Sevenoaks.

The County Council acknowledges the huge challenge in meeting the identified housing need in a highly constrained district and is supportive of the Draft Local Plan approach, which seeks to meet all the housing need within the Sevenoaks boundary.

The County Council supports the Draft Local Plan's preferred option for growth, which looks, first of all, at prioritising growth in existing settlements and redeveloping previously developed land in sustainable locations. KCC appreciates that, even with promoting high density development in such sites, where appropriate, this will only be able to deliver a proportion of the identified housing need for the district.

In looking to provide sufficient sites to meet the housing need, the County Council supports the Draft Local Plan's approach to then look at sites in the Green Belt, provided that this is done in exceptional circumstances, where appropriate and necessary social and community infrastructure is proposed in addition to the housing, and provided that such infrastructure would help address an evidenced infrastructure deficiency in the area. KCC notes that these sites would accommodate a significant proportion of the identified housing need, comprehensively delivering c. 6,800 homes, and that the sites are still being tested by Sevenoaks District Council for suitability, with no guarantee that they will be included in the final draft Local Plan.

The County Council is working closely with the District Council on assessing all the potential sites, and particularly welcomed the opportunity to discuss the Draft Local Plan at a constructive Duty to Cooperate meeting on 1 August 2018. The

inclusion of all the sites put forward by the County Council during the Call for Sites in 2015, is also welcomed.

KCC requests continued engagement as further information for each of the sites emerges, to ensure that each development will fund the infrastructure improvements needed to meet the demand that it creates. There is likely to be particular impact on KCC infrastructure and services as a result of development at Broke Hill Golf Club, Edenbridge, Farningham (Pedham Place Golf Centre), Fort Halstead/Halstead/Badgers Mount (potentially in combination with Broke Hill Golf Course), Hartley, Swanley & Hextable, North Sevenoaks (covering Sevenoaks Quarry, Otford Road and St John's area) and Westerham.

In considering the highways and transportation implications, KCC will continue to work closely with Sevenoaks District Council as the preparation of evidence continues. Only a few sites have, so far, demonstrated that they are able to adequately mitigate their impact and therefore further work has been requested. KCC notes that site promoters have been asked to submit transport assessments/transport statements where their development is of a significant scale and is likely to have a significant impact. As this information is received, the County Council will continue to review and provide comments. Additionally, the County Council has jointly commissioned Sweco to prepare a district-wide transport assessment to consider the impact of the Local Plan development strategy and to identify where mitigating measures will be required. This information is currently being prepared and should be available in November.

KCC recognises that the selection process for proposed sites within this consultation is ongoing - this uncertainty creates a challenge in providing a comprehensive infrastructure requirement breakdown at this stage as the exact need for the range of service and infrastructure requirements will be determined by which of the site options come forward in a given area. As an example, in Edenbridge, determining whether additional primary and secondary education provision can be accommodated within existing capacity or whether new school places will be required will depend upon which of the three large sites and the smaller sites are put forward in the Local Plan.

Accordingly, continued engagement will be vital as you progress the Draft Local Plan and Infrastructure Delivery Plan over the next few months, and the County Council looks forward to helping shape the growth strategy to ensure that the right infrastructure is identified for each site, alongside the mechanisms for its delivery.

KCC provides detailed environmental and technical comments on the Draft Local Plan policies and potential site allocations. For ease of reference, these are set out in comprehensive schedules accompanying this letter.

The County Council recognises the importance of the Local Plan in identifying sites suitable for development within the district, in enabling the delivery of new housing, employment and required infrastructure in response to local needs. The County Council looks forward to continuing the established and collaborative working arrangements in place between the two authorities. The County Council

will continue to welcome this positive engagement as assessment of the development sites progress; and more generally in the overall preparation and progression of the Local Plan.

If you require any further information or clarification on any matter raised in KCC's response, please do not hesitate to contact me.

Yours sincerely,

**Barbara Cooper** 

B. GODOV

Corporate Director – Growth, Environment and Transport

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<u>Appendix 1:</u> Schedule of KCC's Technical Responses to Policies <u>Appendix 2</u>: Appendix 2 KCC Site Specific Commentary for Policy 2