

# Plan 2040 – a new Local Plan for Sevenoaks District

## Regulation 18 Part 2 - Comments Form

Consultation Period: 23<sup>rd</sup> November 2023 – 11<sup>th</sup> January 2024

Please use a separate form for each Policy or Site that you wish to comment on.

1. Please specify the **policy or site** to which your comments relate:

**GT1 - Provision for the Gypsy and Traveller Community**

2. Do you have any comments on or suggested changes to the proposed policy/site?

Edenbridge Town Council concludes that both proposals for additional gypsy and traveller provision for Edenbridge are not suitable, they are inappropriate use of the Green Belt, and the expansion would increase the overall pitches for the town from 27 to 37 (37% increase); Edenbridge already has the highest concentration of provision across the district.

The Government's Planning policy for traveller sites (PPTS) should be considered in conjunction with the National Planning Policy Framework (NPPF).

It is wrong to allocate so many additional pitches in Edenbridge when one of the clear locational disadvantages of the town is its lack of connections to the strategic road network. This is relevant to all forms of new housing provision, having been argued in representations against some of the allocations for market housing, the same principle applies for gypsy and travellers. An overprovision of sites here is unbalanced and should be reconsidered with a more even distribution around the district.

Both existing traveller sites are set between the historical rural town of Edenbridge and the village of Hever, and further development here encroaches on this important strategic separation between the two rural parishes.

The Town Council requests both proposals to be removed from the Plan.

### **GT1 - Seven Acres Farm, Edenbridge**

Edenbridge Town Council object to this proposal and policy, there is no exceptional circumstances to justify this inappropriate and unlawful expansion to the site which lies outside any defined settlement boundary, in countryside designated as Green Belt. At an Appeal hearing on 5 June 2023 (APP/G2245/C/22/3304192), the Planning Inspectorate concluded to refuse planning permission and upheld the enforcement notice on the grounds to have found harm by reason of inappropriateness which must be afforded substantial weight.

On 7 November 2023, The Secretary of State for Levelling up Housing and Communities, refused permission for the appellant to make any further appeal.

The Appeal notice states:

*It is common ground that the appeal site lies within the Metropolitan Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Paragraph 137 of the revised National Planning Policy Framework (the Framework) makes clear that openness and permanence are the essential characteristics of the Green Belt. (11)*

*In accordance with the Framework, the material change of use, as alleged in the notice, represents a form of development that should not be regarded as inappropriate development in the Green Belt, provided that it would preserve openness and would not conflict with the reasons for including land within it. The introduction of a mobile home harms the openness of the Green Belt and thus constitutes inappropriate development in accordance with the PPTS. (12)*

## 2. Continue.....

The Appeal notice goes on to say:

*Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless other considerations exist that would clearly outweigh the harm by reason of inappropriateness and any other harm. **The harm by reason of inappropriateness must be afforded substantial weight.** (15)*

Other observations include: “overly intrusive appearance in the landscape”; “overly intrusive appearance in the landscape”; “results in an incongruous form of development that is at odds with this rural location causing modest harm to the character and appearance of the area and the Green Belt”. It goes on to note, that development is therefore in conflict with Policies SP1 and LO8 of the CS and EN1 of the LP. In summary these policies seek to maintain the extent of the Green Belt and ensure that development conserves and respects the character of the landscape and surrounding area.

The Appeal notice also referenced the emerging Local Plan, saying:

*The site has been proposed for allocation, through the emerging local plan, where its suitability will be assessed along with any other potential sites, which due to the nature of the District are also likely to be sited within the Green Belt. However, this is at a very early stage with the initial assessment not taking place until later this year. The Council hopes that the emerging plan will be submitted for examination in late 2024 and then adopted in late 2024 or early in 2025. It follows that the timings of any formal planning applications would follow adoption of the LP. For these reasons I find the site only partially compliant with the criteria set out in Policy SP6. (33)*

*Turning to the question of alternative sites. There are 7 vacant pitches on Romani Way. However, all of these require updating which is due to be carried out during the summer, with pitches available to re-let in October 2023. The Council confirmed that there is currently a waiting list for these and they were unable to suggest any suitable, available and affordable alternatives. I give the lack of alternative sites significant weight. (34) (Not yet completed.)*

SDC itself said in its own Committee Report para 93, “the case does not clearly outweigh the harm to the Green Belt by reason of inappropriateness, and the other harm resulting from the development, so as to comprise very special circumstances.” Therefore, there are no very special circumstances.

And at para 103 “It is agreed that the development does constitute inappropriate development within the Green Belt”.

Expansion of the Seven Acres Farm site has been sought for several years by the landowner. However, it is clear from the SDC’s own report and conclusion, and the subsequent Appeal that this site should not be expanded any further. It should also be noted that this site sits on the boundary of the flood zone area. The Town Council asks for this to be removed from the draft Local Plan.

*(NB: The Appeal notice refers to the pre-December 2023 revised NPPF policies; Green Belt policies now section 13 para 142 & 143.)*

### **MX11 – Land east of Mead Road, Edenbridge – proposed new pitches 5**

Edenbridge Town Council objects to the proposal of this new site for five pitches.

This site is close to two other gypsy and traveller sites: the Council run site known as Romani Way, Hever Road (next to the proposed MX11); and Seven Acre Farm on the east side of Hever Road.

The Council has already objected to MX11 and the release of this Green Belt Site for development of 120 dwellings on the grounds that ‘it would represent an unacceptable extension of the town onto open land to the south east contrary to the purposes of the Green Belt in preventing the expansion of urban areas and safeguarding the countryside from encroachment. The site makes an important contribution to the Green Belt around Edenbridge and should be kept open’.

Both the PPTS and NPPF policies attach great importance to Green Belts to preserve the character of rural settings and historic areas. Indeed, the PPTS also says, “Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development (16)”.

The Town Council does not believe there are suitable exceptional circumstances to permit further gypsy and traveller development in the Green Belt. This would create an unacceptable expansion of differing traveller communities, with three sites neighbouring each other. The PPTS says, “Local planning authorities should not permit mixed use on rural exception sites”.

It is disappointing that the District Council has considered only two locations (Halstead and Edenbridge) across the whole of the district to accommodate gypsy and traveller provision, thus increasing the concentration in these two existing locations.

## 2. Continue (from p2) .....

The Town Council does not support that there is unmet need in the area. The District Council's own Gypsy and Traveller Accommodation Assessment 2022 (GTAA) confirms there is currently 8 pitches vacant at the Romani Way site. This has been the case for several years. The GTAA suggests across the district there is 37 vacant pitches (List of Gypsy & Traveller pitches on sites (as at April 2022)). The overall assessed need suggests a net need of 43 pitches, the GTAA suggests it has a potential for 82 additional pitches (50 from pitches on existing sites plus 18 vacant council and 14 vacant private pitches) which would be sufficient to address identified pitch need over the plan period. This suggests that the proposals for MX11 are not needed and again, voids any exceptional circumstances.

The exceptional circumstances for further development for gypsy and traveller provision has not been evidenced sufficiently to justify expansion in Edenbridge or for use in the Green Belt which is an unsustainable location, and would be inappropriate development. It is therefore requested that this allocation be removed from the Plan  
The exceptional circumstances for further development for gypsy and traveller provision has not been evidenced sufficiently to justify expansion in Edenbridge or for use in the Green Belt which is an unsustainable location, and would be inappropriate development. It is therefore requested that this allocation be removed from the Plan.

The inclusion of either site in the emerging local Plan are not consistent with policies in the NNPF or PPTS and should be removed.

**Would you like to be added to our mailing list to be notified of updates to the Local Plan and future consultations?**

~~Yes~~ / No (Please delete as appropriate) *Already on list*

Please give your: **Name and Address, Email and Contact Number** and those of your Agent (if you have appointed one to act on your behalf). If you live in the District, please also note which Parish you live in.

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Comments that are submitted anonymously will not be accepted. Comments will be published and attributed by name/organisation only. Contact details will not be published but will be used to keep you informed of the progress of the Local Plan.

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This form can be downloaded from our website:  
[www.sevenoaks.gov.uk/plan2040](http://www.sevenoaks.gov.uk/plan2040)

Please return this form by email to [planning.policy@sevenoaks.gov.uk](mailto:planning.policy@sevenoaks.gov.uk) or to:  
**Strategic Planning Team, Sevenoaks District Council, Argyle Road, Sevenoaks, TN13 1HG**

All comments must be received by no later than **11:59pm on 11<sup>th</sup> January 2024**. Comments received after the deadline may not be accepted.

Comments that are considered to be libelous, racist, abusive or offensive will not be accepted.

