

Plan 2040 – a new Local Plan for Sevenoaks District

Regulation 18 Part 2 - Comments Form

Consultation Period: 23rd November 2023 – 11th 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:

ST1- Balanced Strategy for Growth

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

Edenbridge Town Council considers that the proposed distribution of new development represents an **excessive** focus on Edenbridge that does not reflect the wording of the policy.

It also considers that the proposed distribution involves an excessive loss of Green Belt around the town that gives inadequate weight to the importance of protecting the Green Belt as set out in the NPPF.

The policy states that “*The four towns within the District - Sevenoaks, Swanley, Edenbridge and Westerham will sequentially be the focus for development, having regard to their role and function*”

The Town Council supports this wording on the understanding that it means the focus will be on the towns in sequence, first Sevenoaks, then Swanley, then Edenbridge. This approach is broadly consistent with the Core Strategy which was previously found sound. The sequential approach to locating new development makes sense as Sevenoaks and Swanley are larger and have a wider range of services and facilities than Edenbridge. They are also in more accessible locations with much better access to the motorway network whereas Edenbridge is more distant and only reached by a network of rural B roads. Additionally, they have faster and more frequent rail services to London and direct rail service to a wider range of destinations. In short, they are more sustainable locations for siting new development.

The Town Council does accept that it should receive a share of new development, including some further release of Green Belt land in response to the need for housing in addition to the substantial development already agreed at Four Elms Road in the context of the abandoned previous version of the plan. It has accepted some of the proposed allocations in its response to Policy ST2. But, in accordance with the wording of the policy and the principle of locating development in the most sustainable location, it would expect its provision to be somewhat less than the two larger, better-located towns.

But the actual distribution shows Edenbridge with the second highest provision of housing. Its figure of 1,534 extra units is double the total for Swanley (source: Local Plan Table 1.6). (*Note: it appears to the Town Council that this figure excludes the retirement community at the Kent and Surrey Golf Club allowed on appeal in the Green Belt in 2021 (ref: 19/02834). The Inspector in the appeal acknowledged that the development within Use Class C2 should contribute 100 units to the housing supply (see para 23 of the decision letter). This should be added to the outstanding planning permissions total for the town, increasing the figure from the figure of 105 in the plan to 205, and increasing the overall total from 1,534 to 1,634*). Edenbridge is also expected to accept by far the largest number of new housing allocations in the Green Belt of any of the towns. It gets 891 units, compared with 258 for Sevenoaks and 250 for Swanley. Even if committed schemes, including Sevenoaks Quarry, are added, Edenbridge still has more Green Belt housing with the Four Elms Road and Golf Club schemes (1,331 compared to 1,208) than Sevenoaks even though Sevenoaks is much better located to receive growth.

The result of these allocations is a percentage growth much higher than any of the other towns. The built-up area of Edenbridge currently has about 3,300 households (source: 2021 Census). Adding

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an extra 1,600 will lead to a growth of 48% in the size of the town over the 15 years of the plan period.

There is nothing in Policy ST1, or anywhere else in the plan, to suggest it is intended that Edenbridge should receive this disproportionately high percentage growth.

The distribution does not reflect the sequencing of new development of Sevenoaks first, then Swanley, then Edenbridge that the policy adopts. It does not represent a balanced strategy for growth and does not result in the most sustainable distribution of new development across the District.

The Amount of Green Belt proposed for Release

Additionally, the amount of Green Belt land proposed for release around Edenbridge, both in the draft plan and cumulatively, when taken together with committed Green Belt release for 340 dwellings and a secondary school site at Four Elms Road, together with the retirement community of 100 units at the Golf Club, is excessive and disproportionate when compared to other towns in the District.

In bringing forward these proposals inadequate weight has been given in the draft plan to the importance of protecting the Green Belt as reflected in NPPF para 11 which acknowledges the possibility that the importance of Green Belt protection could outweigh the benefit of providing for development needs in full. The Secretary of State's statement launching the new NPPF also acknowledges that Green Belt considerations may justify a lower level of housing provision than the standard needs assessment would require.

The NPPF requires a balance to be struck and in the case of Edenbridge the overall amount of Green Belt proposed, when added to releases already committed, gives too much weight to providing for development. Reducing the provision for new development in the Green Belt would represent a more balanced solution consistent with the NPPF, providing for significant further growth in response to needs while continuing to protect more of the town's valuable Green Belt.

Application of the Green Belt Assessment and "Under-Performing" Sites

The Town Council objects to the use of the term "under-performing" in Para 1.21 to describe the Green Belt sites proposed for release, at least in relation to Edenbridge on the grounds that is unjustified.

The Town Council recognises that the contribution of individual Green Belt sites should be a factor in deciding which sites to release for housing. But this must be balanced against the relative sustainability of the location for new housing development. This is accepted in the parameters for the study but only to the very limited extent of suggesting the four towns are sustainable locations for new development. There is no distinction drawn between them.

So far as Edenbridge is concerned the assessment does not recommend any site for release. It only recommends sites "for further consideration" where it concludes that release would not harm the wider Green Belt. This process of further consideration by the District Council could have included weighting based on the relative sustainability of the main towns but there is no evidence that this has happened given that Edenbridge, the third ranked town, has more proposals for Green Belt release than anywhere else.

None of the sites proposed for release in Edenbridge is described in the assessment as under-performing which would imply that it is not worth keeping. An under-performing site in Green Belt terms would be one that is either not open or not connected in any significant way to the wider Green Belt. In fact, all the sites are described as contributing significantly to the Green Belt. The assessment would provide a sound justification for maintaining their Green Belt status if it was not for the need to find more land for housing. The argument that a site might be released without harm to the wider Green Belt does not mean it is under-performing and this term should not be used to describe the sites proposed for release in Edenbridge.

Inclusion of Green Belt Sites in the Baseline

The Town Council considers it would have been preferable for the baseline to be limited to sites that could be developed under existing policies and that all proposals for Green Belt development be instead presented as options.

Limiting the baseline to developments consistent with current policy would provide greater clarity in identifying the scale of the shortfall against need and provide a sound basis for moving to the next stage of establishing which development options best meet the test of exceptional circumstances for removal from the Green Belt.

The inclusion of some Green Belt sites (including all the Edenbridge sites) in the baseline and the

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focussing of the consultation question on alternative options beyond the baseline also appears to treat their release as foregone conclusions. This may in part be due to the claim, which that the Town Council does not accept, that the sites are under performing (see above). As exceptional circumstances need to be demonstrated to justify any Green Belt release it would have been more consistent with national policy on Green Belt amendments for the consultation plan to be structured so that all the Green Belt releases are presented as options.

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.

You can review our privacy notice at <https://www.sevenoaks.gov.uk/privacy>

This form can be downloaded from our website:
www.sevenoaks.gov.uk/plan2040

Please return this form by email to 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 11th 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.

