

From: [Planning Policy](#)
To: [localplan](#)
Cc: [Jan A Bailey](#); [REDACTED]
Subject: Sevenoaks District Council - Response to TMBC Local Plan (Reg. 19) Consultation
Date: 19 November 2018 12:22:29
Attachments: [SDC TMBC re Local Plan \(Reg 19\) Consultation 19.11.2018.docx](#)

Good afternoon,

Please find Sevenoaks District Council's response to TMBC's Local Plan (Reg. 19) Consultation.

If you have any questions regarding our response, please do not hesitate to contact either myself or a member of the Planning Policy team on 01732 227000 or email planning.policy@sevenoaks.gov.uk.

Kind regards,

[REDACTED]

Planning Policy

Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | TN13 1HG

Tel: 01732 227000

Email: planning.policy@sevenoaks.gov.uk

Online: www.sevenoaks.gov.uk



This email may contain privileged/confidential information. It is intended solely for the person to whom it is addressed. If you are not the intended recipient you may not copy, deliver or disclose the content of this message to anyone. In such case please destroy/delete the message immediately and notify the sender by reply email. Opinions, conclusions and other information in this message that do not relate to the official business of Sevenoaks District Council shall be understood as neither given nor endorsed by the Council. All email communications sent to or from Sevenoaks District Council may be subject to recording and/or monitoring in accordance with relevant legislation.

How do we [handle your data](#)? Would you like to [unsubscribe from our emails](#)?

Visit the Council at WWW.SEVENOAKS.GOV.UK

FAO Ian Bailey
Head of Planning Policy
Tonbridge & Malling Borough Council

By Email Only

Tel No: 01732 227000
Ask for: Planning Policy
Email: planning.policy@sevenoaks.gov.uk
My Ref:
Your Ref:
Date: 19 November 2018

Dear Ian,

RE: SEVENOAKS DISTRICT COUNCIL RESPONSE TO TONBRIDGE & MALLING BOROUGH COUNCIL'S LOCAL PLAN (REGULATION 19) CONSULTATION

Sevenoaks District Council (SDC) welcomes the opportunity to comment on Tonbridge & Malling Borough Council's (TMBC) Local Plan Regulation 19 consultation. Please note that this is an officer level response.

SDC and TMBC share a number of key constraints including Green Belt, Kent Downs Area of Outstanding Natural Beauty (AONB) and Sites of Specific Scientific Interest (SSSI). Also, it has been set out in the document that the Tonbridge & Malling Borough shares similar issues with the Sevenoaks District in terms of development viability, similar housing market areas and issues surrounding housing affordability.

SDC would like to make the following comments:

Duty to Co-operate

As an adjoining Local Planning Authority, it is important that SDC works with TMBC to address strategic, cross boundary issues such as housing, infrastructure, employment, transport etc. to ensure that development can be enabled over the respective plan period. In this case, we note that TMBC's new Local Plan will cover the plan period 2011-2031.

SDC is producing a new Local Plan, which will cover the period 2015-2035. We undertook an Issues and Options (Regulation 18) consultation in summer 2017 and a further Draft Local Plan (Regulation 18) consultation this summer 2018. We are currently finalising our Regulation 19 Pre-submission draft for publication before the end of the year. We will continue working with all of our neighbouring authorities under the Duty to Co-operate. SDC has worked with Tunbridge Wells Borough Council (TWBC) to establish the housing and economic needs of both local authority areas.

Chief Executive: Dr. Pav Ramewal

Council offices
Argyle Road
Sevenoaks
Kent TN13 1HG

t 01732 227000
e information@sevenoaks.gov.uk
DX30006 Sevenoaks
www.sevenoaks.gov.uk



INVESTORS
IN PEOPLE

Platinum
Until 2019

The consultation documents show the influence of the different housing market areas that are applicable to the Tonbridge & Malling Borough, with significant influence coming from the Sevenoaks/Tunbridge Wells Housing Market Area. This shows that, while each individual local authority must plan for its own area, there needs to be a constant open dialogue between SDC, TMBC and TWBC to discuss the acute development pressures that are affecting the West Kent region as a whole.

SDC welcomes the ongoing, useful Duty to Co-operate discussions with TMBC, as well as wider discussions with TWBC, to address key cross boundary issues, specific to the local level as well as West Kent as a whole. SDC has a number of working groups with its neighbouring authorities under Duty to Co-operate (i.e. West Kent, North Kent, London Boroughs etc.) and these wider meetings are working well.

Meeting the Borough's Objectively Assessed Need (OAN)

We note that TMBC are planning to submit documents to the Secretary of State before 24th January 2019. In this case the plan will be assessed against the previous version of the NPPF.

The Strategic Housing Market Assessment (SHMA) for the Tonbridge & Malling Borough states that there is an OAN requirement of 696 units to be built annually over the plan period 2011-2031. This equates to a total of 13,920 units being built over the 20 year period.

We note that significant growth has occurred in the Borough (3,675 units since 2011) with a substantial number of permissions granted (3,674 units as of 1 April 2017) as well as a number of windfall sites. The cumulative impact is over 8,000 units (which are planned for), which results in a housing need of 6,534 units over the remaining plan period (2016-31). On this basis, it appears that TMBC is on course to meeting its OAN, and can demonstrate a 5 year housing land supply to show sufficient demand.

National planning policy and guidance sets out the parameters for assessing the ability for meeting a local authority's OAN, as well as identifying appropriate sites to meet the requirements. The approach that TMBC has taken is largely consistent with the national planning policy and guidance, as it applies a sequential method by using existing brownfield land within settlement confines before looking further afield. It is recognised that there is potential for TMBC to look at releasing small areas of Green Belt to accommodate further growth to meet the OAN. SDC is generally supportive of TMBC's approach to meeting the OAN of the Borough over the plan period.

We are currently finalising our Pre-submission draft (Regulation 19) version of the Local Plan where the District Council will outline its ability, or not, to progress sustainable development that meets identified needs in either its own area or housing market area. This is due to the high level of Green Belt (93%) and AONB (60%) within Sevenoaks District. As it is highly likely (as set out in our Regulation 18 Plan) that we may not be able to meet our own OAN in full for the District, SDC will continue to engage with its neighbouring authorities, including TMBC, under Duty to Co-operate for further discussions on how this issue can be resolved.

We have been working jointly with Tunbridge Wells Borough Council and yourselves to prepare a West Kent Statement of Common Ground as part of our duty to cooperate. The draft statement identifies the key strategic cross-boundary issues facing West Kent, including any potential unmet housing and/or employment needs, any infrastructure

improvements that require joined-up thinking, and environmental issues that cross administrative boundaries.

As the requirement to prepare statements of common ground is a relatively new thing, we have been successful in receiving support from the Planning Advisory Service (PAS) as part of a national pilot scheme. PAS has facilitated the process, providing advice and guidance as necessary. Officers have found this helpful.

It is anticipated that the draft Statement will be completed prior to the forthcoming Local Plan consultation in the Summer. It will be a working document that is updated as each authority's Local Plan progresses. When we reach examination the Inspector will need to be satisfied that all relevant strategic cross-boundary issues have been identified and measures have been put in place to address them.

Distribution of Development

Chapter 5 outlines that the broad distribution of proposed development falls broadly across the Borough's main settlements of Tonbridge, East and West Malling and Borough Green. It is noted that a strategic site at Borough Green Gardens is included which sits close to the boundary with SDC and is proposed for approximately 3,000 dwellings; 1,720 of which to be completed within the plan period.

Considerations should be given to the impact on highways, especially along the A20, A25 corridor and M20/M26 Junction as there might be increased usage as a result. In particular, we have concerns with how the additional traffic will affect neighbouring villages such as Seal, Btichet Green, Godden Green, Stone Street and Fawke Common. There must also be further consideration for the impact of traffic to/from Trinity School and Weald of Kent Grammar School annex. Furthermore, there is concern that the potential increase in trip generation from the Borough Green development proposal will lessen the air quality for all residents. We would like to draw your attention to the latest 2017 Air Quality Annual Status Report (ASR) which highlights the air quality issues that we have along the A25 corridor.

https://www.sevenoaks.gov.uk/downloads/download/113/air_quality_action_plan

We would also like to draw to your attention to the comments made from Seal Parish Council, who convey the strong local feelings of residents, concerning this particular proposal.

Nonetheless, it is noted that a relief road is proposed, which is proposed to carry traffic away from a section of the A25, and be fully operational during the early stages of the development. We would expect to see a full Transport Assessment to demonstrate no adverse impacts on the surrounding transport network and full mitigation where required. We note that an Air Quality Assessment has been completed in June 2018, suggesting that there would be little or no impact in air quality for the Borough Green development proposal. We suggest that TMBC review this evidence in light of the potential trips generated, to ensure that they are satisfied that either, the proposal will not lessen the existing levels of air quality or there are insufficient mitigation measures in place.

SDC recognises the approach to focussing development towards the top of the settlement hierarchy. Descriptions and justifications are made for each location, including brief descriptions of transport links, services and facilities that are available. It would be helpful for TMBC to publish its Settlement Hierarchy in future consultations, to illustrate clearly how these broad locations were chosen and what services/facilities are available

for sustainable development. This would give greater justification for more detailed site allocations for the new Local Plan.

Conclusion

In summary, SDC believes that TMBC's approach to the new Local Plan is positive and proactive in light of national planning policy. SDC will continue to positively engage with TMBC under the Duty to Co-operate, as both authorities progress their Local Plans and try to meet their requirements over the Plan period.

Yours sincerely,



Planning Officer (Planning Policy)