

### **Suggested response to Sevenoaks District Council's Draft Local Plan consultation (July 2018)**

Thank you for the opportunity to comment on the Sevenoaks Draft Local Plan consultation (July, 2018). We note that this is a consultation under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012 and that the District is still to publish its final Draft Local Plan for examination.

The London Borough of Bromley is committed to engaging positively with its neighbours not only to satisfy the requirements of the "Duty to Cooperate" but also to ensure that any potential adverse impacts on its own communities are highlighted and investigated. We support the broad objectives of the Draft Local Plan and recognise the constraints which influence how the District may be able meet its objectively assessed needs for development, however we wish to raise some concerns.

#### Transport and infrastructure implications for Bromley

The increased level of development in Sevenoaks is likely to have adverse impacts upon the road network, public transport system and other infrastructure in Bromley, particularly resulting from sites close to the borough boundary but also in cumulative terms. It is noted that some of the suggested site allocations include possible mitigation measures, and that the Infrastructure Delivery Plan is still in preparation, so we make some suggestions below about additional information which should be sought in order to assess potential problems and requirements for mitigation.

#### Broke Hill Golf Club site

The London Borough of Borough has a number of concerns about the transport impact of this proposed development and how the ambition for the Garden Village to be a 'self-sustaining and vibrant village for new residents' will be achieved.

The site's 'unrivalled accessibility and public transport credentials', appears to rely significantly on the adjacent Knockholt station providing 2 trains per hour (tph). However this service falls short of the aspirations for a London suburban metro referred to in the Mayors Transport Strategy, and is unlikely to make an attractive travel option when compared to private cars. This proposal will not have been taken into consideration as part of the Kent Route Study which identified capacity issues on services through Knockholt. The capacity of the station car park (for commuter) should also be assessed as it would have a significant impact during the morning and evening peak hours. Equally there are also concerns about rail heading into Bromley to take advantage of lower fares from other fare zones close to London.

In addition to rail, high frequency local bus services to town centres and schools will be required to reduce the impact of car borne trips to secondary schools in the surrounding area and to and from the primary school proposed as part of the development. These buses should be able to serve the whole of the new village therefore streets should be able to accommodate movement buses. Further details of the cycle links are required to ensure they serve corridors of demand.

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The mixed use nature of the development is a welcome step towards creating a sustainable community, however, the employment centre (care home, gin distillery and start-up businesses) proposed may lead to trip generation by train and road from outside the village and impact local roads, a fact recognised by specific references to “unrivalled access to the District’s main arterial roads including the A21 and the M25.”

For the impact on Bromley’s local roads to be assessed more accurately additional information would be required in support of the development including:

- Junction capacity assessments for access to London Road/ Sevenoaks Road and of any other access points,
- Detail of the ability of the road network to accommodate high frequency local bus services to town centre and schools and of cycle links,
- A primary school transport assessment,
- Modelling of the need and access to travel and transport of the staff of the employment facilities proposed as well as car and cycle parking cycle parking facilities.

### Land north and east of Westerham

There are concerns that this composite site, in a location without a railway station or public transport hub, has the potential to increase rail heading to stations within the Bromley. This would come with the associated congestion, noise and emissions impacts on the A233 through Biggin Hill and through Keston Mark junction which already suffers from congestion issues. Mitigations to provide high quality and high frequency feeder buses to the nearest railway stations should therefore be required as part of the proposals, with the development’s street network designed to enable residents easy and convenient access to buses.

### Construction phase disruption

During the construction phase of any development Bromley is concerned that there will be a considerable increase in lorry traffic through Biggin Hill, Darwin and Bromley Common and Keston wards, not just for the construction but particularly for the infilling of the very large sand and gravel pits. The A233 between Westerham and the A21 is predominantly a single carriageway road with congestion issues at key junctions, notably Keston Mark, therefore, a Construction Logistics plan should be used to minimise the impact of construction traffic on the quality of life/environment, congestion and road safety in Biggin Hill, Darwin and Bromley Common and Keston. Consideration should be given to whether a Construction Consolidation Centre could reduce the impact of this and other development in surrounding areas on local roads in Bromley, ideally construction traffic should be kept on the M25 and roads outside of Bromley.

### Housing Supply

It is noted that Sevenoaks has looked at a wide range of options to meet its objectively assessed housing need, including potential Green Belt land release, but that even with the latter it is likely to fall short. Whilst Bromley acknowledges the

constraints of a District with such a large amount of Green Belt it reiterates that it would be unable to help accommodate any unmet housing need due to its own constraints. Since Bromley is part of the London housing market area, Sevenoaks will also need to engage with the Mayor of London in order to discuss meeting any unmet need in the future.

### Locally defined brownfield land and “sustainable previously developed land”

The first point of concern lies with the District’s local definition of “brownfield land”. Whilst it is understandable that the District wishes to maximise supply on areas of land which are already developed in some way, this definition clearly includes uses which are *specifically excluded* from the Previously Developed Land definition in the NPPF. Some of the sites counted in this element are therefore inappropriate development in the Green Belt. Whilst it may be that some planning proposals will fall under the exceptions listed in NPPF Para 145 (g), this can only be determined through the planning application process. Equally, in allocating the sites, there is an assumption that when schemes come forward, the balance will fall in favour of permitting the development, i.e. that “very special circumstances” will exist at that point in time. It is considered that this element of supply should not be included in the site allocations and there is considerable uncertainty in its delivery.

### Greenfield Green Belt release

We note that Sevenoaks are considering releasing 9 greenfield Green Belt sites for residential and mixed use development but that these are still to be fully assessed to establish whether exceptional circumstances exist. However, it is unclear how the Green Belt assessment (2017) which recommended parcels to be considered for release informed the selection of these sites. Bromley has concerns that the proposed Green Belt release sites may have been prioritised due to the contribution that they could make through infrastructure proposed by promoters. These potential benefits are yet to be tested and infrastructure needs are unsupported by the evidence in the Sevenoaks Infrastructure Delivery Plan which is still being updated. Whilst the consultation process provides the opportunity for stakeholders to comment on the proposals, a considerable amount of technical information is still required to demonstrate viability and deliverability as acknowledged in one of the Draft Local Plan appendices.

### Gypsy and Traveller provision

The Government’s Planning Policy for Travellers clarifies that traveller sites are inappropriate development in the Green Belt. It advises that local authorities can make exceptional limited alterations to Green Belt boundaries to accommodate site inset within the Green Belt to meet specific identified need for traveller sites. It advises that if land is removed from the Green Belt in this way, it should be “specifically allocated in the development plan as a traveller site only”.

It is noted that Sevenoaks do not propose to remove the sites from the Green Belt, but rather to adopt a policy which includes criteria to be taken into account when proposals come forward. It is considered that this approach is not consistent with national policy as traveller sites are inappropriate development in the Green Belt.

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The consequence is that, order to meet their needs, Sevenoaks relies upon preempting the future demonstration of very special circumstances. There is also concern that travellers recently displaced from Sevenoaks due to a lack of sites may not have been reflected in the GTAA and that the allocations for 50 additional pitches may not meet need in full over the plan period.

Bromley would like these comments taken into account in developing the final Sevenoaks' Local Plan in order to ensure that Sevenoaks have a robust Draft Local Plan that will withstand examination and to protect the quality of life of Bromley's communities. We look forward to continuing cooperation on cross-boundary matters.