

Suggested response to Sevenoaks District Council's Submission Local Plan consultation (January 2019)

Thank you for the opportunity to comment on the Sevenoaks Submission Local Plan consultation of January 2019. We note that this is a consultation under Regulation 19 of the Town and Country Planning (Local Planning) Regulations 2012 and that the District Council intends to submit this Plan to the Secretary of State for examination.

The London Borough of Bromley is committed to engaging positively with its neighbours and anticipates working with Sevenoaks District Council to agree a Statement of Common Ground to be submitted to the planning Inspectorate with their Local Plan. Such engagement is not only necessary to satisfy the requirements of the "Duty to Cooperate", but also to ensure that any potential adverse impacts on Bromley's own communities are highlighted and investigated.

We responded to your Draft Local Plan consultation in September 2018 and raised concerns about some aspects of the Plan which could have had negative impacts on Bromley. We note that the allocations of Broke Hill golf course and Land North of Westerham are no longer proposed which is a welcome change and our previous comments on those sites no longer apply.

Housing Supply

As previously, Bromley recognise that Sevenoaks has a large amount of Green Belt and faces difficult choices in how to meet objectively assessed housing need. We note that your final strategy includes some Green Belt release, some intensification and proposals for smaller sites scattered across the District. We consider it unlikely that the cumulative impacts of these developments will have significant consequences for Bromley but we will wish to review relevant planning applications in the future to ensure that impacts on local infrastructure have been properly addressed.

We reiterate that Bromley would be unable to help accommodate any unmet housing need due to its own constraints and that, 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.

Fort Halstead

We note that it is proposed to increase the amount of development at Fort Halsted from 450 to 750 residential units. Bromley Council's highways team advise that as the site is not within walking distance of Knockholt Station it is likely that commuters will drive further into lower fare zones within Bromley to take advantage of lower fares. This rail heading effect would have a detrimental impact on residential areas in the Borough already under stress as a result of commuter parking. The mixed use nature of the development is welcomed but the shift based nature of the hotel and limited public transport is likely to lead to more car borne trips from and through Bromley, in contrast to the aspirations of the Borough's draft LIP.

Gypsy and Traveller provision

Bromley notes that the need identified in the 2017 Gypsy and Traveller Accommodation Assessment (GTAA) has been revised downwards to 40 due to the granting of planning permission since the GTAA.

However, some of the additional pitches are on sites within the Green Belt. There are concerns about the soundness of this approach prior to the outcome of planning applications required to demonstrate Very Special Circumstances for 'inappropriate development' in the Green Belt.

Bromley is concerned that any failure of this approach to meet the identified need will result in additional pressures on Bromley's own Gypsy and Traveller sites and may result in unauthorized encampments in Bromley. Bromley would be unable to help accommodate any unmet Gypsy and Traveller Accommodation need from Sevenoaks District due to its own constraints.