



# The Planning Inspectorate

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Mr James Gleave,  
Strategic Planning Manager,  
Sevenoaks District Council

Our Ref: PINS/G2245/429/7

Date: 2 March 2020

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## WITHOUT PREJUDICE

Dear Mr Gleave,

### SEVENOAKS DISTRICT LOCAL PLAN

I stated that I would write to you setting out my thoughts relating to soundness issues following my conclusion that the Council had failed in its Duty to Co-operate. I now do so, at your request.

If the Examination had continued, having regard to the evidence that I had seen and heard up to and including the first two weeks of Hearing sessions, there are several aspects of the Local Plan on which I would have been likely to require further evidence to allow me to reach conclusions. However, I must stress that I did not reach conclusions on these issues. They can be summarised as follows:

- The Sustainability Appraisal, in particular the selection of Reasonable Alternatives and the justification for the Choice of Option 3 as the preferred Spatial Strategy.
- The Green Belt Assessment, in particular the methodology chosen and the range of sizes of the parcels identified as the starting point for the assessment.
- The approach to the definition of exceptional circumstances at the site specific level, which includes whether the release of land will result in the delivery of infrastructure to meet an existing evidence based need.
- The justification for a housing requirement substantially lower than the housing need.
- The retention of the Broad Location for Growth at Pedham Place in the Green Belt and the implications of that in relation to the prospect of the site being developed in the Plan period, having regard to paragraphs 143-145 of the National Planning Policy Framework and the supply of housing generally.
- The deliverability and/or developability of the allocated housing sites, in particular the extent of the evidence to support start dates and build out rates and the simplistic nature of the Council's 'Phasing Rules'.

I hope that these points will prove useful to the Council in its future Plan making.

Yours sincerely,

*Karen L Baker*

INSPECTOR