Dear Sir or Madam

ROYAL MAIL REPRESENTATIONS TO SEVENOAKS DISTRICT CORE STRATEGY ‘DRAFT FOR SUBMISSION’ FEBRUARY 2010

We are instructed by Royal Mail Group Ltd (Royal Mail) to submit representations to the above Core Strategy ‘Draft for Submission’ Document. Royal Mail has submitted separate representations to the Allocations DPD.

BACKGROUND

Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by the Postal Services Regulator, Postcomm. Its letters business, Royal Mail is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide which is a parcels carrier. Post Office Ltd (a wholly owned subsidiary of Royal Mail) operates the national network of post offices and sub post offices.

The United Kingdom letter post business was fully liberalised in January 2006 by Postcomm and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail’s real estate needs to respond accordingly.

Royal Mail has a number of land holdings throughout the District, each of which is strategically important to Royal Mail. These are set out below:

- Swanley Delivery Office (DO) and Post Office (PO), London Road, Swanley, BR8 7AA;
- Edenbridge Delivery Office (DO), High Street, Edenbridge, TN8 5AA;
- Sevenoaks Delivery Office (DO) and Crown Post Office, South Park, Sevenoaks, TN13 1AA; and
- Sevenoaks Rural Delivery Office (DO), 12b Vestry Industrial Estate, Sevenoaks, TN14 5EL.
Should any of the properties surrounding Royal Mail’s sites be redeveloped, it would be vital that any new uses be designed and managed so that they are both cognisant of and sensitive to Royal Mail’s operations.

This approach accords with adopted Government guidance set out in the recently adopted Planning Policy Statement 4 (PPS4): Planning for Sustainable Economic Development. We note that PPS4 states that Local Planning Authorities (LPAs) should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies to allow a quick response to changes in economic circumstances and a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.

REPRESENTATIONS

We note that the Council’s aim of this consultation is to consult on the soundness of the Core Strategy before finalising the Document for submission to the Secretary of State.

In the current format, we consider that the Core Strategy is not ‘sound’ and does not fully comply with the requirements of Planning Policy Statement 12 (PPS12) creating strong safe and prosperous communities through Local Spatial Planning. However, subject to the requests set out in our representations below, Royal Mail considers that the Document would be legally compliant and that the content of the document would be justified, effective and consistent with national policy.

We set out below representations to the Core Strategy in a format that corresponds with the Document.

CHAPTER 4 LOCATION POLICIES

■ Policy LO2 – Development in Sevenoaks Urban Area

Policy LO2 states that in Sevenoaks provision will be made for approximately 1,330 dwellings (2006 – 2026) on a range of sites suitable for residential use within the urban area. The Policy goes on to state that “existing suitable employment sites will be retained with the opportunity for regeneration and redevelopment to better the needs of business”.

We support the principle of Policy LO2 and the identification of Royal Mail’s Sevenoaks Rural DO on Vestry Estate as an employment site. However, we request that the wording of the Policy is amended to explicitly reference employment sites as defined in the emerging Allocations DPD:

“Existing suitable employment sites, as defined in the Allocations DPD, will be retained with the opportunity for regeneration and redevelopment to better the needs of business”.

■ Policy LO3 – Development in Sevenoaks Town Centre

This Policy states that a mix of uses including retail, offices, hotel and residential will be retained and enhanced in the town centre. Approximately 4,000 sq.m net of new shopping floorspace (including 1,700 sq.m of convenience and 2,300 sq.m of comparison floorspace) will be provided in the town centre up to 2026.

Royal Mail support the proposed mix of uses in Sevenoaks Town Centre. However we request that the wording of the Policy is amended to acknowledge that new development could improve the retail offer in the town centre, including the Royal Mail Sevenoaks DO and Crown Post Office:
“A mix of uses (including retail, offices, cultural, leisure, hotel and residential development) will be retained and enhanced **through new development** within the town centre”.

The Council proposes to prepare planning briefs for the land west of Blighs Meadow and land east of High Street. Royal Mail welcomes the opportunity to discuss with the Council the potential for preparing a planning brief for Royal Mail’s site, along with the Telereal and neighbouring land. **We request** that the Council’s acknowledges the potential for the Royal Mail Sevenoaks DO and Crown Post Office to be brought forward for redevelopment independent of the BT Exchange. We understand that the timescales associated with the development of each site could be quite different.

- **Policy LO6 – Development in Edenbridge**

  This Policy states that “provision will be made for approximately 410 dwellings (2006 – 2026) on a range of sites suitable for residential use within the urban area. Existing employment sites will be retained with the opportunity for regeneration and redevelopment to better the needs of the business”.

  **We support** the identification of 410 new dwellings in Edenbridge. However we **request** that the wording of the Policy is amended to explicitly reference employment sites as defined in the Allocations DPD:

  “Existing employment sites, as defined in the Allocations DPD, will be retained with the opportunity for regeneration and redevelopment to better the needs of the business”.

**Chapter 5 - Strategic Policies**

- **Policy SP1 – Design of New Development**

  This Policy states that “in areas where the local environment lacks positive features new development should contribute to an improvement in the quality of the environment”.

  **We support** the principle of Policy SP1. However we **request** that flexibility should be applied to new development where it is not feasible and/or viable to contribute to improving the quality of the local environment where there is a lack of positive features. Further we **request** for the Council’s definition of a “positive feature” and to what extent new development should contribute towards the lack of such “positive features”.

- **Policy SP2 – Sustainable Development**

  The Policy states that new homes will be required to achieve at least Level 3 of the Code for Sustainable Homes, progressing to Level 4 from 2013 and level 6 by 2016. **All new commercial and institutional development will be required to achieve BREEAM “Very Good” standards increasing to “Excellent” standards from 2013 and include the incorporation of sustainable drainage systems (SUDS).** Code levels of BREEAM must include at least a 10% reduction in the total carbon emissions through on-site installation and implementation of decentralised, renewable or low-carbon energy sources.

  **We support** the principle of tackling climate change through sustainable development. However, we **request** that the Council flexibly applies this Policy to development where it is not practical (feasible) or viable to achieve the measures set out in 1 to 3 of Policy SP2. We **support** the inclusion of Point 4 which provides the opportunity for applicants to demonstrate where it is not possible to achieve the specified requirements as part of the development.
Policy SP3 – Provision of Affordable Housing

This Policy states that all types of residential development, including specialist housing will provide affordable housing. 15 dwellings or more gross should provide 40% affordable housing; 10 – 14 dwellings, 30% and 5 – 9 units, 20%. In exceptional circumstances where it is demonstrated to the Council’s satisfaction through an independent assessment of viability that on-site provision in accordance with the policy would not be viable, a reduced level of provision may be accepted or, failing that, a financial contribution towards the provision off-site will be required.

We acknowledge the Council’s aim for the provision of affordable housing as part of new residential developments. However, we request for the Council to adopt a flexible approach towards the provision of affordable housing, taking into account scheme viability and assessing each scheme based on its merits. Further we request that the Council amends the Policy to reflect this.

Policy SP7 – Density of Housing Development

The Council will seek for all new housing to be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. The Policy states that “subject to this overriding consideration:

1. Within the urban areas of Sevenoaks, Swanley and Edenbridge new residential development will be expected to achieve a density of 40 dwellings per hectare. In suitable locations close to Sevenoaks and Swanley town centres higher densities will be encouraged.

2. Within Sevenoaks and Swanley town centres, as defined under Policies LO3 and LO5, new residential development will be expected to achieve a density of 75 dwellings per hectare”.

We request that the supporting text to the Policy recognise the provision of high density housing, in particular in Sevenoaks and Swanley, could potentially have a significant impact on the viability of proposed developments. We therefore request that explicit reference is made to the assessment of applications on a flexible and site specific basis subject to the viability of the development in question. Further we request that the Council amends the Policy to reflect this.

Policy SP8 – Economic Development and Land for Business

This Policy states that “… redevelopment [of business sites] for mixed use of business sites in urban areas may exceptionally be permitted where such development would facilitate the regeneration of the site to more effectively meet the needs of modern business, where employment capacity of the site, represented by the commercial floorspace, is maintained and where a mixed use development would represent a sustainable approach consistent with the general distribution of development”.

The delivery mechanisms for this Policy states that the Allocations DPD will define the boundary of employment sites to be retained under this policy.

We support this Policy subject to explicit reference that this Policy is applicable to designated employment sites as defined in the Allocations DPD. We therefore request the amended wording to the Policy:

“… redevelopment for mixed use of business sites in urban areas, as defined in the Allocations DPD, may exceptionally be permitted where such development would facilitate the regeneration of the site to more effectively meet the needs of modern business…”
Policy SP9 – Infrastructure Provision

This Policy states that “where new development creates a requirement for new or improved physical, social and green infrastructure beyond existing provision, developers will be expected to provide, or contribute to, the additional requirements”.

We support the principle of this Policy. However we request the wording of the Policy is amended to include reference to the viability of a scheme i.e. “……. sought at a level that ensures that the overall delivery of appropriate development and the viability of a scheme is not comprised”.

Policy SP10 – Green Infrastructure, Open Space, Sport and Recreation Provision

The Policy states that the Council will seek for residential development to provide on-site open space provision or a financial contribution where there is an identified shortage or where the development would result otherwise result in a shortage. For the purpose of the Policy open space includes amenity open space, parks and formal gardens, natural and semi natural open space, children’s play areas, outdoor sports facilities, churchyards and allotments.

We support the principle of this Policy. However we request that the wording of the Policy is amended to include reference to the viability of a scheme i.e. “……. sought at a level that ensures that the overall delivery of appropriate development and the viability of a scheme is not comprised”.

We reserve the right to amend or supplement these representations at a later date if necessary.

We should be grateful if you would acknowledge receipt of our representations and advise as to the next stages of the Core Strategy, Allocations Development Plan Document and forthcoming Development Management Policies Document. Please contact Emma Andrews on the above contact details or Lisa Bowden (020 7338 4045 or lisa.bowden@bnpparibas.com) should you have any queries.

We look forward to hearing from you in response to the above.

Yours faithfully

BNP Paribas Real Estate