

**Sevenoaks Town Neighbourhood Plan**

**Steering Committee Meeting**

**(Open to members of the public)**

**Monday 4th April 2022 6pm – 7pm Prior to the Planning Committee  
Sevenoaks Town Council Chamber, Bradbourne Vale Road, TN13 3QG**

**Committee Members**

Sevenoaks Town Council	1	<b>Chairman of Planning</b>
Sevenoaks Town Council	2	<b>Chairman of F&amp;GP</b>
Sevenoaks Town Council	3	<b>Chair / Vice Chair of OSL</b>
Kent County Council	1	<b>Cllr Streatfeild</b>
Sevenoaks District Council	1	<b>Cllr Hogarth</b>
Chamber of Commerce	1	<b>Elizabeth Dolding</b>
Sevenoaks Town Partnership	1	<b>Cllr Avril Hunter</b>
Sevenoaks Society	1	<b>Charles George</b>
Sevenoaks District Seniors Action Forum	1	<b>Cllr Dr Marilyn Canet</b>
Sevenoaks Youth Council	1	<b>Vacant</b>
Specialised professionals / parishioners	1	<b>Glenn Ball</b>
Specialised professionals / parishioners	2	<b>Cllr Purves (Hollybush)</b>
Specialised professionals / parishioners	3	<b>Byron Brown (Bradbourne)</b>
Specialised professionals / parishioners	4	<b>Rep. Wilderness Residents Association</b>
Specialised professionals / parishioners	5	<b>Sarah Williams RIBA Advisor</b>

**Agenda**

1. **Apologies for absence**
  
2. **Declarations of interest**
  
3. **Minutes of the previous meeting held on 22<sup>nd</sup> March 2022 (attached: Pages 3-16)**  
To receive and agree the Minutes of the Steering Committee held on 22<sup>nd</sup> March 2022.
  
4. **Strategic Environmental Assessment Final Report**
  - a) To receive a copy of AECOM's SEA Final Report for approval by the Steering Committee and Planning Committee (circulated separately)
  - b) To receive and discuss collated responses received from Hugo Nowell and members of the Steering and Planning Committee **(attached: Page 17)**
  - c) To approve the SEA Final Report along with comments and suggestions to be forwarded.
  
5. **Review of advice and decisions regarding the 13 sites the NDP supports for development (attached: Pages 19-72)**  
To receive a timeline documenting advice received from Locality, Historic England, AECOM and Sevenoaks District Council, which led to the removal of design quantum.
  
6. **STNP Final Draft – to review and consider edits made to the Final Draft since 12<sup>th</sup> January 2021, and discuss whether these be accepted.**

**7. Dates of future meetings**

To note that the next Steering Committee date will be announced after the conclusion of the SEA 5 week consultation to Statutory Consultees and on receipt and due consideration of responses and recommendations received.

**8. Timetable for progressing STNP (shown below)**

	<b>NDP Projected Programme 2022</b>	<b>Date</b>
1	Planning Committee – Considered and agreed changes following recommendations made by AECOM and Statutory Consultee Historic England.	10.01.2022
2	Planning Committee to receive and approve the Final Report for the Strategic Environmental Assessment from AECOM, to be forwarded to Statutory Consultees.	04.04.2022
3	NDP Steering Committee – consider and agree changes made to date, following recommendations made by AECOM and Statutory Consultee Historic England.	04.04.2022
4	STC to receive Statutory Consultee responses and recommendations following the 5 week consultation on AECOM’s SEA Report.	10.05.2022
5	Prepare Final NDP Draft of NDP in response to comments and recommendations received from Statutory Consultees	May 2022
6	Both NDP Steering Committee and STC Planning Committees to officially sign off the Final Draft as amended.	June 2022
7	Submit Draft Neighbourhood Plan to District Council along with Consultation Statement and Basic Conditions Statement.	July 2022
8	SDC to publicise the plan for a six week period, notify anyone referred to in the consultation statement that the plan has been received, and to appoint an independent examiner.	July 2022
9	Examiner’s Report	August 2022
10	Modifications made to the NDP in response to Examiner’s recommendations	September 2022
11	Referendum	Autumn 2022

**Minutes of the Sevenoaks Town Neighbourhood Development Plan Steering Committee meeting held at the Council Chambers on 22<sup>nd</sup> March 2022, 6pm. Available to watch online via the following link: [https://www.youtube.com/watch?v=zysx1\\_gymhQ](https://www.youtube.com/watch?v=zysx1_gymhQ)**

**In attendance:** Cllr Dr Canet, Cllr Clayton, Cllr Eyre, Cllr Parry, Cllr Raikes, Charles George, Hugo Nowell (Remote Attendance), Elizabeth Dolding (Remote Attendance\*), Sarah Williams, Cllr Streatfeild, Cllr Hunter, Cllr Purves, Linda Larter, Georgie Elliston.

**1. Apologies**

None.

**2. Declarations of Interest**

None.

**3. Minutes of the previous meeting held on 12<sup>th</sup> January 2021**

The minutes of the meeting held on 12<sup>th</sup> January 2021 were received and approved.

**4. Sevenoaks Town Neighbourhood Development Plan (STNP) – to receive a presentation from STC’s consultant for the NDP, Hugo Nowell of Urban Initiatives Studio. This to cover edits and progress made to the NDP since the last meeting.**

The Committee received a presentation from STC’s consultant for the NDP, Hugo Nowell of Urban Initiatives Studio. This covered history of edits and progress made, including advice received from Historic England and AECOM as part of the SEA process. It was followed by a Q & A session. A summary of the most discussed question is provided below. See Appendix for a copy of the presentation slides.

Several members raised queries as to why the design quantum and guidance on height and density could not be retained in the Neighbourhood Plan. It was explained that these had been removed following advice from SDC and Historic England. Neither SDC or Historic England would support the Neighbourhood Plan if the quantum were retained in the document and therefore the Plan would not be able to proceed towards referendum.

The Consultation draft Neighbourhood Plan (January 2020) had included development quantum for sites however at that time it was assumed that the District Council’s emerging plan would be adopted in advance of the Neighbourhood Plan and that sites would be allocated in the Local Plan. In that context the Neighbourhood Plan would be providing additional design guidance over and above that in the Local Plan.

Whilst a Neighbourhood Plan can allocate sites it can only do this if it is supported by evidence to demonstrate that the development proposed is viable and deliverable and that development is supported by the site owner. Additional work would be required to satisfy this requirement and this would delay the Neighbourhood Plan process further.

The options for the NDP to progress therefore were to either:

- i) omit reference to the sites supported for development altogether;
- ii) ignore Historic England’s comments and submit to SDC. SDC advised that in this case they

would not accept the Plan; or

iii) set out the benefits that should be delivered were the sites to be allocated in the Local Plan or be brought forward for development.

The third option was preferred and following advice from AECOM the wording of the site policies (D1 and D2) were amended to make it clear that the sites would not be allocated (December 2021 draft); the form of words were still not acceptable to Historic England and the revised wording in the latest Plan (January 2022 draft) were drafted with Historic England's input.

5. **To receive and review the following:**

- **Full history of edits made to the STNP since last meeting**
  - **Strategic Environmental Assessment (SEA) Final Report by AECOM**
  - **Summary of the SEA Report as prepared by Hugo Nowell**
  - **Full STNP as edited**
- a) The Committee discussed the changes made to the STNP since the last meeting. The following was agreed upon:
- a. The wording under Theme 7 that refers to Tarmac will be reviewed, noting that a planning application for the Quarry site has now been submitted
  - b. Sevenoaks Town Council seek an opportunity to re-open conversations between Sevenoaks District Council and the Clinical Commissioning Group for local provision
  - c. The Planning Committee, which is due to provide a recommendation to SDC on the Tarmac Quarry site on 4<sup>th</sup> April 2022, would add to its response that the Town Council recommends a Design Review that includes local input
  - d. A report of correspondence and advice received from Sevenoaks District Council, AECOM, and Historic England, be collated and provided to members at the next Steering Committee Meeting.
- b) It was noted that review and approval of the SEA Final Report would be deferred for the next Steering Committee Meeting on 4<sup>th</sup> April 2022 in order to give members sufficient time to read and provide comments on the contents. It was agreed that any comments and suggestions be forwarded to the Planning Committee Clerk at [planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk) by 4pm on 29<sup>th</sup> March 2022, in order for them to be included in a collated response sheet.
- c) It was noted that Hugo Nowell's comments would accompany the afore-mentioned collated response sheet.

6. **STNP Final Draft – to review and consider edits made to the Final Draft 12<sup>th</sup> January 2021, and to discuss whether these be accepted.**

It was agreed that the STNP Final Draft would be deferred to the next Steering Committee Meeting on 4<sup>th</sup> April 2022, to be considered with the SEA Final Report.

7. **Dates of future meetings**

It was noted that the next Steering Committee Meeting would be held at 6pm on 4<sup>th</sup> April 2022, prior to the Planning Committee Meeting at 7pm. This to be held at the Council Chambers and open to the public, with remote attendance optional for Committee members.

**8. Timetable for progressing STNP (shown below)**

The committee received and noted the below projected timetable. Items number 2 and 3 to be edited due to the deferral of approving the SEA Final Report until 4<sup>th</sup> April 2022.

**Meeting concluded at 7pm.**

	<b>NDP Projected Programme 2022</b>	<b>Date</b>
1	Planning Committee – Considered and agreed changes following recommendations made by AECOM and Statutory Consultee Historic England.	10.01.2022
2	Planning Committee to receive and approve the Final Report for the Strategic Environmental Assessment from AECOM, to be forwarded to Statutory Consultees.	21.03.2022
3	NDP Steering Committee – consider and agree changes made to date, following recommendations made by AECOM and Statutory Consultee Historic England.	22.03.2022
4	STC to receive Statutory Consultee responses and recommendations following the 5 week consultation on AECOM's SEA Report.	27.04.2022
5	Prepare Final NDP Draft of NDP in response to comments and recommendations received from Statutory Consultees	May 2022
6	Both NDP Steering Committee and STC Planning Committees to officially sign off the Final Draft as amended.	May 2022
7	Submit Draft Neighbourhood Plan to District Council along with Consultation Statement and Basic Conditions Statement.	June 2022
8	SDC to publicise the plan for a six week period, notify anyone referred to in the consultation statement that the plan has been received, and to appoint an independent examiner.	June 2022/July 2022
9	Examiner's Report	August 2022
10	Modifications made to the NDP in response to Examiner's recommendations	September 2022
11	Referendum	Autumn 2022

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# Sevenoaks Town Neighbourhood Plan

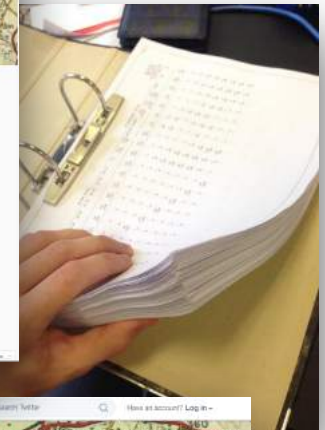
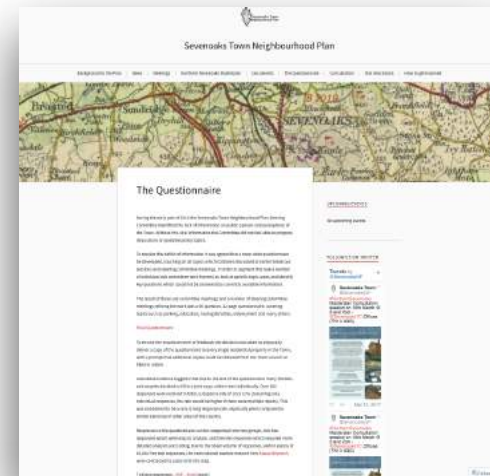
Planning Committee Presentation (21st March 2022)



URBAN  
INITIATIVES  
STUDIO



- Preparation of the Sevenoaks Town Neighbourhood Plan started in 2013
- The Town Council:
  - Designated the Neighbourhood Area
  - Set up a web page and other social media accounts
  - Carried out an initial public consultation in 2015
  - Identified objectives for the Neighbourhood Plan
  - Developed the evidence base including commissioning Northern Sevenoaks masterplan
- The Town Council appointed **Urban Initiatives Studio** in Summer 2017 to prepare the Neighbourhood Plan for the Regulation 14 Consultation and later submission to the LPA.

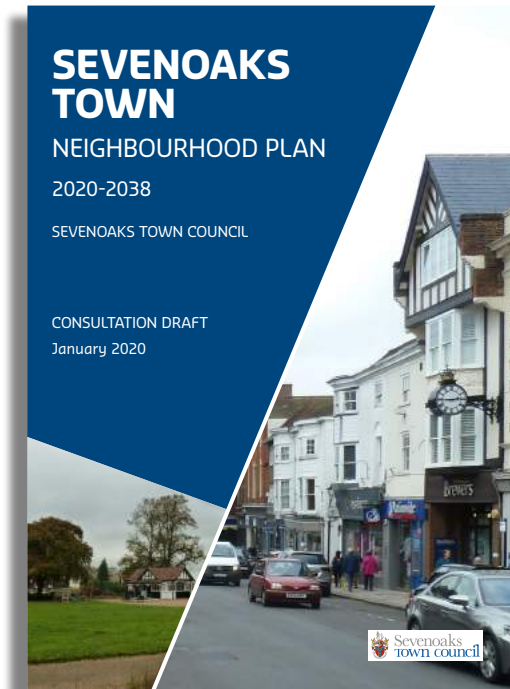




# SEVENOAKS TOWN Neighbourhood Plan Steering Committee Agenda 04-04-2022

# PROGRESS ON THE NEIGHBOURHOOD PLAN

- Consultation draft Plan agreed in January 2020
- Regulation 14 Consultation took place from 31st January to 31 March 2020
- Comments received from Statutory Consultees, stakeholders and members of the public
- All comments carefully considered and changes agreed by Neighbourhood Plan Steering Group in January 2021
- Revised Neighbourhood Plan completed in March 2021



and to ensure that future development is sensitive to the town's character and identity and to provide for the needs of future generations.

Since 2018 the Town Council and the Neighbourhood Plan Committee have undertaken extensive public consultation and engagement activities, including a Masterplan for Northern Sevenoaks to ensure that the contents of the plan reflects what local people want. They have used this information to develop background work for the Plan and commission strategies and studies to support the emerging plan policies.

A six-week public consultation is set to run from Friday 31<sup>st</sup> January 2020 until Friday 13<sup>th</sup> March 2020. The public consultation will be launched in the Sevenoaks Kaleidoscope Gallery on Buckhurst Lane on Friday 31<sup>st</sup> January and Saturday 1<sup>st</sup> February 2020. An exhibition will be available to view at the launch and at locations across the town through the six-week period (see below for details). Further information about the Neighbourhood Plan and how to comment on it are available on the Neighbourhood Plan website at <https://sevenoaksndp.wordpress.com>.

Feedback from this initial consultation will be included where appropriate into the plan which will then be progressed through a statutory programme carried out by Sevenoaks District Council concluding in a referendum for the residents of Sevenoaks.

Dates	Times	Location
Friday 31 <sup>st</sup> January 2020	10.00 a.m. – 3.00 p.m.	Sevenoaks Kaleidoscope Library
Saturday 1 <sup>st</sup> February 2020	10.00 a.m. – 3.00 p.m.	Sevenoaks Kaleidoscope Library
Friday 14 <sup>th</sup> February 2020	10.00 a.m. – 3.00 p.m.	Sevenoaks Town Council Chambers
Saturday 15 <sup>th</sup> February 2020	10.00 a.m. – 3.00 p.m.	Sevenoaks Town Council Chambers
Monday 3 <sup>rd</sup> February – 13 <sup>th</sup> March 2020 (excluding 18 <sup>th</sup> – 20 <sup>th</sup> Feb)	10.00 a.m. – 4.45 p.m.	Stag Theatre Café
Monday 3 <sup>rd</sup> February – 13 <sup>th</sup> March 2020	Monday - Saturday	Station Opening Times
		Sevenoaks Mainline Railway Station Foyer

enquiries to: Sevenoaks Town Council, Council Offices, Bradbourne Vale Road, Sevenoaks, Kent TN13 3QG. [planning@sevenoakstn.gov.uk](mailto:planning@sevenoakstn.gov.uk)

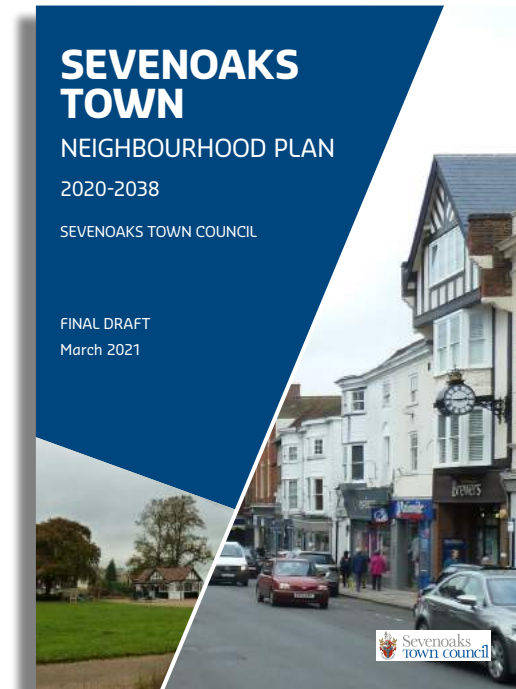


# PROGRESS ON THE NEIGHBOURHOOD PLAN

Sevenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022

## Agreed Changes

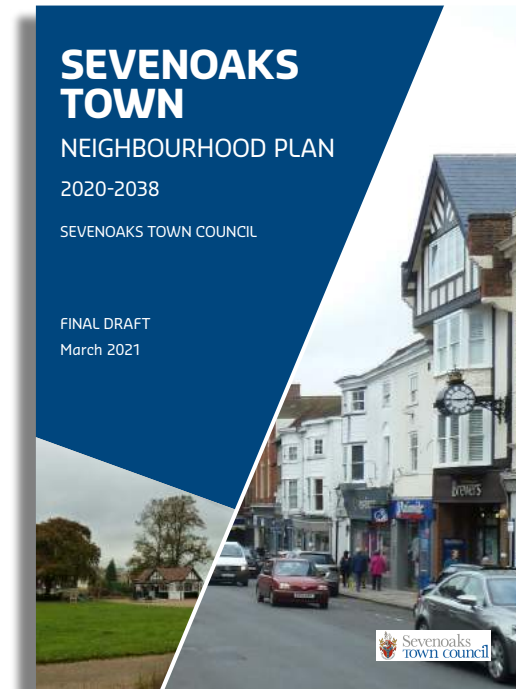
- **Additional policies and aims**
  - Encouraging development of vacant and under utilised sites
  - Naming of streets to reflect people and places of historic significance
  - Delivering biodiversity net gain as part of development
  - Managing surface water to minimise flood risk
  - Directing HGV movements away from the town centre
  - Enhanced play and sports provision
  - Separate policy relating to Tarmac site
- **Revisions to existing policies and to supporting text**



# STRATEGIC ENVIRONMENTAL ASSESSMENT

Sevenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022

- Updated Plan submitted to the District Council to assess whether a **Strategic Environmental Assessment (SEA)** was required (April 2021)
- **Initial screening opinion was that an SEA was not required but Historic England disagreed**
- AECOM appointed to prepare SEA in August 2021



# STRATEGIC ENVIRONMENTAL ASSESSMENT

Savenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022

- SEA is a mechanism for considering and communicating the potential impacts of an emerging plan
- **Aim of SEA:** to inform the Plan and to avoid and mitigate any potential negative impacts, and to maximise the Plan's contribution to sustainable development
- AECOM issued SEA Scoping Report in September 2021
- Scoping was carried out under eight environmental themes:
  - Air Quality
  - Biodiversity and Geodiversity
  - Climate Change
  - Landscape and Townscape
  - Historic Environment
  - Land, Soil, and Water Resources
  - Community Wellbeing
  - Transportation.

# STRATEGIC ENVIRONMENTAL ASSESSMENT

Sevenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022

- Consultation on Scoping Report with Historic England, Natural England and the Environment Agency
- Recommendation on minor changes to strengthen policies in the Neighbourhood Plan made by AECOM in November 2021
- These were incorporated into the January 2022 Neighbourhood Plan





# ALLOCATING SITES

- The purpose of the Sevenoaks Neighbourhood Plan is to ensure that new development is delivered in a coordinated way that **maximises benefits** to the town and is **supported by local people**.
- The Sevenoaks Neighbourhood Plan **must be in compliance with the District Council's Local Plan**
- The consultation draft Neighbourhood Plan was prepared to align with the emerging **Local Plan (2015-2035)** and **assumed that sites identified within the plan would be allocated**
- Delays to the Local Plan mean that this is no longer the case - wording in the plan has therefore been amended to align with the current planning policy
- Whilst a Neighbourhood Plan can allocate sites this would require additional evidence (proof that development is viable and deliverable and that development is supported by owners)
- **The Neighbourhood Plan does not allocate sites** but instead sets out the benefits that development should deliver through the design, layout and use of each site



# STRATEGIC ENVIRONMENTAL ASSESSMENT

Sevenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022

- SEA Environmental Report issued by AECOM on 21 March 2022
- SEA Environmental Report includes an assessment of the Neighbourhood Plan policies against the eight themes:
  - Air Quality **Beneficial Approaches**
  - Biodiversity and Geodiversity **Positive Effects**
  - Climate Change **Potential Positive Effects**
  - Landscape and Townscape **Positive Effects**
  - Historic Environment **Positive Effects**
  - Land, Soil, and Water Resources
  - Community Wellbeing **Significant Positive Effects**
  - Transportation. **Beneficial Approaches**
- Once SEA finalised Historic England, Natural England and the Environment Agency will be consulted (5 weeks).



# NEXT STEPS

- **Sign off Submission Draft Neighbourhood Plan** with Neighbourhood Plan Steering Group and Town Council **May 2022**
- **Submit Submission Draft Neighbourhood Plan** to District Council along with Consultation Statement, Basic Conditions Statement and SEA **June 2022**
- SDC will then: **June / July 2022**
  - **publicise the plan** for a six week period;
  - notify anyone referred to in the consultation statement that the plan has been received; and
  - **appoint an independent examiner**

Any representations received on the plan during the 6-week consultation period will be passed to the independent examiner for consideration.
- **Examiners Report** **August 2022**

At the end of the 6-week period the independent examiner will issue a report to the SDC and the Town Council and may make recommendations on modifications required to the plan prior to going to referendum.
- **Modify Neighbourhood Plan** in response to Examiner's recommendations **September 2022**
- **Referendum** **Autumn 2022**

Assuming that the plan is found to be satisfactory then SDC will organise a referendum. They will need to publicise this 28 working days before the referendum is held.

**If more than 50% of those voting in the referendum vote yes to support the plan, then it becomes a part of the statutory development plan.**

Sevenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022  
 Comments received on the Strategic Environmental Assessment Final Report  
 Planning Committee 04.04.2022 and Steering Committee 04.04.2022

Comment by	Page/section reference	Comment
Hugo Nowell	Page 5 Section 2.6	Character, heritage and identity (no comma after heritage)
Hugo Nowell	Page 9 Bullet point 1 under "Landscape and Townscape"	Should reference to trees be made here given the contribution they make to the character of town and that this is highlighted in the NP?
Hugo Nowell	Page 17 Section 4.9 Reference "[...] the planning policies proposed for the identified sites have..."	For some sites perhaps but not all – perhaps rephrase to say "on some of the sites".
Hugo Nowell	Page 18 Section 4.14 Reference "and through the recommendations and suggestions..."	"and through the SEA process"
Hugo Nowell	Page 24 Section 5.20	Should this section emphasise NP Policy L5 and the potential new public open space opportunities that could be delivered as part of the potential development of the Tarmac site?
Hugo Nowell	Page 27 Section 5.32	Should this section emphasise NP Policy L5 and the potential new public open space and leisure opportunities that could be delivered as part of the potential development of the Tarmac site?
Charles George	Page 61 App A Context review and baseline	There is mention of the Local List, I can find no mention of this in the text of the SEA. Is this intentional?

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Description:	Related date:	Pages:
NDP SEA Screening to Statutory Consultees circulated by SDC. STNP identified and supports suitable sites for development, the plan did not allocate them as they were already either allocated in current or emerging SDC Local Plan	6 <sup>th</sup> May 2021	
SDC confirm via email that an SEA is not needed <b>(attached)</b> Environmental issues will be considered in the assessment of the Plan (by the examiner) which is different to requirement of SEA.	18 <sup>th</sup> May 2021	Appendix A Pages 5-7
SDC email STC the Statutory Consultee response from Historic England with advice on next steps <b>(attached)</b>	15 <sup>th</sup> June 2021	Appendix B Pages 9-10
Zoom meeting between SDC Officers and STC Officers noting that an SEA is required	17 <sup>th</sup> June 2021	
Zoom meeting between SDC Officers, Hugo Nowell and STC Officers to discuss STC's options regarding an SEA (following Historic England's recommendation).  Meeting summarised in a report to Planning Committee on 28.6.2021 <b>(attached)</b>	22 <sup>nd</sup> June 2021  28 <sup>th</sup> June 2021	Appendix C Pages 11-12
SDC confirm they will not progress the NDP without an SEA	30 <sup>th</sup> June 2021	
Phone call with Dave Chapman of Locality regarding advice on Locality funding application. Advised to treat the sites as allocations  Information emailed internally to SDC Officers, STC Officers and Hugo Nowell <b>(attached)</b>	5 <sup>th</sup> July 2021	Appendix D Pages 13-20
Zoom meeting between STC Officers, Hugo Nowell and AECOM – AECOM filled in their part of the application form. <i>At this point the potential of allocating some of the sites was being considered, as a follow up of the Emerging Local Plan.</i> Meeting summarised in a report to Planning Committee on 26 <sup>th</sup> July 2021 and provided to SDC during Zoom meeting on 21 <sup>st</sup> July 2021 <b>(attached)</b>  Email between SDC Officers and STC Officers advising that allocating sites will require significant amounts of extra work resulting in setbacks to the timetable <b>(see quote below and email attached)</b> <b>“[Emma], Helen and Hannah have had a discussion regarding the possible implications of the chosen SEA approach and turning the sites in the NP into allocations. In particular, this would require a large amount of extra work which may have substantial setbacks to your timetable. The sites will need to be assessed individually to prove that they are deliverable, achievable, justified and evidenced etc.”</b>	13 <sup>th</sup> July 2021  15 <sup>th</sup> July 2021	Appendix E Pages 21-22  Appendix F Page 23

<p>Zoom meeting between SDC Officers and STC Officers discussing the SEA funding application. SDC recommended getting in touch with Historic England to remove doubt that the NDP is allocating sites.</p>	<p>21<sup>st</sup> July 2021</p>	
<p>Zoom meeting between AECOM and STC Officers. STC was considering at that point allocating Town Council Offices, Adult Education site and the Tarmac site. These were originally to be in the Emerging Local Plan, so the NDP would have followed on from this. Potentially applying for a design review of the NDP was considered and AECOM advised they would ask their design team if a facilitation package could help the NDP.</p> <p>Summarised in email between AECOM and STC Officers <b>(attached)</b></p>	<p>9<sup>th</sup> August 2021</p>	<p>Appendix G Pages 24-26</p>
<p>Email from AECOM with their design team’s response, advising a Design Review couldn’t be done in the calendar year but that we should have enough information for the plan to go ahead as it is (no allocations)</p>	<p>6<sup>th</sup> September 2021</p>	<p>Appendix H Page 27</p>
<p>Zoom meeting between AECOM, Hugo Nowell and STC Officers. AECOM suggested replacing red-line drawings with shaded maps and re-wording to remove doubt that the NDP is not allocating sites. Recommended to check with SDC whether they are satisfied the wording removes doubt of allocation. Meeting summarised in internal email between AECOM and STC Officers <b>(attached)</b></p>	<p>10<sup>th</sup> November 2021</p>	<p>Appendix I Pages 31-32</p>
<p>Email from AECOM to STC with suggested edits for policy strengthening, following their appraisal. This included Biodiversity, Climate Change, Historic Environment, as well as Land, Soil and Water Resource <b>(attached)</b></p>	<p>15<sup>th</sup> November 2021</p>	<p>Appendix I Pages 28-30</p>
<p>Email between SDC Officers and STC Officers. Notifying SDC that the NDP will not be allocating sites and requesting a meeting with SDC to present the changes made.</p>	<p>18<sup>th</sup> November 2021</p>	<p>Appendix J Pages 33-34</p>
<p>Zoom meeting between SDC Officers, Hugo Nowell and STC Officers. Regarding the edits made to remove doubt of allocation. SDC Officers advised that the revised version be sent to Historic England for them to approve.</p> <p>Information on the outcomes of this were emailed internally to AECOM. AECOM also advise forwarding to Historic England <b>(attached)</b></p>	<p>6<sup>th</sup> December 2021</p>	<p>Appendix K Pages 35-39</p>
<p>Historic England forwarded the updated wording changes and comment requested.</p>	<p>7<sup>th</sup> December 2021</p>	<p>Appendix L Page 40</p>
<p>Historic England respond that they do not consider the changes acceptable, and indicated they believe “Allocation of sites” would policy would require substantial additional evidence.</p>	<p>17<sup>th</sup> December 2021</p>	<p>Appendix M Page 41</p>

<p>Phone call between AECOM and Planning Committee Clerk, regarding Historic England’s email, AECOM advise that the SEA itself cannot address Historic England’s concerns. AECOM advised STC to consider the implied options (either no mention of the development sites or clear allocations with additional evidence). Information emailed internally between STC Officers and Hugo Nowell <b>(attached)</b></p>	<p>20<sup>th</sup> December 2021</p>	<p>Appendix N Page 43</p>
<p>Report provided to Planning Committee 20<sup>th</sup> December 2021 with summary of edits made in line with AECOM’s comments so far <b>(attached)</b> The item was deferred to the following meeting on 10<sup>th</sup> January 2022 due to Historic England responding after the Agenda was published and before the meeting was held.</p>	<p>20<sup>th</sup> December 2021</p>	<p>Appendix O Pages 44-46</p>
<p>Zoom meeting between Hugo Nowell and Historic England, agreeing a form of words for Policy D1 that would not require the Town Council to undertake further evidence work.  Agreed upon changes forwarded to STC Officers by Hugo Nowell on 7<sup>th</sup> January 2022 <b>(attached)</b></p>	<p>22<sup>nd</sup> December 2021 7<sup>th</sup> January 2022</p>	<p>Appendix P Pages 47-51</p>
<p>Planning Committee discussed and approved the edits made to the Final Draft in order for it to progress without further investigations <b>(minutes attached)</b></p>	<p>10<sup>th</sup> January 2022</p>	<p>Appendix Q Pages 52-54</p>

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**APPENDIX A. This is an email chain. Please therefore read bottom to top (start at page 7)**

**From:** Helen French <[Helen.French@sevenoaks.gov.uk](mailto:Helen.French@sevenoaks.gov.uk)>  
**Sent:** 18 May 2021 09:47  
**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hannah Gooden <[Hannah.Gooden@sevenoaks.gov.uk](mailto:Hannah.Gooden@sevenoaks.gov.uk)>  
**Subject:** RE: NDP and SEA Screening Assessment - query for tonight's meeting

Hi Linda,

Just to clarify. An SEA is required where the plan is likely to have significant environmental impacts. This is usually the case where the plan allows for changes to land use or redevelopment. The screening assessment concluded that the NP doesn't allocate any land for a change of use or redevelopment, nor does it include any policies that are likely to cause significant environmental impact when implemented. Therefore, an SEA is not required.

If the plan was allocating land, it does not automatically mean that an SEA would be required, it would need to be determined as to whether that allocation is likely to have significant environmental impacts. The government guidance does state that Neighbourhood Plans are unlikely to need an SEA because of the size and scope of the document, and because it must be in conformity with the adopted Local Plan which has an SEA.

I hope this helps.

Thanks

Helen

**Helen French MRTPI**  
Principal Planning Officer (Planning Policy)  
Sevenoaks District Council | Argyle Road | Sevenoaks | TN13 1HG  
Tel: 01732 22 7357  
Email: [helen.french@sevenoaks.gov.uk](mailto:helen.french@sevenoaks.gov.uk)  
Online: [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)  
(Part-Time: Tuesday - Thursday)

**From:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Sent:** 18 May 2021 09:34  
**To:** Hannah Gooden <[Hannah.Gooden@sevenoaks.gov.uk](mailto:Hannah.Gooden@sevenoaks.gov.uk)>; Helen French <[Helen.French@sevenoaks.gov.uk](mailto:Helen.French@sevenoaks.gov.uk)>  
**Subject:** RE: NDP and SEA Screening Assessment - query for tonight's meeting

**EXTERNAL EMAIL:** Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Hannah



Thank you that is all helpful information.

With Regards  
Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG  
Tel: 01732 459953



Sevenoaks Town Council is grateful to everyone  
who is stepping up to help the community.



**From:** Hannah Gooden <[Hannah.Gooden@sevenoaks.gov.uk](mailto:Hannah.Gooden@sevenoaks.gov.uk)>  
**Sent:** 18 May 2021 09:32  
**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Helen French  
<[Helen.French@sevenoaks.gov.uk](mailto:Helen.French@sevenoaks.gov.uk)>  
**Subject:** RE: NDP and SEA Screening Assessment - query for tonight's meeting

Apologies Linda – I've just seen this (I work school hours and Helen doesn't work on Mondays)  
Your understanding is correct. Environmental issues will still be considered in the assessment of the  
Plan (by the examiner), but this is different to the requirement for SEA.

In terms of responses, we've heard back from the Environment Agency with no comment.

Thanks  
Hannah

**From:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Sent:** 17 May 2021 16:40  
**To:** Helen French <[Helen.French@sevenoaks.gov.uk](mailto:Helen.French@sevenoaks.gov.uk)>; Hannah Gooden  
<[Hannah.Gooden@sevenoaks.gov.uk](mailto:Hannah.Gooden@sevenoaks.gov.uk)>

**Subject:** NDP and SEA Screening Assessment - query for tonight's meeting

**Importance:** High

**EXTERNAL EMAIL:** Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Helen and Hannah

Hoping you might be able to pick this up tonight.

STC are considering tonight the SEA Screening Assessment and some Cllrs are querying this for not considering Environmental Impact etc.

My understanding is as follows

2.5. Although the STNP identifies suitable sustainable sites for development, the plan does not allocate them and the majority are already identified or allocated within the adopting or emerging Local Plan.

STC would therefore only need an SEA Screening Assessment if it was allocating sites not within SDC's strategic documents?

Have you had any responses from statutory consultees to date please?

With Regards

Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG  
Tel: 01732 459953

[Page deliberately left blank]

**APPENDIX B This is an email chain. Please therefore read bottom to top (start at page 10)**

**From:** Helen French <Helen.French@sevenoaks.gov.uk>  
**Sent:** 15 June 2021 12:19  
**To:** Linda Larter <townclerk@sevenoakstown.gov.uk>; Hugo Nowell <h.nowell@uistudio.co.uk>  
**Cc:** Hannah Gooden <Hannah.Gooden@sevenoaks.gov.uk>; Emma Coffin <Emma.Coffin@sevenoaks.gov.uk>; Sevenoaks Town Planning <planning@sevenoakstown.gov.uk>  
**Subject:** RE: Sevenoaks Neighbourhood Plan \_ Final Draft

Hi Linda,

The statutory consultees have had 6 weeks to respond to the SEA screening of the Neighbourhood Plan.

We have not received a response from Natural England and the Environment Agency indicated that they only respond to scoping opinions once it has been determined that an SEA is required.

However, we have received a response from Historic England who have raised concerns about the development sites policy D1 within the neighbourhood plan. In their opinion, an SEA is required. I have attached the response and suggest that we have a meeting to discuss the next steps.

In terms of options, initially I think the following are available to you and we can discuss the merits and implications of each:

- Undertake an SEA for the plan. There are consultants that can undertake this work relatively easily but this would have time and expense implications.
- Remove Policy D1 and any explicit mention of support or requirements for new development on specific sites.
- Amend Policy D1 to the point where Historic England deem an SEA is not required. This would involve discussions with Historic England and it may be that they will only be satisfied with the removal of any requirements on specific sites.

Can you please liaise with Emma Coffin for some dates for a meeting?

Thanks

Helen

**Helen French MRTPI**  
Principal Planning Officer (Planning Policy)  
Sevenoaks District Council | Argyle Road | Sevenoaks | TN13 1HG  
Tel: 01732 22 7357  
Email: [helen.french@sevenoaks.gov.uk](mailto:helen.french@sevenoaks.gov.uk)  
Online: [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)  
(Part-Time: Tuesday - Thursday)

Dear Helen,

Thank you for consulting Historic England on your screening assessment of the Sevenoaks Town Neighbourhood plan for SEA. We would like to offer the following advice based on the information available to date.

We note in your statement that the Neighbourhood Plan does not allocate specific sites for future development but promotes policies that seek to shape future development proposals. I note that a number of the sites are proposed to be promoted for development under Policy D1. The map associated with the policy identifies a use type for each area and therefore this policy is, in effect an allocation policy promoting the development of these sites. Whilst I understand most of these appear to have been drawn from the existing and emerging local plan, which will be subject to a separate SEA, some sites appear to be specific to this plan, such as site 9 (the Former Edward Electrical 166 High Street) and site 10 (Buckhurst Lane Sevenoaks Town Centre). Both sites are near designated heritage assets, site 9 borders the Sevenoaks Vine Conservation Area, whilst site 10 partially falls within the Sevenoaks High Street Conservation Area and has numerous Grade II listed buildings in its immediate vicinity. In our view these proposed allocations in particular trigger the need for an SEA. The potential for development in these areas to have effects for the heritage assets, including indirect impacts on their settings should be assessed, including their potential for cumulative effects and the alternative effects of reasonable alternative that have been considered in the decision-making process. This should inform consideration of any mitigation that may be required within the allocation policy. As such we feel the plan does merit SEA.

We are not aware of what other sites may have been assessed and what heritage assets or potential assets they might have effects for. It is important to consider whether alternative sites that are 'reasonable alternatives' (if any could be considered within the plan area) might also have had greater or lesser effects on these or other heritage assets, as well as their other environmental effects.

Our assessment is limited to the effects on sites recorded on the National Heritage List of England. However, we would also recommend giving consideration at this stage to whether any sites recorded on the Kent Historic Environment Record might be considered as non-designated heritage assets, and could be affected by the proposed allocations. The presence of records of previously identified but currently non-designated archaeological remains of national importance could significantly affect the need for consideration of cultural heritage within the SEA.

Thank you again for consulting Historic England. Please let us know if you have questions about any of the above comments.

Kind regards,

Andrew

**Andrew Scott**

Assistant Inspector of Historic Buildings and Areas  
London & South East Region

Historic England | 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Checked by:

**Robert Lloyd-Sweet**, MA, PGDip, BA (Hons.), AIFA  
Historic Places Adviser, South East England

## **APPENDIX C**

Sevenoaks Town Neighbourhood Plan Steering Committee Agenda 04-04-2022

Sevenoaks Town Council

Planning Committee 28<sup>th</sup> June 2021

### Update on the progress of the Neighbourhood Development Plan and SEA requirement

On 15<sup>th</sup> June 2021, Sevenoaks District Council confirmed that the statutory consultees have now had 6 weeks to respond to the SEA screening of the NDP. The responses were as follows:

- Natural England have not responded/have not raised any issues
- The Environment Agency have indicated that they only respond to scoping opinions once it has been determined that an SEA is required
- Historic England have raised concerns about the Development Sites Policy D1 and recommended that an SEA be acquired.

Due to Historic England's recommendation, the following options, each with their own advantages and disadvantages, have been proposed by the District Council:

#### **1. The Town Council undertakes an SEA for the NDP:**

##### **Advantages:**

- This grants STC the potential to strengthen their previous wording of Policy D1, which states that the Town Council would "support" development of particular sites, rather than allocating them. This would allow the NDP greater influence on planning decisions involving the relevant sites, and could include sites such as the Edwards Electrical site.
- This also eliminates the risk of being required by an Inspector to undertake an SEA at a later date.
- This would serve as evidence that the Town Council responded to and adequately addressed their statutory consultant's concerns.

##### **Disadvantages:**

- An SEA would incur additional costs\* and delay the NDP going to referendum, estimated to be approximately 12 weeks.  
\*(Sevenoaks Town Council may be eligible for a Technical Support Grant for this and an Expression of Interest has been submitted)

#### **2. The Town Council remove the Development Sites Policy D1, which is the source of Historic England's concerns and their recommendation that an SEA is required.**

##### **Advantages:**

- This could potentially eliminate the requirement for an SEA, which would prevent the delay in the NDP going to referendum and incur no additional costs to the Town Council.
- This would serve as evidence that the Town Council responded to and adequately addressed their statutory consultant's concerns.

##### **Disadvantages:**

- Removing Policy D1 may not be enough to completely eliminate the requirement for an SEA, as Historic England's reasoning for Policy D1 to require an SEA could also apply to Policy D2, which features the Tarmac Site.

- Removing both policies would not eliminate the risk of an SEA being requested by an Inspector at a later stage in the process. This could mean that the Town Council may still end up having to undertake an SEA, however without the advantage of strengthening the Town Council's stance on allocating sites.



**APPENDIX D. This is an email chain. Please therefore read bottom to top (start at page 20)**

**From:** Sevenoaks Town Planning  
**Sent:** 05 July 2021 16:27  
**To:** Helen French <Helen.French@sevenoaks.gov.uk>; Emma Coffin <Emma.Coffin@sevenoaks.gov.uk>  
**Subject:** FW: NDP event - advice on funding app

Dear Helen and Emma,

I hope you had a relaxing weekend!  
Please see below. Would either of you have any comments to input on the below questions before we submit our technical support application please? I spoke with Dave Chapman as you suggested and he advised that we treat the 13 sites mentioned in our NDP as allocations due to Historic England's recommendation for an SEA.

Kind regards,  
Georgie

**From:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Sent:** 05 July 2021 15:55  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** RE: NDP event - advice on funding app

Dear Georgie

Thank you for forwarding this. I think it might be useful to also ask the same questions of SDC?

With Regards  
Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG  
Tel: 01732 459953



Sevenoaks Town Council is grateful to everyone who is stepping up to help the community.



**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>

**Sent:** 05 July 2021 15:51

**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>

**Subject:** RE: NDP event - advice on funding app

Dear Linda and Hugo,

As Dave Chapman advised we treat the 13 sites as allocations on the application, any comments to the following questions would be very helpful:

<p>If ye Please add any comments you may have on your site allocations here</p>	<p>For example:</p> <ul style="list-style-type: none"> <li>• have you completed a full assessment of all sites;</li> <li>• have the LPA considered the sites you wish to allocate;</li> <li>• do you know the likely number and types of houses that will be allocated to each site;</li> <li>• is the landowner happy that the site will be allocated.</li> </ul> <p>This information helps us to understand the work you have completed in respect to site allocations.</p>
<p>A Are you considering allocating sites or parts of sites for affordable housing for sale?</p> <ul style="list-style-type: none"> <li>- Yes</li> <li>- No</li> <li>- Too early to say</li> </ul>	<p>If you are considering or intending to allocate sites or part of a site for affordable housing for sale, then you will be likely to say yes to this question.</p> <p>If it's too early to say, then you may be considering a Housing Needs Assessment to determine if there is a need for affordable housing for sale in your neighbourhood area.</p>
<p>If yes, please provide more information about the sites te(s)</p>	<p>What information have you already gathered about these sites?</p>
<p>Why are you seeking to allocate more homes than the Local Plan or emerging Local Plan?</p>	<p>(We suggest 990 while the emerging local plan recommende 684).</p>
<p>Are you considering assessing sites or parts of sites for affordable housing for sale?</p> <ul style="list-style-type: none"> <li>Yes</li> <li>No</li> <li>- Too early to say</li> </ul>	<p>If you are considering or intending allocate sites or part of a site for affordable housing for sale, then you will be likely to say yes to this question.</p> <p>If it's too early to say, then you may be considering a Housing Needs Assessment to determine if there is a need for affordable housing for sale in your neighbourhood area.</p>
<p>I If yes, please provide more information about the site(s)</p>	<p>What information have you already gathered about these sites?</p>

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Sent:** 05 July 2021 15:25  
**To:** Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Cc:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Subject:** RE: NDP event - advice on funding app

Dear Georgie

Do you need any further information from Hugo?

With Regards  
Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG  
Tel: 01732 459953



Sevenoaks Town Council is grateful to everyone who is stepping up to help the community.



**From:** Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Sent:** 05 July 2021 15:20  
**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Cc:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Subject:** Re: NDP event - advice on funding app

Hi Linda

That all sounds good.

Do you need anything from me at this stage? I am conscious that in the flurry of activity around getting quotes I did not compete the application form queries.

I have gone to four people for quotes (including AECOM) and although I have not had a reply from them I have had positive messages from two companies but it sounds like the Locality report may work out.

Best wishes

Hugo

Hugo Nowell  
Director

URBAN  
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STUDIO

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On 5 Jul 2021, at 14:38, Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)> wrote:

Dear Hugo

Please see below. I was nervous as previously mentioned about the need for Design Codes.

Fingers crossed Dave might get back to us asap.

With Regards  
Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG  
Tel: 01732 459953

<image002.png>

<image003.png>

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>

**Sent:** 05 July 2021 14:32

**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>

**Subject:** RE: NDP event - advice on funding app

Dear Linda,

I have just spoken to Dave Chapman from Locality and gave him a sort of run down of where we're at and our screening opinions. He said that usually the eligibility is for if you have a design code or are allocating sites, but as Historic England have recommended we need an SEA, that our application would be treated as if we are allocating which means we should be eligible for the technical support and free SEA from AECOM.

He said to fill out the form as if we are allocating sites, which I have done, and upload the SEA opinions. It is his opinion that we will be eligible for the technical support, so he said that applying for grant funding wouldn't be necessary. The application goes straight to him and he will then set up a meeting with us and AECOM to discuss.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Sent:** 03 July 2021 11:12  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Subject:** RE: NDP event - advice on funding app

Dear Georgie

Thanks for the update. Hopefully you will receive a call back on Monday

With Regards  
Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

Tel: 01732 459953  
[www.sevenoakstown.gov.uk](http://www.sevenoakstown.gov.uk)

<image001.png>

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 02 July 2021 15:58  
**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Subject:** RE: NDP event - advice on funding app

Dear Linda,

I had hoped I would have more of an update of this by now, but just to let you know: I left Dave Chapman from Locality a voicemail earlier this morning, as Emma Coffin suggested. I will keep an eye on my emails over the weekend as I left him my number and work email.

The list of things I was planning on asking his advice on if we should be applying for grant money, technical support, or both in case one gets rejected. I looked into the guidance a bit more and it says that they provide an SEA support package “where the Local Planning Authority have confirmed a Strategic Environmental Assessment is required”, so I was also going to check with him that Historic England’s recommendation would be enough. I thought I might as well also check how exact they would like our quotes to be and mention LUC’s £10,000 rough figure.

Is there anything else you wanted me to ask?

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>  
**Sent:** 02 July 2021 09:16  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Subject:** RE: NDP event - advice on funding app

Dear Georgie

I think it would be helpful to obtain some more information from Locality.  
Thank you for offering to follow this up.

With Regards  
Linda

Linda Larter MBE  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG  
Tel: 01732 459953

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<image003.png>

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 01 July 2021 17:08



**To:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>

**Subject:** NDP event - advice on funding app

Dear Linda,

I asked for advice on our NDP funding application at the NDP event I attended this afternoon. Alison Eardley said she has worked on plans that have been in similar positions; Historic England recommended an SEA when the LPA didn't think it was needed. She advised that it may be best we apply for technical support, not a grant, from Locality and also include a note in our application saying that SDC had advised we didn't need one, Historic England advised we do, and specifying that we do not allocate sites. (Unless that will change). She said that that might actually make the process less complicated and they have sometimes gone back to Historic England and made sure they understood the scope of the plan etc.

I hadn't realised, but if we apply only for the technical support, we won't need to include the quotes or get one from AECOM as if it is granted, they will just be appointed to us to do the SEA without us seeing the cost or needing a grant. She said that if we do need additional funding we might as well apply at the same time, but that it wouldn't be needed for the SEA. Unless you wish to get the quotes first and still apply for funding as well, would you like me to send you the final application draft for technical support and send it off tomorrow? Hopefully the timing would line up with us receiving a response around the same time that the next planning meeting where the 3 quotes from Hugo are presented, so there wouldn't be too much time lost if we find out we aren't eligible?

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

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Notice: <https://www.sevenoakstown.gov.uk/UserFiles/Files/GDPR/Privacy%20Notice.pdf>

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## **APPENDIX E**

### **Sevenoaks Town Council**

#### **Planning Committee 26<sup>th</sup> July 2021**

#### **Outcome of STC's meeting with AECOM to discuss our Locality Technical Support application**

The following topics and their outcomes were discussed in a meeting with a consultant from AECOM and Urban Initiatives Studio on Tuesday 13<sup>th</sup> July 2021:

#### **The Locality Technical Support Application:**

AECOM filled in their own application with information provided by STC and Urban Initiatives Studio on the NDP, to be submitted to Locality. They aim to finalise the application by 16<sup>th</sup> July 2021 and hope to hear from Locality regarding the success of our application by the end of July.

If approved by Locality, a lead AECOM consultant will be allocated to STC, with a predicted 8-12 weeks for the SEA to be completed.

#### **Allocations:**

Currently, STC do not allocate any sites, but support development on 13. These can be divided into 3 categories:

Sites that are allocated in the *current* SDC Local Plan, sites that are allocated in the *emerging* Local Plan, and sites that are in neither. Those that are in the current Local Plan can not be allocated by STC.

It was discussed that, even with an SEA, STC may not wish to allocate all 13 developments referred to in the NDP. This is due to particular sites being supported for more long-term development, or for employment rather than housing.

For instance, Sevenoaks Station could be flagged up as an area for potential development or change, rather than being allocated.

It was noted that STC was not a housing authority, and the provision of housing numbers was not its key aim. STC did have concerns about potential increased density on current development sites and requested that this be addressed within the SEA.

#### **Design Codes:**

Design Codes are becoming more common in NDP's, so there is potential for the Examiner to enquire as to why STC did not produce one.

STC could be eligible for a Locality Design Code package to be provided at the same time as the SEA, this could incur further delays. However, since STC did a lot of research on the Northern Sevenoaks Masterplan, a *facilitation* package, where consultants review and provide advice as to how to bring the work up to Design Code quality, could be beneficial and incur less delays.

#### **Actions agreed:**

The AECOM consultant to contact AECOM's Design Team regarding the possibility and predicted timescales of providing a facilitation package, rather than a Design Code package.

### **The SEA process:**

Consisting of three stages, the first of which (Screening) has already been completed. The next two are Scoping and an Environmental Report.

Scoping will provide AECOM with an understanding on the issues that the 13 supported development sites may be affected by. It will then set out a list of questions and objectives for the SEA to answer. We will be given this to review before a 5-week consultation goes out to Statutory Consultants including Historic England, Natural England and the Environmental Agency. It will be edited as per comments received.

The Environmental Report will set out a summary of the scoping opinions, an appraisal of the NDP policies under the SEA themes (air quality, climate, landscape, population, transport, density concerns etc), a general narrative on how each site perform under those themes, and recommendations for the NDP policy wording. Reasonable alternatives will also be set out, and the 13 sites displayed in a table under each SEA theme title, outlining the impacts of each under these.

The final report will accompany the NDP at submission to SDC.

### **Consultation with Regulation 14**

The AECOM consultant raised the possible risk that submitting the two documents (NDP and SEA) to SDC without reconsulting with Regulation 14 could be a risk for the NDP's progression. This is because the more common order of events sees the SEA completed before final consultation with Regulation 14, so that the SEA can also undergo potential edits as per consultants' responses.

It is therefore possible that the Examiner will wish to see evidence on how the SEA informed and influenced the NDP. The AECOM consultant advised that STC could still provide evidence of this without the 6 additional week re-consultation, and that the re-consultation would usually only occur when the draft has undergone significant change since initial consultation; not applicable in this case.

SDC have been contacted on AECOM's advice on whether they are happy for us to not re-consult, and instead include a section in our submission detailing how the SEA has informed and influenced the NDP.

## **APPENDIX F**

**From:** Emma Coffin <Emma.Coffin@sevenoaks.gov.uk>

**Sent:** 15 July 2021 15:57

**To:** Sevenoaks Town Planning <planning@sevenoakstown.gov.uk>

**Cc:** Hannah Gooden <Hannah.Gooden@sevenoaks.gov.uk>; Helen French

<Helen.French@sevenoaks.gov.uk>; Linda Larter <townclerk@sevenoakstown.gov.uk>; Hugo Nowell <h.nowell@uistudio.co.uk>

**Subject:** FW: NDP queries for AECOM

Good Afternoon Georgie

Many thanks for your email.

Myself, Helen and Hannah have had a discussion regarding the possible implications of the chosen SEA approach and turning the sites in the NP into allocations. In particular, this would require a large amount of extra work which may have substantial setbacks to your timetable. The sites will need to be assessed individually to prove that they are deliverable, achievable, justified and evidenced etc.

Additionally and further to your email below, at the moment there is no evidence to prove that the SEA has informed the Neighbourhood Plan and this could be a potential issue at Examination and Referendum.

We think it would be useful to have a meeting as soon as possible to discuss your options going forward, and ensure that we are all on the same page. Please could you let me know when you are available? We are available tomorrow afternoon, or any afternoon next week.

I look forward to hearing from you.

Kind regards

Emma

Emma Coffin

Planning Officer (Policy)

Planning Policy

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

Tel: 01732 227315

Email: [emma.coffin@sevenoaks.gov.uk](mailto:emma.coffin@sevenoaks.gov.uk)

Online: [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

\*Please note that I am not in the office on Mondays

**APPENDIX G. This is an email chain. Please therefore read bottom to top.**

**From:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>  
**Sent:** 10 August 2021 15:09  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>;  
Chisholm-Batten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Subject:** RE: Sevenoaks Town Council NDP - table of our 13 sites supported for development

Hi Georgie,

Great to catch up yesterday, and many thanks for your email below. This is most helpful.

We have since reached out to our design team and will be in touch shortly with their advice. If indeed they suggest that a facilitation technical support package is the most appropriate route to take, I shall look to progress with the application on your behalf.

In the meantime we shall continue to progress with the SEA Scoping Report.

Best regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 10 August 2021 10:26  
**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>; Chisholm-Batten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** [EXTERNAL] Sevenoaks Town Council NDP - table of our 13 sites supported for development

Dear both,

Thank you for meeting with us yesterday morning.

Following our discussions, please see attached a list of the 13 sites that STC support development of in our NDP, and their status in the District Council's emerging or existing Local Plan. The highlighted 3 sites are those that we would be considering allocating.

The below links may also be of use to you:

Local List 2017 – this page includes a link to the SPD and a link to the interactive map that shows each asset and the reasons for their inclusion:

[https://www.sevenoaks.gov.uk/info/20069129/current\\_local\\_plan/351/local\\_list\\_-\\_supplementary\\_planning\\_document](https://www.sevenoaks.gov.uk/info/20069129/current_local_plan/351/local_list_-_supplementary_planning_document)

Sevenoaks Residential Character Area Assessment 2012:

[https://www.sevenoaks.gov.uk/downloads/download/211/sevenoaks\\_residential\\_character\\_area\\_assessment\\_supplementary\\_planning\\_document](https://www.sevenoaks.gov.uk/downloads/download/211/sevenoaks_residential_character_area_assessment_supplementary_planning_document)

Kind regards,

Georgie

Georgie Elliston

Planning Committee Clerk

Sevenoaks Town Council

Town Council Offices

Bradbourne Vale Road

Sevenoaks

Kent TN13 3QG

Orange highlight marks the sites we would be considering allocating

Site:	Status in SDC Local Plan:
Bat and Ball Centre, Bat and Ball	Emerging Local Plan - Mixed use allocation
Travis Perkins, Bat and Ball	
Cramptons Road, Water Works	Existing and emerging Local Plan – Residential Development
Carpwright / Wickes, Otford Road	
Sevenoaks Gasholder Station	Existing and emerging Local Plan – Residential Development
Bat and Ball Enterprise Centre	Existing and emerging Local Plan – Land for Business
Sevenoaks Station and surrounding area	
Edwards Electrical, High Street	
Buckhurst Lane (Suffolk Way) sites	
Post Office / BT Exchange	Existing and emerging Local Plan – Mixed Use Development
Town Council offices, Bradbourne Vale Road	Emerging Local Plan - Residential
Adult Education site, Bradbourne Vale Road	Emerging Local Plan - Residential
Tarmac Ltd Site at Greatness – Sevenoaks Quarry, Bat and Ball Road	Emerging Local Plan – Mixed Use



## **APPENDIX H**

**From:** Putt, Ryan <ryan.putt@aecom.com>  
**Sent:** 06 September 2021 16:22  
**To:** Sevenoaks Town Planning <planning@sevenoakstown.gov.uk>  
**Cc:** Chisholm-Batten, Nick <nick.chisholm-batten@aecom.com>  
**Subject:** Sevenoaks Town Neighbourhood Plan: SEA Update

Afternoon Georgie,

Hope you are well. We have now completed the SEA Scoping Report for the Sevenoaks Town Neighbourhood Plan. Please find attached, as discussed. Thanks again for sharing the evidence base documents, the Northern Sevenoaks Masterplan, and the Neighbourhood Plan document with us. These were essential sources of reference during the preparation of the Scoping Report, and you'll see that we've lifted and incorporated several pieces of information to contribute to the baseline sections for each chapter.

As a reminder, the Scoping Report presents a baseline and context review for the SEA, a series of key sustainability issues, and the SEA Framework against which we intend to appraise the Neighbourhood Plan (including reasonable alternatives). The idea of the Scoping Report is to provide the three statutory bodies for SEA, Historic England, the Environment Agency and Natural England an opportunity to comment on the proposed scope of the SEA. This is a statutory requirement.

Once you have confirmed you are happy with the document, we will release the Scoping Report to Historic England, the Environment Agency and Natural England for the statutory period of five weeks on your behalf.

I trust this all makes sense. We look forward to any comments you may have before finalising and sending out to the consultees. Please note, given this is not the main document for the SEA, you may just wish to give this a skim read rather than undertake a detailed review to check you are happy with it. We look forward to hearing from you soon.

As mentioned during our inception meeting, I have also reached out to our design team to ask for their thoughts on whether a Design including Design Codes technical support package would be appropriate. I've summarised their response below for your reference:

*"The Neighbourhood Plan would likely benefit from a Plan Health Check prior to submission in order to obtain a more considered view on the design elements which have been included, but I don't think they would come unstuck at examination because of the work that has been completed to date. There is more design information within the Neighbourhood Plan than in many Local Plans, and they have the Residential Character SPD to fall back on (although this is quite limited). This being said, the Neighbourhood Plan could potentially benefit from a design code that does a layout and sets coding expectations for each of the sites. However, that would not be completed this calendar year due to existing work commitments, so I guess it's down to whether they are happy to wait for the time being."*

Look forward to your thoughts on this, and do feel free to contact if you have any further questions at this stage.

Best regards,

Ryan

**APPENDIX I. This is an email chain. Please therefore read bottom to top (start at page 32)**

**From:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>  
**Sent:** 18 November 2021 14:19  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Cc:** Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>; Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Subject:** RE: Sevenoaks Town Neighbourhood Plan: SEA Update

Dear Georgie,

Many thanks for the update below. This all sounds fine from our perspective, and we appreciate the time taken to provide us with the additional information. Look forward to hearing from you soon.

We shall continue to progress with the SEA Environmental Report in the interim, and can leave a couple of sections as 'to be confirmed' following the outcomes of your meeting with SDC.

Best regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 18 November 2021 11:54  
**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Subject:** [EXTERNAL] RE: Sevenoaks Town Neighbourhood Plan: SEA Update

Dear Ryan,

Thank you for sending these through. We have reviewed the suggestions and are happy with them, with the only slight amendment being "SDC's commitment" under the Climate Change heading being changed to "STC's commitment".

Our next steps are to go through the NDP wording around the sites to make sure they don't come across as allocations, replacing the red line boundary plans with shaded instead, and then presenting these to SDC with the hopes of scheduling a meeting for the first week of December to run these by them and make sure they are satisfied that they are not allocations. We will also be addressing the hopes that the NDP can be submitted without another Regulation 14 consultation. I will keep you updated as to the outcomes of this meeting.

In the meantime, having now caught up with Hugo, I am going to draft a summary of how the 5 sites not allocated by the Local Plan were selected and provide information on the sites considered but ultimately omitted from the NDP.

If there is anything I have missed that we need to be working on, please do let me know.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council

Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Putt, Ryan <ryan.putt@aecom.com>

**Sent:** 15 November 2021 14:38

**To:** Sevenoaks Town Planning <planning@sevenoakstown.gov.uk>

**Cc:** Linda Larter <townclerk@sevenoakstown.gov.uk>; Hugo Nowell <h.nowell@uistudio.co.uk>; ChisholmBatten, Nick <nick.chisholm-batten@aecom.com>

**Subject:** RE: Sevenoaks Town Neighbourhood Plan: SEA Update

Afternoon Georgie,

Many thanks for sending through the additional details in relation to the Sevenoaks Gasholder Station and Tarmac Quarry Site.

As discussed, we have undertaken a high-level appraisal of the latest version of the Neighbourhood Plan (i.e. the March 2021 version, accessible [here](#)) and have found that the policies and aims perform favourably in sustainability terms. This is not a surprise, given the diligence and time which you have spent preparing the Neighbourhood Plan to date. We provide the following few points for your consideration, grouped by SEA theme. Given these are only suggestions, and are not intended to be prescriptive, please do consider these as you see fit and appropriate. Do let us know if you intend to make any updates in light of these suggestions. Our detailed appraisal will be presented within the SEA Environmental Report.

#### **Biodiversity**

- Opportunity to strengthen Policy L1 to encourage proposals to deliver measurable net gains through design, in line with national policy. For example, proposals could be encouraged to utilise the latest biodiversity metric tools to calculate net gains. Natural England have recently developed a biodiversity metric tool specifically for smaller sites (accessible [here](#)), which could be appropriate for some of the sites.

#### **Climate Change**

- Policy D6 could encourage applications to ensure that any retrofits to historic buildings considers Historic England's latest guidance, accessible [here](#).
- Potential to include a statement within a relevant policy which encourages proposals to source construction materials locally and use recyclable materials wherever possible. Whilst this is difficult to enforce, it will demonstrate a positive and proactive response to SDC's commitment to net zero by supporting proposals which seek to reduce embedded carbon and work towards delivering carbon neutrality through design.

#### **Historic Environment**

- With reference to the setting of designated and non-designated heritage assets (including views into and out of these features), development proposals could be encouraged to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas. This will ensure that appropriate mitigation is provided to assuage any concerns by Historic England.
- For areas of land which have been identified for their archaeological importance, new development proposals could undertake archaeological evaluations prior to construction,

with any findings appropriately reported and documented on the local historic environment record in line with best practice guidance.

#### **Land, Soil, and Water Resources**

- Encouraging proposals to ensure that appropriate drainage infrastructure is available to serve new development areas in order to not overbear the existing network or add to difficulties with local water supplies, sewerage and sewage treatment, and waste disposal.

We look forward to hearing from you soon following your discussions with SDC.

Best regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>

**Sent:** 12 November 2021 10:26

**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>; Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>

**Cc:** ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>

**Subject:** [EXTERNAL] RE: Housing numbers for Reasonable Alternatives

Dear Ryan,

Thank you for adding those points and especially the wording for hopefully avoiding another Regulation 14 consultation.

The two sites discussed are Sevenoaks Gasholder Station and Tarmac Quarry site. The document I attached to the last email sets out the housing numbers proposed by STC, SDC and the developers. So Gasholder Station is identified in the NDP as being suitable for 73 potential dwellings, and by the developer for 136 dwellings. The Planning Application reference for this is 21/01254/FUL and viewable via the following link: <https://pa.sevenoaks.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QRWTKFBK0L000>

The Tarmac Quarry site is, as far as I'm aware, intended to be submitted as a Planning Application by the end of November. They had a public consultation event on their proposals which ended on 5<sup>th</sup> November so I imagine they are currently going through those. I will forward the reference number for this as soon as we receive it however in the meantime, the following link is a website that they have set up for the development in case this is of use: <https://sevenoaks.tarmac.com/>. The NDP identifies this as being suitable for 600 dwellings, and the developer are currently proposing up to 950, with 150 of these being specialist care homes.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>

**Sent:** 10 November 2021 15:05

**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>; Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>

**Cc:** ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>

**Subject:** RE: Housing numbers for Reasonable Alternatives

Afternoon All,

Great to catch up earlier today, and thanks Georgie for summarising the key points. A couple of additional points to add, for your reference:

- We will be providing a high-level review of the Neighbourhood Plan policies by the end of this week. Given any recommendations or suggestions which we highlight are not intended to be prescriptive, do consider these as you see fit and appropriate. Our detailed appraisal of the policies will be presented within the SEA Environmental Report.
- Please could you let us know the planning application reference numbers for the two sites which we discussed, along with your preferred housing numbers for these? We can then look to develop our options for the reasonable alternatives.
- Please could you advise us as the outcomes of your discussion with SDC on how you will be presenting the sites for which you will be providing policy provisions on (and will not be allocating).
- Given that you have already undertaken Regulation 14 consultation, and the SEA has been screened in at a relatively late stage of plan making, we would advise confirming with SDC that they are happy for you to go straight to submission with the SEA outputs (rather than repeating Regulation 14 consultation again). You could highlight in the covering email that 1) you were screened in as requiring an SEA at a late stage, and there is consultation fatigue within the community 2) the submission version of the Neighbourhood Plan is not likely to change significantly following Regulation 14, and 3) the SEA has had appropriate time to inform and influence the Neighbourhood Plan to date. The decision rests with SDC in this respect.

I've attached the consultee responses on the SEA Scoping Report too, for your consideration. As discussed, Natural England and the Environment Agency had no specific points to raise. Historic England outline a couple of points for consideration, both of which we can readily address within the SEA Environmental Report.

Look forward to hearing from you soon. If you have any further questions, do let us know.

Kind regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>

**Sent:** 10 November 2021 11:41

**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>; Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>

**Subject:** [EXTERNAL] Housing numbers for Reasonable Alternatives

Dear all,

Many thanks for the information and advice provided at the meeting today, it is very helpful and I have made a list of actions agreed for STC at the end of this email, which I will follow up with.

Please see attached an overview of potential housing numbers as proposed by SDC, STC and the developers for Tarmac Quarry and Sevenoaks Gasholder Station. I have attached links to where I found this information in case that is helpful.

Also, it was mentioned that having a general map with the 13 sites shaded, rather than redline boundary maps would make it look less like STC is allocating. Would the map on page 69 of the [draft NDP](#) be of use for this?

List of information to be provided for AECOM:

- Overview of the process and evidence base used to select the 5 sites that are not included in SDC's Local Plan (and confirmation from Hugo and SDC that they aren't included)
- Re-word how the sites are presented in the NDP to remove potential doubt that they are not being allocated by the NDP (and confirmation from SDC that they are happy with this wording)
- Ask SDC for evidence base of their allocations for the emerging and existing Local Plan for the 13 sites
- Confirm with SDC that the NDP may be submitted without another Regulation 14 consultation, if no sites are allocated

If I have missed anything that you require clarification on, please let me know.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

You may have provided Sevenoaks Town Council and associated companies with some personal data relating to you. Under the General Data Protection Regulations, we as the data controller in respect of that personal data are required to provide you with a set of specific information about how we will use, hold and retain this data as well as making you aware of various rights that you have. For more information please view our full Privacy Notice:

<https://www.sevenoakstown.gov.uk/UserFiles/Files/GDPR/Privacy%20Notice.pdf>

You may have provided Sevenoaks Town Council and associated companies with some personal data relating to you. Under the General Data Protection Regulations, we as the data controller in respect of that personal data are required to provide you with a set of specific information about how we will use, hold and retain this data as well as making you aware of various rights that you have. For more information please view our full Privacy Notice:

<https://www.sevenoakstown.gov.uk/UserFiles/Files/GDPR/Privacy%20Notice.pdf>

**APPENDIX J. This is an email chain. Please therefore read bottom to top (start at page 34)**

**From:** Sevenoaks Town Planning  
**Sent:** 02 December 2021 14:04  
**To:** Hannah Gooden <Hannah.Gooden@sevenoaks.gov.uk>; Helen French <Helen.French@sevenoaks.gov.uk>; Emma Coffin <Emma.Coffin@sevenoaks.gov.uk>  
**Cc:** Linda Larter <townclerk@sevenoakstown.gov.uk>; Hugo Nowell <h.nowell@uistudio.co.uk>  
**Subject:** RE: Update on NDP and request to meet virtually

Dear all,

Please see attached a copy of the edited NDP and document detailing the changes that Hugo has made. These include edits recommended by AECOM after the Scoping Report consultation, removal of red-line plans and changes to the wording around the 13 sites to clarify that they are not allocations.

I look forward to seeing you Monday.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Hannah Gooden <[Hannah.Gooden@sevenoaks.gov.uk](mailto:Hannah.Gooden@sevenoaks.gov.uk)>  
**Sent:** 23 November 2021 12:39  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>; Helen French <[Helen.French@sevenoaks.gov.uk](mailto:Helen.French@sevenoaks.gov.uk)>; Emma Coffin <[Emma.Coffin@sevenoaks.gov.uk](mailto:Emma.Coffin@sevenoaks.gov.uk)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** RE: Update on NDP and request to meet virtually

Dear Georgie

Thank you for your email and the update, regarding the proposed non-allocation of sites and consultation  
In terms of a meeting to discuss the points below, Monday 6<sup>th</sup> December (before 11.30am) work for us – shall we say 10am?

Kind regards  
Hannah

**From:** Sevenoaks Town Planning  
**Sent:** 18 November 2021 12:23  
**To:** Hannah Gooden <Hannah.Gooden@sevenoaks.gov.uk>; Helen French <Helen.French@sevenoaks.gov.uk>; Emma Coffin <Emma.Coffin@sevenoaks.gov.uk>

**Cc:** Linda Larter <townclerk@sevenoakstown.gov.uk>; Hugo Nowell <h.nowell@uistudio.co.uk>  
**Subject:** Update on NDP and request to meet virtually

Dear all,

Just an update on the progress of the NDP so far:

We have ultimately decided against allocating any sites in the NDP, and will be amending the wording around the 13 sites supported for development to remove any doubt as to their un-allocated status.

With discussing these edits in mind, would you be available for a virtual meeting to discuss the changes and whether you are satisfied that any doubt that the sites are not being allocated is removed please? It would also be useful to have a general catch up to update you on where we are at. To give enough time for these edits to be made, we were hoping to meet either **6<sup>th</sup> or 8<sup>th</sup> December if either of those dates work for you?**

The SEA Scoping Report has recently come back from Statutory consultation and AECOM is working on its final document and we are working to provide last minute information required for this. Current timeline prediction is mid/end of December.

We have received a list of recommendations from AECOM following the consultation comments received from Historic England, and will be incorporating these into the NDP final draft, on top of the afore-mentioned wording changes, both of which we will be aiming to provide to you ahead of meeting.

Given that the NDP has already undertaken Regulation 14 consultation, general consultation fatigue in the community as well as the SEA being screened in at a relatively late stage of plan making, we were also hoping to discuss submitting the NDP with the SEA outputs without repeating this, so as to avoid further delay to it going to referendum. As mentioned above, we are working alongside AECOM in tandem with them producing the SEA and have already approved edits to be made, therefore the SEA will have had appropriate time to inform and influence the NDP at the time of submission. Furthermore, the final version for submission is not likely to change significantly following Regulation 14, as the changes informed by the SEA are minimal and so far only strengthen and reinforce the existing policies.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks



**APPENDIX K. This is an email chain. Please therefore read bottom to top (start at page 39)**

**From:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>  
**Sent:** 08 December 2021 14:16  
**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Subject:** RE: Outcome of SDC meeting

Afternoon Georgie,

Many thanks for sharing these details with us, this is great. We shall ensure that the explanations are appropriately presented within the Environmental Report.

We look forward to hearing from you in due course with regards to Historic England's response.

Kind regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 08 December 2021 14:01  
**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Subject:** [EXTERNAL] RE: Outcome of SDC meeting

Dear Ryan,

Please see attached for your reference explanation of how the sites promoted for development in the NDP were selected.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Sevenoaks Town Planning  
**Sent:** 07 December 2021 16:54  
**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Subject:** RE: Outcome of SDC meeting

Dear Ryan,

Thank you very much for your comments below, they are incredibly helpful. I have contacted Historic England and will keep you updated with their response.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

Afternoon Georgie,

Many thanks for providing the update below, this is most appreciated.

The purpose of the SEA is to provide an independent and objective assessment of the approaches which you are considering (i.e. the relative sustainability merits and likely significant effects of the approaches), contributing to the evidence base for the Neighbourhood Plan and **assisting** the Town Council with their decision making process. The SEA itself is not the decision maker, which is an important distinction. In this respect, Nick and I provide the following responses for your consideration (annotated below), specifically with our SEA hats on.

Look forward to your thoughts.

Best regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 06 December 2021 12:13  
**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** [EXTERNAL] Outcome of SDC meeting

Dear Ryan and Nick,

Please see attached a compressed version of the updated NDP and a document detailing the edits that have been made. This will also be uploaded to the NDP website <https://sevenoaksndp.wordpress.com/blog/> later on today. **Perfect, many thanks for sharing.**

The include those suggested by yourself, editing of wording around the 13 sites and replacement of red-line boundary maps with shaded areas instead. Both the edited NDP and edits document were forwarded to SDC Thursday 2<sup>nd</sup> for their consideration, and we met with them this morning to discuss whether the changes are deemed satisfactory and if they think we need another Regulation 14 consultation.

The outcomes of the meeting are outlined below. In bold is information that would be useful to get from you please:

- SDC agree that a regulation 14 consultation shouldn't be required as long as we submit a detailed schedule of changes with submission of the plan. **This is conditional on your agreement as they are happy to go with your judgement. We can provide an overview within the Environmental Report to demonstrate how the SEA process has informed and influenced the Neighbourhood Plan following Regulation 14 consultation. So far, this has included our high-level appraisal of the Neighbourhood Plan policies (which has informed policy development), and will also be demonstrated through our consideration of reasonable alternatives with regards to housing numbers at the Sevenoaks Gasholder Station and the Tarmac Quarry site. Please note, for the obvious reasons, we are unable to be the decision maker on the Regulation 14 issue.**

The above is the same for the wording of the 13 sites; **if you are confident/happy that the wording makes it clear STC are not allocating, then SDC are happy too.** They advised however that we forward the edited version of the NDP to the Statutory Consultees so that Historical England can confirm that they are satisfied with the wording. **Would you advise I forward now, or that it come from yourselves, or would the SEA report be enough do you think please? We would advise that the Neighbourhood Plan is circulated to Historic England at this stage to confirm whether they are content with the approach that is being taken with regards to the issue of allocations. If they respond to state that they are content with the wording, we can appropriately reflect this within the SEA. This will avoid any abortive work from the SEA perspective. There should be no need to contact Natural England and the Environment Agency (the other statutory consultees) given it is not a formal consultation stage, and they have not raised any issues.**

- Advice on where to get/produce guidance for how Councillors are and are not allowed to promote the NDP would be especially useful – **would you have any advice on this please? Whilst not specific to the SEA process, we would advise that the Town Council's own conflict of interest policies are adopted and adhered to with regards to the promotion of the NDP.**

SDC plan on waiting for Statutory Consultee responses on whether they are satisfied with the amended wording before publicising the plan. **Same as above really, please could you advise whether the SEA report would be enough for them to sign off on and how and when this might happen? Once Historic England has responded, we can update and finalise the SEA Environmental Report to accompany the submission version of the Neighbourhood Plan (Regulation 15). We have made good progress with the Environmental Report to date, so this should be a fairly straightforward process once you have heard back from them. The SEA Environmental Report can then be publicised alongside the Neighbourhood Plan at Regulation 16 by SDC.**

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

**From:** Putt, Ryan <ryan.putt@aecom.com>  
**Sent:** 06 December 2021 14:03  
**To:** Sevenoaks Town Planning <planning@sevenoakstown.gov.uk>  
**Subject:** RE: Outcome of SDC meeting

Afternoon Georgie,

Many thanks for the below, this is most appreciated.

Just wanted to send a holding email to say that Nick and I will be discussing these points tomorrow and will get back to you shortly (copying everyone in). Hope this is okay.

Best regards,

Ryan

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 06 December 2021 12:13  
**To:** Putt, Ryan <[ryan.putt@aecom.com](mailto:ryan.putt@aecom.com)>; ChisholmBatten, Nick <[nick.chisholm-batten@aecom.com](mailto:nick.chisholm-batten@aecom.com)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** [EXTERNAL] Outcome of SDC meeting

Dear Ryan and Nick,

Please see attached a compressed version of the updated NDP and a document detailing the edits that have been made. This will also be uploaded to the NDP website <https://sevenoaksndp.wordpress.com/blog/> later on today.

The include those suggested by yourself, editing of wording around the 13 sites and replacement of red-line boundary maps with shaded areas instead. Both the edited NDP and edits document were forwarded to SDC Thursday 2<sup>nd</sup> for their consideration, and we met with them this morning to discuss whether the changes are deemed satisfactory and if they think we need another Regulation 14 consultation.

The outcomes of the meeting are outlined below. In bold is information that would be useful to get from you please:

- SDC agree that a regulation 14 consultation shouldn't be required as long as we submit a detailed schedule of changes with submission of the plan. **This is conditional on your agreement as they are happy to go with your judgement.**
- The above is the same for the wording of the 13 sites; **if you are confident/happy that the wording makes it clear STC are not allocating, then SDC are happy too.** They advised however that we forward the edited version of the NDP to the Statutory Consultees so that Historical England can confirm that they are satisfied with the wording. **Would you advise I forward now, or that it come from yourselves, or would the SEA report be enough do you think please?**
- Advice on where to get/produce guidance for how Councillors are and are not allowed to promote the NDP would be especially useful – **would you have any advice on this please?**
- SDC plan on waiting for Statutory Consultee responses on whether they are satisfied with the amended wording before publicising the plan. **Same as above really, please could you**

**advise whether the SEA report would be enough for them to sign off on and how and when this might happen?**

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

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## **APPENDIX L**

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 07 December 2021 16:30  
**To:** LondonSEast ([LondonSEast@historicengland.org.uk](mailto:LondonSEast@historicengland.org.uk)) <[LondonSEast@historicengland.org.uk](mailto:LondonSEast@historicengland.org.uk)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** Request for Comment - Sevenoaks Town Council Neighbourhood Development Plan  
**Importance:** High

**THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you**

Dear Historic England,

Sevenoaks Town Council is currently preparing a Neighbourhood Development Plan (NDP) for the Sevenoaks Town Neighbourhood area, located in Kent.

As you may know, a Strategic Environment Assessment (SEA) is currently being undertaken by AECOM in order to inform, influence and accompany the NDP. Throughout the SEA process, Sevenoaks Town Council has been working with AECOM to make alterations to its Neighbourhood Plan, and has now compiled these edits into an initial Final Draft (December 2021). Please see attached a compressed version of this. A document outlining the changes made has also been attached for your information and reference.

Most pertinently, some of the edits made are to do with sections that allude to the 13 sites that the NDP supports future development on, namely pages 15, and 68-79 which relate to Policy D1. In order to remove doubt that these 13 sites are allocated by the NDP, the wording of Policy D1 has been amended, development quantum has been removed, and red-line boundary plans have been replaced.

**As Historic England had raised the concern that the initial draft appears to allocate sites, I would be extremely grateful if you could please review the changes that Sevenoaks Town Council has made – specifically in relation to this initial concern and relating to the aforementioned page numbers – and let us know if the changes in wording appropriately address the issue. I have highlighted the changes that pertain to the 13 sites in the attached document for your convenience.**

As this is not an official consultation, there is not a deadline for Historic England to confirm whether it is satisfied that the changes made address the issue of allocations, however Sevenoaks Town Council would be extremely grateful to receive a response within the next two weeks so that it may be included in the SEA which is hoped to be completed within or before this timeframe.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

## **APPENDIX M**

---

**From:** Lloyd Sweet, Robert <[Robert.LloydSweet@HistoricEngland.org.uk](mailto:Robert.LloydSweet@HistoricEngland.org.uk)>  
**Sent:** Friday, December 17, 2021 12:42 pm  
**To:** Sevenoaks Town Planning  
**Subject:** Re: Request for Comment - Sevenoaks Town Council Neighbourhood Development Plan

Dear Georgie.

I've reviewed the suggested updated policy. My feeling is this hasn't moved the policy into a more acceptable form at present. It is now less certain where the sites referred to are and what would be considered acceptable as 'sustainable development' on each. The revised policy does not provide clarity for decision making and isn't clearly evidenced to show it supports sustainable development. If the town council want to support development on these sites that is what they should do, with clarity, but they need to be clear what environmental factors have been taken into account in determining the location and use of each and be able to demonstrate that necessary requirements have been put in place to mitigate harmful impacts and to secure the benefit that are considered desirable to achieve and that are considered to outweigh any unavoidable harm.

Happy to discuss this further if you would like to call me back or arrange a meeting at a convenient time.

Kind regards

Robert Lloyd-Sweet

Robert Lloyd-Sweet | Historic Places Adviser | South East England | Historic England  
Cannon Bridge House | 25 Dowgate Hill | London | EC4R 2YA  
Mobile: 07825 907288

**From:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>  
**Sent:** 07 December 2021 16:30  
**To:** LondonSEast (<[LondonSEast@historicengland.org.uk](mailto:LondonSEast@historicengland.org.uk)> <[LondonSEast@historicengland.org.uk](mailto:LondonSEast@historicengland.org.uk)>  
**Cc:** Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>; Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>  
**Subject:** Request for Comment - Sevenoaks Town Council Neighbourhood Development Plan  
**Importance:** High

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Dear Historic England,

Sevenoaks Town Council is currently preparing a Neighbourhood Development Plan (NDP) for the Sevenoaks Town Neighbourhood area, located in Kent.

As you may know, a Strategic Environment Assessment (SEA) is currently being undertaken by AECOM in order to inform, influence and accompany the NDP. Throughout the SEA process, Sevenoaks Town Council has been working with AECOM to make alterations to its Neighbourhood Plan, and has now compiled these edits into an initial Final Draft (December 2021). Please see

attached a compressed version of this. A document outlining the changes made has also been attached for your information and reference.

Most pertinently, some of the edits made are to do with sections that allude to the 13 sites that the NDP supports future development on, namely pages 15, and 68-79 which relate to Policy D1. In order to remove doubt that these 13 sites are allocated by the NDP, the wording of Policy D1 has been amended, development quantum has been removed, and red-line boundary plans have been replaced.

**As Historic England had raised the concern that the initial draft appears to allocate sites, I would be extremely grateful if you could please review the changes that Sevenoaks Town Council has made – specifically in relation to this initial concern and relating to the aforementioned page numbers – and let us know if the changes in wording appropriately address the issue. I have highlighted the changes that pertain to the 13 sites in the attached document for your convenience.**

As this is not an official consultation, there is not a deadline for Historic England to confirm whether it is satisfied that the changes made address the issue of allocations, however Sevenoaks Town Council would be extremely grateful to receive a response within the next two weeks so that it may be included in the SEA which is hoped to be completed within or before this timeframe.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

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Historic England

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## **APPENDIX N**

**From:** Sevenoaks Town Planning

**Sent:** 20 December 2021 13:30

**To:** Linda Larter <townclerk@sevenoakstown.gov.uk>

**Subject:** RE: Request for MEETING - Sevenoaks Town Council Neighbourhood Development Plan

Dear Linda and Hugo,

I just spoke to Ryan, he thinks that the best course of action is that he and Nick send us their response to Historic England's comments, as they will be too busy to meet with us this week – but also because if Historic England aren't happy, there isn't much the SEA can do to address it.

He thinks Historic England seems to want either no mentions of development sites, or want allocations, and that our next course of action should be to consider our options with Hugo. They can't make recommendations on what to do, but can appraise the decisions we end up making and make recommendations on how these can be strengthened.

He proposes that we meet again in the New year and work with Hugo in the mean time.

Kind regards,  
Georgie

Georgie Elliston  
Planning Committee Clerk  
Sevenoaks Town Council  
Town Council Offices  
Bradbourne Vale Road  
Sevenoaks  
Kent TN13 3QG

## **APPENDIX O**

### **Sevenoaks Town Council Planning Committee 20<sup>th</sup> December 2021**

#### **Outcomes of STC's meeting with SDC to discuss the progress and next steps for the NDP**

- STC anticipates the completed Strategic Environmental Assessment to be forwarded by AECOM to Statutory Consultees Historic England, Natural England and the Environment Agency by the end of December.
- STC have been working closely with AECOM, with suggested edits having been incorporated into the NDP Final Draft December 2021 as opposed to waiting for the final Report. A summary of the edits, as well as a link to this Final Draft are published on the Sevenoaks Town Council NDP website via the following link:  
<https://sevenoaksndp.wordpress.com/2021/12/06/sevenoaks-town-councils-ndp-december-2021-final-draft-published-with-progress-update/>
- In addition to Statutory Consultees being consulted on the final SEA document, SDC recommended forwarding Historic England the Final December 2021 Draft in order to confirm that the changes made address their concerns with the NDP's wording around the 13 sites that it supports development on. **A copy of the changes made and the Final December Draft were forwarded on 7<sup>th</sup> December 2021, awaiting Historic England's response.**
- On referencing Locality's NDP Roadmap page 45 and in conjunction with the recommendation by AECOM, **SDC agreed that another Regulation 14 consultation should not be required** after edits influenced by the SEA have been finalised. Instead, a detailed schedule of changes will be required in addition to other various supporting documents required at formal submission.
- SDC are currently preparing for the examiner and referendum stages by investigating different options for the independent examiner, and also having had their elections team receive recent training for the referendum.
- SDC recommend that STC source clear guidelines on what restrictions there are on how the NDP can be publicised by STC, STC Councillors and outside parties such as Sevenoaks Society.

#### **An *example* timeline of next steps:**

- December 2021: AECOM complete their SEA Report and forward it to Statutory Consultees.
- January 2022: ***If*** Statutory Consultee responses on the SEA are received by the end of December – **including Historic England confirming that they are happy with the wording changes** – final edits to the NDP will be made and STC will arrange a Town Neighbourhood Plan Steering Committee for the final draft to be approved for submission.
- January 2022: STC formally submit the NDP to SDC.
- Mid January/February: SDC will publicise the plan for 6 weeks, and during that time select an Independent Examiner to appoint at the end of this 6 week period.

- March/April: the NDP will be examined by the appointed parties and be expected to go to referendum by late April. Unless the Examiner considers parts of the NDP controversial, SDC anticipate that this will be facilitated with written representations.

**HOWEVER**, SDC propose delaying the above submission stage until Historic England has confirmed that they are satisfied that the NDP's terminology no longer implies allocation of sites.

## **Appendix O**

### **Neighbourhood Plan changes (1 December 2021)**

Page 11 - Policy L2 text revised to add note re drainage infrastructure

Page 15 – Policy D1 text amended to make clear that sites are not allocated

Page 21 - Addition of text re SEA

Page 40 – Additional notes added re heritage impact assessments and archaeological evaluations (supporting text to Policy C1)

Page 48 – Reference to the use of biodiversity metric tools to calculate biodiversity net gain. (supporting text to Policy L1)

Page 49 - Policy L2 text revised to add note re drainage infrastructure

Page 68 – Policy D1 reworded to make it clear that sites are not allocated.

Pages 70-76 - Development quantum removed from all site guidance and redlines removed from figures

Page 79 - Development quantum removed from guidance on Tarmac site and redline removed from figure

Page 81 – additional notes on sourcing of local materials and on retrofitting properties added (supporting text to Policy D6)

## **APPENDIX P.**

**From:** Hugo Nowell <[h.nowell@uistudio.co.uk](mailto:h.nowell@uistudio.co.uk)>

**Sent:** 07 January 2022 15:38

**To:** Sevenoaks Town Planning <[planning@sevenoakstown.gov.uk](mailto:planning@sevenoakstown.gov.uk)>; Linda Larter <[townclerk@sevenoakstown.gov.uk](mailto:townclerk@sevenoakstown.gov.uk)>

**Subject:** Note for Mondays Planning Meeting

Dear Linda / Georgie

Happy New Year to you both.

Following our discussions just before Christmas I met (virtually) with Robert Lloyd Sweet at Historic England and agreed a form of words for Policy D1 that Historic England are happy with. He recommends bringing the benefits / design principles for each site into the policy to strengthen this aspect of the policy and hopefully Councillors who are uncomfortable with the removal of development quantum from the information on sites will be reassured by this approach.

I attach a note on the SEA / NP process and the revised policy wording. If you are happy with this please circulate in advance of the Committee meeting.

Best wishes

Hugo

Hugo Nowell  
Director

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**URBAN**  
INITIATIVES  
**STUDIO**

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M: +44 779 5614032

**Sevenoaks Town Council Planning Committee**  
**Monday 10<sup>th</sup> January 2022**

**Update on the Sevenoaks Town Neighbourhood Plan**

In August 2021 AECOM were appointed to prepare a Strategic Environmental Assessment (SEA) on the draft Sevenoaks Neighbourhood Plan. This was required following concerns raised by Historic England (as part of the consultation on the SEA screening carried out by SDC) on Policy D1 relating to development sites in the draft Neighbourhood Plan.

AECOM prepared an SEA Scoping report in September and consultation with Historic England, the Environment Agency and Natural England followed.

As part of the SEA process AECOM carried out a high-level appraisal of the Neighbourhood Plan (March 2021 version) and found that the policies and aims performed favourably in sustainability terms. AECOM made a number of recommendations on how policies in the plan relating to biodiversity, climate change, the historic environment and surface water management could be strengthened

AECOM also suggested updated wording for the Neighbourhood Plan policies on development. This followed clarification from the District Council that it would not be possible to allocate sites in the Neighbourhood Plan without significant further work to test deliverability and a further Regulation 14 consultation. This would significantly delay the submission of the plan for independent examination and referendum.

AECOM's recommended changes included rewording policies to make it clearer that the Neighbourhood Plan was not allocating sites and removing reference to development quantum under policies D1 (sites) and D2 (the Tarmac site). Importantly the design principles relating to each site were retained. A further draft of the Plan was circulated in December 2021 incorporating these suggested amendments.

The District Council will only accept the Plan and progress towards independent examination if statutory authorities are supportive and we therefore shared the updated version of the Neighbourhood Plan with Historic England in December. They confirmed that whilst they are supportive of the plan they were still not happy with the wording of policy D1 and recommended an alternative policy wording that would make it clearer that the sites are not allocated in the plan whilst also emphasising the benefits of development.

The revised wording of policy D1 and D2 is included on the pages that follow. This brings the benefits that should be secured on sites into the policy wording whilst making it clear that allocation would be a matter for the Local Plan.

It is recommended that these changes be supported in the Neighbourhood Plan and that the Plan is then finalised and submitted alongside a consultation statement and basic conditions statement (demonstrating that the plan is in general conformity with policy) to SDC for independent examination and referendum.

AECOM are in the process of completing the SEA Environmental Report and this will also be provided to SDC as part of the submission and will add greater robustness to the Plan.

## THEME SEVEN: DEVELOPMENT AND HOUSING

### Objective Fifteen: To promote high quality development that enhances the town and consolidates vacant or under-utilised land

**Policy D1:** The Neighbourhood Plan recognises that there are sites that may come forward for development, either as windfall or through allocation in the Local Plan, that have potential to deliver benefits that should be secured through the design, layout and use of each site. Planning applications on the following vacant and under-utilised sites within the Neighbourhood Plan area should demonstrate that they will deliver the relevant benefits set out below, in addition to other requirements set out in the Local Plan:

#### 1. Bat and Ball Centre, Bat and Ball\*

- Mixed-use development accommodating community use, office use and residential dwellings within buildings of up to four storey;
- A southern access and entrance to Bat and Ball station; and
- A building layout that would facilitate enhanced access to Bat and Ball station and provide an arrival space in front of the new southern entrance to the station.

#### 2. Travis Perkins, Bat and Ball

- A longer term opportunity to relocate light industrial uses northwards to Vestry Industrial Estate / Otford (outside of the Neighbourhood Plan area) and redevelop the site with mixed-use development within compact blocks of up to four storey height;
- Removal of the conflict between the light industrial employment uses and residential accommodation within the Bat and Ball area; and
- Improved access towards Bat and Ball station and better animation of the streets in the area.

#### 3. Cramptons Road, Water Works

- Potential for residential development close to Bat and Ball station. With its proximity to shops and facilities it could be a suitable site for a co-housing project;
- Layout must retain access to the water treatment works to the north of the site. The layout of development should facilitate a potential future pedestrian connection through Sevenoaks Business Centre to Bat and Ball station; and
- The scale and massing of development should respond to the lower scale properties to the west of the site.

#### 4. Carpetright / Wickes, Otford Road

- Relocate existing uses northwards to the Vestry Industrial Estate where they are more appropriate;
- Strengthen the residential character of the area and remove the conflict between the big box retail uses and existing homes;
- Deliver buildings that create a positive frontage to Cramptons Road (houses) and Otford Road (apartments); and
- Respond positively with proposals for the adjacent gasholder station site (Site 5).

#### 5. Sevenoaks Gasholder Station

- Residential development close to Bat and Ball station that supports the regeneration of Northern Sevenoaks;
- A development layout that provides positive frontages to streets and retains, fronts onto and overlooks the pedestrian path (a public right of way) that connects Cramptons Road with Otford Road through the site; and
- A scale and massing that responds to the context (i.e. two storey buildings on Cramptons Road but with potential for four storeys on Otford Road).

#### 6. Bat and Ball Enterprise Centre

- Longer term opportunity to change this area close to Bat and Ball station to mixed-use;
- Strengthen the residential character of the area and improve access to the station for people living in Greatness through pedestrian routes (from Queens Drive) that are overlooked by new development;
- Deliver apartment buildings (with ground floor employment) that create a positive frontage to Bat and Ball Road; and
- Buildings could be up to four storeys in this location.

\* Represents a site where further studies / actions may be pursued by the Town Council over the life of the Plan

## THEME SEVEN: DEVELOPMENT AND HOUSING (CONTINUED)

### 7. Sevenoaks station and surrounding area

- Significant opportunity for development that will transform the sense of arrival into Sevenoaks and could establish a new urban quarter for the town;
- There are notable views down London Road towards the Kent Downs AONB to the north and any development should respond sensitively to this setting;
- Scale of buildings to be typically four to six storey. There may be potential for a taller building to mark the station; and
- Opportunity to reconsider transport interchange and public realm treatment at the station.

### 8. Edwards Electrical, High Street

- Development proposals to respond to heritage sensitivities (the site is located immediately to the south of, and adjacent to, the Vine Conservation Area);
- Development should respond to the character of the existing streetscape both in terms of materials, design language and height and massing — two / three storeys is appropriate;
- Development should provide a positive and active frontage to the High Street that is aligned to frontages on adjacent plots and is sympathetic to adjacent built form; and
- Potential for mews houses to the rear of the site.

### 9. Buckhurst Lane (Suffolk Way) sites

- Development proposals to respond to heritage sensitivities (the site is located on the edge of the Sevenoaks High Street Conservation Area) and development will need to respond to the historic development pattern, materials and character of the area;
- Access will need to be maintained to service yards of properties on High Street;
- Potential to provide development that provides a positive frontage to Suffolk Way and Buckhurst Lane;
- Scale and massing of development to respond to the existing context with potential for three storey buildings plus an additional set back storey;
- Development should front streets whilst concealing existing service yards from public view; and
- Pedestrian connections through the area to be retained and any trees that are removed to be replaced.

### 10. Post Office / BT Exchange

- Development proposals to respond to heritage sensitivities (the site is located adjacent to the Sevenoaks High Street Conservation Area and the locally listed Stag Theatre);
- The site is located on elevated ground with land dropping away to the south and development is likely to be highly visible from a number of locations. The height and massing needs to be carefully considered and modelled;
- Potential to re-establish the primacy of London Road through development providing active ground floor uses onto London Road with apartments above. Total building height three storeys plus an additional set back storey;
- Frontage onto London Road should be set back to create a public space that serves the adjacent theatre and provides a setting for the new ground floor uses;
- Development should provide a positive frontage to the lane connecting the car park to the rear of The Stag Theatre with London Road;
- Potential for public realm enhancement to South Park; and
- A comprehensive scheme should be prepared but could be delivered as two independent phases (Post Office and BT Building).




## THEME SEVEN: DEVELOPMENT AND HOUSING (CONTINUED)

### 11. Town Council offices, Bradbourne Vale Road\*

- Residential development in the form of apartments that provide a frontage to Bradbourne Vale Road with other dwellings to the rear;
- Development up to three storeys; and
- Potential to relocate existing office space to the Community Centre site at Bat and Ball station.


### 12. Adult Education site, Bradbourne Road

- Potential for sensitive residential conversion of the locally listed college building which maintains the integrity of the existing building;
- Potential for a new build residential annex; this must be subservient to main college building in respect of its design and scale and massing; and
- Existing mature trees and quality of landscape setting to be retained.


Developers will be encouraged to develop buildings constructed to the highest environmental standards to reduce carbon emissions through construction and later life 


**Policy D2:** Should the Tarmac Ltd. Site at Greatness be brought forward for development, either as windfall or through allocation in the Local Plan, this should be guided by an agreed masterplan that indicates how development would be laid out to respond to, and provide a significant landscape resource for Sevenoaks, how it will be phased and the supporting infrastructure that would be delivered as part of the development.

Development of the site should also deliver the following benefits for the area:


- Community infrastructure including the potential provision of a primary school and medical facilities;
- Green infrastructure including the provision of a new lake and centre for sport, recreation and leisure, a network of walking and cycling routes and play space;
- Transport infrastructure and in particular proposals must demonstrate how vehicular access will be achieved and how any transport impacts will be mitigated, including but not limited to improvements to Bat and Ball junction;
- Re-use of historic buildings - the former oast house should be refurbished, integrated into the development and re-used for community use; and
- A mix of new homes that supports local needs and including affordable homes to meet the requirements of the Local Plan. 


### Objective Sixteen: To deliver a range of new homes to meet local needs

**Policy D3:** Where practicable larger residential developments will be expected to provide a range of homes. New housing should contribute to meeting the identified local need. Affordable housing provision will be required as part of all eligible developments 

**Policy D4:** The development of on-site key worker housing will be encouraged as part of larger infrastructure developments and subject to a condition preventing sale or rent on the open market 

### Objective Seventeen: To provide homes that are energy efficient and minimise environmental impact

**Policy D5:** The Neighbourhood Plan promotes the delivery of new homes that are energy efficient, that are constructed using materials that reduce the impact on the environment and that are designed to maximise daylight and sun penetration whilst also avoiding overheating 

**Policy D6:** The Neighbourhood Plan promotes the retrofitting of existing homes to increase their energy efficiency 

\* Represents a site where further studies / actions may be pursued by the Town Council over the life of the Plan

## **Appendix Q**

Notes on the report to PLANNING COMMITTEE Working Party\*  
Monday 10<sup>th</sup> January 2022 at 7:00pm via Zoom.

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### **Present:**

#### **Committee Members**

Cllr Bonin	<b>Present</b>	Cllr Michaelides	<b>Present</b>
Cllr Busvine OBE	<b>Present</b>	Cllr Morris Brown	<b>Apologies</b>
Cllr Camp – <b>Vice Chairman</b>	<b>Present</b>	Cllr Mrs Parry	<b>Present</b>
Cllr Dr Canet, Mayor	<b>Present</b>	Cllr Parry	<b>Present</b>
Cllr Clayton	<b>Present</b>	Cllr Piper	<b>Apologies</b>
Cllr Eyre	<b>Present</b>	Cllr Raikes - <b>Chairman</b>	<b>Present</b>
Cllr Granville-Baxter	<b>Present</b>	Cllr Shea	<b>Present</b>
Cllr Hogarth	<b>Present</b>	Cllr Waite	<b>Apologies</b>

### **Also in attendance:**

Town Clerk  
 Planning Committee Clerk  
 Hugo Nowell, Urban Initiatives Studio  
 Darren Bell, David Lock Associates  
 Will Bridges, Tarmac Ltd  
 Simon Tucker, David Tucker Associates  
 Duncan Flynn, Cratus Communications Ltd  
 1 member of the public

**At 7pm, prior to the commencement of the meeting, there was a presentation from Hugo Nowell, STC’s consultant from Urban Initiatives Studio for the NDP. This provided an update on the NDP’s progress, including edits made and the processes that led to these being essential for the NDP’s progression.**

**At 7:15pm, representatives for Tarmac Ltd provided a presentation on its Planning Application and proposals for the Sevenoaks Quarry site. The presentation was followed by a Q & A session.**

### **PUBLIC QUESTION TIME**

None.

#### **440 REQUESTS FOR DISPENSATIONS**

No requests for dispensations had been received.

#### **441 DECLARATIONS OF INTEREST**

None.

#### **442 DECLARATIONS OF LOBBYING**

Representation was received and circulated to all Councillors objecting to the following application:

[Plan no. 8] 21/04174/FUL – Summerhill, Seal Hollow Road

443 NOTES

Councillors received the notes on the report to Planning Committee Meeting held 20<sup>th</sup> December 2021. **It was RESOLVED** that the notes be approved.

444 COVID-19: PLANNING COMMITTEE ARRANGEMENTS

a) Councillors noted that decisions and planning recommendations are to be made via a “Working Party” of the Council with Meetings held on Zoom and live-streamed on Youtube as per the last year, and signed off under delegated powers by the Chief Executive.

b) It was noted that all arrangement were subject to review.

445 APPEALS

a) Councillors noted that the following appeal was dismissed on 15<sup>th</sup> December 2021.

**APP/G2245/D/21/328057: 21/00703/HOUSE – The Old Bakehouse, Six Bells Lane**

b) Councillors also noted that a separate application for costs was made against SDC and refused on 15<sup>th</sup> December 2021.

446 TREE PRESERVATION ORDER NO. 08 OF 2021, SITUATED AT 22 ST GEORGES ROAD

a) The Committee received notice that the above Tree Preservation Order (TPO) took effect on a provisional basis on 13<sup>th</sup> December 2021, and noted the deadline of 14<sup>th</sup> January 2022 for comment.

b) Councillors questioned why STC had been consulted on this and whether STC owns any land near the provisional TPO. It was noted that the Chief Executive and Planning Committee Clerk would refer to the Open Spaces Manager for advice and that no comment or objection would be made at this time.

447 NEIGHBOURHOOD DEVELOPMENT PLAN (SEE APPENDIX FOR HUGO NOWELL’S FULL REPORT)

a) Councillors discussed the update provided by Hugo Nowell, STC’s consultant on the NDP from Urban Initiatives Studio. This included edits made to the 13 sites the NDP supports for future development, revised in line with comments and approval from Historic England.

b) Cllr Clayton voiced concerns that the edited version would not be supported at referendum with the design quantum and guidance on height and density removed.

c) The Chief Executive and Hugo Nowell explained that whilst principles that guide the scale, height and massing of development can be retained in the plan, guidance on potential development quantum and densities need to be removed as the sites will not

be allocated in the NDP. The NDP can then be accepted by the District Council for independent examination and referendum without significant further investigation and delays. It was **RESOLVED** that the edits be approved, and the NDP move forwards with next steps for it to be presented to the Steering Committee.

448 APPLICATION FOR DISABLED PERSONS PARKING BAY – HILLINGDON RISE

a) Councillors received details of an application for a disabled persons (blue badge) parking bay to be provided in Hillingdon Rise.

b) It was **RESOLVED** that STC support for this application be forwarded to SDC.

449 PLANNING APPLICATIONS

(a) The meeting was adjourned to allow members of the public to speak for three minutes on the following application, by prior arrangement:

[Plan no. 8] 21/04174/FUL – Summerhill, Seal Hollow Road (Against)

(b) The Committee considered planning applications received during the two weeks ending 3<sup>rd</sup> January 2022. It was **RESOLVED** that the comments listed on the attached schedule be forwarded to Sevenoaks District Council.

450 PRESS RELEASES

None.

There being no further business the Chairman closed the meeting at 20:53.

Signed .....  
Chairman

Dated .....