

Sevenoaks Town Council's response to Sevenoaks District
Council's Regulation 18 Public Consultation on what its
Local Plan ought to contain as approved by the Planning
Committee on 09-01-2023

1 Have we identified the right strategic issues that will influence the development of the District to 2040?

Please select only one item

- Yes
 No

Are there any other issues that we should identify?

STC supports Net 0 but there needs to be consideration of other elements on quality of environment, as Net 0 is too specific. STC would like to see SDC also look at wider topics e.g. air quality, flooding, density
STC requests that SDC look at deliverability of these and look at different scenarios which prioritise different issues first because STC is concerned that focusing on design excellence and Net 0 could have cost implications on deliverability of other priorities. (similarly to how they did with housing densities).

A much wider framework is needed as a strategy for the District as a whole to meet the government's objective of net zero for the whole community by 2050 or earlier.

2 Do you support the Vision and Objectives?

Please select only one item

- Strongly Support
 Support
 Neither support or oppose
 Oppose
 Strongly oppose

Do you have any comments on the Vision and Objectives?

Is there a Housing Needs survey for Sevenoaks Town?
 On Housing needs, STC would like to see work to ensure that there is housing to provide for all segments of the community. Housing to meet changing demographic is fair enough but if the demographic is changing because younger can't afford it then should we be working to meet affordability needs
 Need younger people to be able to live here and move
 OB18 "equal" access doesn't deliver access; if everyone has none then its still equal - so STC would recommend change of wording to read "ready" access.
 The spacial vision also doesn't recognise the challenge whereby some towns at the boundaries of Sevenoaks District are more primarily linked to others outside it than inside.

Chapter 01 – Development Strategy

1 Do you agree with the proposed Development Strategy?

Development Strategy Summary

Our proposed development strategy is summarised below:

Step 1: Focus on optimising density and utilising brownfield land in existing settlements (the focus of this Regulation 18 consultation).

Step 2: Robust Duty to Co-operate discussions with neighbouring authorities, informed by step 1 and the constraints of the District.

Step 3: Green Belt release, if required, in Exceptional Circumstances (to be covered within the subsequent Regulation 18 consultation).

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

STC agrees with the broad strategy but is reluctant to see optimum plus in a market town which is dominated by 2/3 storey family homes STC would request a height/storey limit that respects the height of adjacent buildings - not just the character of tthe own.

STC does not consider the Optimum Plus option to respect this

There is also no mention of the Residential Character Area Assessments and conservation areas, which should be respected and considered in the vision and planning process as proposed in the Sevenoaks Town Neighbourhood Plan.

2 We are considering density within existing settlements at different levels, which is your preferred approach?

Density Approaches

We are considering density within existing settlements at different levels:

- *Minimum Uplift (delivers approx. 7.5k units, shortfall of 6k units)*
- *Optimum (delivers approx. 8.5k units, shortfall of 5k units)*
- *Optimum Plus (delivers approx. 9k units, shortfall of 4.5k units)*
- *The shortfall may need to be accommodated in neighbouring areas or in the Green Belt.*

Table 1.1: Settlement Density Options

OPTION 1: Minimum uplift (dph)	OPTION 2: Optimum (dph)	OPTION 3: Optimum Plus (dph)
Modest density increase across all sites.	Modest density increase across all sites.	Maximum change - opportunities to maximise densities, particularly in town centres and close to transport hubs.

Table 1.2: Settlement Density Scenarios

	Minimum uplift (dph)	Optimum (dph)	Optimum Plus (dph)
Town centre locations and close to transport nodes	150	150+	150+
Built up areas	50	100	150
Edge of built up areas	40	50	60

**Mid-point, to be further informed by character based approach. Further details on how these density levels have been set are included within the Housing chapter. These scenarios reflect development proposals that have come forward in our settlements. The proposed baseline densities are a starting point that will be tested further as we move through the plan making process.*

Density Examples

Below are some examples of higher densities in town centre locations and built up areas:

Density: 100 DPH
Ryewood Estate, Dunton Green
Sevenoaks Urban Area

1 Hexagon = 1 Hectare

Density: 150+ DPH
11 High Street
Swanley

1 Hexagon = 1 Hectare

Density: 150+ DPH
Quinton Court, London Road
Sevenoaks

1 Hexagon = 1 Hectare

Please select only one item

- Minimum Uplift (delivers approx. 7.5k units, shortfall of 6k units)
- Optimum (delivers approx. 8.5k units, shortfall of 5k units)
- Optimum Plus (delivers approx. 9k units, shortfall of 4.5k units)
- None of the above

If you wish to explain your answer further, please use this space

STC's preferred approach is Option 2 - Optimum in Sevenoaks Town, and STC would furthermore ask that this respects the height of neighbouring buildings with a limit put on height/storeys in each area.

It is also imperative for the town that affordable housing is delivered.

In addition, STC wishes to point out that there are very limited of transport options in buses etc in lots of development sites, so not many would be sustainable for higher density.

3 Are you aware of any additional sites in existing settlements which we have not yet considered?

Please select only one item

- Yes
 No

If you have selected 'Yes' please specify site details

4 What would you like to see in a Development Brief for the Sevenoaks Station Area

Traffic flow and traffic management for less congestion & safer crossing for pedestrians. As noted in STC's Submission Draft of its NDP, this is a "significant opportunity for development that will transform the arrival into Sevenoaks and could establish a new urban quarter for the Town."
 STC would wish for the above to be managed with true collaboration with Town Council on a development brief as recommended by the Independent Examiner in his report for the NDP. This should also include STC's recommendations as set out in Policy D1 of its Neighbourhood* **Q4 answer continued at end of page.**

5 Do you have a view on the areas of land that the brief should cover and sites that could be included?

Please enter your answer here

Sevenoaks Station as well as its car parks and the car park at the Bat & Ball Station, the farmers site, parade, and bradbourn park car park as part of overall development.

Chapter 02 – Housing Choice for All

Q4 continued:

*Development Plan: that "any development should respond sensitively to [the setting of the notable views towards the Kent Downs AONB]", that the scale of buildings be typically four or six storeys with "potential for a taller building to mark the station", and reconsideration of "transport interchange and public realm treatment at the station."

STC's Highway Improvement Plan 2021 prioritised the pedestrian crossing by Sevenoaks Station as needing a redesign for safer crossing. Kent County Council confirmed that this is viable and that STC would need to fund the design and feasibility for it. STC is waiting on an update as to what exactly was confirmed viable and what STC would need to do next, but would also like to see it in a Development Brief.

The Local Plan should include the Sevenoaks NDP provisions for this area. The draft Local Plan seems to treat Sevenoaks station primarily as a townscape and housing opportunity before getting to what it needs to be to sustain the success of the town - a major sustainable transport hub. There is certainly room for housing above the railway tracks - by agreement with Network Rail Properties. However the key objective should be to expand active travel opportunities to and from the station from across the town, and to link it more effectively with the town centre.

1 Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of Policy H1?

Policy H1

Policy H1

Housing Mix

This policy will ensure that a variety of house sizes and types are delivered across the District to meet the needs of the current and future population. Proposals for new housing development will be required to meet the following technical and design criteria:

- Proposals should be informed by the dwelling mix profiles set out in the latest housing needs evidence (Targeted Review of Local Housing Needs 2022) where appropriate, unless it can be demonstrated that an alternative mix meets an identified need;
- For new build housing development, commit to delivering all homes to meet the M4(2) standard for accessible and adaptable homes;
- For new build schemes of 20 units or more, commit to delivering at least 5% of homes to meet the M4(3)b standard for wheelchair user dwellings, to be delivered as affordable housing for rent;
- Provide homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment and for the District to become Net Zero; and
- Proposals should meet the minimum nationally described space standards.

STRATEGIC POLICY

Please select only one item

Yes

No

If you wish to explain your answer further, please use this space

The missing Housing Assessments for urban towns is regrettable. It needs to be done before decisions are taken on the potential for development. While the Sevenoaks Town Neighbourhood Plan recommends sites for [potential development, and the scale of development, the needs assessment still has to be done. It is crucial that affordable housing requirements on all sizes on new developments are enforced in full.

2 Do you think the proposed affordable housing contributions are reasonable and will help to achieve the aims of Policy H2?

Policy H2

Policy H2

Provision of Affordable Housing

This policy will boost the delivery of affordable housing from developments with market housing, ensuring that overall viability is not prejudiced and that a mix of tenures is provided that meet the needs of the current and future population. Proposals for new housing development will be required to contribute to the provision of affordable housing as follows:

Number of new homes proposed (net)	% affordable housing required	Type of affordable housing to be provided
0-5	0	N/A
6-9 (in Designated Rural Areas only)	20%	Financial contribution
10+ or >0.5 Ha (on brownfield land)	30%	On-site (unless the Council advises that a financial contribution is more appropriate)
10+ or >0.5Ha (on greenfield land)	40%	

Where the provision of on-site affordable housing applies, the recommended tenure split should reflect the latest housing needs evidence (Targeted Review of Local Housing Needs 2022) - 58% social rented, 7% affordable rented, 25% First Homes and 10% other intermediate tenures. First Homes should be offered at a discount of 50% of open market value. Where it is demonstrated that this is not viable due to site specific circumstances, whether this relates to the proposal as a whole or an element, an alternative tenure split is to be agreed with the Council. On the occasion that it is demonstrated that the required on-site provision is not viable or does not best meet identified housing needs and the Council agrees, one of the following options is to be agreed with the Council:

1. The provision of a reduced level of on-site affordable housing plus a financial contribution in lieu of the shortfall;
2. The provision of a reduced level of on-site affordable housing that meets a specific localised need e.g. a greater number of wheelchair accessible homes; or
3. The payment of a financial contribution in lieu of the provision of any on-site affordable housing.

On the occasion it can be demonstrated that the full affordable housing requirement is not viable and the Council agrees, a viability review is required upon first occupation or an alternative trigger point as agreed. This is to ensure that any uplift in the development value of the scheme is shared and contributes to the affordable housing provision, whether this be on site or as an off-site financial contribution. All affordable housing delivered should not generate housing costs of more than 35% of gross household income. Applicants are required to enter into discussions with the Council's Housing team, in consultation with registered providers, at the earliest stage of the application process where the provision of on-site affordable housing applies.

STRATEGIC POLICY

Please select only one item

Yes

No

If you wish to explain your answer further, please use this space

Is there a way of making the policy stronger? STC notes that there have been multiple instances recently where a development has been approved despite offering lower than policy or even 0% affordable housing, with the justification that they weren't viable for affordable housing anyway.

3 Do you think the proposed criteria are reasonable and will help to achieve the aims of Policy H3?

Policy H3

Policy H3 Housing in Rural Areas

This policy will ensure a sufficient supply of rural housing specifically for those who live in or have a connection to the rural areas of the District. Proposals for new housing development in rural areas that meet a specific local need will be required to meet the following criteria to be permitted as an exception to other Local Plan policies:

- The local need has been identified in an up to date local housing needs survey;
- The local need identified cannot be met by any other means through the development of non-Green Belt sites within the parish or, where appropriate, in the adjacent parish; and
- A thorough site options appraisal has been carried out.

The Council expects rural exception housing schemes to provide 100% local needs housing to meet identified needs. However, on the occasion it can be demonstrated that a wholly local needs housing scheme is not viable or deliverable, and the Council agrees, it is expected that the market housing for sale will be used, in the first instance, to meet identified needs including housing for local essential workers, older people, plots for self build and co-housing.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

STC considers this proposed criteria reasonable, but notes that it is not a rural Parish.

4 Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of Policy H4?

Policy H4

Policy H4 Housing for Older People

This policy will ensure a sufficient supply and range of housing and accommodation suitable for older people, both market and affordable, in order to meet the specific needs of this group and to assist in the creation of mixed, balanced and inclusive communities. Proposals for new retirement housing will be required to meet the following technical and design criteria, in addition to the criteria set out in the Housing Mix policy:

- Proposals should reflect the latest evidence on older persons housing needs set out in the latest housing needs evidence (Targeted Review of Local Housing Needs 2022). Alternative methods of assessment will not be considered appropriate;
- Be within sustainably located and well-connected areas of the District, where there is easy access to shops, community facilities including healthcare, public transport and other services appropriate to the needs of the future occupiers;
- Be located in rural villages where an up to date local housing needs survey identifies a local need for older persons accommodation;
- Incorporate the latest HAPPI (Housing our Ageing Population Panel for Innovation) design principles, where possible, in order to offer attractive alternatives to the current home;
- Incorporate an accessible lift in flatted developments of 2 or more storeys;
- Provide access to private and/or communal outdoor space; and
- Provide high quality homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment and for the District to become Net Zero.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

While STC supports these, it would also like to see in the housing mix thought for older people housing without just being flats, and broader provision of all housing stock to allow for the occasional short or long term for those less mobile to exist. It would also support developments being built to house more mixed communities - with quality accommodation to make for independent living (e.g. flat surfaces) that allow for integration of all sectors of society and flexible use, as well as Lifetime properties that allow for a residents' changing needs e.g. wider doors, wetrooms. Rockdale Housing are a good example of how housing can be provided for older people.

5 Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of Policy H5?

Policy H5

Policy H5

Build to Rent

This policy will boost the number of smaller and more affordable units through the delivery of private rented homes that can house people across a range of income levels, ages and household types. Proposals for build to rent schemes will be required to meet the following technical and design criteria, in addition to the criteria set out in the Housing Mix policy:

- Be within the built up areas of Sevenoaks, Swanley and Edenbridge. These are sustainably located and well-connected areas of the District where there is easy access to shops, community facilities and public transport;
- Meet the definition of build to rent as set out in the glossary;
- Provide 20% on-site affordable housing in the form of one and two bedroom affordable private rented homes with rents capped at 80% of the open market value including any service charges;
- Provide high quality homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment and for the District to become Net Zero; and
- Wherever possible incorporate public realm improvements to the benefit of the wider community.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

STC supports Build-to-Rent as defined in the glossary.

6 Build to rent schemes often require a minimum number of units to be deliverable. What should that be in Sevenoaks District?

Please select only one item

- 0-50
- 50-100
- 100+
- Other

If you've selected 'Other', please specify here

7 What else can we do to encourage the delivery of suitable smaller sites in existing built up areas?

Policy H6



Please enter your answer here

STC noted that smaller sites coming forward for development need to be addressed in a way that respects what is already there, and have enough amenity space for its purpose e.g. garden for family houses while respecting of character of area. Proposals need to demonstrate that they fit in.

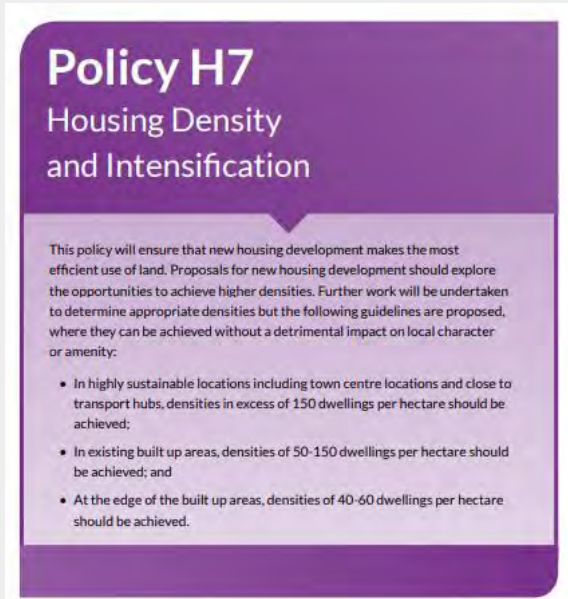
8 Is there anything else that we should include, or an alternative approach we should consider through Policy H6?

Please enter your answer here

Encourage use of more suitable publicly held land and redevelopment of existing sites that are not well designed

9 Do you think the proposed density guidelines are reasonable and will help to achieve the aims of Policy H7?

Policy H7



***Question 10 continued**

The SDNP recommends around Sevenoaks Station typically four to six storey buildings with potential for a taller building to mark the station (up to 10 storeys as already permitted in that area). Consideration will need to be taken as to how the development appears from notable viewpoints.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

STC reiterated that the development has to respect surrounding area and buildings and the character of the town.
STC would resist seeing buildings that are substantially taller than those existing in town because it would change character of the town too significantly.

10 What do you think are appropriate locations for taller buildings and are there areas of land that are suitable for intensification?

Please enter your answer here

STC considers this question too broad, as there is no quantification to what "taller buildings" are. For instance, the existing "tall" building at Tubbs Hill House is an anomaly and doesn't fit the town, and STC would not welcome more schemes of that height.
There are two areas in Sevenoaks which may be suitable for high levels of housing density, although the height should not greatly exceed what is currently on or around those sites. This would include land opposite the station, including the former Farmers site, the site of the BT building and the main station car park. This would also include the site of the Stag car park, telephone exchange and Royal Mail Building. ***answer continued above**

11 Is there anything we should include, or an alternative approach we should consider through Policy H7?

Please enter your answer here

12 Do you agree with the proposed strategy for identifying new Gypsy and Traveller pitch allocations in the most sustainable locations?

Policy GT1

Policy GT1
Gypsy and Traveller
Site Allocations

Consideration will be given to whether a site:

- Is sustainable, prioritising those close to existing services and facilities;
- Has existing pitches, and whether those are permanent, temporary or unauthorised;
- Has impact on local character, prioritising those lying outside of the AONB and with existing built form;
- Has impact on protected areas such as Local Wildlife Sites, Ancient Woodland, SSSI; and
- Will provide an acceptable living environment for future occupants in terms of size, noise and air quality and is not located within an area likely to flood.

STRATEGIC POLICY

Please select only one item

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

If you wish to explain your answer further, please use this space

Sevenoaks Town doesn't have suitable sites and STC agrees with the policy as written, but notes that the policy excludes a section of the community that stop over between locations and would ask that SDC properly look at transit sites available that can be provided through negotiation. This is a priority for STC as providing stop-over locations would reduce confrontation and open space damage. Local areas including Sevenoaks Town have been impacted - so STC's main concern is ensuring availability of temporary stopover locations for travellers coming through the area and SDC should strengthen policy to cover this.

13 Is there anything else we should consider through Policy GT1?

Please enter your answer here

Provision of sites for temporary stopping places - (transit provision)

14 Are you aware of any additional sites for new Gypsy and Traveller pitches?

Please select only one item

- Yes
- No

If you have selected 'Yes' please specify site details

15 Do you agree with the development management Policy GT2?

Policy GT2

Policy GT2

Gypsy and Traveller Accommodation

Accommodation for Gypsy and Travellers and transit pitches must take account of the policies within the Local Plan and should take account of the following criteria:

- The site should be located close to services and facilities and access to public transport;
- The site will provide an acceptable living environment for future occupants in terms of size, noise and air quality and is not located within an area likely to flood;
- Safe and convenient vehicular, pedestrian and cycle access can be provided to the site;
- The development will minimise the potential impacts on the surrounding character, landscape, including in Areas of Outstanding Natural Beauty, and biodiversity; and
- Associated buildings, including amenity blocks, must be proportionate in scale and bulk to the pitches proposed.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

1 What are the factors that make Sevenoaks District a successful place for businesses to locate?

Please enter your answer here

Proximity to London and access to continent, motorway links, supportive to local businesses, wealth of local talent. Schools with high quality education for settling down
 Open space and supporting facilities
 Good local availability of skilled people in finance/professional services/ICT etc (see BRES 2016 local analysis of job types in Sevenoaks)
 Access to key customers in the markets they serve (often London)
~~Transport links and ICT infrastructure to access additional skills and people they need~~
 Attractive living environment, housing, education, leisure etc to draw skilled people to jobs here.

2 What steps could be taken to improve economic competitiveness across the District?

Please enter your answer here

Improve high fibre connectivity throughout the District
 Local businesses often feedback to STC that its hard to find out who to talk to about help with setting up a business here, which means they can't make an appointment. SDC could provide a named contact on the website with email address to contact in relation to setting up a business - prospective and new businesses
 Hotel accommodation
 Improve local public transport connections to retail hubs
~~Improve last mile to tourism facilities~~

3 Are there further measures of economic success that should be considered over the plan period?

Please enter your answer here

Number of new businesses, and how many of these last 3+ years, assessment of home working, and number of businesses that have expanded

4 How should the Council encourage the development of the circular economy, which aims to reduce wastage?

Please enter your answer here

Invest in recycling for businesses and broaden what can be recycled in the district.
 Provide greater facilities for businesses to take advantage of this, and support in particular smaller businesses who have trouble in particular with accessing recycling facilities.
 Include provision of smaller recycling centres within new developments, especially significant ones.

5 How should the plan promote innovation and make sufficient provision for emerging trends and technology?

Please enter your answer here

Actively support and promote the local and district-wide initiatives and work more closely with the other parishes and towns on these.

6 Is there additional information that should be included in the marketing evidence to support the loss employment uses?

Policy EMP3

Policy EMP3 Employment Floorspace

New Employment Uses

A criteria-based policy is proposed to assess proposals for new employment space and the loss of existing space. Key principles may include:

- Development proposals for new employment floor space on sites currently in employment use will be supported; and
- Development proposals for employment floor space on sites currently used for non-employment purposes will be considered on their merits. Where benefits arising from the proposed use would exceed the benefit of retaining the existing use, the development proposal will be supported.

Existing Employment Uses

Where a change is proposed from an economic use to another use, the Council is likely to require credible and robust evidence:

- of an appropriate period of marketing for economic use; and
- that the proposals would not cause unacceptable harm to the local economy.

Marketing evidence should prove that both the land and the premises have been widely advertised and marketed for a wide range of economic uses for at least one continuous year, immediately prior to submission of a relevant planning application.

The Council will expect the content of marketing evidence to form a key part of pre-application proposals. The evidence will be assessed in the context of:

- the overall quality of the site as an employment location;
- the level of occupation/vacancy of the site;
- consideration of the suitability of conversion for start-up and micro businesses;
- whether the existing employment use generates any adverse impacts on the adjoining area;
- possible benefits from relocating the economic use;
- possible benefits from using the site for alternative uses; and
- the achievement of other plan objectives.

Marketing evidence will need to address the demand from both the freehold and leasehold markets, reflecting that the dynamics of the two markets may differ.

Please enter your answer here

Design needs to take account of security when considering mixed use in residential areas. While shops may stay lit-up at night, alternative employment uses that don't remain lit-up can cause darker and less safe areas that residents do not feel safe walking through. STC recommends that lower storeys in residential areas be shops, or alternative use buildings be distributed evenly between them in order to avoid "dark corridors" Mixed use needs design by security and improved aesthetics. An example of where this has not been provided is Cramptons Road.

STC recommends addition of wording "**or community**" to the end of the bullet point reading "that the proposals would not cause unacceptable harm to the local economy". Also add that the marketing evidence mentioned as being required as part of pre-application proposals must be analysed by **quality**.

7 What type of employment space is needed to support changing working patterns and practices across Sevenoaks District over the period of the Local Plan?

Please enter your answer here

Small workshops if there is the demand for it, either for public or for small businesses
The 2018 data developed for the NDP showed the dominant role of professional, financial and business services in the local labour force and business demography needs to be better reflected in this area of the plan. It is a key factor behind the acceleration of home working since 2020, and has allowed Sevenoaks to weather the pandemic as well as it has. There have been a number of private and public initiatives to provide flexible office space to help home workers in these sectors, and more will be needed. Encouraging them around transport hubs, with active travel options, would help to ensure sustainable employment that contributes to net zero.

Shared services for small businesses and homeowners such as print/copy services, finance advice and meeting rooms.

8 How should healthy workspaces be promoted in the plan?

Please enter your answer here

Proposals for new workspaces should allow for access to retail, open spaces, cycle storage, public transport links and incorporate good rest spaces.

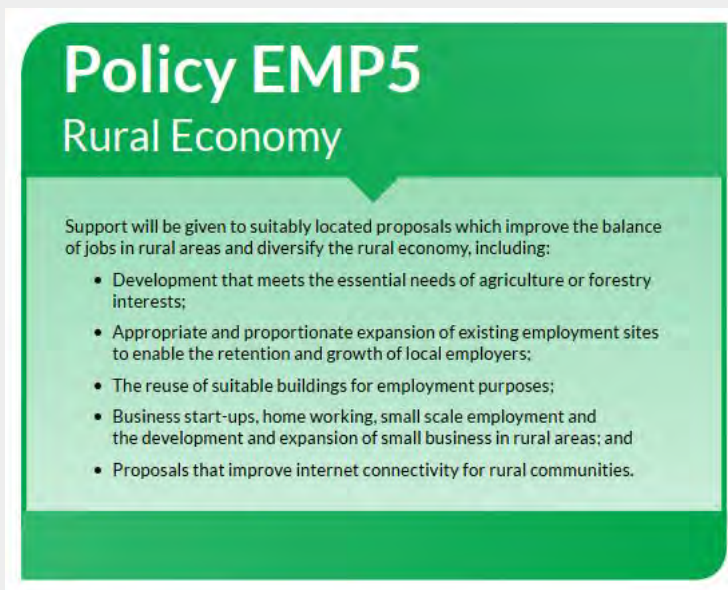
9 What measures can the Council take to encourage sustainable employment space that contributes to its Net Zero objectives?

Please enter your answer here

Supportive planning policies and/or a flexible planning approach when considering planning applications. Incorporate robust sustainable construction and operation requirements into planning requirements, including evidence of transport needs of users. Policies to encourage local sourcing of materials and supplies.

10 Are there additional matters that should be included to support the rural economy?

Policy EMP5



Policy EMP5
Rural Economy

Support will be given to suitably located proposals which improve the balance of jobs in rural areas and diversify the rural economy, including:

- Development that meets the essential needs of agriculture or forestry interests;
- Appropriate and proportionate expansion of existing employment sites to enable the retention and growth of local employers;
- The reuse of suitable buildings for employment purposes;
- Business start-ups, home working, small scale employment and the development and expansion of small business in rural areas; and
- Proposals that improve internet connectivity for rural communities.

Please enter your answer here

Encourage local agriculture to produce food

11 Do you agree with the approach of supporting and retaining the existing high streets rather than identifying areas for expansion or contraction?

Policy TLC1

Policy TLC1

Town and Local Centres

This policy will:

- Promote the unique characteristics of each of the town centres to allow them to thrive and form a network of complementary centres, which provide for the needs of the District;
- Ensure town centres remain the focus for retail, leisure and other town centre activities, bringing people together in accessible locations to meet their needs. We continue to support a 'town centres first' approach, to ensure town centre uses are conveniently clustered together within defined town centre boundaries, and retail provision is maintained within the primary shopping areas;
- Support town centre developments which include a residential element, to provide customer footfall within the town centre, provided that the residential element is not proposed at ground floor level (within the primary shopping area), other than that which falls under permitted development;
- Consider an Article 4 Direction for Sevenoaks town centre primary shopping area, to restrict the Permitted Development change of use (Class MA0 from Class E to residential);
- Support local centres to provide for the day-to-day needs of the communities which they serve and resist the loss of shops and services where they are serving a local need, particularly where they are considered 'key' sustainable services in the Settlement Hierarchy;
- Where strategic sites are proposed (i.e. approximately 100 units or more), it is expected that new small-scale convenience retail will be included within the site, to promote sustainable services which can be easily accessed on foot or cycle;
- Town centre development, particularly where it includes work within the public realm, will be expected to meet the following criteria, where appropriate:
 - Focus on quality, inclusive design;
 - Development should be accessible, promoting walking/cycling and public transport use, with adequate parking, EV and cycling infrastructure and car clubs;
 - Development should promote health and well-being, including community space/green space;
 - Development should help to deliver the Council's Net Zero, 2030 commitment.
- Development should help to deliver the Council's Net Zero 2030 commitment.

STRATEGIC POLICY

Please select only one item

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

If you wish to explain your answer further, please use this space

STC's objection is based on the fact that it believes that Town Centre strategies should be designed by the communities, not imposed by the District Council. This will be different for each one e.g. STC wants High Street and St Johns developed.

Different towns will want different approaches and they should be community led - for instance through Neighbourhood Development Plans.

Secondary shopping centres should also be considered.

12 Do you support or have any comments on the specific proposals for the five highlighted centres?

Please select which Town or Local Centre you are commenting on

Please select only one item

- Sevenoaks Town
- Swanley
- Edenbridge
- Westerham
- New Ash Green

Please enter your answer here

As identified in the NDP's in Cultural Quarter document.
STC recommends that a new policy also be added to support secondary shopping centres within towns.
Where appropriate, uniformity of size in buildings would enhance the local area.

13 Do you agree with the proposal to restrict conversion of shops (Class E) to houses at ground floor level in primary shopping areas?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

Yes, when front facing primary shopping.

Sevenoaks Town Council would support it in the High Street, London road, and prime locations of secondary shopping centres.

It is also worth drawing attention to the fact that Sevenoaks Town's largest retail unit is Sainsbury, at northern boundary, and much existing employment land is between Sainsbury and Bat & Ball station. The nearby hospital is also an important employment and community service centre. Meanwhile, much of the expansion in residential capacity will be in and around Greatness Quarry. The need for local services - and infrastructure - to support the developments in this area should be highlighted in the plan. These areas will also gain from policies to support business and professional services. This is as per the Northern Sevenoaks Masterplan which forms part of the evidence base of the STNP.

14 Does the proposed amendment to Sevenoaks Town Centre boundaries look appropriate?

Proposed Amendment to Sevenoaks Town Centre Boundary



Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

The boundary doesn't include St Johns Hill and Hollybush and STC requests that these be recognised as prime locations of secondary shopping centres in a separate policy supporting secondary shopping centres in towns as mentioned above.

Sevenoaks Town Council considers the idea for the market to be moved to the delivery area in Blighs impractical and unlikely to be supported by Blighs or the market traders. STC would prefer it be kept in the High Street.

15 Do you support a lower Retail Impact Assessment threshold?

Policy TLC2

Policy TLC2

Town Centre Development Management

This policy will:

- Expect developers to demonstrate compliance with the Town Centre's Strategy;
- Ensure new development for town centre uses is located within defined town centre boundaries, and retail provision is maintained within the primary shopping areas;
- Assess any development outside of the defined town centre boundaries, in accordance with the NPPF sequential test, to ensure all sequentially preferable locations are assessed in terms of their suitability and availability;
- Propose an impact assessment for any retail and leisure development with a floorspace of 500sqm gross or above outside of defined town centre boundaries;
- Seek to limit the extent of hot food takeaway, where the number of approved establishments within a ward, equals or exceeds the UK national average, per 100,000 population. The details of numbers and location of existing outlets can be assessed using FEAT (Food Environment Assessment Tool); and

Proposals related to the evening economy should:

- Be consistent with the Council's Town Centre Strategy;
- Complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation of these uses;
- Demonstrate there would not be a significant adverse effect on amenity or function, particularly impacts on residential uses;
- Promote access via sustainable modes of transport and avoid reliance on private vehicular transport, including private hire vehicles; and
- Investigate the potential for allowing daytime uses to activate the space, including on a meanwhile basis, where the use is only intended to operate during evening/night-time hours.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

Sevenoaks Town Council agrees with some parts of the policy, however would want proposals to be consistent with the NDP cultural strategy, not the SDC Town Centre strategy.

16 Do you agree with the proposals to manage hot foot takeaway applications?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

No comment, however please be aware of the typo in the question and consultation document, reading "hot foot".

17 What additional support do you think the plan could provide for the evening economy in the Sevenoaks District?

Please enter your answer here

Transport e.g. public late night provision. STC has received feedback that residents are able to get to the Stag Community Arts Centre via bus but are unable to get back home the same way.

Reducing evening car parking charges.

18 Do you agree that we should protect, support and encourage tourism businesses, visitor accommodation and visitor attractions, including heritage assets?

Policy TO1

Policy TO1

Tourism and the Visitor Economy

It is expected that development proposals will support, strengthen and protect the existing accommodation and attractions.

It is suggested that the loss of tourist attractions and accommodation will be resisted where possible. Exceptions will be made where equivalent facilities, which are equally accessible to the population, are provided. Alternatively, it should be demonstrated through evidence submitted, that the continued operation of the tourist attraction or accommodation is no longer needed or is financially unviable.

Proposals to provide new sustainable tourism development, including hotels, guesthouses, bed and breakfasts, outdoor accommodation, self-catering accommodation and new visitor attractions, will be supported after consideration of the following criteria:

- Whether the location is readily accessible, by a range of means of transport including walking, cycling and by public transport;
- The anticipated traffic generation by the proposal;
- The impact of the proposal on local and landscape character and amenity;
- The relationship to existing tourism development and whether the proposal is for the upgrading of those facilities; and
- Whether the proposal will contribute to the diversification of tourist attractions in the District.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

Good public transport would help for sustainable tourism - for instance the traffic going to Knole during peak visiting times e.g. bank holiday, sunny day, weekend could be reduced and visitors encouraged. There also needs to be more thought of access for non-cars with good cycle routes and pedestrian access.

19 Do you agree that the loss of tourist attractions and accommodation should only be permitted where a clear justification for their loss is provided?

Please select only one item

- Strongly agree
 Agree
 Neither agree or disagree
 Disagree
 Strongly disagree

If you wish to explain your answer further, please use this space

Chapter 04 – Climate Change

1 Do you agree that the Local Plan should seek to ensure development mitigates and adapts to climate change?

Policy CC1

Policy CC1

Climate Change

This policy will seek to:

- Ensure all developments recognise and support the Council's Net Zero 2030 commitment for the District to reduce carbon emissions;
- Minimise carbon emissions where possible through effective spatial planning by promoting sustainable development, supporting local services and facilities, and sustainable movement;
- Ensure developments incorporate measures to mitigate the causes of climate change and reduce emissions;
- Support the delivery of appropriate renewable and low carbon energy schemes;
- Ensure developments implement measures to support climate resilience and adaptation including supporting the natural environment, increasing water efficiency, incorporating sustainable drainage systems and avoiding areas at risk of flooding; and
- Maximise opportunities for carbon storage and sequestration.

STRATEGIC POLICY

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

STC agrees with the policy, however it needs to be expanded to shape the overall footprint of homes, businesses and transport towards a community zero carbon target for 2050. Given that most of the homes which will exist in 2050 are already built, this could be helped by policies to incentivise better energy performance in existing homes - perhaps when they interact with the planning system for extensions and improvements. Focusing only on new buildings will not deliver the legally required result.

2 Are there any other ways the local plan can address climate change?

Please enter your answer here

Flexible planning policies to allow climate changing initiatives e.g. solar panels, on street electric car parking.

3 Do you agree with the use of climate impact assessments as a way to ensure developments significantly reduce carbon emissions?

Policy CC2

Policy CC2

Low Carbon and Climate Resilient Development

This policy will seek to ensure development is built to significantly reduce carbon emissions and to be resilient to a changing climate. It will include:

- Scheme layout and design requirements to reduce energy use, make the most of natural heating and cooling and encourage active and low carbon movement;
- Encouragement to use nationally recognised eco building standards such as Passivhaus and BREEAM and to meet the Future Homes standard as a minimum;
- Requirements for low carbon and renewable energy technologies to be included in all new developments to reduce energy use;
- Requirements for adaptation measures to be incorporated into schemes including green spaces, trees, porous surfaces, living roofs and walls, and water harvesting; and
- Climate Impact Assessments to be required for all developments to set out how they are achieving the lowest possible carbon rating, incorporating renewable energy measures and ensuring climate resilience.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

STC agrees in principle, however viability of scheme should not be solely determined with this.

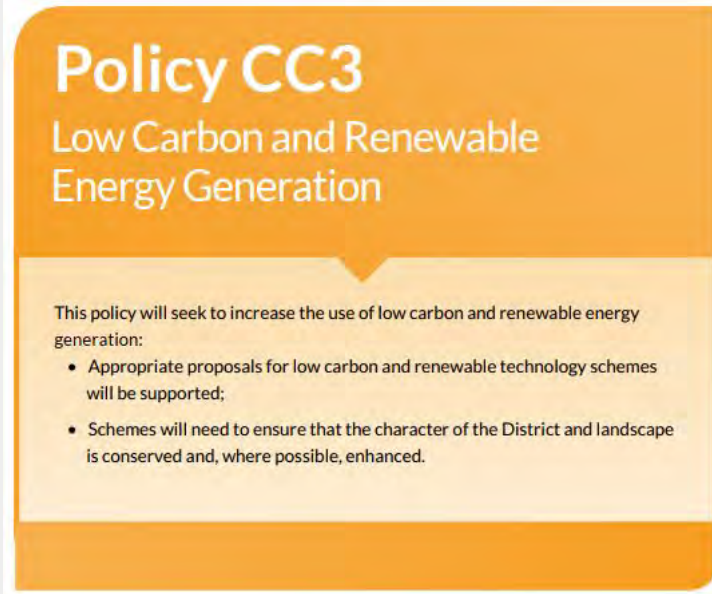
4 Are there any other ways the local plan can ensure low carbon developments?

Please enter your answer here

Subsidise electric buses and good transport links.
Design new developments in such a way that pedestrian links to them are built in (as per STC's NDP)

5 Do you agree with our approach to low carbon and renewable energy generation?

Policy CC3

A graphic for Policy CC3 with an orange background. The title 'Policy CC3' is in large white font, followed by 'Low Carbon and Renewable Energy Generation' in a smaller white font. Below this, in a white box, is the text: 'This policy will seek to increase the use of low carbon and renewable energy generation:' followed by two bullet points: '• Appropriate proposals for low carbon and renewable technology schemes will be supported;' and '• Schemes will need to ensure that the character of the District and landscape is conserved and, where possible, enhanced.'

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

There are no proposals. STC thinks that there should be more constructive proposals in this policy, and that thought as to ability of the landscape to produce needs to be considered in tandem with the impact on the landscape.

6 Do you agree with our approach to flood risk?

Policy W1

Policy W1

Flood Risk

This policy will require:

- No development in areas at risk of flooding and no development taking place in Flood Zones 2 and 3, without agreement from the Environment Agency;
- Any areas in new development schemes, that are created specifically to deal with flooding, to be designed to maximize wildlife and habitat opportunities;
- Development on sites larger than 1ha in Flood Zone 1 to be subject to a Flood Risk Assessment (FRA) in accordance with the Council's SFRA, National and Local guidance and the LLFA drainage guidance and policy statements;
- That each FRA should include the requirement for any mitigation measures and, where relevant, the assessment should also address the risk of flooding from surface water, groundwater and ordinary watercourses. Where there is evidence that water from these sources ponds or flows over the proposed site, the assessment should state how this will be managed and what the impact on neighbouring sites will be; and
- That measures identified to mitigate the effects of flooding shall be installed and maintained at the applicants' own expense, or put into a management company to ensure their long term retention, maintenance and management.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

Permeable surfaces as planning policy

The section on flooding does not identify the area of Sevenoaks most prone to flooding and sewage discharge. The Mill Stream from Millpond Wood to Greatness Quarry floods regularly and carries sewage into the street, and on into the Darent. It is identified by the Environment Agency as part of the River Darent system, yet it is not shown on page 136. This need correcting. The consequence for policies on development and sustainable drainage for northern Sevenoaks also needs to be acknowledged.

7 Do you agree with our approach to sustainable drainage?

Policy W2

Policy W2 Sustainable Drainage

This policy will require that:

- All developments must incorporate natural flood alleviation measures and sustainable drainage provision which mimics natural flows and drainage pathways and ensures that surface water run-off is managed as close to its source as possible.
- Any drainage scheme must manage all sources of surface water, including exceedance flows and surface flows from off-site, provide for emergency ingress and egress and ensure adequate drainage connectivity. It will not be acceptable for surface water run-off to enter the foul water system.
- Sustainable Drainage Systems (SuDS) or other appropriate measures must also:
 - Maintain public safety;
 - Provide sufficient attenuation to surface water flows as appropriate;
 - Ensure that there is adequate treatment of surface water flows, such that there is no diminution in quality of any receiving watercourse;
 - Ensure protection of groundwater; and
 - Provide or enhance wetland habitat and biodiversity where possible.
- Approval of the design, phasing, long term management and maintenance of SuDS must be agreed prior to the development commencing.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

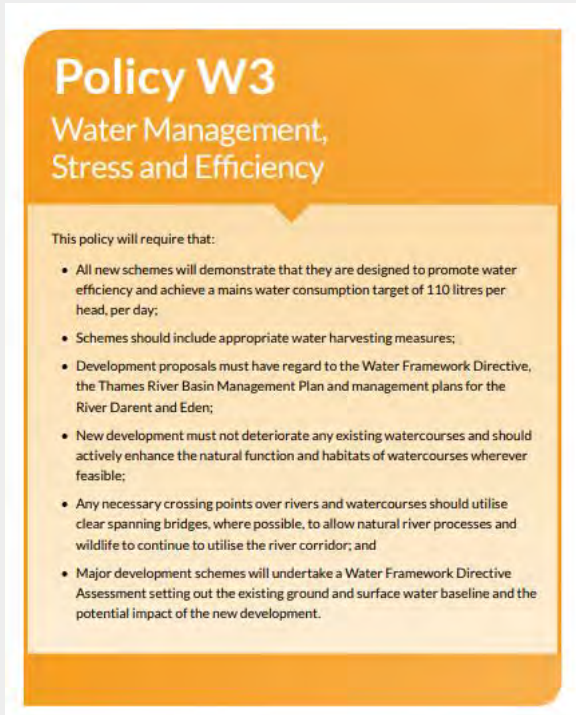
8 Is there anything else that should be incorporated into Policy W2 to support sustainable drainage?

Please enter your answer here

SDC should include that surface water drainage should not put pressure on sewage drainage facilities.

9 Do you agree with our approach to water management including water efficiency measures?

Policy W3



Policy W3
Water Management,
Stress and Efficiency

This policy will require that:

- All new schemes will demonstrate that they are designed to promote water efficiency and achieve a mains water consumption target of 110 litres per head, per day;
- Schemes should include appropriate water harvesting measures;
- Development proposals must have regard to the Water Framework Directive, the Thames River Basin Management Plan and management plans for the River Darent and Eden;
- New development must not deteriorate any existing watercourses and should actively enhance the natural function and habitats of watercourses wherever feasible;
- Any necessary crossing points over rivers and watercourses should utilise clear spanning bridges, where possible, to allow natural river processes and wildlife to continue to utilise the river corridor; and
- Major development schemes will undertake a Water Framework Directive Assessment setting out the existing ground and surface water baseline and the potential impact of the new development.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

Where possible water should be reused within facilities e.g. for flushing toilets

1 What Design Policies do you think would support the successful delivery of the Strategic Objectives?

Policy DE1



Please enter your answer here

Design review panels that include local communities and town/parish councils, as recommended by the Independent Examiner's report on STC's NDP.

2 Do you think this approach will support the delivery of new well-designed spaces within the District?

Policy DE2



Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

As above, Town and Parish Councils should be involved in this process. Sevenoaks Town Council's Submission Draft NDP Aim C6 states that "the Town Council will normally require major planning applications or proposals on sites within sensitive locations, to be submitted to a Design Review Panel for review early in the planning process", and the Independent Examiner has agreed and recommended that STC be involved in this.

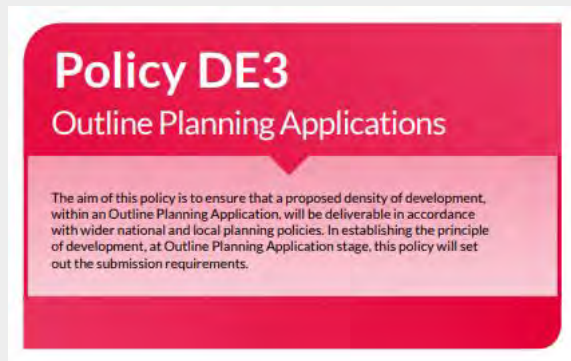
3 What criteria do you think should be used for presenting schemes to the Design Review Panel?

Please enter your answer here

Sensitive location

4 Do you agree that Policy DE3 will help to make optimal use of a potential of a site?

Policy DE3



Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

Ref Pinehurst Nursing Home (20/03293/FUL) and Sevenoaks Quarry (Tarmac) (22/00512/OUT) are poor examples of large densities being included in the Outline, and STC therefore doesn't believe this works.

***5** What documents should be required to be submitted at outline application stage to establish that the proposed development will be policy compliant?

Current requirements

[Planning validation checklists | Sevenoaks District Council](https://www.sevenoaks.gov.uk/downloads/download/218/planning_validation_checklists) <https://www.sevenoaks.gov.uk/downloads/download/218/planning_validation_checklists>

Please enter your answer here

Access,
Indicative layout or positioning and height of dwellings

6 Will Policy DE4 help to secure well-designed places?

Policy DE4

*Please select only one item*

- Yes
 No

If you wish to explain your answer further, please use this space

It would be helpful for residents to have DWCS acronym explained

7 Will Policy DE4 help new development respect local character?*Please select only one item*

- Yes
 No

If you wish to explain your answer further, please use this space

8 What size of site should Policy DE4 apply to?

Please enter your answer here

This depends on the site and STC would recommend:
4+ for urban areas and 10+ for less urban areas.

- 9 Do you think Policy DE5 will support the aim of national planning policy in delivering development that responds to local character and engages with the local community?

Policy DE5



Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

This should include town and parish councils in order to reflect communities

Chapter 06 – Health and Wellbeing

1 Do you agree that Health Impact Assessments (HIA) should be included for certain new developments?

Policy HW1

Policy HW1

Health and Wellbeing

This policy will seek to support healthy living opportunities, promote social inclusion and improve community cohesion To support healthy and safe communities new development should:

- Be located within easy access to services and facilities;
- Create opportunities for better active travel to including provision for safe cycle and pedestrian routes;
- Be designed to minimise threats and improve public safety; and
- Be designed to improve mental health and reduce loneliness and isolation.

Development that reduces health inequalities and social exclusion will be supported.

The policy will set out requirements for HIAs to be submitted on the following new developments, which are expected to have significant impacts:

- All major housing developments of 10 units or more;
- For non-residential developments containing any of the following uses:
 - Education facilities;
 - Health facilities;
 - Leisure or community facilities;
 - Betting shops;
 - Hot food takeaways;
 - Restaurants; and
- For any other uses that could be considered to have a detrimental impact on physical or mental health (e.g. payday loan shops/vapour parlours/nightclubs).

Where unavoidable negative impacts on health, wellbeing and safety are identified, mitigation measures must be incorporated into the proposal.

Proposals will be encouraged to include green and community spaces to support social prescribing for both mental and physical wellbeing.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

All developments should have a health impact assessment while acknowledging that there will be differences of how extensive these will need to be depending on how many developments are proposed.

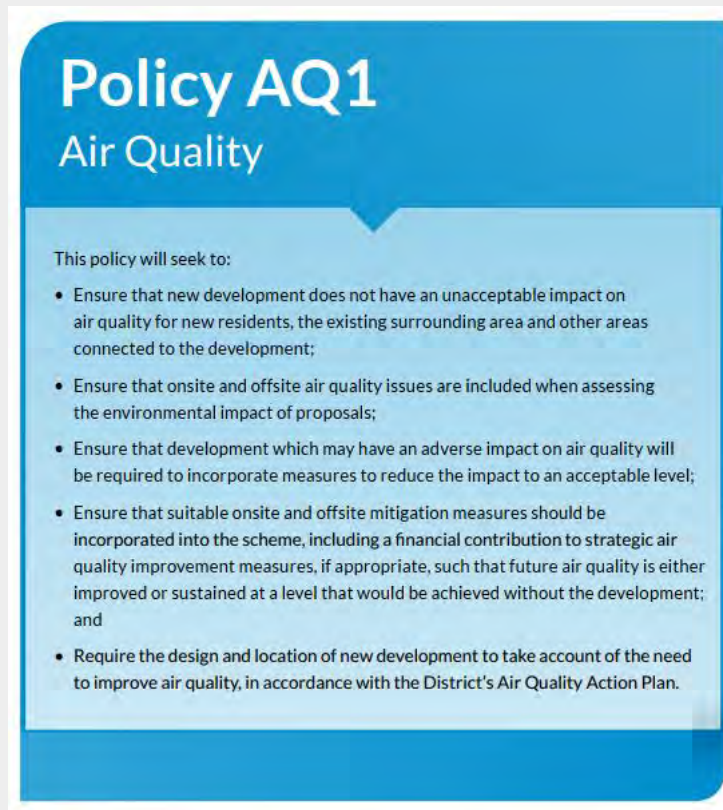
2 How else can the Local Plan support healthy, inclusive and safe communities?

Please enter your answer here

By requiring all developments to have a health impact assessment on applicable topics

3 Do you agree that all new developments should have a neutral or positive impact on air quality?

Policy AQ1



Policy AQ1
Air Quality

This policy will seek to:

- Ensure that new development does not have an unacceptable impact on air quality for new residents, the existing surrounding area and other areas connected to the development;
- Ensure that onsite and offsite air quality issues are included when assessing the environmental impact of proposals;
- Ensure that development which may have an adverse impact on air quality will be required to incorporate measures to reduce the impact to an acceptable level;
- Ensure that suitable onsite and offsite mitigation measures should be incorporated into the scheme, including a financial contribution to strategic air quality improvement measures, if appropriate, such that future air quality is either improved or sustained at a level that would be achieved without the development; and
- Require the design and location of new development to take account of the need to improve air quality, in accordance with the District's Air Quality Action Plan.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

STC doesnt understand how this would be possible, as any development will have some level of negative effects via construction, pollution, increase of residents, traffic etc. It does agree that steps should be taken to mitigate the effects however.

4 What other measures could be included to improve air quality in the District?

Please enter your answer here

5 Do you agree with the policy approach to noise in new developments?

Policy HW2

Policy HW2

Noise

This policy will seek to:

- Ensure that new development provides adequate residential amenity for existing and future occupiers of the development with regards to noise;
- Safeguard the amenities of existing and future occupants of nearby; properties by ensuring that development does not contribute to and avoids areas where occupiers of the development would be subject to, excessive noise and vibration; and
- Ensure that development would not result in unacceptable noise levels from existing noise sources, which cannot be adequately mitigated.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

1 Do you think Policy HEN1 meets the Strategic Objectives for Historic Environment?

Policy HEN1

Policy HEN1

Historic Environment

New development will protect and enhance the District's historic environment.

STRATEGIC POLICY

Please select only one item

Yes

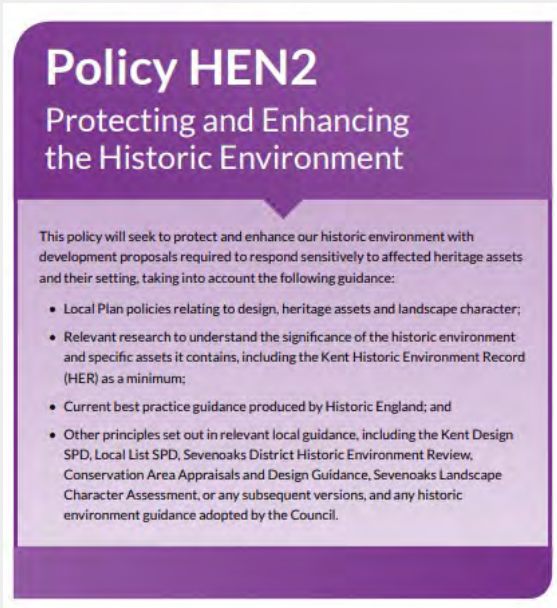
No

If you wish to explain your answer further, please use this space

STC suggest rewording to read "must not detract" because it may be impossible to enhance the historic environment, so the emphasis should be on at least retaining the environment with nothing to detract from it.

2 Do you think Policy HEN2 will support development that protects and enhances the historic environment?

Policy HEN2



Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

STC reiterates its above answer to the previous question, and recommendation that the policy be reworded to state that development proposals "must not detract" from the historic environment.

3 Are there any additional policies that would protect and enhance the historic environment in new development?

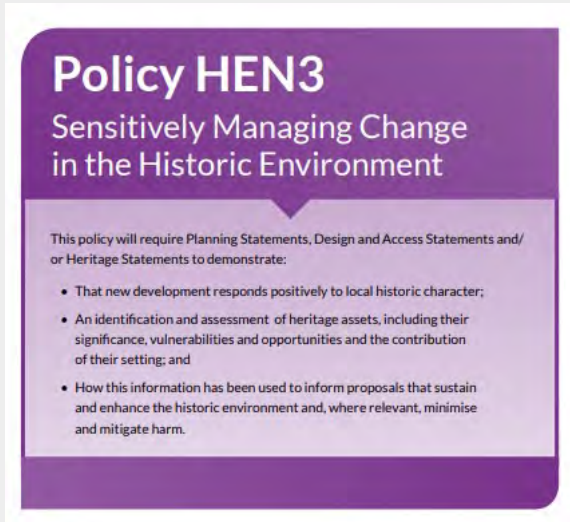
Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

4 Do you think that Policy HEN3 will support sensitively managed change within the historic environment?

Policy HEN3



Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

5 Are there any additional policies that would support sensitively managed change in the historic environment?

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

6 Do you consider that Policy HEN4 will adequately support the protections of non-designated archaeological sites?

Policy HEN4



Please select only one item

Yes

No

If you wish to explain your answer further, please use this space

7 Are there any additional policies that would support the protection of non-designated archaeological sites?

Please select only one item

Yes

No

If you wish to explain your answer further, please use this space

8 Do you think the Local List should be expanded to the wider District?

Policy HEN5



Policy HEN5
Locally Listed Buildings

This policy will seek to reaffirm the Council's recognition of the contribution the Local List makes in valuing and defining local distinctiveness and their status as non-designated heritage assets as a material planning consideration. It will also consider the expansion of the Local List to the wider District.

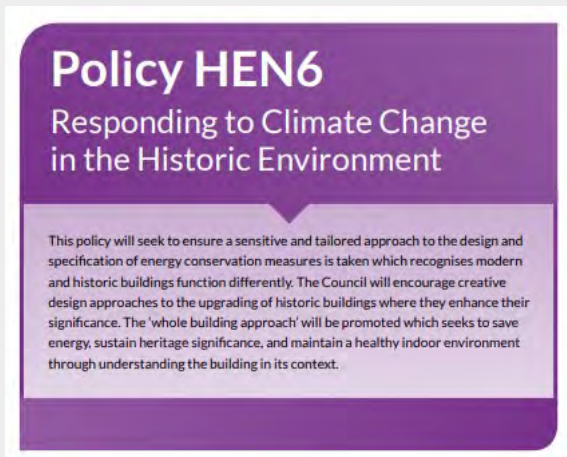
Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

9 Do you think Policy HEN6 will support a sensitive and successful approach to responding to climate changes and energy efficiency in the historic environment?

Policy HEN6



Policy HEN6
Responding to Climate Change
in the Historic Environment

This policy will seek to ensure a sensitive and tailored approach to the design and specification of energy conservation measures is taken which recognises modern and historic buildings function differently. The Council will encourage creative design approaches to the upgrading of historic buildings where they enhance their significance. The 'whole building approach' will be promoted which seeks to save energy, sustain heritage significance, and maintain a healthy indoor environment through understanding the building in its context.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

The policy should also take account of **sustainable** use (not just sustaining the appearance).

10 Are there any additional policies that would support a sensitive and successful approach to responding to climate change and energy efficiency in the historic environment?

Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

The policy should also include allowing sustainable use.

11 Do you think Policy HEN7 will recognise the value of historic shop fronts and ensure appropriate replacements in historic contexts?

Policy HEN7



Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

12 Listed buildings with shopfronts already have statutory protection. Do you think this policy should apply outside conservation areas?

Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

13 Do you think that Policy HEN8 will support the conservation and enhancement of historic park and gardens in new development?

Policy HEN8



Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

STC considers there to be insufficient detail to comment on without knowing what specific guidance would be.

14 Are there any additional polices that would support the conservation and enhancement of historic parks and gardens in the development proposals?

Please select only one item

- Yes
 No

If you wish to explain your answer further, please use this space

Chapter 08 – Natural Environment

1 What could be included in Policy NE1 and design criteria for developments in the AONB?

Policy NE1



Please enter your answer here

No comment

*2 Do you agree that Landscape and Visual Impact Assessments (LVIA) should be required for all new large developments?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

3 Is there anything else that should be identified as part of the District's natural landscape (blue green infrastructure network)?

Policy BW1



Please enter your answer here

This policy should include allotments which STCs regard as being included in the blue/green infrastructure and should be protected as so.

4 Do you agree with Policy BW1 that locally designated sites should generally be protected from development?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

5 Do you agree with the approach to protecting the Ashdown Forest?

Policy AF1

Policy AF1

Ashdown Forest

This policy will require:

- Any residential development in the 7km zone to provide a strategic access management and monitoring (SAMMs) contribution to address visitor impact on Ashdown Forest, in line with the SAMM strategy;
- Major development within or adjacent to the 7km boundary to be assessed on a case by case basis to determine any additional mitigation measures.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

6 Is the 20% biodiversity net gain target appropriate for Sevenoaks District?

Policy BW2

Policy BW2
Biodiversity in
New Development

This policy will seek to:

- Achieve 20% biodiversity net gain from new development;
- Ensure proposals incorporate natural environment measures that help to support biodiversity, mitigate climate change and integrate climate resilience.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

How will the 20% be measured and the policy's success monitored?

1 Should we consider anything else to ~~deliver infrastructure?~~

Policy IN1

Policy IN1 Infrastructure Delivery

This policy will seek to:

- Co-ordinate the appropriate delivery of new infrastructure to support development and growth within our District. We will work with providers to retain, improve and provide new infrastructure to support development and help to ensure a high quality of life for residents of all ages;
- Ensure that new development makes a contribution towards infrastructure needs arising from development, facilitating necessary infrastructure on or off site or where necessary retaining land for essential educational, community, health, movement, flood defences and Blue Green Infrastructure to support the development; and
- Work with stakeholders to address barriers that prevent infrastructure from being provided including funding.

STRATEGIC POLICY

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

2 We are considering identifying what specific infrastructure will be needed to support large developments. This may prioritise infrastructure types. Do you think this is the right approach?

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

Health provision, public transport, resurfacing of roads, and sporting Infrastructure in schools, leisure and recreation spaces are major generators of regular travel. All these types of infrastructure creation or improvement should be developed with active travel as a key element.

*** 3** If we are looking to prioritise infrastructure, what do you consider are the most important types to support growth?

	1	2	3	4	5	6	7	8	9
Highways & Transport e.g. junctions, sustainable transport <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Flooding e.g. flooding defences <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Utilities e.g. gas, water, sewerage <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communications e.g. telecommunications and broadband <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Community Facilities e.g. libraries, leisure centres, sports venues <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Education e.g. pre-school and nursery schools, primary and secondary education <i>Please select only one item</i>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health and Social Care Facilities e.g. GP surgeries, mental health services <i>Please select only one item</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Police and Emergency Services Facilities <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Blue-Green Infrastructure e.g. parks, lakes <i>Please select only one item</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4 Do you agree that new developments should include open spaces?

Policy OS1

Policy OS1

Open Space and Recreation

This policy will encourage:

- The retention of the District's designated open spaces shown for the current use and open space type unless it can be demonstrated that the tests set out in National Policy have been met;
- The retention of all other open spaces of value to the local community, either because of use or contribution to local character. Local Green Spaces as defined by the National Planning Policy Framework will be designated through Neighbourhood Plans; and
- The inclusion of Open Space in new development from the earliest design stage alongside onsite blue green infrastructure and biodiversity features. All new open space must include arrangements for long term maintenance and management.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

It should be recommended for development applications that an allocation for green space be made which is linked to the size of development.

5 What else can we include to improve open space and recreation in the District?

Please enter your answer here

6 Do you agree with our approach to Children and Young People Space?

Policy OS2

Policy OS2

Children and Young People Play Space

This policy will encourage:

- Housing developments to include children and young people play space and apply, as a minimum, the following Fields in Trust requirements for the inclusion of equipped play space:

Size of Development	Fields in Trust Children and Play Space Standards		
	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)
5 - 10 dwellings	✓	N/A	N/A
11 - 200 dwellings	✓	✓	N/A
201 - 500 dwellings	✓	✓	Considered
500+ dwellings	✓	✓	✓

Where it has been clearly demonstrated that this is not feasible or viable, a lower level of provision must be provided as agreed by the Council:

- New and high quality children's and young people play space including multiple pieces of attractive and engaging equipment, suitable to the location and serve the local community;
- The creation of new children's and young people play space with accessible and inclusive equipment so that children and young people with special educational needs and disabilities can also use the space; and
- The improvement and expansion of existing facilities directly adjacent or very close to a smaller development site if they cannot be delivered onsite. This will be considered on a case-by-case basis for smaller developments at the Council's discretion.

Please select only one item

- Strongly agree
 Agree
 Neither agree or disagree
 Disagree
 Strongly disagree

If you wish to explain your answer further, please use this space

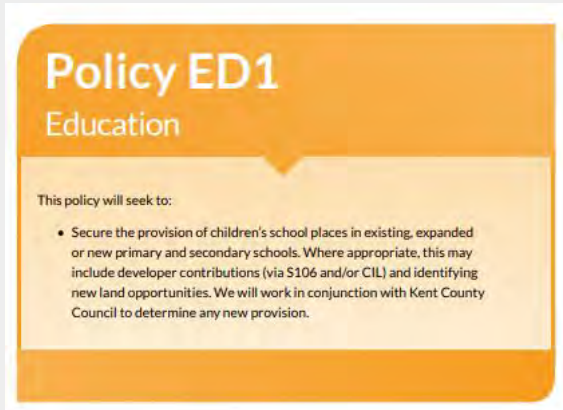
7 Are there any other criteria we should include for Children and Young People Play Spaces?

Please enter your answer here

On point 3, there should be a presumption in favour of providing a space

8 Do you agree with our approach to enhancing and increasing education provisions?

Policy ED1



Please select only one item

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

9 Are there any other priorities we should include in Policy ED1?

Please enter your answer here

10 Do you agree with our approach to Sports and Leisure Facilities?

Policy SL1

Policy SL1 Sports and Leisure Facilities

This policy will encourage:

- The retention of the existing sport and leisure provision within the District unless it can be reprovided, taking account of local needs and improvement to quality. This includes:
 - All indoor sports facilities including swimming pools;
 - All sports pitches identified in the Playing Pitch Strategy;
 - Golf courses;
 - Multi-use games areas;
 - Outdoor gyms; and
 - Playing fields and sites on education establishments.
- Any redevelopment of sports and leisure provision to prioritise other sport and leisure uses in the first instance, then by other non-residential employment generating uses before a wholly residential scheme;
- Proposals to improve the quality of the District's existing leisure provision including playing pitches, indoor sports provision as well as informal sports areas to provide facilities and access for all;
- New playing pitches to be full size, be appropriately surfaced and capable of competition use unless not technically feasible;
- Proposals increasing pay and play provision and/or community access;
- New educational establishments to include community use facilities and be subject to formal community use agreements;
- Proposals increasing the number of indoor or outdoor fitness stations;
- Proposals for new playing pitches in accordance with the Playing Pitch Strategy recommendations;
- The ancillary use of sport or recreational facilities in developments where appropriate.

Please select only one item

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

11 What else should we include to encourage sports and leisure facilities in the District?

Please enter your answer here

Allotments,

Reference the bullet point "new educational establishments to include community..." STC requests the addition of wording: "These must comply with sports governing bodies requirements"

12 Do you agree with our approach to protecting community uses?

Policy COM1

Policy COM1

Protection of Community Uses

This policy will seek to:

- Protect the loss of service uses where they are serving a local need. Exceptions will be made where equivalent replacement facilities equally accessible to the population served are provided, or where it is demonstrated, through evidence submitted that the continued operation of the service or facility is no longer needed or financially viable; and
- Prioritise the reuse of redundant school and community buildings, where there is no requirement for an alternative educational use or the existing community use, to address local need for community facilities. Proposals for change of use or redevelopment for alternative non-community uses will only be considered if it is demonstrated by the applicant that there is no identified community need that can be facilitated through the site, or that community facilities that meet the identified need are incorporated into a wider mixed-use scheme.

Please select only one item

- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

13 What else can we include to protect community uses?

Please enter your answer here

14 Are there other areas of the District which have water capacity issues?

Policy IN2

Policy IN2

Water Infrastructure

This policy will:

- Require developers to ensure any necessary water or wastewater upgrades are in place before a development's occupation in order to avoid adverse impacts such as sewer flooding, pollution or issues of low/no water pressure. This can be addressed through the use of planning conditions;
- Encourage the use of Sustainable Drainage Systems (SuDs) in development. This can have multiple benefits including assisting the prevention of water pollution, decreasing surface water run-off, reducing risk of flooding and creating green spaces; and
- Support the inclusion of positive pumped devices in any basement development that is connected to the drainage network in order to protect the development from risks of sewer flooding.

Please enter your answer here

That development shouldnt impact sewage drainage.

15 Do you agree with our approach to water infrastructure?*Please select only one item*

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

16 What else can we include to successfully manage the District's water infrastructure?

Please enter your answer here

Chapter 10 – Transport

1 Do you agree with our approach to a sustainable movement network?

Policy T1

Policy T1

Sustainable Movement Network

This policy will:

- Ensure that new development is located near public transport infrastructure, services and facilities to enhance sustainable places;
- Support the incorporation, enhancement and creation of cycling and walking routes and provisions within a new development that is connected to the wider transport network;
- Create and strengthen interchanges between different transport modes (such as rail, bus, walking, cycling) to improve access and support first and last mile journeys by active travel;
- Place cycling parking facilities at transport interchanges;
- Support the improvement of the public electric vehicle-charging network in accessible and strategic locations to encourage the uptake of electric vehicles.

STRATEGIC POLICY

Please select only one item

- Strongly agree
 Agree
 Neither agree or disagree
 Disagree
 Strongly disagree

If you wish to explain your answer further, please use this space

Public transport should be extended to new development to show how it will be connected, such as bus routes.

2 Is there anything else to facilitate the sustainable movement network we should include in Policy T1?

Policy T1

Policy T1
Sustainable Movement Network

This policy will:

- Ensure that new development is located near public transport infrastructure, services and facilities to enhance sustainable places;
- Support the incorporation, enhancement and creation of cycling and walking routes and provisions within a new development that is connected to the wider transport network;
- Create and strengthen interchanges between different transport modes (such as rail, bus, walking, cycling) to improve access and support first and last mile journeys by active travel;
- Place cycling parking facilities at transport interchanges;
- Support the improvement of the public electric vehicle-charging network in accessible and strategic locations to encourage the uptake of electric vehicles.

STRATEGIC POLICY

If you wish to explain your answer further, please use this space

Rail services also need more consideration. Technology and Covid have changed travel patterns, reducing demand for high cost peak services with the potential to make rail travel even more sustainable. But rail services will still be just as important for Sevenoaks and its workers in professional, financial and business services, even if they spend more time working here. Fast and regular access to customers is as important as access to physical City offices. Towns and villages, and the Darent Valley Rail Partnership, have identified active travel access to a range of stations (not just Sevenoaks) as important and this plan should build on the ideas.

3 Is it appropriate for walking and cycling to be in the same policy or is it better for them to be in separate policies?

Policy T2

Policy T2

Cycling and Walking

This policy will:

- Encourage new, safe and appealing cycling and walking routes to key locations and transport interchanges;
- Enhance the existing cycling and walking routes, including Public Rights of Way (PRoW) routes, and improve the existing cycle and walking network within the development's vicinity, particularly connecting services and facilities;
- Support the adequate amount of cycle storage that is accessible, secure and weatherproof within new development;
- Integrate new pedestrian and cycle routes with the PRoW and wider travel network;
- Support the implementation of identified routes in the Local Cycling and Walking Infrastructure Plans;
- Create safe and continuous routes for pedestrians and cyclists that align with desire lines and integrate into the wider network;
- Prioritise pedestrians and cyclists needs within the development's design e.g. traffic calming measures, limiting traffic speeds, appropriate materials and landscaping;
- Create new routes to fill existing gaps thereby enhancing PRoW network connectivity.

Please select only one item

- Separate Policies
- Joint Policy

If you wish to explain your answer further, please use this space

Ideally cycling & pedestrian routes would be separated as this would be simpler for deliverability

4 Do you agree with our approach to cycling and walking?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

See STC recommendations in the NDP.

5 Should we consider anything further to encourage cycling and walking?

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

6 Should we provide less car parking in developments situated in sustainable locations, for example, town centres?

Policy T3

Policy T3 Vehicle Parking

This policy will encourage:

- Compliance with the current KCC vehicle parking standards in Interim Guidance Note 3 to the Kent Design Guide (or any subsequent replacement);
- Vehicle parking to be conveniently located to and overseen by the development;
- Developments to be well screened and integrate soft landscaping improving visual amenity;
- For residential developments with unallocated parking spaces, sufficient space provided for electric vehicle charging points;
- For non-residential developments, sufficient space within the site for the parking, unloading, loading of goods and manoeuvring of vehicles delivering and collecting goods;
- Bicycle parking to meet minimum standards with greater provision where feasible.

Notwithstanding the above, the Council may depart from the established maxima or minima standards in order to:

- Consider specific local circumstances including the development's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems;
- Ensure the successful restoration, refurbishment and re-use of listed buildings or buildings affecting the character of a Conservation Area;
- Allow the appropriate re-use of the upper floors of buildings in town centres or above shop units;
- Consider the existing parking provision (whether on or off-site) for the building's existing use for redevelopment or change of use proposals and for the use of existing public car parks outside of normal working/trading hours by restaurants and leisure uses;
- Consider a proposal's inventive parking design justifying less than the minimum provision.

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

7 Do you agree with our approach to vehicle parking?

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

8 Should we consider anything further to manage vehicle parking?

Please select only one item

- Yes
- No

If you wish to explain your answer further, please use this space

9 Do you agree with our approach to electric charging vehicle points?

Policy T4

Policy T4**Electric Vehicle Charging Points**

This policy will require:

- All non-residential developments with car parking to include electric vehicle charging points for employees or customers use. All proposals should include publically accessible rapid electric vehicle charging points where possible and appropriate. The number of points will be at the discretion of the Council and will be determined by:
 - The size and type of the new development;
 - The number of expected employees, customers or car parking spaces;
 - The accessibility of the location;
 - The expected length of stay.
- Within new residential developments, all new houses with a garage or off street parking must include an external electrical socket with suitable voltage and wiring for the safe charging of electrical vehicles;
- Schemes for new apartments and houses with separate parking areas must include a scheme for communal charging points. The number of housing units will determine the number of points required;
- All new developments must have sufficient infrastructure to provide additional charging points to meet future demand;
- Management arrangements should be in place for all publically available or communal electric vehicle charging points to ensure charging points are working and readily available. This may include:
 - Regular maintenance to ensure points are not faulty;
 - Ensuring any faulty points are fixed quickly;
 - Maximum charge times and sanctions for users who block access to a point for other users.

Please select only one item

- Strongly agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly disagree

If you wish to explain your answer further, please use this space

10 Are there any other priorities we should include in Policy T4?

Policy T4

Policy T4

Electric Vehicle Charging Points

This policy will require:

- All non-residential developments with car parking to include electric vehicle charging points for employees or customers use. All proposals should include publically accessible rapid electric vehicle charging points where possible and appropriate. The number of points will be at the discretion of the Council and will be determined by:
 - The size and type of the new development;
 - The number of expected employees, customers or car parking spaces;
 - The accessibility of the location;
 - The expected length of stay.
- Within new residential developments, all new houses with a garage or off street parking must include an external electrical socket with suitable voltage and wiring for the safe charging of electrical vehicles;
- Schemes for new apartments and houses with separate parking areas must include a scheme for communal charging points. The number of housing units will determine the number of points required;
- All new developments must have sufficient infrastructure to provide additional charging points to meet future demand;
- Management arrangements should be in place for all publically available or communal electric vehicle charging points to ensure charging points are working and readily available. This may include:
 - Regular maintenance to ensure points are not faulty;
 - Ensuring any faulty points are fixed quickly;
 - Maximum charge times and sanctions for users who block access to a point for other users.

Please enter your answer here

Any other comments?

1 If you have any further comments for the Plan 2040 consultation, please use the space below

The Sevenoaks Town Neighbourhood Development Plan which is hoped to go to Referendum before May 2023 is referenced a few times throughout STC's response. The document is available with its supporting literature via the following link: <https://sevenoaksndp.wordpress.com/>