

Appendix C - Full Analysis of Regulation 18 Consultation (November 2022) Responses

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Notes

The following Appendix sets out a full analysis to the November 2022 Regulation 18 Consultation on Plan 2040 - a new Local Plan for Sevenoaks District.

The appendix is split by Chapter and Policy and for each policy includes:

1. The number of responses
2. Key quantitative statistics
3. A summary of qualitative responses from Statutory Consultees and general respondents.
4. The Officer Response to the key matters raised.

Policies marked with a * represent that a question for that Policy was included in both the Short and Full Survey. Results have been combined.

Please note that the number of responses listed refers to the total respondents per Policy. Some policies have more than one question and where a respondent commented on multiple questions per policy, they have only been counted once in this total.

Statistics for quantitative questions relate only to the number of respondents to that particular question, and not to the respondents on the Policy as a whole.

Introductory Chapter

Strategic Issues *

190 responses

83% of respondents said that we had identified the right strategic issues in the consultation.

Issues which were highlighted as important included:

- Protection of the character of the area
- Focus on infrastructure as a priority, in advance of new development, particularly health, education and transport (roads, parking, public transport and active travel)
- Delivery and availability of a diverse range of homes, including older persons' housing and genuinely affordable housing
- Net Zero to cover the District as a whole
- Loss of employment/offices - need to provide a full choice of employment opportunities
- Influence of other areas, including London

Vision and Objectives *

176 responses

87% of respondents supported the Vision and Objectives up to 2040.

These include ensuring new developments support well-designed places and spaces and healthy communities while tackling climate change. Further focus on the Areas of Outstanding Natural Beauty (AONB) and the historic environment was highlighted.

Officer Response:

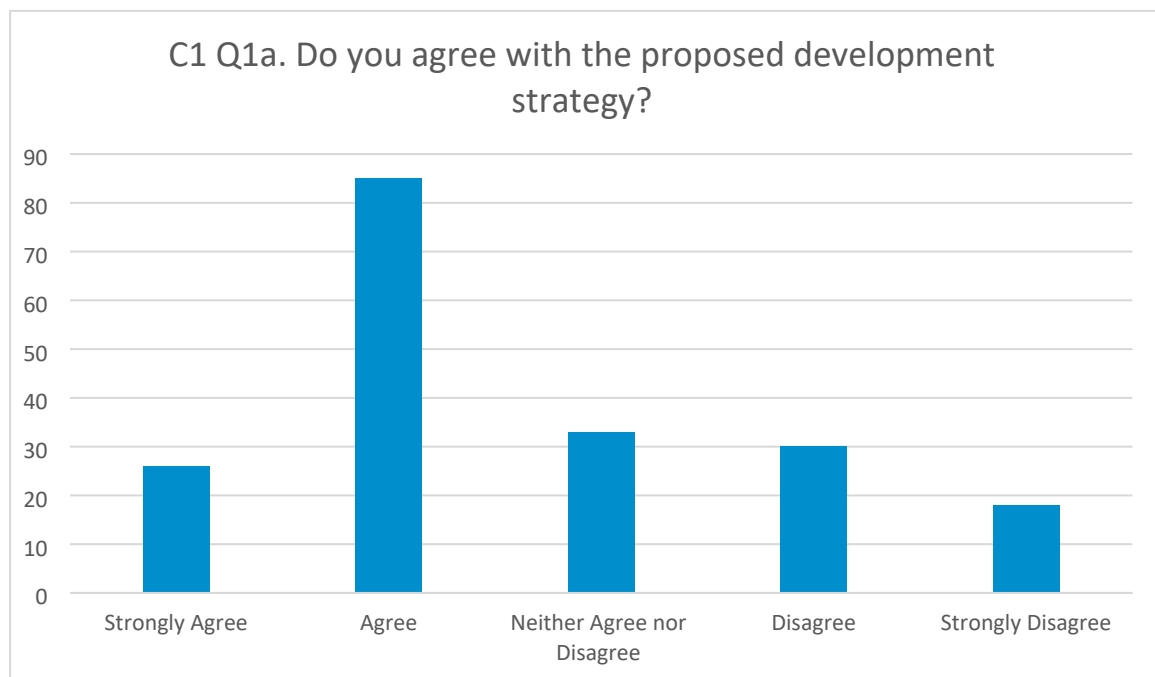
It is welcomed that the vast majority of respondents acknowledged that the correct strategic issues had been identified and that the proposed Vision and Objectives were appropriate. We will continue to work with stakeholders and partners to further develop the issues, vision and objectives to ensure that they fully reflect the challenges and opportunities within the District.

Chapter 1 - Development Strategy

Development Strategy *

197 responses

58% of respondents said that they Strongly Agree or Agree with the proposed Development Strategy, which proposed focusing development and optimising densities in existing settlements and only releasing Green Belt land in exceptional circumstances.



Many comments focused on the issue of Green Belt. Some respondents wanted even further protection of the Green Belt and considered it a ‘last resort’, whilst others felt that strategic Green Belt release in sustainable locations is necessary to meet needs and that it is too much of a ‘sacred cow’. Some respondents recommended SDC undertake a comprehensive/cross-boundary Green Belt review to promote strategic release and others highlighted that Green Belt and AONB should both be respected. It was suggested that Green Belt release, particularly on the edge of settlements where there are good connections, offers the opportunity to contribute to housing supply without prejudicing the role of the Green Belt, and that it is necessary to balance meeting housing need and green belt release. It was noted that there is very little brownfield land in the District and that greenfield land in existing settlements could be considered.

Another issue which was highlighted was concern about increased densities and the need for the protection of local character, for example through Residential Character Area Assessments, Conservation Area Appraisals and Heritage Impact Assessments. It was also clear that many people struggle to understand what

density means at different levels and there was some concern that some density options were too high.

Infrastructure was again raised as a key issue, to support development, to avoid 'gridlock' and ensure existing communities can get GP appointments and school places. It was also recommended that we should plan for uplift in cycling and walking and be more ambitious in relation to climate change.

The need to focus on the provision of affordable housing was also highlighted as a priority.

There was reference to the consultation on reforms to national planning policy and that housing 'targets' may not be so high / mandatory in future. It was also raised that the standard method represents a starting point, not a target, and constraints of the District should be taken into account or central government should be challenged on their approach. Respondents noted that neighbouring authorities are just as constrained as SDC and all have indicated very little if any ability to assist Sevenoaks in meeting their housing needs as they are not able to meet their own.

Officer Response:

The development strategy for the District is clearly an emotive issue as it involves consideration of Green Belt land, as the District is unable to meet needs with the existing urban areas. SDC will continue to focus on optimising development opportunities in our existing towns and service settlements, but will also consider the potential contribution of Green Belt land, in exceptional circumstances. To this end, a Stage 2 Green Belt Assessment has been undertaken, focusing on the areas adjacent to our 8 higher-tier settlements, which will assist in the site selection process. Where land is considered to be underperforming Green Belt, and where it is sustainably located next to a town or service settlement, and where there are no other over-riding constraints, these sites will be included as options within the next Local Plan consultation.

In relation to local character and density, further design work is being undertaken to ensure that the development guidance for each site promotes appropriate densities, which take into account local character and the development of a Design Code will also assist this process.

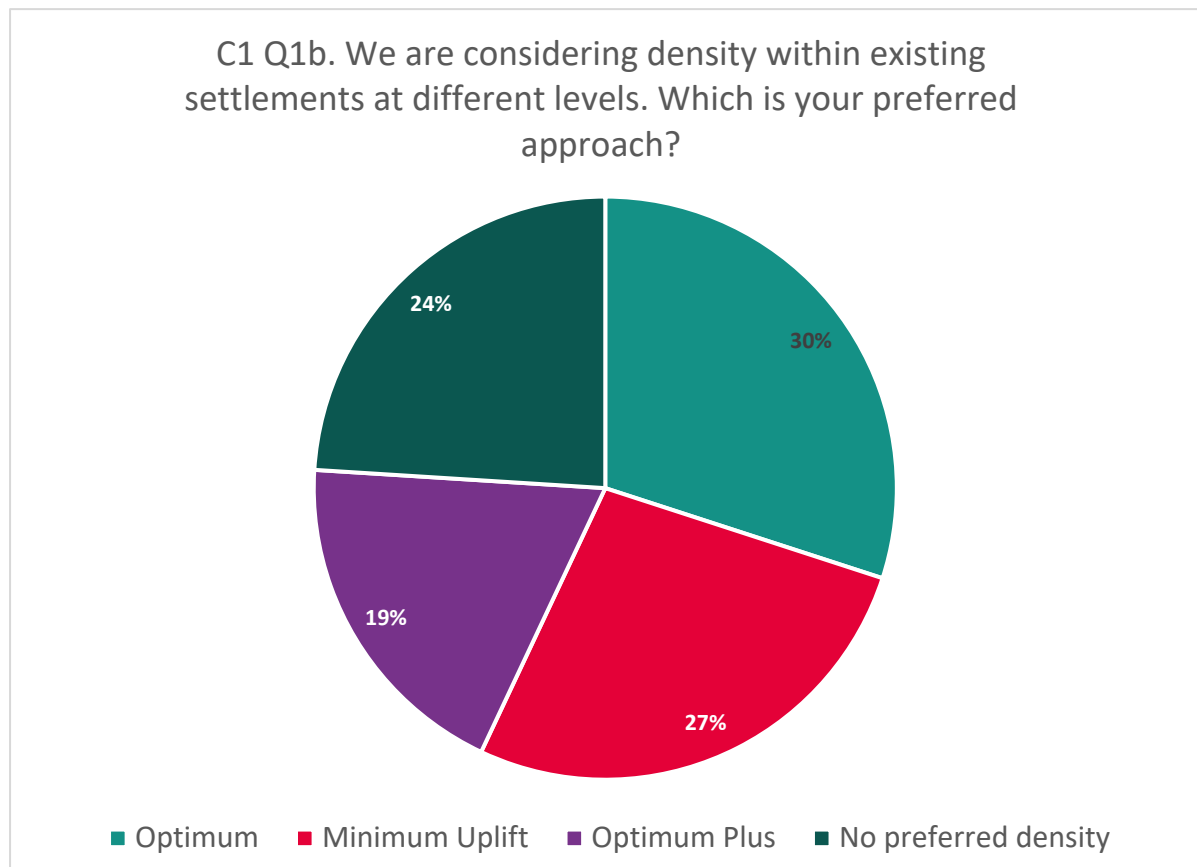
Infrastructure considerations are a top priority for SDC and the Plan will be accompanied by an Infrastructure Delivery Plan (IDP) which, produced in consultation with infrastructure providers, will highlight the strategic infrastructure requirements, to support planned growth.

Housing and Climate Change will continue to be a focus for this plan and we will monitor progress on national planning reforms to ensure that our Plan reflects the latest policy position, particularly in relation to Green Belt and local character.

Approach to Density *

184 responses

Density of development was a subject which clearly splits opinion as there was no clear preference for one option. The responses show that 'Optimum' is the most popular approach to development (30%), closely followed by Minimum Uplift (27%) and then Optimum Plus (19%). Approximately a quarter of respondents didn't express a preference.



The consultation set out three different density options: Minimum Uplift, Optimum and Optimum Plus, which outlined a range of development densities for different areas (150+dph for town centres / 50-150 dph for built up areas and 40-60 dph for settlement edges).

Those who selected 'Minimum Uplift' highlighted that there is already too much housing, roads are congested, raised concerns regarding impact on infrastructure and the need to conserve local character / green space. It was also noted that the character of Sevenoaks will be more undermined by high-density housing than minor development of existing Green Belt.

Those who selected 'Optimum' highlighted the need for the efficient use of land and many saw this as the compromise/middle or 'balanced' option, retaining the character of existing neighbourhoods without the need for high density

developments or too much Green Belt release. A character-led approach to development. A number of caveats were raised such as the need to protect Conservation Areas and consider limiting storey /building heights in certain areas, particularly where there are limited transport options. There should be targets but also a site specific assessment on each site (as per London Plan Policy D3 on optimising sites).

Those who selected 'Optimum Plus' suggested that optimising density and promoting efficient use of land in existing settlements is paramount if the District is to cater for housing need in a sustainable way and is the only way housing need can be met. Respondents opted for higher density in urban areas to maximise the provision of housing, including affordable housing, but noted that only certain town centre sites and areas near transport hubs will be suitable for this density and that there should be a mix of houses and flats and taller buildings with a high standard of design. Respondents noted that we must provide the highest density possible for all new developments where local character permits, ensuring that the character of existing settlement is protected. Others noted that Green Belt should be protected at all costs and building larger developments in a few small areas reduces the number of objections.

Officer Response:

The responses highlight the diverging opinions in relation to density, but it is apparent that in all options, the need to retain local character was raised and that although the efficient use of land is supported, a blanket-approach is not appropriate, as there will be areas (such as town centres and transport hubs) which are more suitable for higher density development than others (such as conservation areas). Design work is ongoing to produce development briefs for promoted sites, to ensure the proposed densities are appropriate, achievable and respect local character.

The fact that the middle or 'balanced' option was most popular suggests there is recognition of the challenging balance which needs to be struck between building at higher density in towns versus building in the Green Belt.

Sevenoaks Station Area *

118 responses

In relation to a proposed Development Brief for the Sevenoaks station area, comments focused on:

- Redevelopment of the vacant 'Farmers' site, which many respondents described as an 'eyesore', seen as a priority
- Great location for optimising density, including housing and affordable housing
- Support for transport hub / bus station relocation / shuttle bus into town / better connectivity, together with adequate car/cycle/taxi parking and better road crossings/focus on sustainable transport modes.
- Importance of good design - gateway location / character of area (not generic London suburb development). Improvement in public realm
- Need for green space/wildlife, somewhere to still and dwell
- More retail/public houses/restaurants/cafes to support commuters, complement but not compete with town centre, and employment opportunities
- Better station facilities
- Development brief should be developed in consultation with local community, encompassing 'Farmers' site, road network up to High Street, car parks, Tubs Hill parade and BT building

Officer Response:

Welcome the useful feedback on the station area which will be used to inform the production of a development brief for area, in conjunction with landowners and local stakeholders, building on the principles and priorities set out in the recently adopted Sevenoaks Town Neighbourhood Plan.

Chapter 2 - Housing Choice for All

Policy H1 - Housing Mix

45 responses

71% of respondents to Policy H1 - Housing Mix - think that the proposed technical and design criteria for the policy are reasonable.

Comments from Statutory Consultees and other key consultation bodies highlighted that this policy criteria is very rarely applicable to small sites. The suggestion was made to refer to Self and Custom Build housing in this policy. It was also suggested that 'High Sustainability Standards' be further defined to include specified conservation measures e.g. solar panels, air source heat pumps and rainwater harvesting. It was also highlighted that the current housing mix differs across the District.

Other responses to Policy H1 suggested changing the reference to the 'Targeted Review of Local Housing Need (TRLHN)' to 'latest Housing Needs evidence' to avoid the policy becoming outdated. It was also highlighted that Policy H1 should be subject to Viability testing.

Officer Response:

We welcome the feedback to this Policy and will consider this in ongoing policy development. It is acknowledged that circumstances will differ across the District, dependent on different factors such as settlement size, environmental and other constraints and size of site. A specific policy for small sites is proposed at Policy H6.

The Council will explore the possibility of including a stand-alone Self and Custom Build Policy in the Local Plan, or the option to incorporate this into an existing Policy. Future iterations of the Housing Mix Policy will refer to the 'latest Housing Needs evidence' to avoid being outdated.

Policy H2 - Provision of Affordable Housing *

169 responses

66% of respondents to Policy H2 consider that the proposed affordable housing contributions set out in the Policy are reasonable.

Responses on Policy H2 - Provision of Affordable Housing from Statutory Consultees and other key consultation bodies highlighted that the general preferred approach is for affordable housing provision on site rather than as a financial contribution. The importance of priority for Affordable Housing for local residents, key workers and people with a connection to the area was highlighted. General concerns were raised regarding the level of affordable housing need and how this will be delivered and implemented in a constrained District.

Other responses to Policy H2 highlighted the importance of viability testing on the affordable housing policy. Queries were raised regarding whether this policy applies to other types of Housing such as Older Persons Housing. Higher financial contributions were also suggested, where Affordable Housing cannot be provided on site. Concerns were also raised regarding the provision of affordable housing being a 'gateway' to develop greenfield land.

Officer Response:

The responses to Policy H2 support the fact that Affordable Housing remains a key issue for Sevenoaks District and that it is a high priority for many of our respondents. We will continue to explore ways, including emerging Affordable Housing models, to secure the on-site provision of affordable housing units.

In particular, we are aware of the emerging 'Right to Require', which has recently been consulted on alongside the Governments Infrastructure Levy consultation. This proposal, should it come forward, gives Local Planning Authorities the ability to set out the amount of Affordable Housing which is expected as on-site provisions. This minimises the possibility for negotiations and therefore resulting in the potential increase in delivery for on-site affordable units.

Sites proposed within the Green Belt will continue to be required to meet a Very Special Circumstances (VSC) test at Planning Application stage, as is set out in National Planning Policy. This will continue to be judged on a site-by-site basis.

The technical feedback for this Policy is welcomed and this will be considered and incorporated into future policy development.

Policy H3 - Housing in Rural Areas

48 responses

70% of respondents to Policy H3 - Housing in Rural Areas think that the proposed criteria for the policy is reasonable.

Comments from Statutory Consultees and other key consultation bodies suggested that reference should be made in the policy to Rural Exception Sites being explicitly used for the provision of Affordable Housing. A definition of 'rural areas' was also suggested, along with clarification on whether this Policy refers to Green Belt sites only and whether it is relevant to rural key worker dwellings, which are not always picked up through Local Housing Needs Surveys.

Among other comments, concerns were raised regarding the proposed restrictions for Market Housing on Rural Exception Schemes. Comments were also made concerning whether Policy H3 would pose as an opportunity for greenfield development and therefore threaten the extent of the Green Belt.

Officer Response:

Responses to Policy H3 highlight the interest surrounding Rural Exceptions Housing, a mechanism which in some circumstances, and where supported by Local Housing Needs Surveys, fully Affordable schemes can come forward on greenfield Green Belt land.

Responses to this Policy have highlighted areas where clarity is required and this will be addressed and incorporated into the Policy for the next draft at the second Regulation 18 stage.

Policy H4 - Housing for Older People

46 responses

64% of respondents to Policy H4 - Housing for Older People think that the proposed criteria is reasonable.

Responses from Statutory Consultees highlighted that Policy H4 does not set out the need for Older Persons Housing or how sites will be identified/bought forwards. It was also proposed that, despite the commitment, the policy contains no evidence that the Council will meet Older Persons housing need in full, specifically if SDC does not meet its overall housing need, which at this stage of the Local Plan process is too soon to know.

Other responses to Policy H4 raised concerns that without formally allocating sites for Older Persons housing, the current demand is unlikely to be met due to the availability and pricing of land. Suggestions were made regarding the opportunity to include Older Persons Housing in Rural Exceptions Schemes in the Green Belt.

Officer Response:

Responses to Policy H4 are welcomed and highlight the importance of providing housing for our elderly residents in the District. The Older Person's Housing Study 2022 sets out the most recent need for Older Persons Housing across the District and forms the basis of this Policy, alongside the wider Housing Need evidence base, the Targeted Review of Local Housing Needs 2022. It is noted that reference should be made to Evidence Base within the Policy.

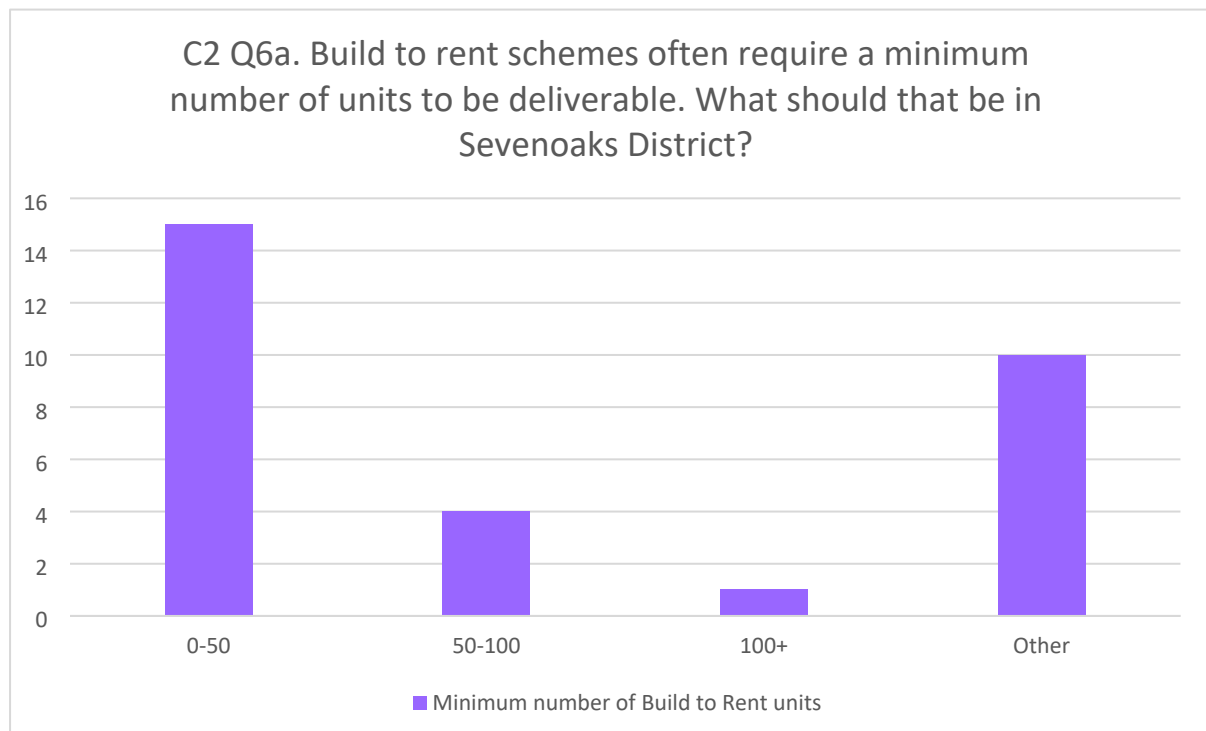
The Council will continue to explore mechanisms to meet this identified need, which could come forward through detailed development guidance on site allocations, or through the Development Management process.

As is highlighted through responses to this Policy, the level of met/unmet housing need through the emerging Local Plan is unknown at this stage of the process. The Council will continue to consider the need for Older Persons housing as a clearer picture emerges alongside the upcoming Regulation 18 and 19 consultations.

Policy H5 - Build to Rent

37 responses

66% of respondents to Policy H5 - Build to Rent agree that the proposed criteria is reasonable. 48% of respondents considered that 0-50 units was the most appropriate minimum standard for Build to Rent developments. A further 34% responded with 'Other'.



Statutory Consultees suggested that Policy H5 should consider other settlements in the District, and not be limited to the three towns specified, in sustainable locations. It was also highlighted the minimum number of Build to Rent units required to be deliverable is likely to differ depending on the settlement.

Other responses to Policy H5 included queries on the Glossary definition for 'Build to Rent' being based on a London model, and whether this was easily translatable to Sevenoaks. The suggestion was also put forward that the minimum number of Build to Rent units should be considered on a site by site basis and should consider site specific viability.

Officer Response:

In 2023 Q1, the UKs Build to Rent stock stood at 82,500 homes (Savills). The majority of these units are situated within the more sustainable locations of higher-tier Towns and Cities.

In Sevenoaks District, there are currently no Build to Rent units and therefore, as a starting point, the Council's initial focus is within our higher tier settlements, as set out in the Settlement Hierarchy 2022, namely the built up areas of Sevenoaks, Swanley and Edenbridge due to their sustainability, proximity to services and facilities and good transport connections. However, the Council will keep this under review throughout the emerging Local Plan process in line with the emerging national picture.

Feedback on Policy H5 is welcomed, not least as this is a relatively new tenure for the Council, and comments will feed into policy development throughout the emerging Local Plan process.

Policy H6 - Smaller Sites

33 responses

Responses from Statutory Consultees and other key consultation bodies highlighted that it should be made clear how Policy H6 relates to the National Planning Policy Framework (NPPF) Paragraph 69a target of 10% of its housing requirement on smaller sites. Responses also highlighted the importance of encouraging currently vacant land, within our existing settlements to come forward for development, where sites are in sustainable locations, and to explore the potential to use Compulsory Purchase Orders.

Other responses to Policy H6 highlighted the benefit of greater flexibility for meeting Net Zero targets on smaller sites. It was also highlighted that for the delivery of smaller sites, Green Belt release may need to be considered. The suggestion was also made to consider releasing smaller sites from other policy requirements such as Affordable Housing contributions and Building Regulation Standard M4(2).

Officer Response:

The supporting text to Policy H6 sets out that the National Planning Policy Framework (NPPF) requires us to identify land to accommodate at least 10% of our housing requirement on smaller sites. For Sevenoaks, with a yearly housing target of approximately 712 homes, this equates to 71 units on smaller sites.

Small sites, historically, have been crucial to Housing Delivery in Sevenoaks District, not least due to the constrained nature of the District, and they continue to offer opportunities to grow the housing stock.

Responses highlight the importance of encouraging vacant land within existing settlements to come forward for development. The Settlement Capacity Study 2022 (SCS) identifies the potential for approximately 1,000 units to come forward in the existing built up areas of the District's most-sustainable higher-tiered settlements.

Policy H7 - Housing Density and Intensification

47 responses

45% of respondents to Policy H7 - Housing Density and Intensification considered that the proposed density guidelines were reasonable.

In response to Policy H7, Statutory Consultees and other key consultation bodies highlighted that Policy H7 may contain some repetition of the proposed Development Strategy in Chapter 1 of Plan 2040. It was highlighted that developments at higher densities should reflect local character and have high quality design, and that it is crucial for individual site circumstances to be taken into account. In terms of intensification, it was generally agreed among statutory consultees that town centres and urban settlement centres are the most appropriate locations for taller buildings.

Other responses to Policy H7 highlighted that the proposed densities may not be appropriate across different areas of the District, and that any developments should respect local character and take account of the existing built form. It was also highlighted that large undeveloped spaces, within existing settlements, such as large car parks may be appropriate for higher densities and intensification.

Officer Response:

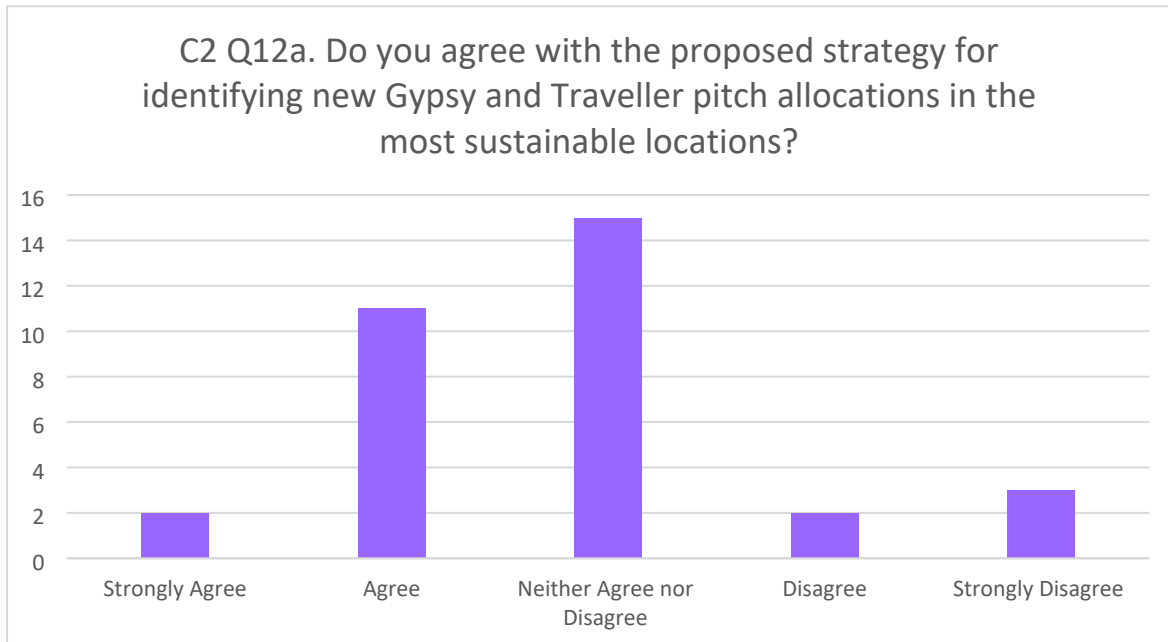
It is acknowledged that proposals will need to be determined on a site-by-site basis and alongside other Local Plan policies. Whilst the Development Strategy at Chapter 1 does refer to Density, Policy ST1, as currently drafted, does not refer in detail to Density or Intensification and therefore it is considered necessary that Policy H7 add additional detail and clarity to these topics.

Feedback on Policy H7 are welcomed and will be used to further develop the Policy throughout the emerging Local Plan process.

Policy GT1 - Gypsy and Traveller Site Allocations

35 responses

84% responded that they either Agree, Strongly Agree with or were neutral to the proposed strategy in Policy GT1.



In response to Policy GT1, Statutory Consultees suggested that the Policy note that Gypsy and Traveller sites are not always located in sustainable locations close to existing settlements, with many of the existing sites in Sevenoaks District located in rural areas. It was also suggested that Policy GT1 make reference to transit sites (temporary stopover locations), which could be bought forward through negotiation.

Other responses to Policy GT1 highlighted that Gypsy and Traveller sites should be prioritised first on brownfield land. It was also suggested that the policy address water, sanitation, waste and energy provision.

Officer Response:

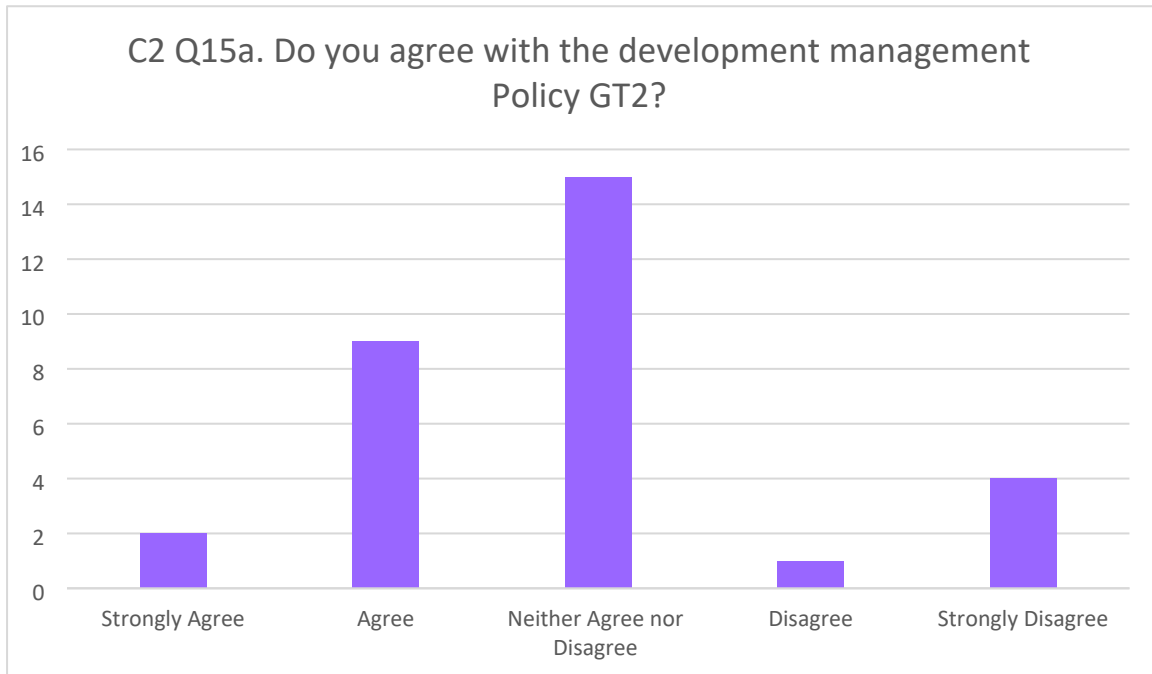
Whilst it is noted that many of the District's existing Gypsy and Traveller sites are located in rural locations, and indeed all sites are located within the Green Belt, a key focus of this emerging Local Plan is sustainability and health and wellbeing. The Council will endeavour to allocate new Gypsy and Traveller pitches within the most sustainable locations wherever possible, close to existing settlements, services and facilities and with good transport connections.

Feedback and suggestions are welcomed and will feed in to further policy development.

Policy GT2 - Gypsy and Traveller Accommodation

31 responses

84% of respondents to Policy GT2 - Gypsy and Traveller Accommodation either agreed with or were neutral to Policy GT2 as a Development Management Policy.



Comments from statutory consultees raised concerns regarding conformity with the NPPF regarding conserving and enhancing Areas of Outstanding Natural Beauty. The suggestion to include minimising potential impacts on the Green Belt, alongside mention of AONB and Biodiversity.

Other comments suggested that 'close proximity' be defined. It was also highlighted that our existing Gypsy and Traveller sites are rural in nature, and that this is a chosen way of life resulting in the suggestion that Gypsy and Traveller sites should not need to be sustainably located.

Officer Response:

It is acknowledged that planning applications for new/additional gypsy and traveller pitches will need to be considered alongside other policies in the emerging Local Plan.

As with SDCs response to Policy GT1, although it is true that our existing Gypsy and Traveller pitches are rural in nature and all lie within the Green Belt, the Council would look more positively upon proposals for pitches in more sustainable locations in close proximity to services and facilities and with good transport connections.

Chapter 3 - Employment and Economy

Policy EMP1 - Delivering Economic Success * & Policy EMP2 - Allocated Sites to Meet Economic Needs

131 responses

A wide range of factors were referenced as to what makes the District a successful place for business, including:

- Skilled workforce;
- Good local schools and sense of community;
- Attractive place to live, safe and pleasant environment, open space and vibrant town centre;
- Good transportation links, including into London and M25 - road and rail network, accessibility to Gatwick and City airports and the continent/ access to customers;
- High-speed broadband rollout would assist, particularly with more working from home. Need to be flexible for changing working practices, including flexible office/meeting space;
- Good business parks / smaller trading estates where SMEs can establish themselves;
- Leisure and tourism, including specific locations such as Brands Hatch, although more accommodation required; and
- Economy needs to be considered in tandem with infrastructure, transport and housing (housing affordability constrains the supply of labour).

In terms of improving the economic competitiveness of the District, the following factors were identified: cheaper parking, infrastructure improvements and improved public transport for workers (incl. buses), public realm in town centres, improved broadband and mobile reception, accommodation for SMEs / hubs, sustainable mixed use development, releasing Green Belt land for employment and affordable housing for key workers.

In order to measure economic success, it was suggested that the following indicators are relevant: attraction of high-tech business, improving average earnings, net zero aspirations met, including waste reduction, support for flexible working practices, including hubs, retention of existing businesses and new business establishment, whether they succeed, assessment of home working and business expansion and close working with Economic Development team.

In relation to reducing wastage, respondents recommended that redundant buildings should be used for start-ups, we should adopt a 'make do and mend' philosophy / repair cafés, improve recycling facilities, lead by example / set up an award scheme, discourage single-use of materials and encourage re-use of

materials on site / re-use/retrofit of buildings and promote local producers selling locally.

And finally, to promote innovation, consultees suggested homes are built with work-spaces (live-work units), we develop work hubs / satellite campuses / science park to share ideas, retain flexibility to respond to shifting work patterns, ensure no broadband or mobile black spots, release land from the Green Belt, give grants/awards and share best practice, reduce rates for those spearheading technologies and work more closely with towns and parishes on local initiatives.

Officer Response:

A wide range of issues were identified in terms of how we can support business and the economy in Sevenoaks from support for skills, broadband, start-ups, tourism, connectivity and ensuring there is enough land for business and homes for workers. We will work closely with our Economic Development Team and those towns and parishes preparing neighbourhood plans, to ensure that we help to deliver economic success in all of our places, whilst reducing wastage and promoting innovation.

Policy EMP3 - Employment Floorspace

24 responses

In relation to the justification for loss of employment space, further clarity was sought on the type of employment uses (use classes) and whether 'economic' use is considered the same as 'employment' use. Some respondents felt that 1 year marketing evidence (to justify loss) appeared appropriate whereas others felt that this policy was too bureaucratic and should recognise the shifts in retail and the economy and be agile to those shifts. Some highlighted specific areas where there should be greater flexibility such as the relocation of a non-conforming use from a residential area that should be supported and others referred to the issue of the encroachment of retail uses on business sites, and whether this can be controlled through policy.

Officer Response:

SDC is keen to protect employment floorspace, to support the local economy, and therefore loss of such spaces will need to be thoroughly justified. However, it is acknowledged that there are instances where a degree of flexibility will be required, to reflect the agile local economy and this will be incorporated in the policy. The issue of the loss of business space to retail will be further investigated to understand whether this can be addressed through local policy.

Policy EMP4 - Affordable Workspace, Flexible Office Space and Co-Location

28 responses

To support changing working patterns in the District, consultees highlighted the need for space to work from home / live-work units, co-working spaces/hubs/cafes/small-serviced offices, better broadband, a range of sizes in office space / flexible space and doggy day-care! The need to protect residential amenity was also highlighted.

In terms of healthy workspaces, it was suggested that offices/units should have access to or incorporate amenity green space/roof and that a target should be set for greening external space e.g. 10% must be planted, including some trees or bushes. Locations should be accessible by cycling and walking and public transport, with changing/showering/storage facilities and well lit with natural light.

Sustainable employment space was universally supported with consultees suggesting focusing on brownfield land in a sustainable location which reduces the need to travel by car / live-work units / shuttle bus from Sevenoaks station to town, encourage renewable building materials or retrofit, well-insulated and energy efficient buildings, requiring air source heat pumps, easy access to recycling, allow max natural light to work space, bike racks and EV car charging points, encourage local sourcing of materials and supplies, provide grants for retrofitting insulation, double glazing and require employment development to include a statement setting out contribution to objective of Net Zero.

Officer Response:

We will continue to promote the development of affordable workspace, flexible office space and co-location. New employment space will need to be sustainability located to benefit from public transport and active travel opportunities and buildings will need to healthy workspaces which meet the highest standards of sustainable design.

Policy EMP5 - Rural Economy

26 responses

To support the rural economy, respondents suggested improving broadband / mobile signal coverage, improving the quality and safety of rural roads, supporting proposals that look to help develop tourism opportunities, supporting live work schemes and giving greater flexibility and support for re-use of rural buildings and endeavours to secure alternative commercial uses through diversification. It was also noted that supporting the rural economy is consistent with the secondary purpose of AONBs and that a balance needs to be reached between the needs and aspirations of rural businesses and enterprise, the need to foster sustainable patterns of development and the need to protect the character and quality of the countryside and especially within the AONBs.

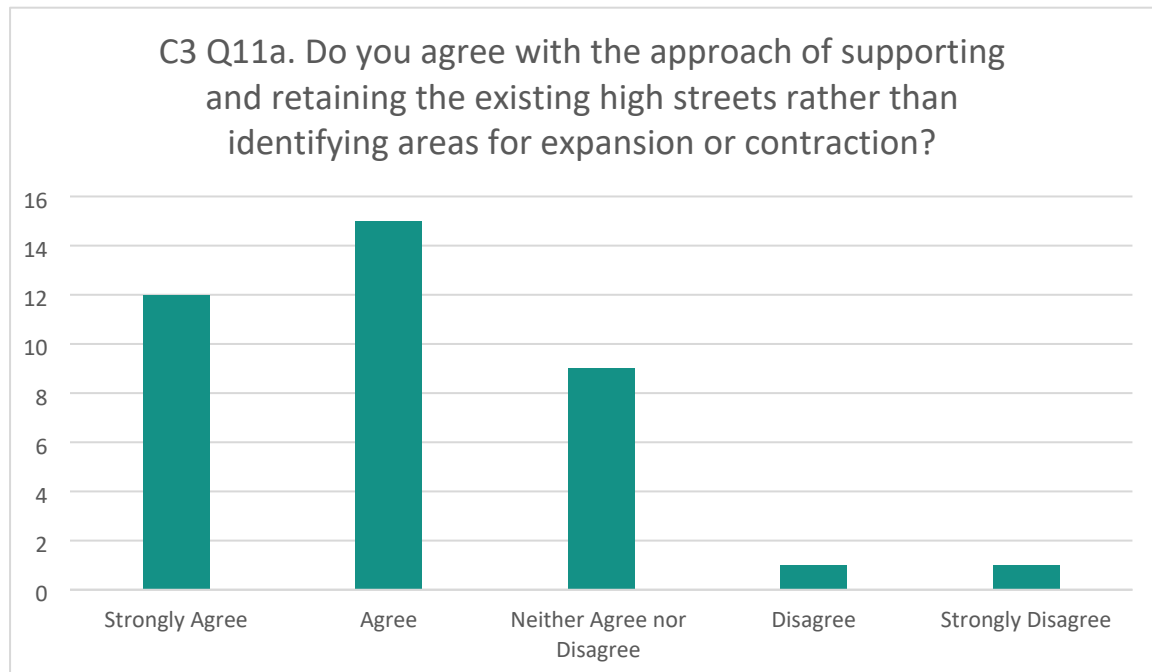
Officer Response:

SDC will continue to work with rural landowners, businesses and stakeholders such as the AONB units to develop policy which fully supports the diversification and resilience of the rural economy, whilst recognising the need to promote sustainable patterns of development and protect the rural nature of the countryside.

Policy TLC1 - Town and Local Centres

38 responses

55% percent strongly agree/agree with taking the approach of supporting and retaining the existing high streets rather than identifying areas for expansion or contraction.



Consultees demonstrated strong support for ‘nurturing’ and improving the existing high streets rather than expanding them. Any new development should enhance the character of the existing areas and concerns were raised about ‘excessive densities’.

Support for pedestrianisation and new housing within town centres to increase footfall and vitality. New strategic developments should include small local centres to improve sustainability. Concern that town centre strategies should be developed by local communities through neighbourhood plans. Request to set out the hierarchy of the centres within this section.

Officer Response:

It is recognised that we need to support and retain our existing high streets rather than identifying areas for expansion, including through the provision of town centre housing to provide footfall and expenditure. We will continue to work with those communities producing neighbourhood plans to ensure that local community aspirations and visions are reflected in town centre policies and that there is consensus over identified priorities.

Policy SEV1 - Sevenoaks Town Centre

In relation to Sevenoaks Town Centre, a number of issues were raised:

- Development should be in the local vernacular / support local character
- Highways alterations - wider pavements, one-way system, restricted access, improved public realm, reduce traffic, make Blighs more of a town square with outdoor seating, banish the car!
- Idea for the market to be moved to Blighs was not supported and it was suggested it should be kept in the High Street.
- Reduced/affordable parking costs
- Improve east-west movement across the town and support for improving walking routes into Knole Park
- More clarity needed on specific development sites
- New policy to support secondary (local) shopping centres within the town.

Officer Response:

Since the consultation on the Regulation 18 Plan, the Sevenoaks Town Neighbourhood Plan has been adopted, which builds on many of these priorities for the town centre. SDC will work with local partners, including the Town Council, to ensure that there is co-ordination and consensus in terms of the projects and priorities to be reflected in the Plan.

Policy SWN1 - Swanley Town Centre

In relation to Swanley Town Centre, a number of issues were raised. Many respondents noted that the town is in need of regeneration, particularly the town centre, but that development needs to reflect local needs, and not just high-rise flats. The provision of a new health hub was seen as the main concern, which should be prioritised before any public realm improvements

Officer Response:

Since the consultation on the Regulation 18 Plan, the Swanley Neighbourhood Plan has been subject to public consultation, which builds on many of these priorities for the town centre. SDC will work with local partners, including the Town Council, to ensure that there is co-ordination and consensus in terms of the projects and priorities to be reflected in the Plan.

Policy EDN1 - Edenbridge Town Centre

In relation to Edenbridge Town Centre, a number of issues were raised. The transformation of the Leathermarket site is seen as a priority, but some of the proposals were seen as too ambitious or not deliverable and land release remains an ongoing issue. It was suggested that the plan should include a proposal for the redevelopment of the Leathermarket that meets the needs of the town. It was noted that there is scope for town centre public realm improvement, building on Edenbridge's historic character.

Some suggested that pedestrian only areas could be further investigated whereas others suggested that this is impractical due to the level of residential units in the centre. The relocation of the market was not supported and existing parking should be maintained.

Raising awareness of the river was positive but should be handled sensitively to keep the riverside's rural character and to protect wildlife. Any proposals should take account of the significant flood risk and environmental considerations.

Officer Response:

The detailed feedback on the town centre proposals will assist SDC, working in conjunction with Edenbridge Town Council, to develop policy and priorities to support the vitality of Edenbridge Town Centre. It is clear that the Leathermarket site is seen as priority for the transformation of the town, together with sensitive public realm improvement and river connections enhancement.

Policy WST1 - Westerham Town Centre

In relation to Westerham Town Centre, a number of issues were raised. There was general support for linkages to the visitor economy and improved way-finding. This was supported under the umbrella of 'Sevenoaks - so much more', although concern was highlighted regarding the extent of Airbnb accommodation. The possibility of linking centres e.g. via a "jump on/jump off" bus route around the district was raised. Improvements to access a better mobile signal, fibre optic broadband or 5G was raised as a priority within the town.

There were some concerns regarding the practicability and deliverability of certain potential projects. The George and Dragon hotel car park is required for the functioning of the hotel and is not considered a development opportunity. Additional pedestrian crossings and a 'one way system' around London Road and Beggars Lane have previously met opposition from KCC or residents and the A25 will not/cannot be downgraded. The proposal to decrease the width of the carriageway through the High Street would not facilitate the servicing of and deliveries to the businesses in the High Street.

Officer Response:

The detailed feedback on the town centre proposals will assist SDC, working in conjunction with Westerham Town Council, to develop policy and priorities to support the vitality of Westerham Town Centre. It is clear that support for the visitor economy, wayfinding and better connectivity are all important issues for Westerham. A number of the traffic and highways schemes are unlikely to be feasible due to capacity and access constraints.

Policy NAG1 - New Ash Green Village Centre

In relation to New Ash Green Village Centre, a number of issues were raised. The proposals were seen as a helpful framework for regeneration of the New Ash Green village centre with the creation of flexible workspaces that will help to revitalise the centre and support those residents who are remote working. It was noted that the SPAN concept should be used as a focus for future direction and that a sympathetic and sensitively designed regeneration scheme will ensure that the village continues to meet the changing needs of its residents.

Officer Response:

The useful feedback on the village centre proposals will assist SDC, working in conjunction with Ash Cum Ridley Parish Council, to develop policy and priorities to support the regeneration of New Ash Green village centre.

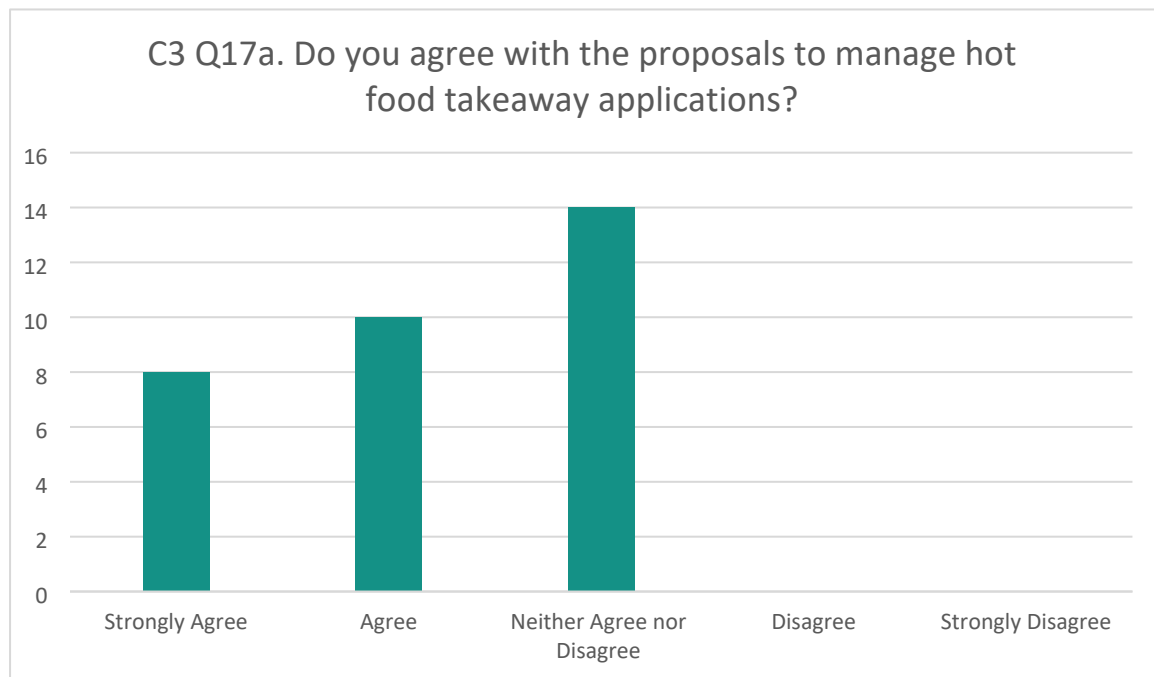
Policy TLC2 - Town Centre Development Management

37 responses

83% of respondents thought that the proposed amendment to the Sevenoaks Town Centre boundaries looked appropriate.

80% of respondents supported a lower Retail Impact Assessment threshold.

56% of respondents either Strongly Agree or Agree with the proposals to manage hot food takeaway applications.



Restricting the conversion of shops to residential at ground floor in primary shopping areas was generally supported, but it was suggested that there may be areas at the periphery of the high street which may be suitable for conversion to residential, to reduce empty premises. Specific areas where this applies should be highlighted. It was suggested that this approach should be expanded to local centres serving villages and smaller communities to protect convenience stores. The need for local services to support the developments of strategic sites should be highlighted, together with policies to support business and professional services.

In relation to the proposed amendment to Sevenoaks Town Centre boundary, the boundary change was largely supported, with the suggestion that the area around the station should be expanded, which could then be considered an 'edge of centre' location. A suggestion that St Johns Hill and Hollybush be recognised as secondary shopping areas in a separate policy supporting secondary shopping centres in towns and that there should be reference to the neighbourhood plan.

With regards to a lower Retail Impact Assessment threshold, again there was general support for this approach, which would enable appropriate small scale retail facilities to be included as part of residential development proposals, to support day to day needs. Such uses can reduce the need the travel and support economic and social sustainable development. It was also suggested that the policy could benefit from greater clarity in relation to the use classes that it is referring to.

In terms of managing hot food takeaway applications, there was strong support for the policy and suggestion that it could go further, including managing litter and odour. Comments were received regarding distinguishing between types of takeaway in terms of fast food and healthier/street food options and need to target only the unhealthy takeaway food options.

A number of suggestions were made where the plan could support the evening economy, through more residential for footfall by encouraging residential development in the town centres, reducing 'hurdles' for opening of new bars, restaurants and dancing venues - Sevenoaks appears 'muted' in terms of evening economy, removing/reducing evening parking charges and having better public transport which runs into the evening, ensuring the town is safe and well policed and considering further pedestrianisation to provide outside areas for people to dwell.

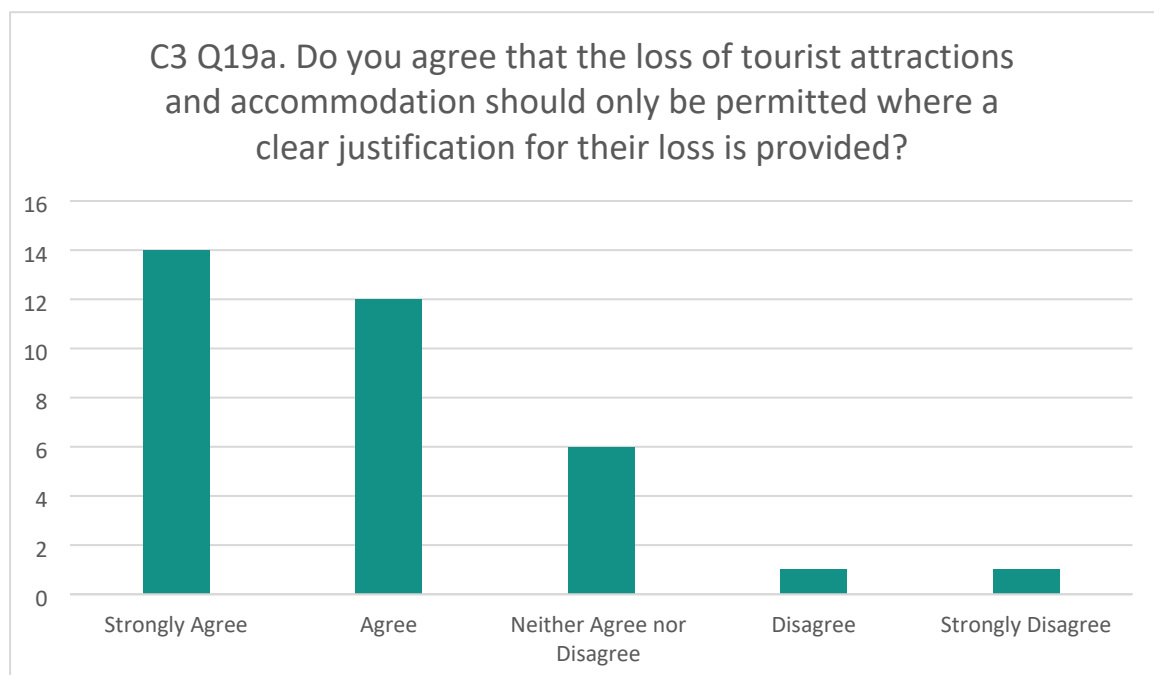
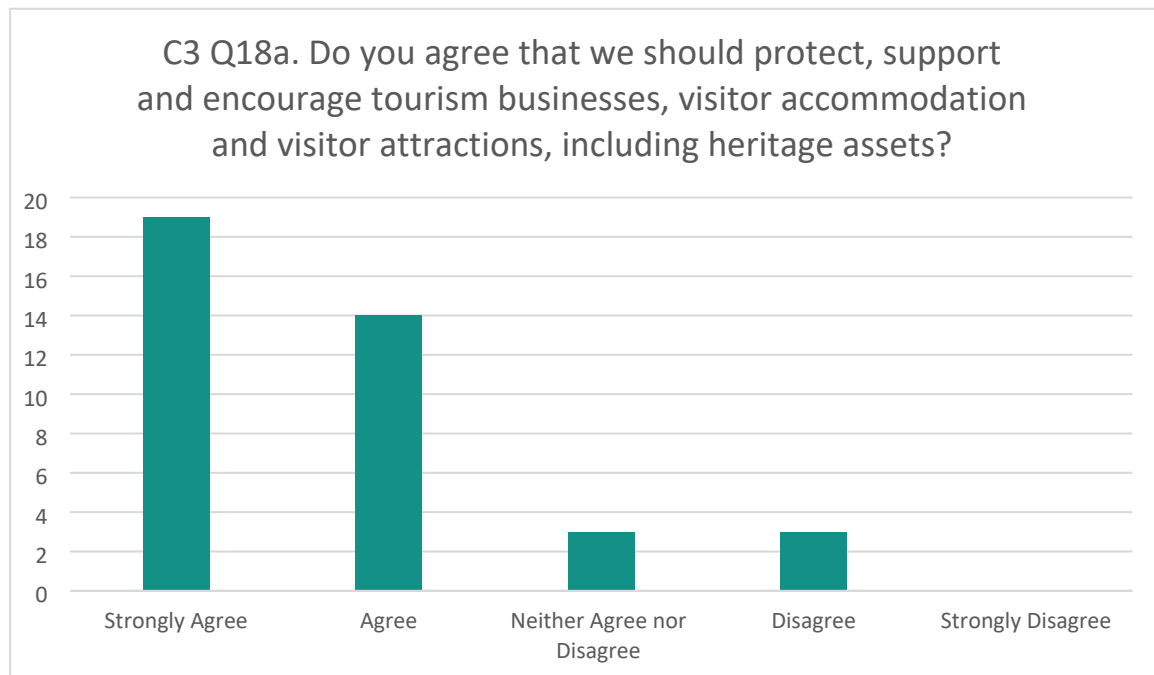
Officer Response:

The Plan will include a range of development management policies to promote the vitality and viability of our network of town and local centres. Protection of primary shopping areas and convenience retail in local centres will be incorporated in the policy, together with an expectation that new strategic development will include small-scale retail to meet local needs. Sevenoaks Town Centre boundary will be amended as proposed and a lower retail impact assessment will be introduced to ensure the impacts of out of town retail are fully assessed. We will further investigate the introduction of a hot food takeaway policy, in line with our ambition to promote healthy communities and we will aim to promote the night-time economy within the District, whilst recognising the challenges that this can present.

Policy T01 - Tourism and the Visitor Economy

39 responses

85% of respondents responded that they either Strongly Agreed or Agreed that we should protect, support and encourage tourism businesses, attractions and accommodation, including heritage assets. 79% of respondents either Strongly Agree or Agree that the loss of tourist attractions and accommodation should only be permitted where there is a clear justification for their loss.



Responses from Statutory Consultees and other key consultation bodies highlighted that tourist facilities need to be served by good public transport infrastructure in order to be sustainable. Comments also highlighted a concern regarding an increase in AirBnB units in the District as well as noting that other material considerations could weigh in favour of the loss of tourist facilities, subject to the appropriate criteria being set out within the Policy.

Other comments suggested that some tourist accommodation may require a more rural location to provide the facilities expected and therefore by nature may not necessarily be proposed in the most sustainable areas in the District. The suggestion was also made to incorporate sustainable public transport services, for example mini buses, to connect stations and key tourist attractions such as Knole Park.

Officer Response:

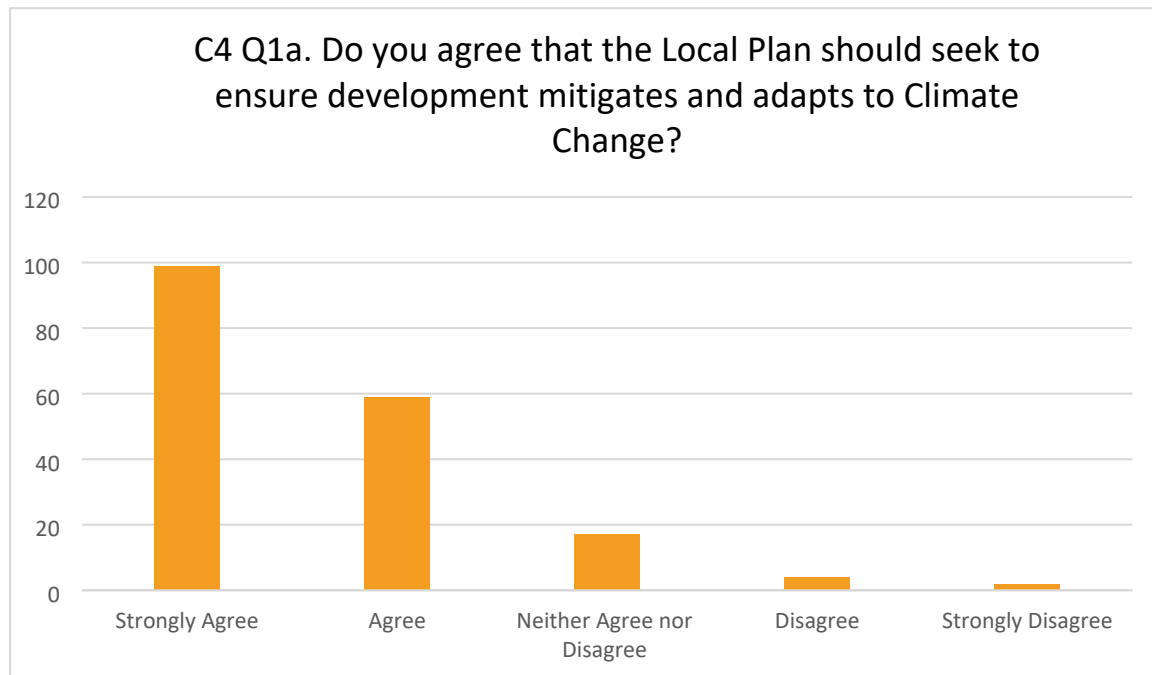
Feedback on Policy TO1 is welcomed and will assist in the further development of the policy. Planning applications considering tourist attractions will be assessed alongside other Local Plan policies, and will be preferred in the most sustainable locations where possible.

Chapter 4 - Climate Change

Policy CC1 - Climate Change *

186 responses.

85% of respondents said that they Strongly Agree/Agree that the Local Plan should seek to ensure development mitigates and adapts to Climate Change.



Responses from Statutory Consultees and other key consultation bodies suggested that policies should aim to incentivise better energy performance in existing homes, as there are concerns that focussing only on new build homes will not deliver the required results. The suggestion was also put forward to include a policy which seeks to increase water efficiency, in particular requiring new residential development to meet the currently optional requirement for water efficiency set out in Building Regulations.

Other comments submitted suggested that the Climate Change chapter should be moved to Chapter 1 as the Council's number 1 priority. It was highlighted that any policies should also take into account Conservation Areas and will need to be tested within the Local Plan viability assessment, as the Council should recognise the costs imposed on businesses. We will also need to ensure that any requirements set out in this policy do not duplicate other legislation (for example Part L and Part F of the Building Regulations).

When asked whether there are any other ways the Local Plan can address Climate Change, Statutory Consultees highlighted that the Plan should look at creative suggestions such as local energy production ideas (e.g. wind farms and solar

farms), heat recovery and electric bus options. It was reiterated that development should be sustainably located with access to public transport and active travel routes to minimise car journeys.

Other notable suggestions included an increase in urban greening (fountains, trees etc.), installing more Electric Vehicle Charging Points, requiring appropriate insulation as well as stronger requirements for energy efficiency and low carbon energy creation and the suggestion to be more restrictive with policy requirements for replacement dwellings.

Officer Response:

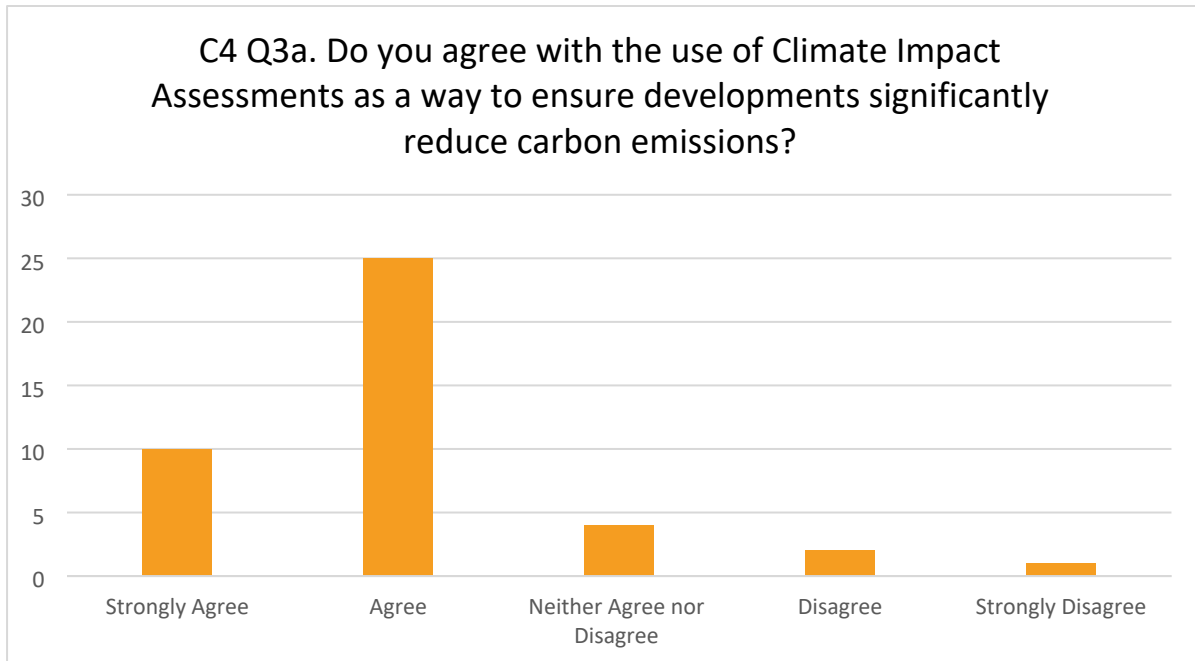
Responses to Policy CC1 reiterated the importance of Climate Change for respondents as a key focus for the Local Plan and this is mirrored by the Council as a key theme running throughout Plan 2040. Responses put forward a range of additional innovative suggestions to address Climate Change, which the Council will take into consideration in the further development of policies.

The Council will continue to explore, within the remit of planning, additional options to help to address climate change and to aid in meeting the Council's Net Zero 2030 commitment. Any proposals coming forward at both planning application and local plan allocation stage will be considered alongside other Local Plan policies, and will therefore take into consideration other land use and environmental constraints such as Conservation Areas and Areas of Outstanding Natural Beauty.

Policy CC2 - Low Carbon and Resilient Development

44 responses

83% of respondents said that they 'Strongly Agree' or 'Agree' with the use of Climate Impact Assessments as a way to ensure developments significantly reduce carbon emissions.



Responses from Statutory Consultees and other key consultation bodies highlighted that more information is needed for how Climate Impact Assessments would work in practice, including how outcomes are to be measured. The suggestion was made that developments over an agreed threshold should be required to use national standards such as Passivhaus and BREAM, unless it can be shown that this might not be appropriate or viable.

Other comments suggested the policy include standards such as: a fabric-first approach, low carbon technologies, no on-site fossil fuel consumption and minimising embodied energy. It was highlighted that the Local Plan should consider the impact of construction and encourage developers to minimise the carbon release during construction.

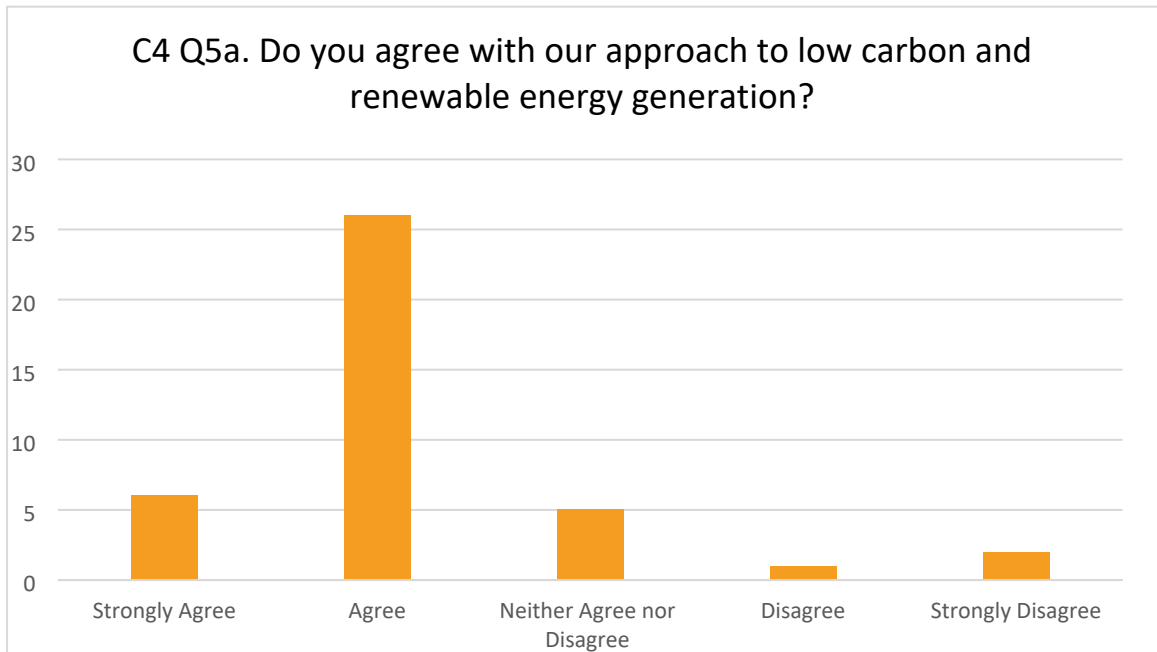
Officer Response:

Responses highlighted that Policy CC2 could include further detail, including performance indicators for the policy. Technical feedback is welcomed and will be considered in the further development of policy in the emerging Local Plan process.

Policy CC3 - Low Carbon and Renewable Energy Generation

40 responses

80% of respondents answered that they 'Strongly Agree' or 'Agree' with our approach to low carbon and renewable energy efficiency.



Responses from Statutory Consultees and other consultation bodies suggested that this policy should make clear the opportunities for low carbon and renewable energy technology in the District. It was highlighted that the policy should reiterate that proposals should be consistent with the requirements of specific constraints, such as in Areas of Outstanding Natural Beauty (AONB), for example.

Other notable comments raised concerns surrounding the wording of the policy in 'conserving the character of the District and landscape', and it was highlighted that it is important that this term is not specifically used to prevent schemes for renewable or low carbon energy coming forward. It was also highlighted that planning guidance is required to set out what small scale projects would be considered as appropriate development, for example: solar arrays on or in the immediate vicinity of existing buildings.

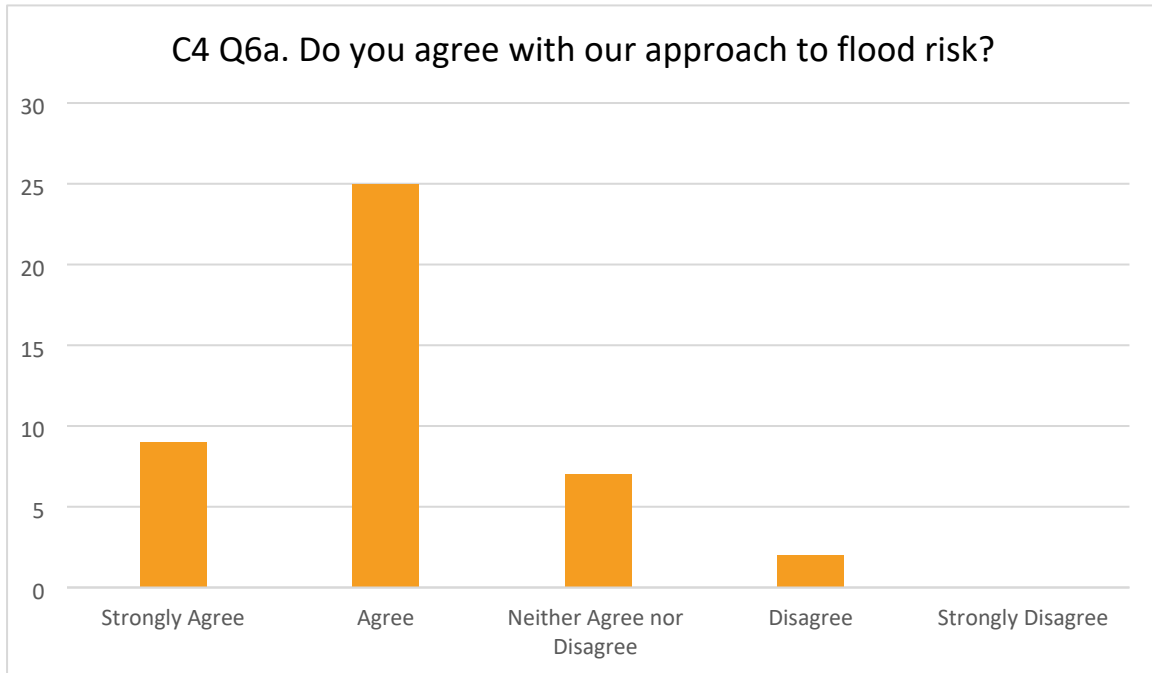
Officer Response:

Responses highlighted that Policy CC3 could be clarified further to make clear what the policy is trying to achieve, in particular reiterating some supporting text in the Policy wording and also clarifying caveats to ensure they are not overly restrictive. Proposals at planning applications stage will need to be considered alongside other Local Plan policies, and therefore land use and environmental constraints such as Conservation Areas and Area of Outstanding Natural Beauty (AONB) will be considered.

Policy W1 - Flood Risk

44 responses

79% of respondents answered that they 'Strongly Agree' or 'Agree' with our approach to flood risk.



Statutory Consultees and other key consultation bodies suggested that this Policy should be expanded to include all forms of flooding and in particular, sewer flooding which could arise if new development is connected to the sewerage network ahead of necessary upgrades being delivered. It was also highlighted that this policy could go further in referencing the ambition for overall flood risk reduction in the District.

Other notable comments reiterated the importance for the Council to ensure that flood risk assessments are provided for new development.

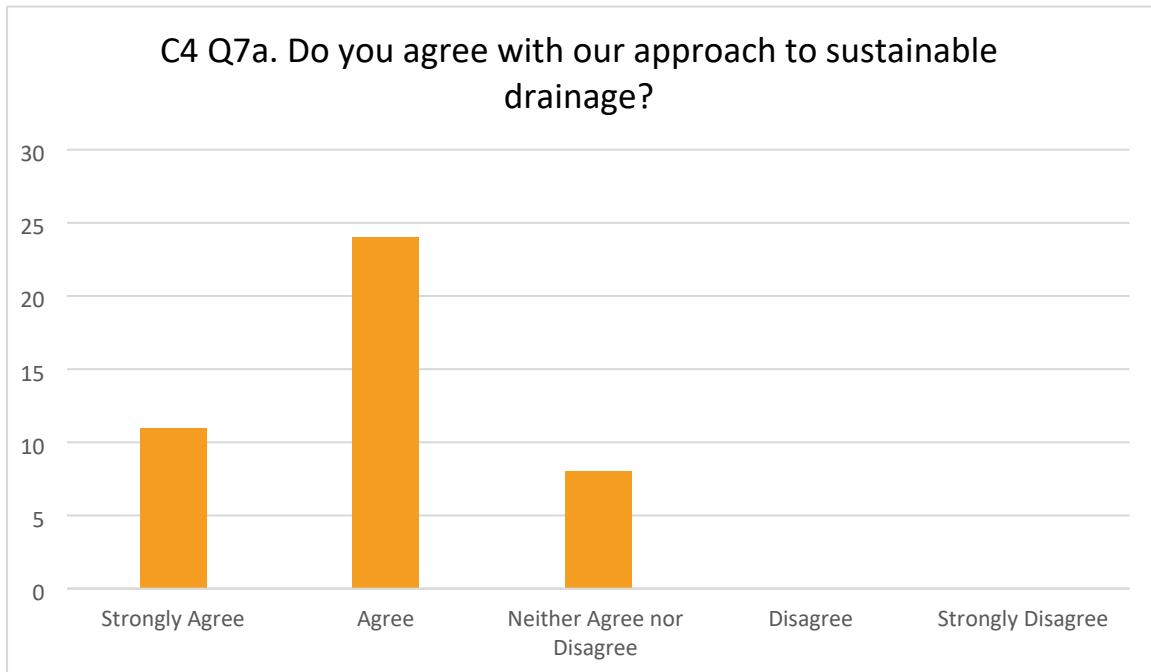
Officer Response:

The ability to widen this policy, both in terms of ambition and also to incorporate other forms of flooding is noted and the Council will explore this as an option when further developing Policy W1. A Level 2 Strategic Flood Risk Assessment (SFRA) is underway which will inform plan production, which will also include required updates to reflect the PPG update from August 2022.

Policy W2 - Sustainable Drainage

44 responses

81% of respondents answered that they 'Strongly Agree' or 'Agree' with our approach to sustainable drainage. The remaining 19% answered that they 'Neither Agree nor Disagree'



Responses from statutory consultees and other key consultation bodies highlighted that it would be beneficial to incorporate a drainage hierarchy into the policy, setting out how water should be managed as close to its source as possible. A similar approach is set out in Policy S113 of the London Plan. A stronger requirement was also recommended that development is not permitted to connect surface water into the foul or combined network.

Other notable comments included the suggestion to encourage non-product based solutions including appropriate planting, ditches, ponds and hedges.

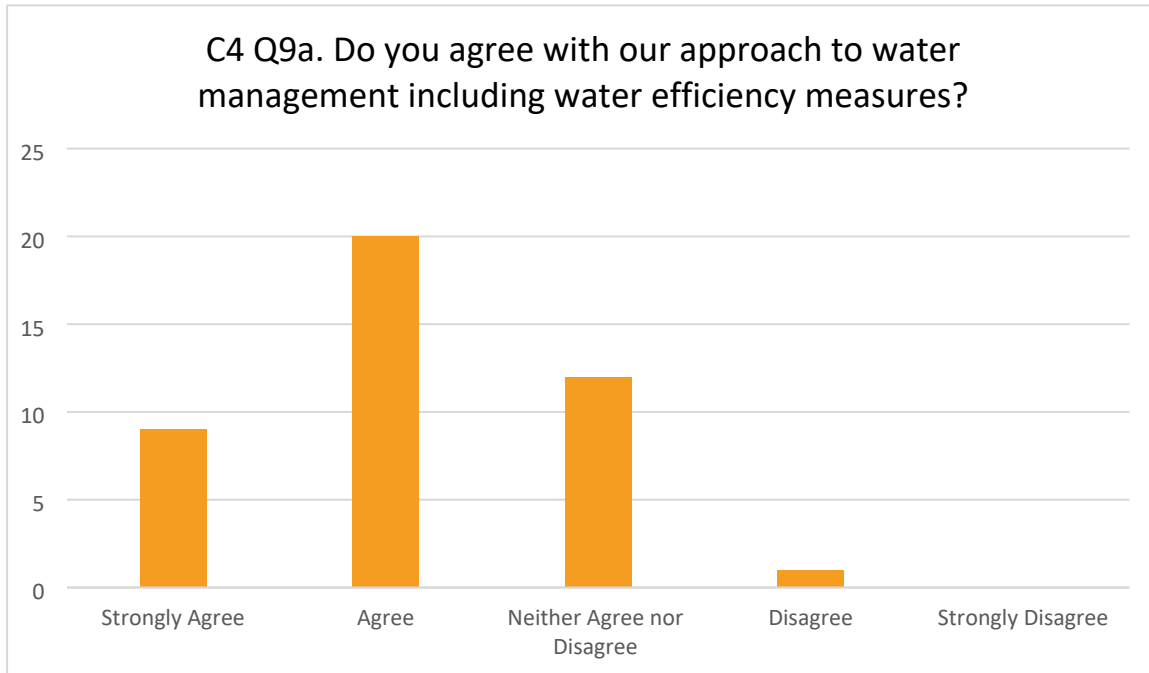
Officer Response:

Responses highlighted Policy S113 of the London Plan as a good example of a drainage hierarchy policy, and the Council will explore this as an option for future iterations of Policy W2.

Policy W3 - Water Management, Stress and Efficiency

42 responses

69% of respondents answered that they 'Strongly Agree' or 'Agree' with our approach to water management, including water efficiency measures.



Responses from Statutory Consultees and other key consultation bodies highlighted that it should be stated that the 'Mains Water Consumption Target of 110 l/p/d' is a maximum mains water usage target to allow for the policy to be flexible to any future Building Regulations changes. It was also suggested that the policy should support the reuse of water within facilities where possible.

Other notable comments included the suggestion that the requirement for Water Framework Directive Assessments is overly onerous and that the policy should add a site size threshold criteria.

Officer Response:

Responses to Policy W3 highlighted the need to clarify the maximum mains water usage target of 110 l/p/d. The suggestion for the Council should consider adding a site size threshold criteria for Water Framework Directive Assessments is also noted and the Council will explore this as an option ahead of the second Regulation 18 consultation later this year.

Feedback on Policy W3 is welcomed and will feed into future policy development.

Chapter 5 - Design

Policy DE1 - Delivering Design Excellence *

105 responses

We invited suggestions surrounding what policies would support well-designed places in our district. The top themes from all respondents included policies which ensure development supports local character, delivering sustainable low carbon places and durable, attractive buildings.

Statutory consultees highlighted the importance of referring to Village Design Statements, Neighbourhood plans, AONB management plans and other local guidance to inform the design of development. They also highlight the importance of clear and measurable policies which have high aspirations in terms of design quality and sustainability.

Other comments highlight the need for more character area assessments and design codes, as required by the NPPF para.127, to provide clarity on how a development should respond to local character. Other suggestions include design policies which will increase the presence of nature in the public realm, provide efficient and legible sustainable transport routes and involve local residents in the decision making process.

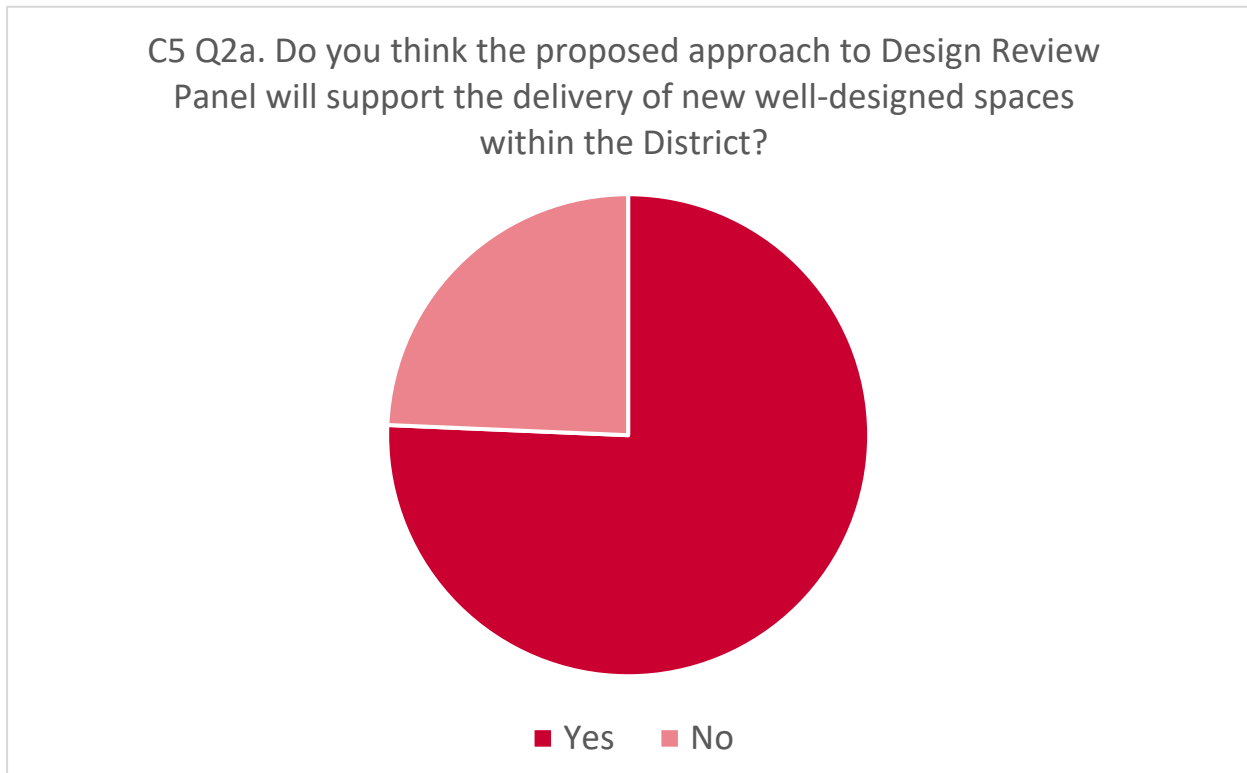
Officer Response:

This open question has provided us with a helpful understanding of the important topics our design policies should address. We will continue to develop measurable policies targeting design excellence, health and wellbeing and climate change. We are developing a strategy for the production of further local design guidance and design codes with the input of the local communities and our policies will evolve with this.

Policy DE2 - Design Review Panel

39 responses

76% of respondents support the proposed Design Review Panel approach which sets out the criteria for development proposals presented to a Design Review Panel, such as the size, the location, the site constraints and sensitivity to change.



The statutory consultees suggest Town and Parish Councils should be involved in Design Review Panel and highlight the need for SDC to clearly define the topics and scope of the Design Review Panel.

Other respondents raised concern towards the adverse effects Design Review Panel can have on the budget and timeline of a project. They suggest DRPs are held regularly, are made optional and that the panel are made aware of previous officers and members comments.

Other comments generally support the suggested criteria for presenting schemes to DRP. Other suggestions for criteria include a sites in close proximity to historic environment, all major development, schemes above 500 units and those with a significant impact on town centres.

Officer Response:

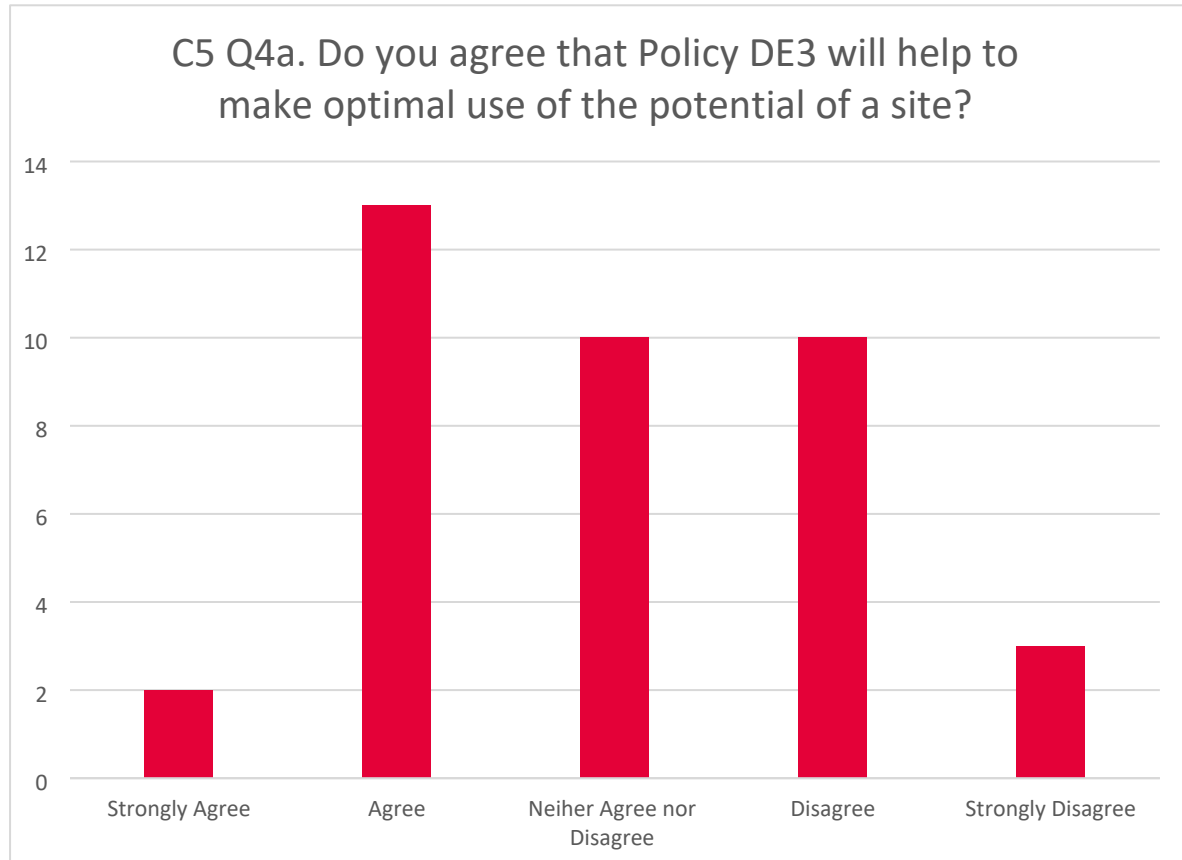
The responses to this policy have highlighted that Design Review Panels are valued but can present issues in relation to project timelines and unhelpful topics

discussed by the panel. We intend to explore the potential to incorporate the professional expertise of the Design Review Panel at an earlier stage within the design process.

Policy DE3 - Outline Planning Applications

39 responses

38% of all respondents agree that a policy stating Outline Planning Applications requirements in relation to density will help to make optimal use of a site. A further 28% were neutral to the proposals in Policy DE3.



Statutory consultees suggest defining densities through design codes could be an effective solution. They suggest the policy should be clear about what optimal density means and highlight that the Outline Planning Permissions are complicated and often not fully understood by the public. Statutory consultees state that the documents included in an Outline Planning Applications should be parameter plans, indicative layout to demonstrate density, types of dwellings, access layout and building heights.

Other respondents suggest there is no need for this policy and that requirements for Outline Planning Applications are well established in the TCPA. Suggestions for the information included within an Outline Planning Permission include the number of proposed homes, density, quantity of amenity space, provision of disabled access homes, parking quantities, movement networks, and the provision of green energy.

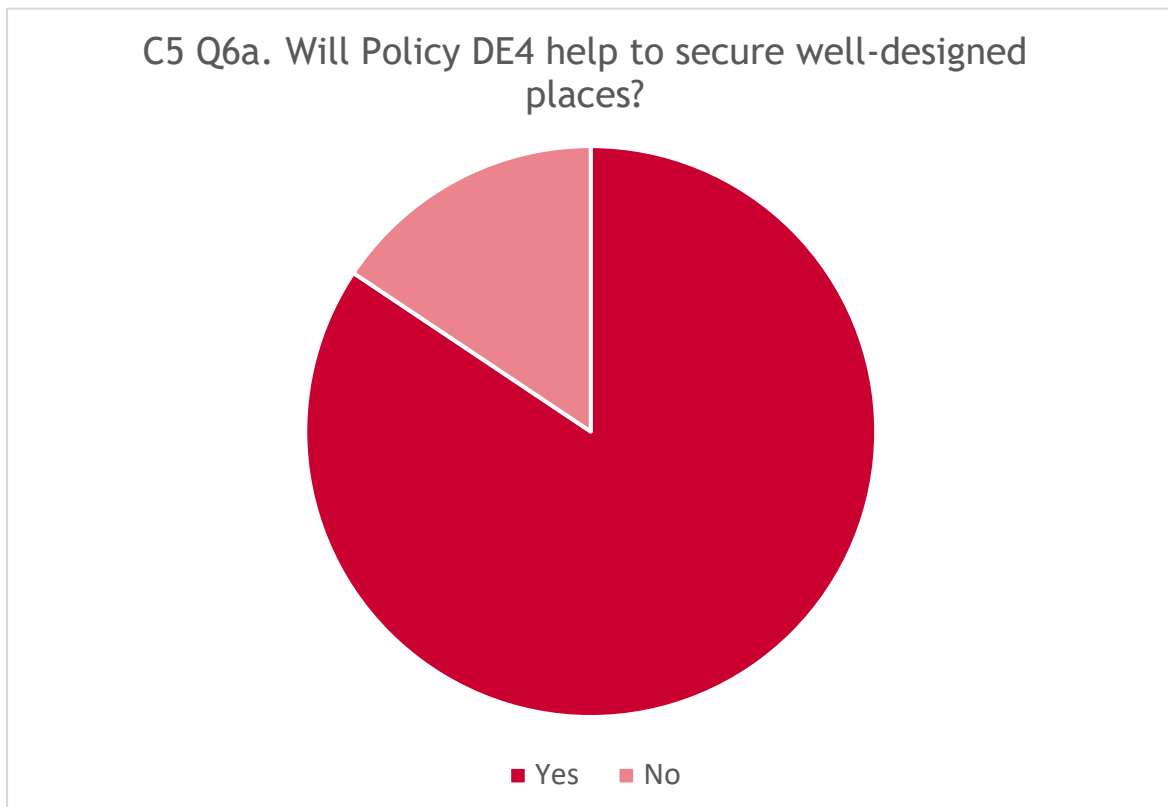
Officer Response:

The responses to this policy highlighted some confusion surrounding what Outline Planning Applications can include. We aim to explore other means of the securing optimal density for sites which can be delivered whilst also demonstrating they are policy compliant.

Policy DE4 - Ensuring Design Quality

35 responses

84% of respondents agree that the policy requiring large sites to demonstrate that meet the ten characteristics of place and utilising the District Wide Character Study will help to secure well-designed places. 81% agree that the policy will also help new development respect local character.



Statutory consultees question why this policy will only apply to large sites and suggest it should apply to all. They also suggest the National Design Guidance should be cross referenced with local design guidance such as Conservation Area Appraisal, Village Design Statements and Local Lists. Furthermore, they highlight that local needs and opinions must also be taken into consideration here.

Other respondents also ask for SDC to highlight elements of design which contribute to local distinctiveness and also highlight how the DWCS should not restrict combatting climate change. They suggest local character assessments and design codes are needed to deliver this policy. Other comments also state how the criteria should be applicable to all sites not only large ones. It was suggested that this policy should be applied to criteria such as sensitive sites, major developments, 10+ units.

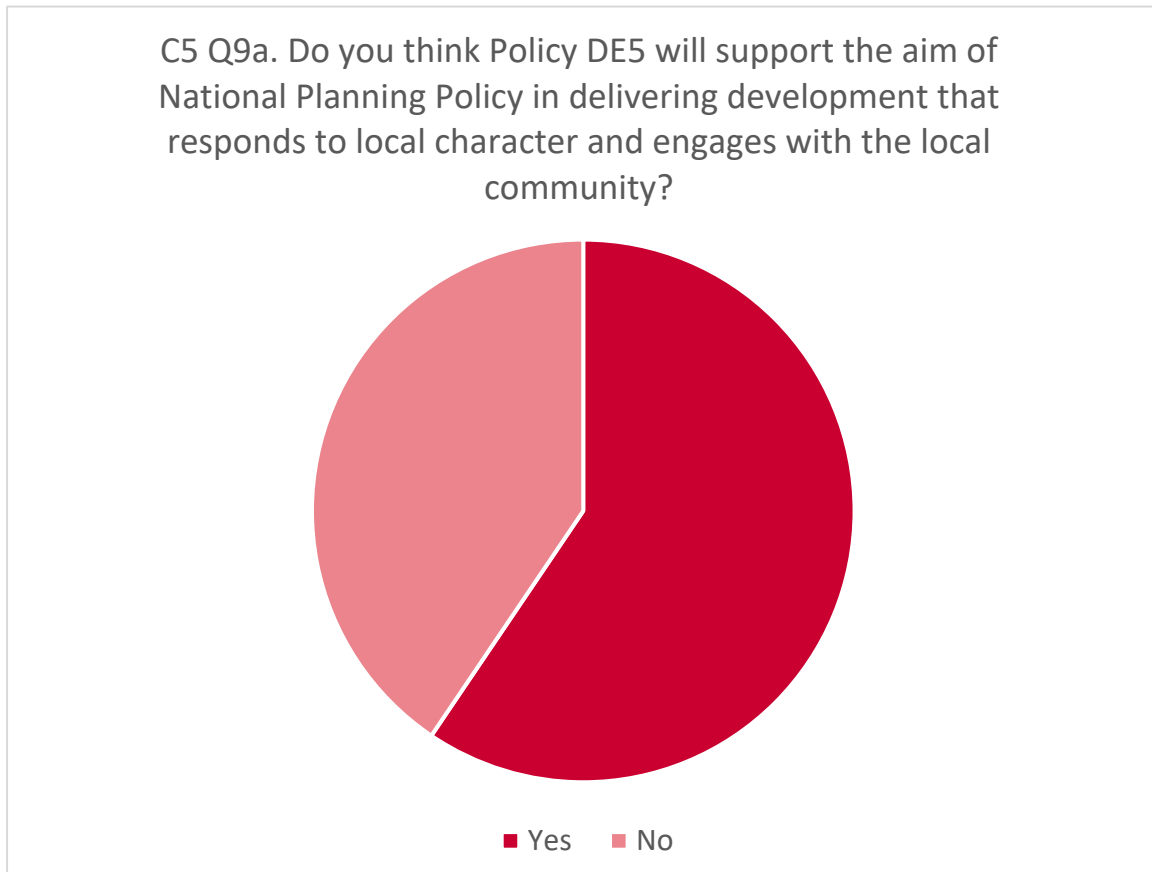
Officer Response:

The positive response to this policy ensures us that the ten characteristics of place within the National Design Guide and the District Wide Character study are regarded as helpful tools to ensure the delivery of high quality design. The responses also highlight that the policy could take further steps towards achieving high quality design such as applying this policy to all scales of development and delivering a Design Code strategy for the district.

Policy DE5 - Design Codes

40 responses

60% of respondents agree that requirements for the production of Design Codes informed by local engagement will support the aim of NPPF in delivering development that responds to local character and engages communities.



Statutory consultees ask for clarification on the extent of engagement required for different scales of development and request that further guidance is needed. They highlight how engagement should be led by SDC, not developers.

Other respondents who disagreed, raised concerns towards how local engagement can lead to many differing opinions which will not result in clear design guidance. They also asked for clarity on the scale and types of development requiring design codes and highlight the need for an appropriate amount of flexibility in codes. Other respondents who agreed with the policy highlight the importance of local consultation and suggest this should be done at the early stages of design.

Officer Response:

The responses to this policy suggest Design Code are viewed as valued tools for securing contextual high quality design and reflecting local interest. The responses

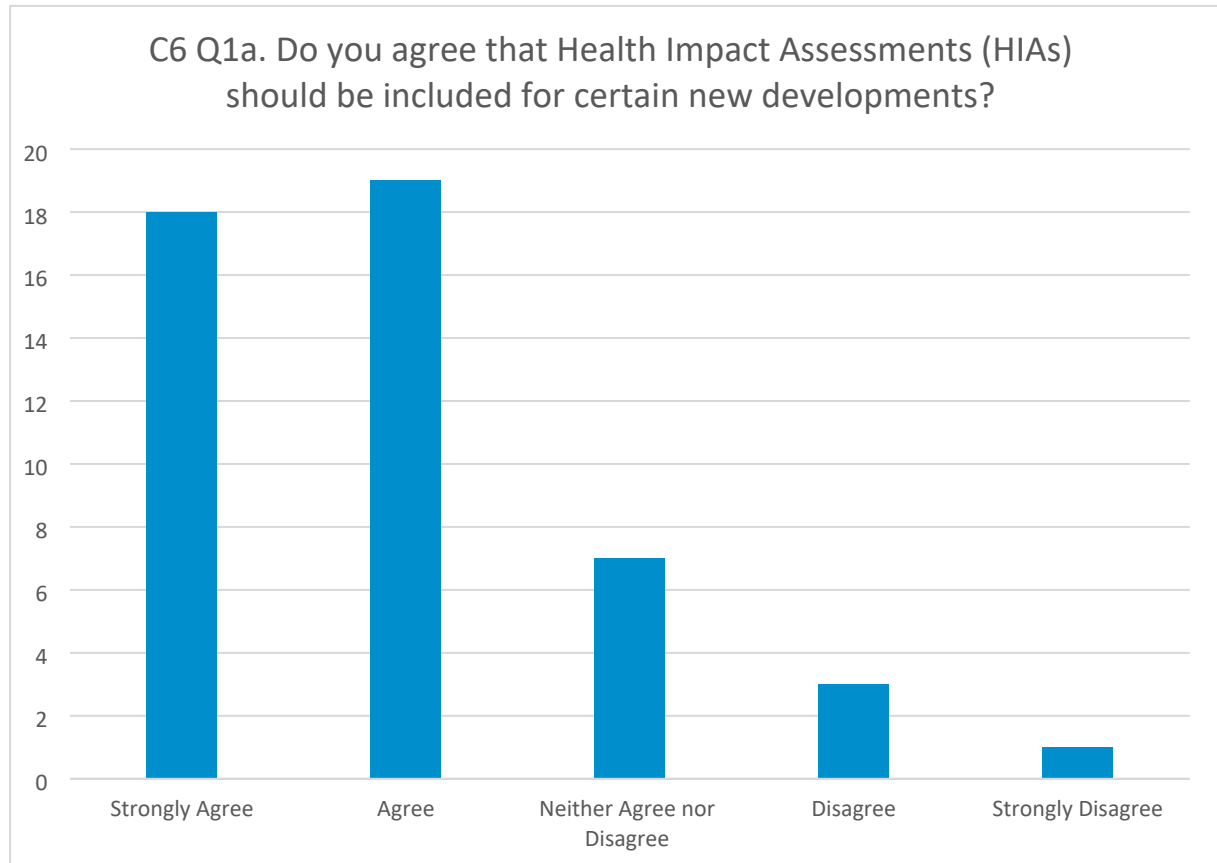
also highlighted the challenges Design Codes can present such as managing community engagement within project timelines and budgets and ensuring there remains flexibility for innovation and societal changes. With these points in mind, we are continuing to develop a strategy for producing Design Code at a variety of scales for our district which will meet the requirements of the NPPF and provide an aspirational design vision for the district.

Chapter 6 - Health and Wellbeing

Policy HW1 - Health and Wellbeing *

138 responses

78% of respondents to Policy HW1 - Health and Wellbeing strongly agree or agree that Health Impact Assessments should be included for certain new developments.



Comments from Statutory Consultees and other key consultation bodies provided a mixed response to the policy, the majority were in favour of the introduction of HIA's, however, the criteria for when they would be required was debated.

Suggestions were made to incorporate an additional clause stating that where it is 'anticipated that the eventual development within the immediate area could be 10 units or more' a HIA should be required. Other responses to Policy HW1 suggested that 'health' and 'healthy design' should be included as part of a Design and Access Statement instead of a standalone document.

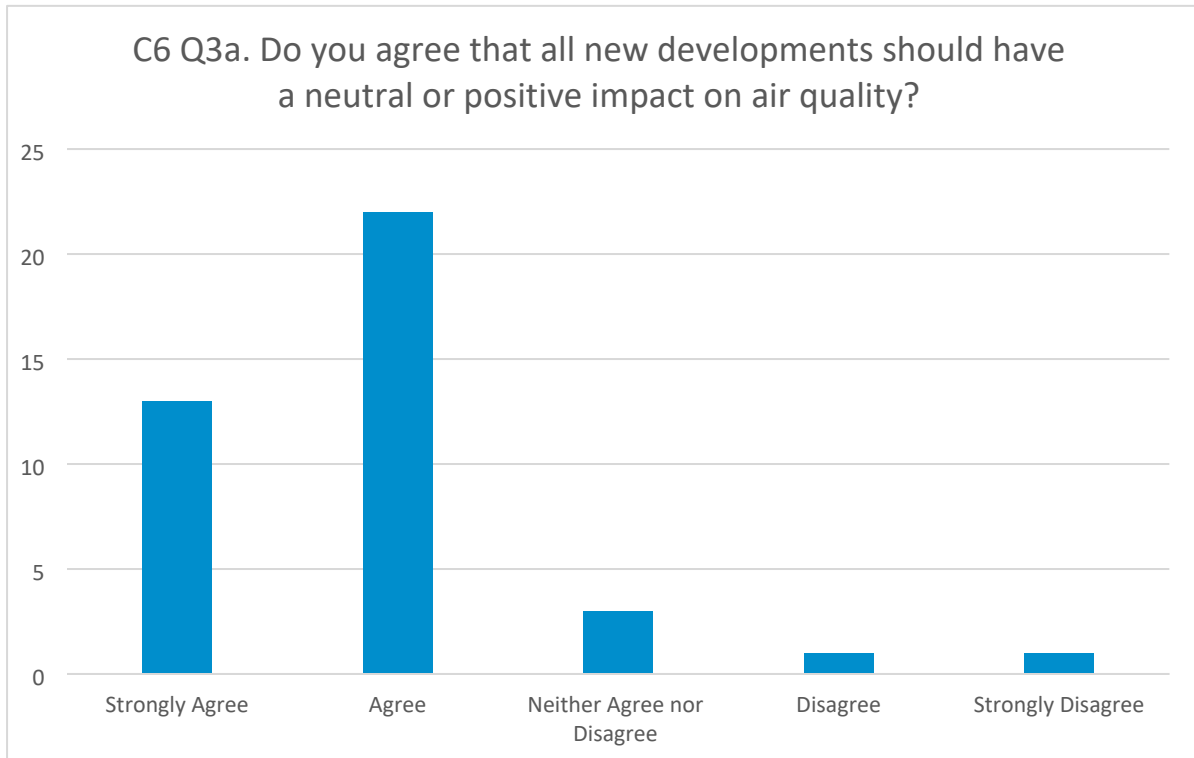
Officer Response:

A wide range of suggestions were provided in terms of the implementation and triggering of the requirement for a Health Impact Assessment. The Council will work closely with our Health and Environmental Health Teams to develop this policy. Key considerations will be whether there should be site specific requirements, the required content of HIAs and whether the requirement for an HIA should be based on unit numbers alone.

Policy AQ1 - Air Quality

54 responses

88% of respondents either Strongly Agree or Agree that new development should have a positive or neutral impact on Air Quality.



Comments from Statutory Consultees have provided a relatively uniform response, with the comments focusing on the language within the policy and its need to more closely align within the desired outcome. For example, bullet point 1 states that development should not have an “unacceptable impact”, rather than a positive or neutral impact as stated in the policy. Bullet point 3 refers to “adverse impact” and the need to reduce it “to an acceptable level”. The policy should stipulate a neutral or positive impact

Other comments query how air quality neutrality will be assessed, and whether it will apply only to the transport aspects of the development, and/or to the buildings.

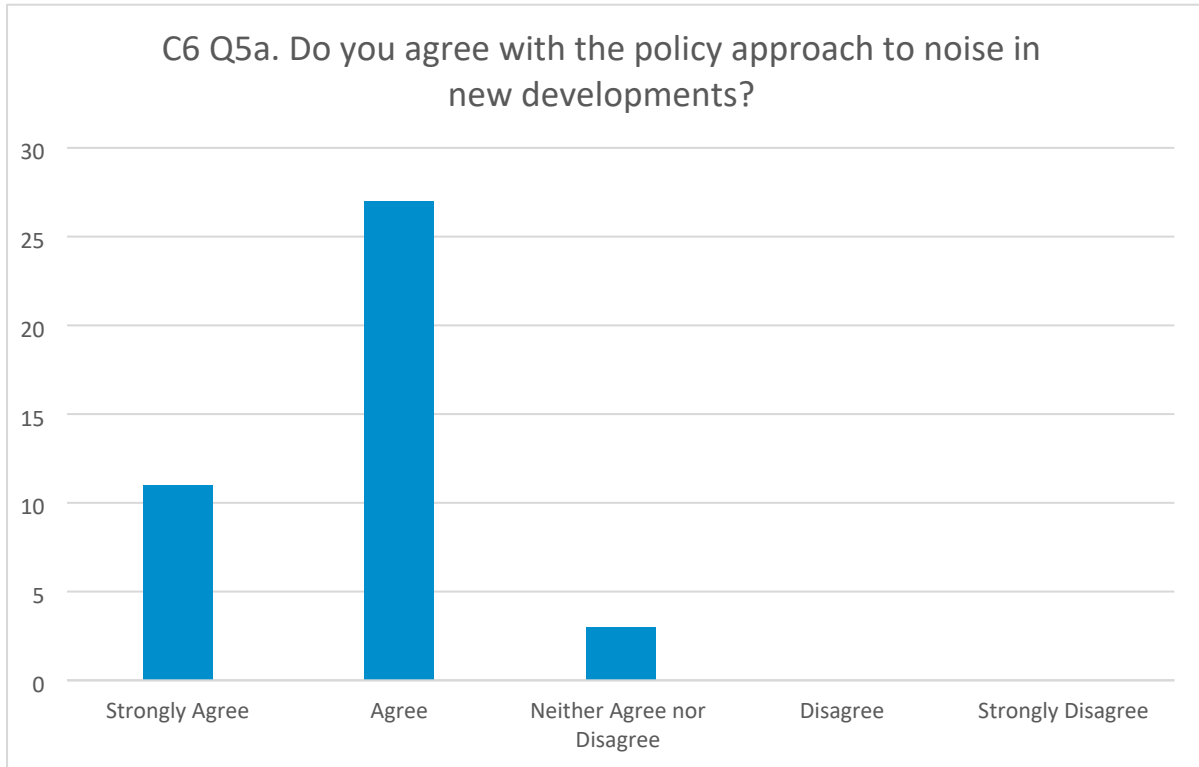
Officer Response:

We will review and refine the policy upon reflection of the comments received in response to Policy AQ1. The Council will provide clarification on what aspects of the development will be assessed and amend the language within the policy bullet points, to more closely align with the desired outcome of the policy.

Policy HW2 - Noise

54 responses

93% of respondents either Strong Agree or Agree with the policy approach to noise in new developments.



Comments from Statutory Consultees voiced similar concerns, both Southern and Thames Water have requested the policy be extended to incorporate odour, vibration and light.

Other general comments include more rigorous enforcement and clearer criteria to conclude what constitutes as excessive noise.

Officer Response:

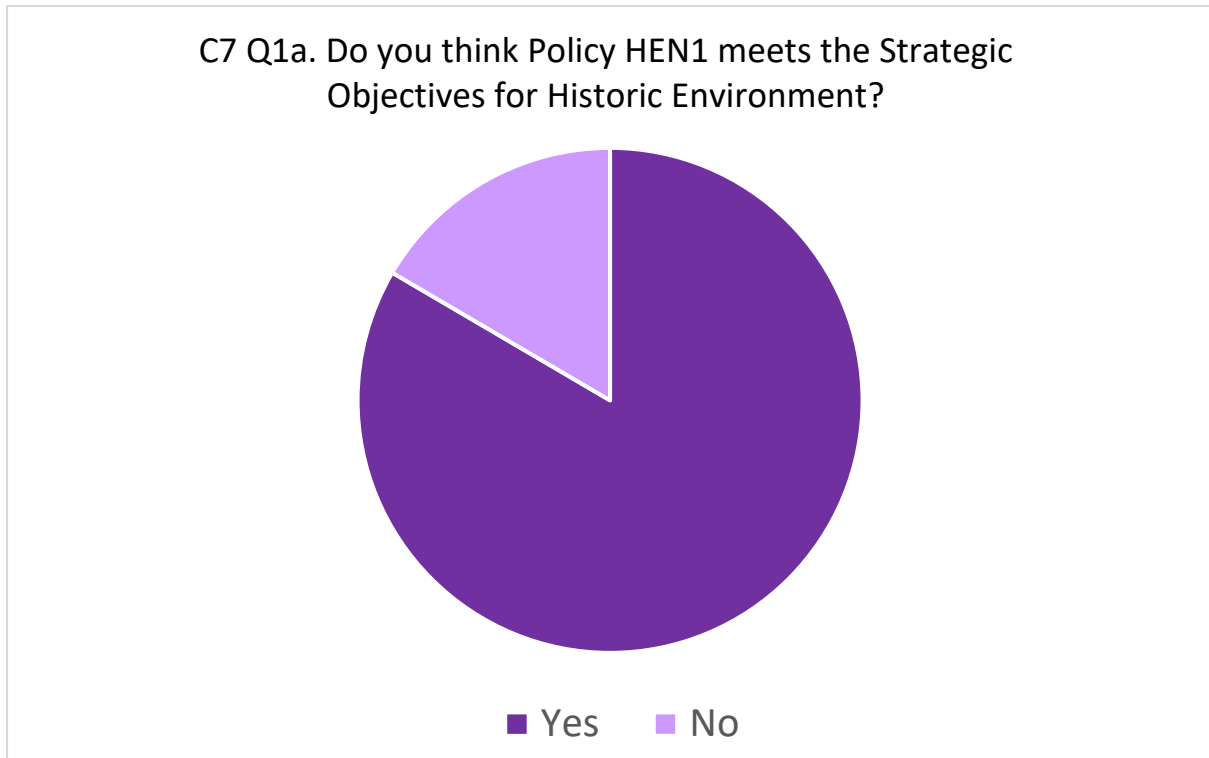
We will review and refine the policy upon reflection of the comments received in response to Policy HW1. The Council will consider whether there is a need to extend the scope of the policy.

Chapter 7 - Historic Environment

Policy HEN1 - Historic Environment *

147 responses

81% of respondents think Policy HEN1 meets the Strategic Objectives for Historic Environment.



Comments from Statutory Consultee, Historic England, was that Policy HEN1 meets the Strategic Objectives for the Historic Environment.

Other notable comments received related to ensuring the Historic Environment is protected as a requirement of development and having policy to ensure new development is sympathetic to the Historic Environment. Some respondents commented that the policy needs to go further to ensure new development and changes to existing development are sensitive to the Historic Environment. Landscape, parks and gardens, local assets and setting were all specifically mentioned. Reference was also made to the consideration of the Historic Environment in increased densities.

Officer Response:

We will consider the comments received and where there is the opportunity to strengthen in the areas suggested in the responses.

Policy HEN2 - Protecting and Enhancing the Historic Environment

38 responses

97% of respondents think Policy HEN2 will support development that protects and enhances the historic environment.

The National Trust proposed Policy HEN2 could apply to both designated and non-designated heritage assets which should be conserved in a manner appropriate to their significance. Policy HEN2 could be drafted in such a way that it also supports sensitively managed change within the historic environment, currently proposed through the formation of Policy HEN3.

Other notable comments included that Residential Character Area Assessments need to be given greater weight in planning. Buildings of special and historic interest but are not Listed, should be afforded additional protections too.

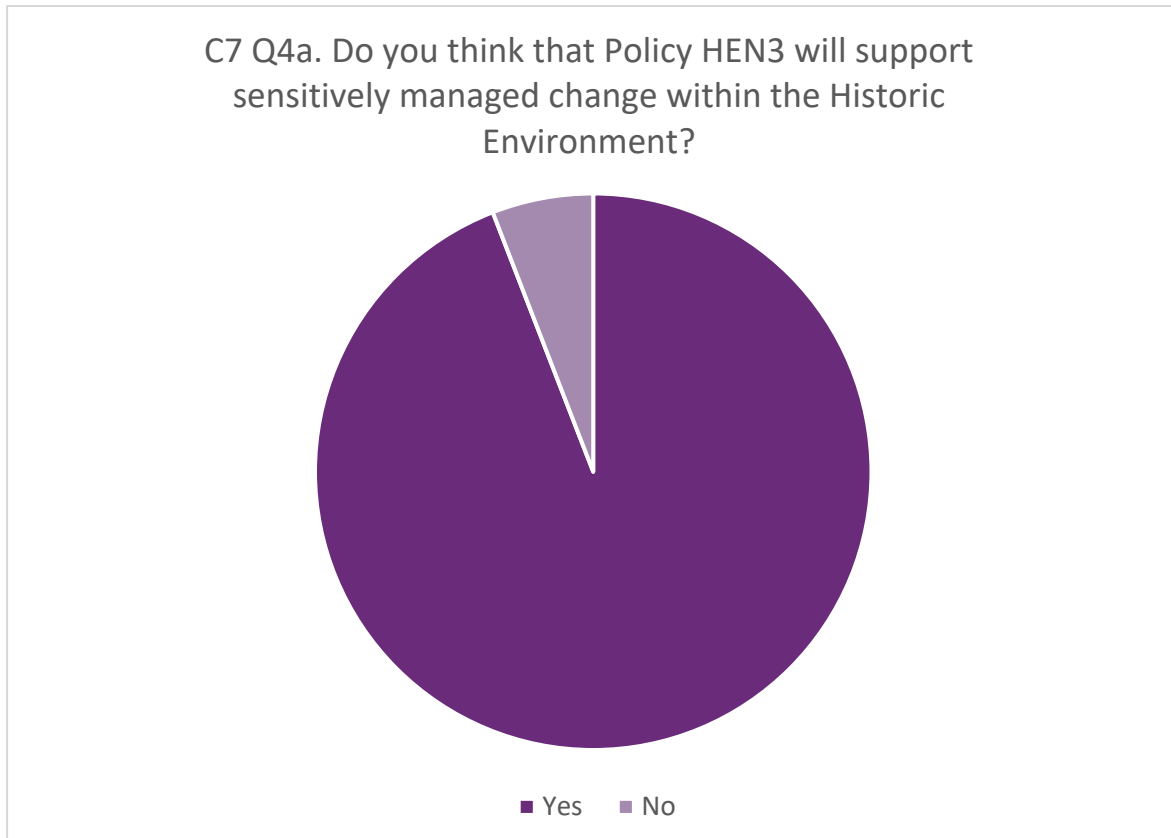
Officer Response:

Designated Heritage Assets have protection in legislation and in national planning policy and non-designated heritage assets have protection appropriate their level of significance. Local planning policy cannot go further than national policy but we will reflect upon the comments received and consider whether there is scope to extend the policy.

Policy HEN3 - Sensitively Managing Change in the Historic Environment

36 responses

94% of respondents think HEN3 will support sensitively managed change within the historic environment. 74% of respondents think no additional policies are required to sensitively manage change within the historic environment.



Comments again want wider protections for the historic environment and non-designated heritage assets.

Officer Response:

We will reflect on the comments received and whether there is scope to extend the reach of the policy.

Policy HEN4 - Archaeology

37 responses

86% of respondents think Policy HEN4 will adequately support the protections of non-designated archaeological sites. 91% of respondents think no additional policies are required to support the protection of non-designated archaeological sites.

Respondents were keen to have the wording strengthened to be more directive about protection that can be afforded to non-designated archaeological sites. The seeking to 'identify' was highlighted as burdensome.

Officer Response:

We will reflect on the comments received and whether there is scope to extend the reach of the policy but also the reasonableness of the requirement to 'identify'.

Policy HEN5 - Locally Listed Buildings

37 responses

88% of respondents think the Local List should be expanded to the wider District.

Comments proposed rigour to the selection of additions to the local list to protect the integrity and partnership working. Although it was also proposed that all buildings in the district should be given the same status.

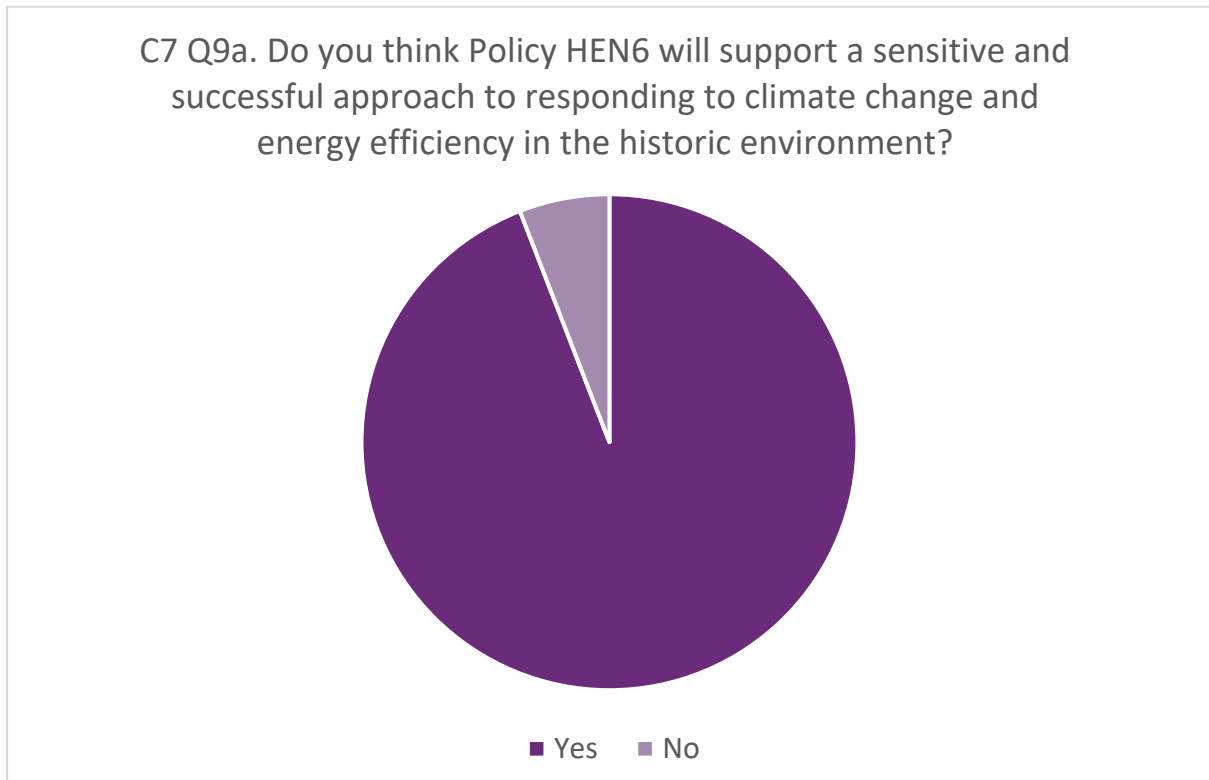
Officer Response:

We will reflect on the comments received and devise policy wording that reflects the support for this programme.

Policy HEN6 - Responding to Climate Change in the Historic Environment

37 responses

94% of respondents think Policy HEN6 will support a sensitive and successful approach to responding to climate change and energy efficiency in the historic environment. 68% of respondents think no additional policies are required to support a sensitive and successful approach to responding to climate change and energy efficiency in the historic environment.



Strong support for the policy and the National Trust welcomed it for acknowledging that historic and standard modern buildings function differently when it comes to implementing energy efficiency measures.

Officer Response:

We will reflect on the comments received and devise policy wording that reflects the support for this policy.

Policy HEN7 - Shopfronts and Signage

37 responses

91% of respondents think Policy HEN7 will recognise the value of historic shopfronts and ensure appropriate replacements in historic contexts. 68% of respondents think this policy should apply outside conservation areas.

Strong support for the protection of historic shopfronts in the District. There was support for the development of separate guidance.

Officer Response:

We will reflect on the comments received and devise policy wording that reflects the support for this policy. We will review the suggestion for separate guidance and if this is appropriate.

Policy HEN8 - Historic Parks and Gardens

37 responses

94% of respondents think Policy HEN8 will support the conservation and enhancement of historic parks and gardens in new development. 83% of respondents think no additional policies are required to support the conservation and enhancement of historic parks and gardens in the development proposals.

Kent AONB Unit wants there to be specific provision for sites that are now in multiple ownership to ensure that development proposals should consider the site as a whole. The National Trust were supportive and would welcome specific policy guidance.

Officer Response:

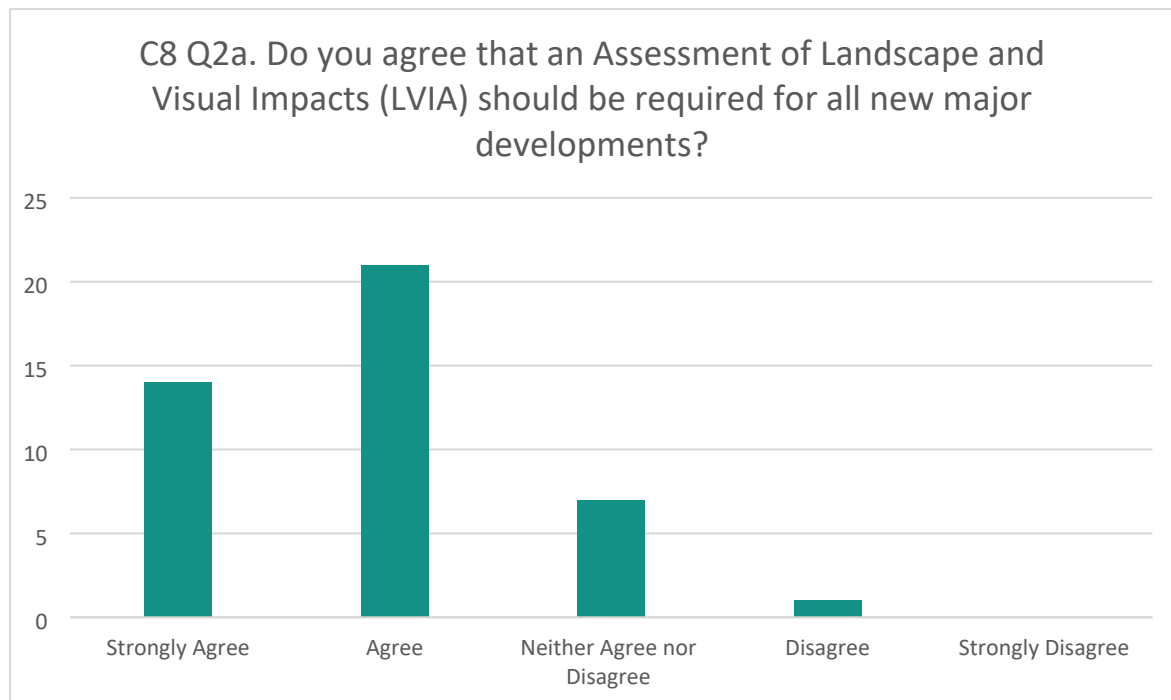
We will review the comments and explore how we can incorporate this into the formulated policy wording.

Chapter 8 - The Natural Environment

Policy NE1 - Landscape and Areas of Outstanding Natural Beauty (AONB)

45 responses

81% of respondents to policy NE1 - Landscape and Areas of Outstanding Natural Beauty think that Landscape and Visual Impact Assessments should be required for all new major developments.



With respect to the AONB, comments range from no major/large development should be permitted, to it should be minimised and development directed to sustainable sites outside the AONB, to major development should be allowed, particularly on brownfield sites or areas of lower sensitivity. A few comments suggest that current policy EN5 just needs to be updated or that design criteria are adequately covered by AONB design guide, whilst other comments suggest that the following be included: the weight given to AONB; exceptional circumstances for major development; criteria relating to how 'enhance' could be achieved and inclusion of references to Management Plans, supporting guidance, impact on setting, cumulative impacts and tranquillity and remoteness as special characteristics. It has also been suggested that it should: recognise the importance of the AONB's sensitive landscape; include references to the AONB Design Guide, and it should require applicants to demonstrate how applications make a positive contribution to Management Plan objectives.

In terms of design criteria, concern was expressed that employment sites might not be able to accord with strict criteria and as such it needs to allow each site to be assessed on its own merits, with flexibility to allow site specific mitigation.

Comments also suggest that the AONB policy should apply to land outside of the AONB, whilst one comment suggests that the AONB should be extended. Responses regarding Landscape and Visual Impact Assessments and when they should be required range from requiring them for all development, support for them where development may impact on the Kent Downs AONB or its setting, to objections that the proposed threshold of all major developments is too high, going beyond the Landscape Institute and Institute of Environment and Assessment's guidelines, whilst other comments reference the need to define 'larger development'.

Comments also refer to the use of local Landscape Character Assessments produced as part of neighbourhood plans, support use of 'landscape character', state that it should refer to countryside and equestrian development and recognise the contribution of farming to the countryside, that it should aim to retain rather than improve tranquillity as more realistic, and be clear that any identified harm will be considered as part of the planning balance exercise. Comments highlight and recommend adherence to Kent architectural designs, use of natural materials, the protection and improvement of provision for wildlife, planting of more trees, aircraft noise reduction and inclusion of a dark skies policy. A number of comments refer to including good quality Green Belt and existing protections within the policy and that it needs to be brought in line with the NPPF with respect to the Green Belt.

Officer Response:

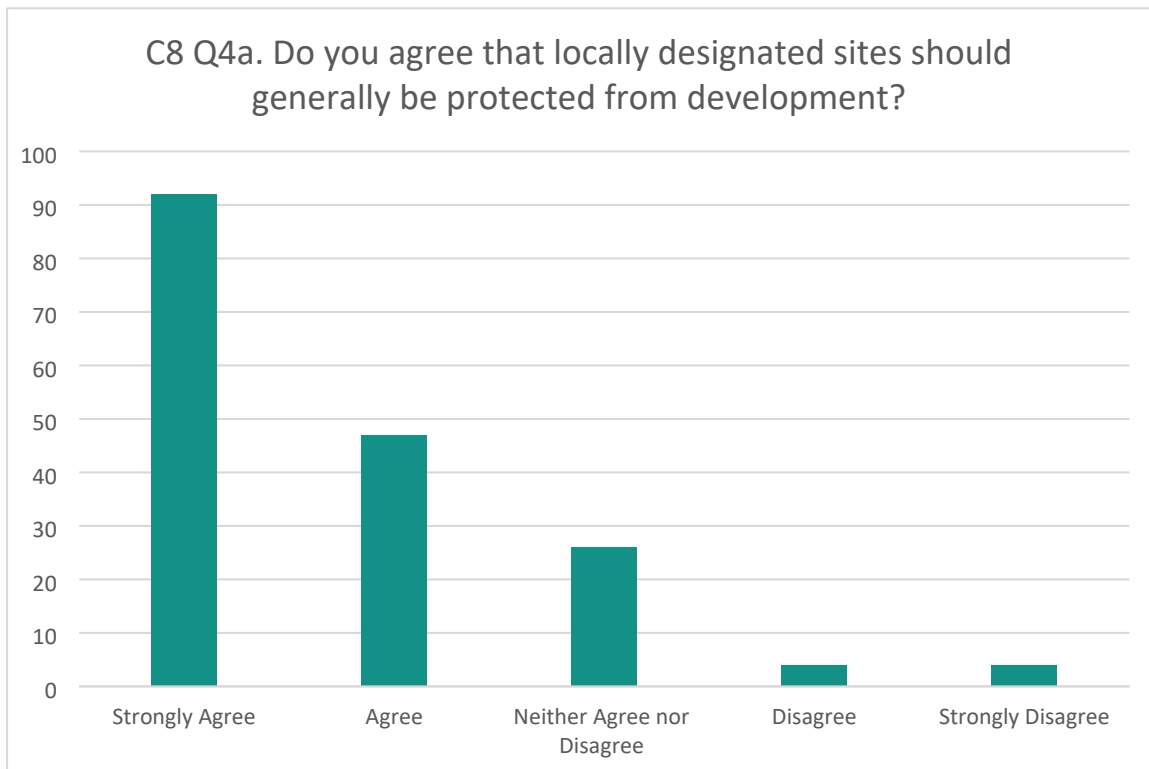
In drawing up our policy relating to Landscape and the AONB we will take into account the suggestions made through the consultation. We will also consider further the appropriate trigger for requiring a Landscape and Visual Impact Assessment and provide clarity as to when one would be required. With respect to the AONB, the NPPF affords great weight to conserving and enhancing its landscape and scenic beauty (paragraph 176) and whilst it sets out that permission should be refused for major development (paragraph 177), it does allow for major development where there are exceptional circumstances and it is in the public interest and our policy will need to accord with this. Furthermore, the NPPF (paragraph 174 a) requires us to protect and enhance valued landscapes in a manner commensurate with their statutory status and as AONB is a statutory designation our policy approach will need to be different for landscape which is not designated as AONB. In terms of its extension, this is the responsibility of Natural England and as such falls outside of the remit of the local plan.

With respect to comments about including the Green Belt, this policy relates to landscape matters and as such Green Belt is not applicable. Furthermore, this consultation focusses on the opportunities that exist in our settlements. However a district-wide version will be undertaken which includes consideration of the Green Belt, which will be dealt with as a separate topic as part of our next Regulation 18 consultation.

Policy BW1 - Safeguarding Places for Wildlife and Nature *

41 responses

82% of respondents to policy BW1- Safeguarding Places for Wildlife and Nature agreed or strongly agreed that locally designated sites should generally be protected from development.



Comments included suggestions that allotments and sites for geology should be identified as part of the district's natural landscape, as well as hedgerows, treelines and ponds. Recommendations include: incorporating blue/green infrastructure in larger scale development; setting out hierarchy of protection of sites and requirements for development in terms protection and setting targets. There is support for a strongly worded policy that protects designated sites, protected species, ecological networks and ancient and/or species-rich hedgerows and ancient trees and promotes biodiversity enhancements.

In relation to protecting locally designated sites from development, responses ranged from a need to improve and manage every area for wildlife, to a need to protect these sites, supporting their inclusion and valuing the commitment to designating areas not already protected by legislation, to a concern that the use of the word 'generally' weakens protection to concern that sufficient protection is in place and more could stunt growth. One comment suggests that they should be protected from aircraft and road noise. Concerns expressed that a blanket approach is contrary to the NPPF and that the approach should be about ensuring development does not result in an adverse impact. Further comments noted the

need to develop strategies to protect wildlife corridors and the need for local community support if any locally designated site is to be considered for development. Concern was also expressed about the need to provide better protections and enhancements of existing Local Wildlife Sites (LWS), including comments supporting the expansion of LWS designations so that they include smaller sites and the importance of surrounding habitats as components of the ecological network.

Officer Response:

We will take into consideration the recommendations for inclusion in our blue green infrastructure network as this policy develops.

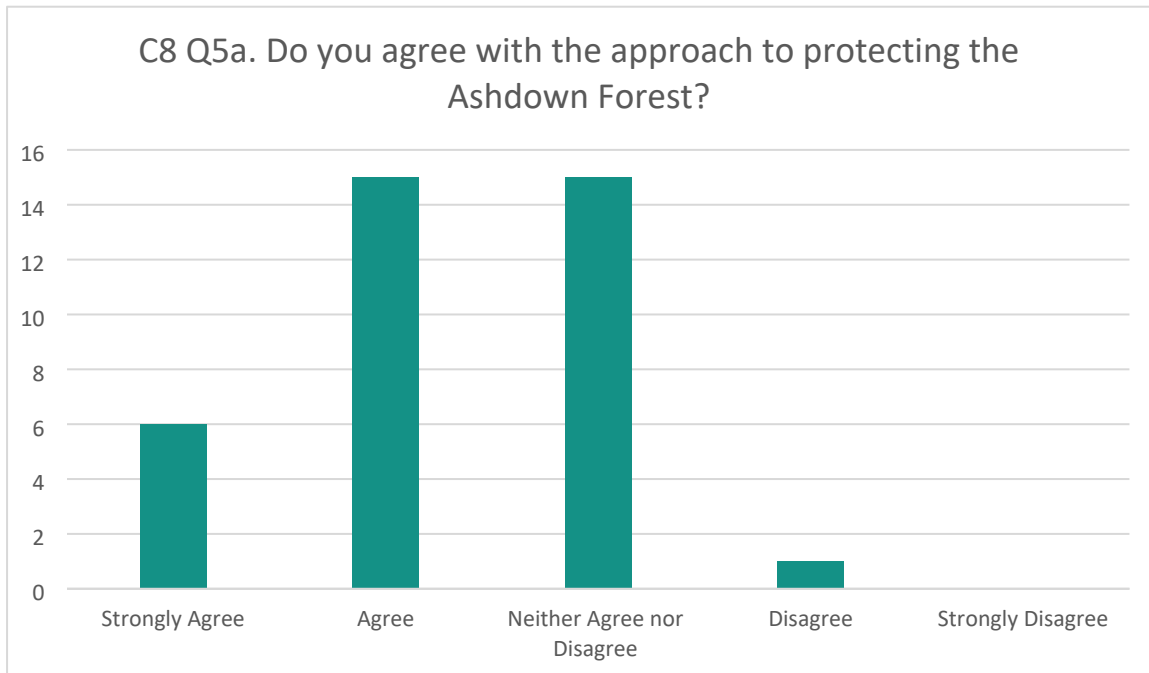
In terms of locally designated sites, primarily Local Wildlife Sites, these are designated following consideration of criteria which are drawn up by the Kent Nature Partnership, in its role as the Local Sites Partnership for Kent; as such it will not be possible to designate LWSs through the local plan, but we will work with partners to ensure that LWS are regularly reviewed and designated where appropriate.

In terms of their protection, the NPPF 2021, at paragraph 179, requires us to identify, map and safeguard components of local wildlife-rich habitats, including locally designated sites of importance of biodiversity and any planning application which could impact on a locally designated site would have to accord with the mitigation hierarchy as set out at paragraph 180 (a). Planning Practice Guidance also (Paragraph: 013 Reference ID: 8-013-20190721 Revision date: 21 07 2019) sets out that the NPPF expects LPAs to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks. We will therefore consider how best to formulate policy in relation to locally designated sites in light of national policy and guidance and the comments received as part of this consultation.

Policy AF1 - Ashdown Forest

37 responses

57% of respondents to Policy AF1 - Ashdown Forest strongly agree or agree with our proposed approach.



Comments from statutory consultees and other key consultation bodies included the need to include a requirement to make a contribution towards SANG provision for development within the 7km zone.

Among other comments, concerns were raised that evidence does not support the 7km zone and the contention that Ashdown Forest would be destroyed by additional housing and associated visitors within it, whilst other comments suggest district and forest boundaries are merged to reduce the number of policy requirements.

Officer Response:

Ashdown Forest is an internationally important site, which is located approximately 6km to the south of Sevenoaks District and 12km from our nearest settlement. Whilst a small percentage of our residents have been identified as visiting it, we have to consider the impact of our local plan, the impact of development that comes forward on unallocated sites, and their impact in combination with that of other local plans.

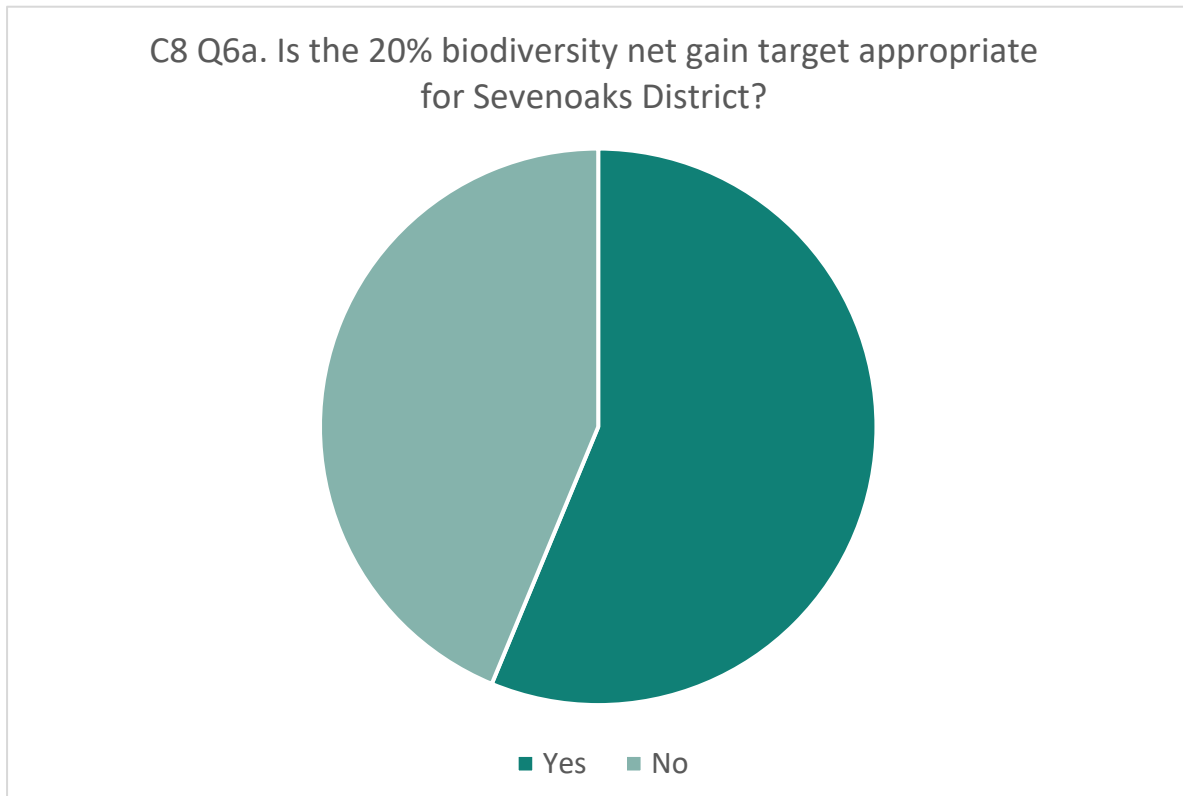
As such it requires a strategic approach working jointly with other affected local authorities, which we will continue to do as part of the working groups relating to

the recreational impact and air quality impacts arising from development. This has included work to understand the source and scale of impact, on which the 7k zone of influence is based. In terms of the recreational impact, development proposals for new dwellings within the 7km zone are required to pay a tariff which goes towards a Strategic Access Management and Monitoring Strategy whilst we will continue to explore the most appropriate approach to Suitable Alternative Natural Greenspaces commensurate with the impact of development arising in our district both through the local plan and unallocated sites that may come forward.

Policy BW2 - Biodiversity in New Development

51 responses

56% of respondents to Policy BW2 - Biodiversity in New Development think that a 20% biodiversity net gain is appropriate.



Comments include those querying as to how it is possible to achieve a 20% gain on a previously natural site whilst others highlight that not all development can have a positive impact on biodiversity. It is noted by some that it aligns with the approach of other organisations e.g. Kent Nature Partnership (KNP) and other documents e.g. the AONB Management Plan. Some comments set out support for exceeding 20% but a number of the comments raise concerns about exceeding the Government's 10% requirement. Those that raise concerns refer to insufficient evidence to demonstrate its viability, with potential to impact on other requirements, or to demonstrate justification for exceeding legislative requirements and that it would be inconsistent with national policy.

Concerns and comments also include the following: that it will prevent development coming forward; that it could be incompatible with other policy aspirations e.g. increased densities; that further evidence is needed in relation to land-take and density implications; that it should include flexibility for enhanced densities; that there are potential difficulties of achieving this on sites of different types and sizes; that it should be on a site-by-site basis and that it should be aspirational. In terms of its operation comments highlight the need for realistic

assessment of sites and their potential, the need to measure and enforce it and the importance of hedges.

In relation to its delivery, comments include support for allocating sites for BNG, specifically within the AONB, and for securing off-site gains in strategic locations which contribute to areas of noted conservation value. They note the need for a strategic mitigation package/district-wide/cross-boundary biodiversity schemes and that policy should allow for a combination of on-site, off-site and district/strategic schemes and include flexibility for legislative changes and that there is a need to allow for off-site funding to improve donor sites and for flexibility to allow for future changes to legislation.

Officer Response:

Biodiversity Net Gain at 10% will be a statutory requirement for major development as of November 2023 and for small sites as of April 2024. Whilst the Government has proposed a 10% target it does not prevent local authorities from proposing a higher target and we remain committed to exploring a 20% increase, however we are mindful that this will need to be viability tested alongside other requirements and this will inform our policy approach.

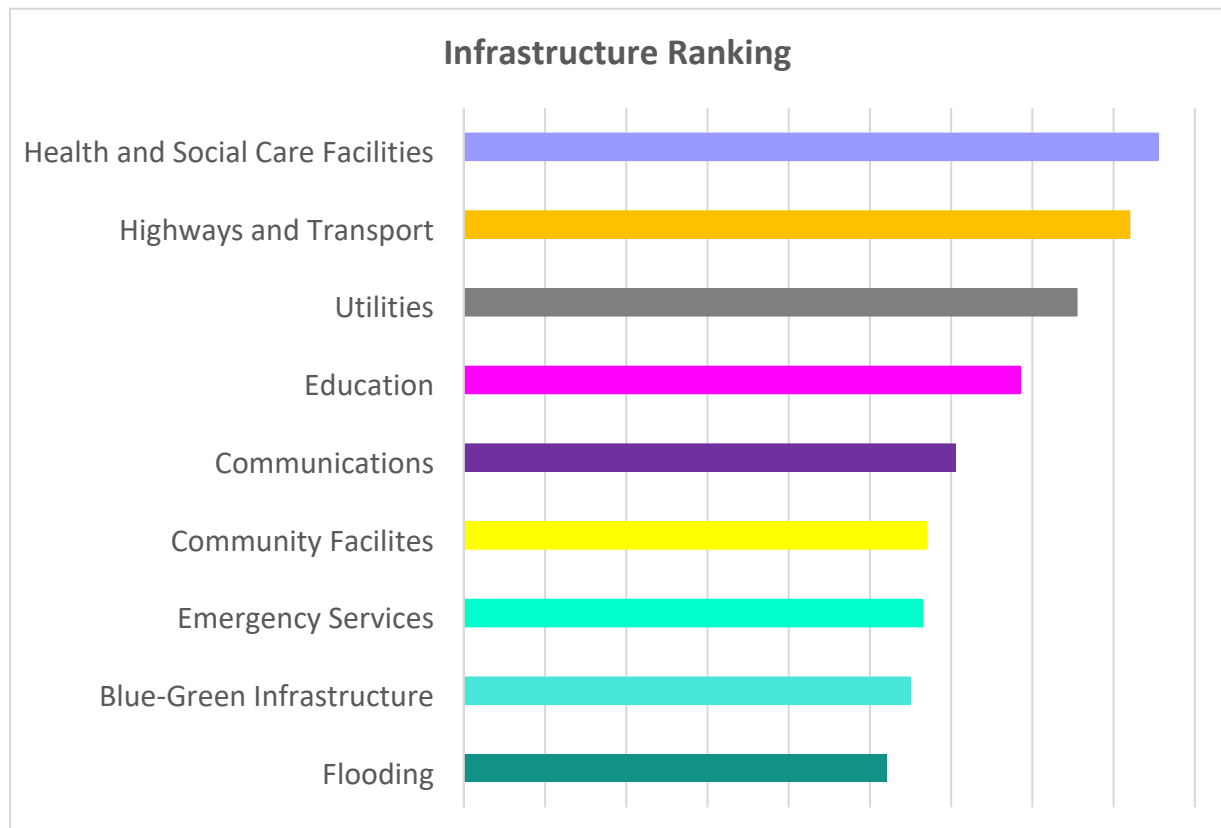
With respect to delivery, work will continue with Kent County Council to understand what land is available for off-site Biodiversity Net Gain and we will work with the responsible authority (provisionally KCC) on the Local Nature Recovery Strategy, a spatial strategy for nature and environmental improvements, which will identify where action to achieve net gain will have the most impact and which will encourage actions through the way net gain is calculated. The operation of BNG i.e. site assessment, measurement and enforcement will take place within the framework set out by the Government through its regulations and guidance.

Chapter 9 - Infrastructure and Community

Policy IN1 - Infrastructure Delivery *

167 responses

86% of respondents supported our proposal to prioritise infrastructure types on large developments, and considered health, highways and utilities to be the most important. However it was also recognised that all infrastructure is important and demand for each will fluctuate over the plan period.



This policy was generally supported, with a recognition of the importance of providing new and improved infrastructure to meet the needs arising from the development proposed in the Local Plan, and a request for clarity in terms of what infrastructure needs to be provided, how much it will cost, when it will be delivered, who by and how it will be maintained.

It was felt that specific consideration should be given to cross-boundary infrastructure and an approach set out to address these. A small number of comments suggested that infrastructure should be in place before development commences, and that we should review our CIL charging schedule to ensure infrastructure needs are being met.

Officer Response:

The responses highlight the importance of delivering infrastructure in a timely manner, but also the competing demands for infrastructure and complexities involved in securing it. Over the coming months we will be working closely with the infrastructure providers to ascertain what is needed over the plan period to support the development proposed, at District level but also with our neighbours in respect of cross-boundary needs. Projects identified will then be included within the Infrastructure Delivery Plan (IDP), clearly set out alongside costs, any funding gaps and likely delivery timescales. The IDP will then be used to support the Local Plan to ensure the timely delivery of infrastructure.

Policy OS1 - Open Space and Recreation

47 responses

89% of respondents agreed that new developments should include open spaces.

Many comments suggested that the policy should go further and 'require' rather than 'encourage', and that all open space should be retained without exception. It was also noted that open spaces help reduce rainwater run-off, reducing the risk of flooding, but that they need to be well-maintained. A small number of comments suggested that small sites are unlikely to be able to deliver on-site open space and that off-site provision should be considered in these circumstances.

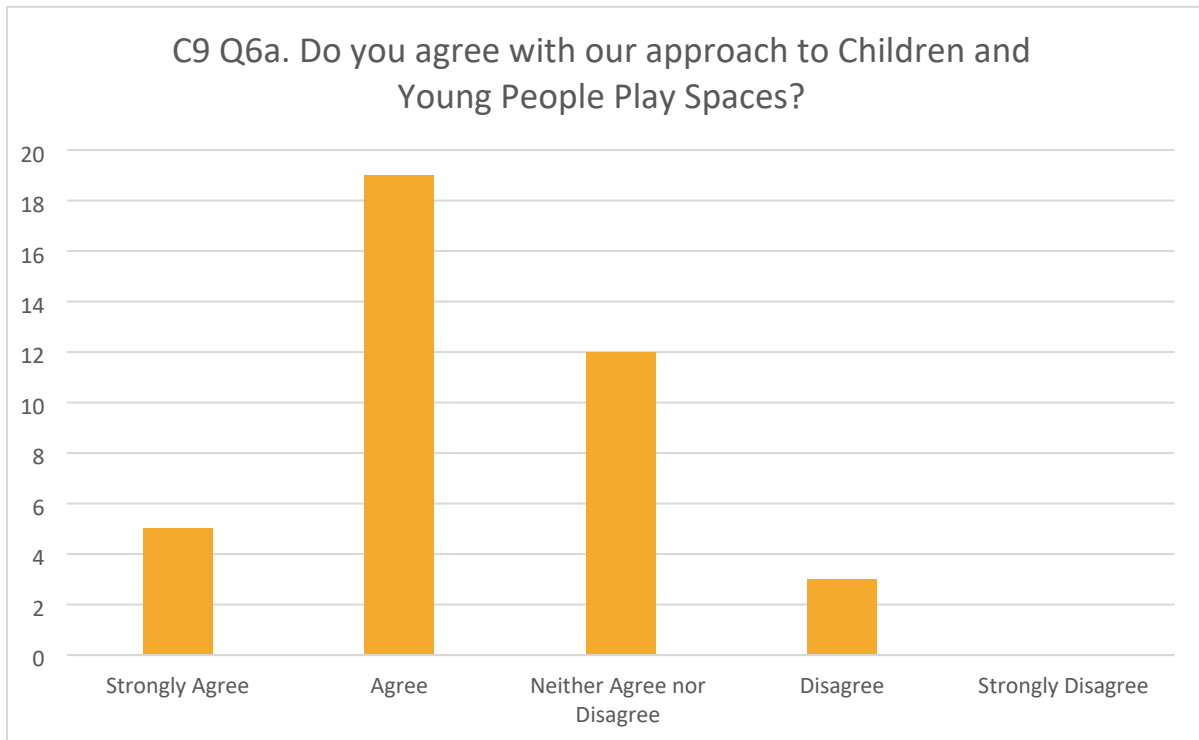
Officer Response:

The responses highlight the overwhelming support for, and importance of, easy access to open space. The types and quantity of open space need to be based on robust evidence. Going forward, the policy must retain an element of flexibility, and we will consider the feedback given to refine our approach.

Policy OS2 - Children and Young People Play Space

41 Responses

62% of respondents agreed with our approach to children and young people play space.



Whilst there was general support for this policy, there was some disagreement amongst respondents in respect of the Fields in Trust requirements for the inclusion of equipped play space. Some suggested that we should set local requirements that go further and others suggested that the proposed requirements are too onerous for small and medium sized developments. Again, the question of maintenance was raised. There were also a few innovative suggestions including meeting a local need for play space through the upgrading of an existing popular site (rather than duplicating) and greater roll out of informal/imaginative play space.

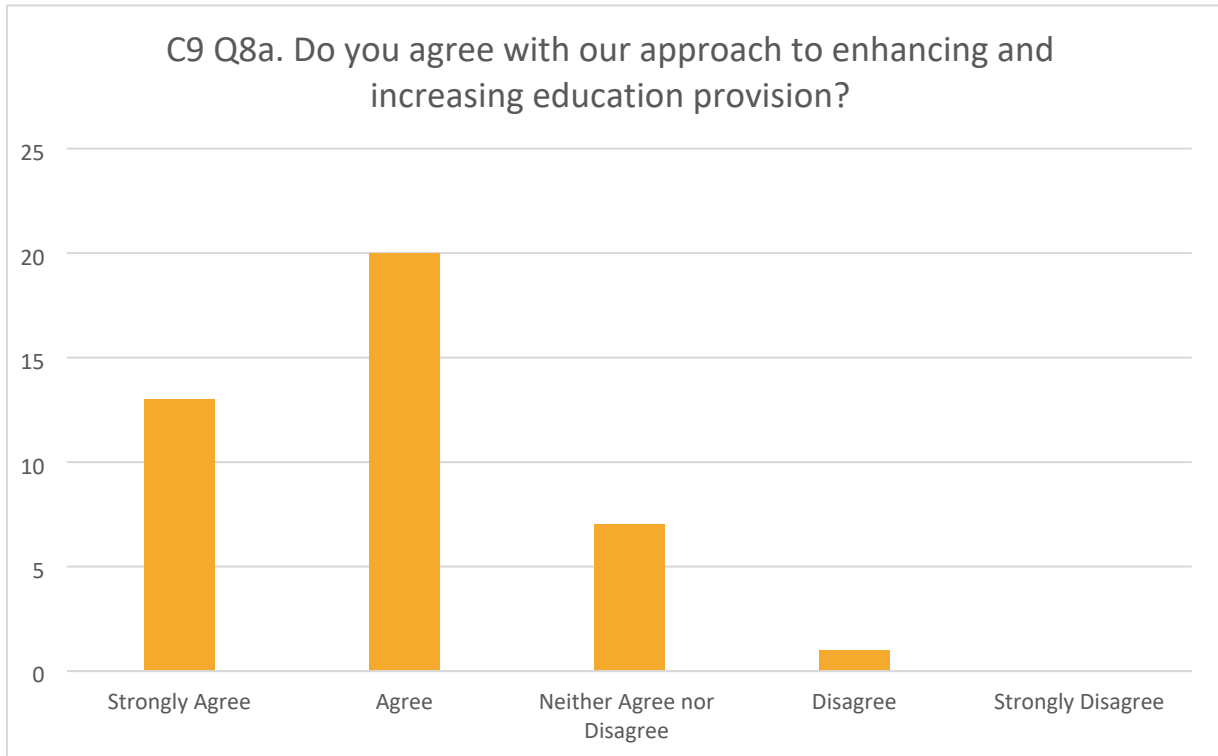
Officer Response:

It is noted that the Fields in Trust requirements for the inclusion of equipped play space are not universally supported, however these are a benchmark and our policy does contain flexibility to deal with site specific circumstances. The innovative suggestions are welcome and we will consider the feedback given to refine our approach.

Policy ED1 - Education

41 responses

81% of respondents agreed with our approach to enhancing and increasing education provision in the District.



Many comments suggest that any new school needs to be easily accessible to reduce car journeys and that public transport provision should be improved. Others said that current schools should be expanded or if that is not possible then greenfield land should be used. In any case, it is clear that education provision is a priority for respondents and that SDC should work closely with KCC to assess need.

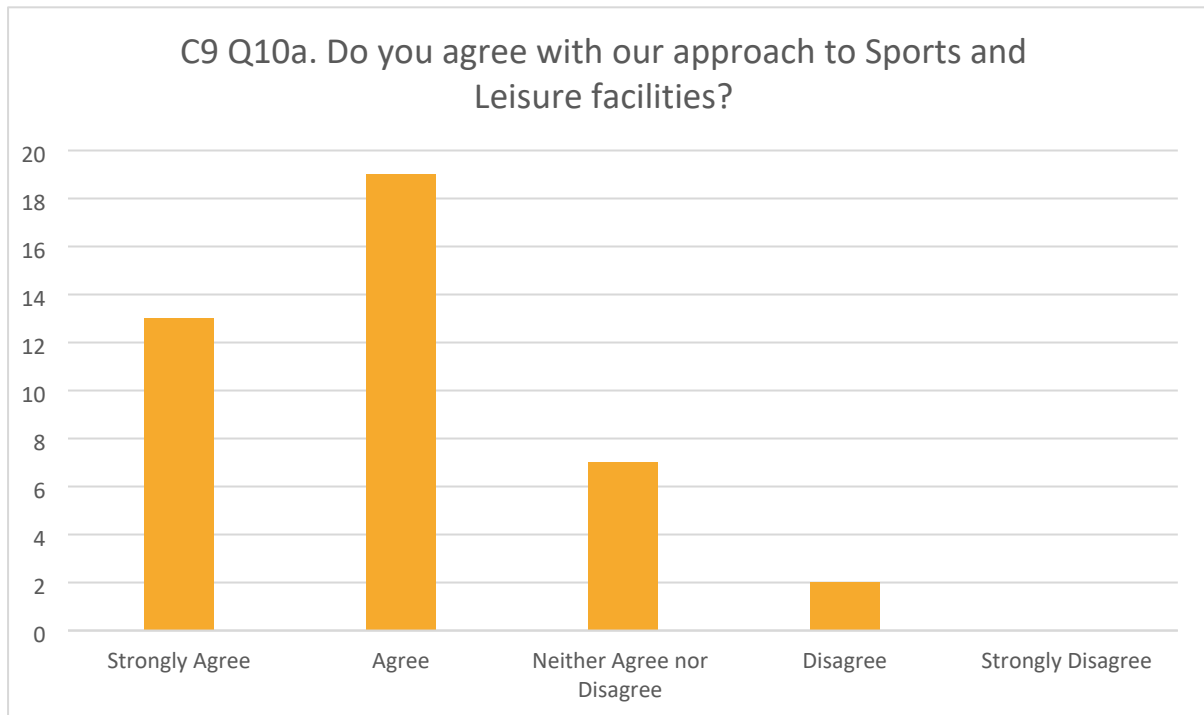
Officer Response:

Over the coming months we will be working closely with KCC Education to ascertain what education provision is needed over the plan period to support the development proposed, at District level but also with our neighbours in respect of cross-boundary needs. Projects identified will then be included within the Infrastructure Delivery Plan (IDP), clearly set out alongside costs, any funding gaps and likely delivery timescales. The IDP will then be used to support the Local Plan to ensure the timely delivery of education provision.

Policy SL1 - Sport and Leisure Facilities

44 responses

78% of respondents agreed with our approach to sports and leisure facilities.



Many comments recognise the importance of our leisure centres but also feel that some are in need of upgrading. Some respondents said that we are lacking a clear strategy to deliver new sports facilities in the District. Facilities need to be accessible by public transport, and schools with facilities should be encouraged to open these up to the public when not in use. Sport England raised concerns with the current evidence base supporting this policy and suggested that it be updated in line with its own guidance. Playing pitches should not have to be full sized.

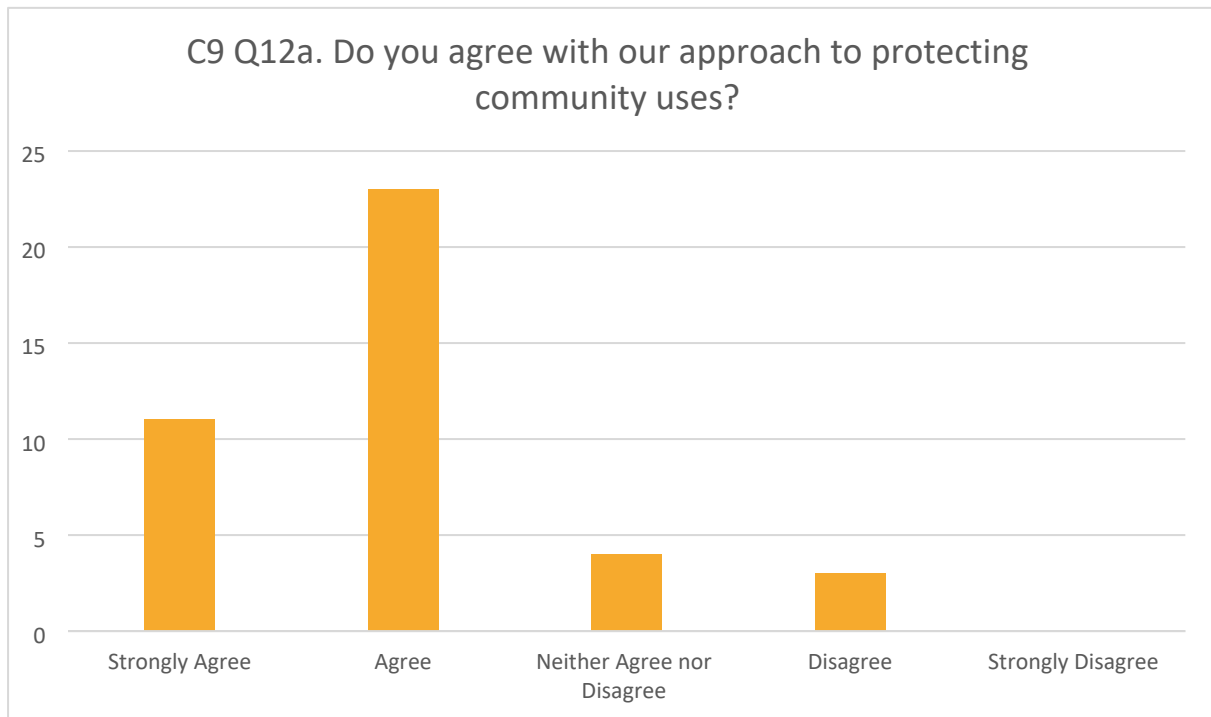
Officer Response:

We recognise the concerns raised by Sport England and others and work is underway to update the Playing Pitch Strategy (2018) and Sports Facility Strategy (2017). This will also include a new District-wide leisure strategy which will inform our policy going forward.

Policy COM1 - Protection of Community Uses

42 responses

83% of respondents agreed with our approach to protecting community uses.



There was overall support for retaining community uses in line with the proposed policy criteria, but some respondents questioned the definition of local need.

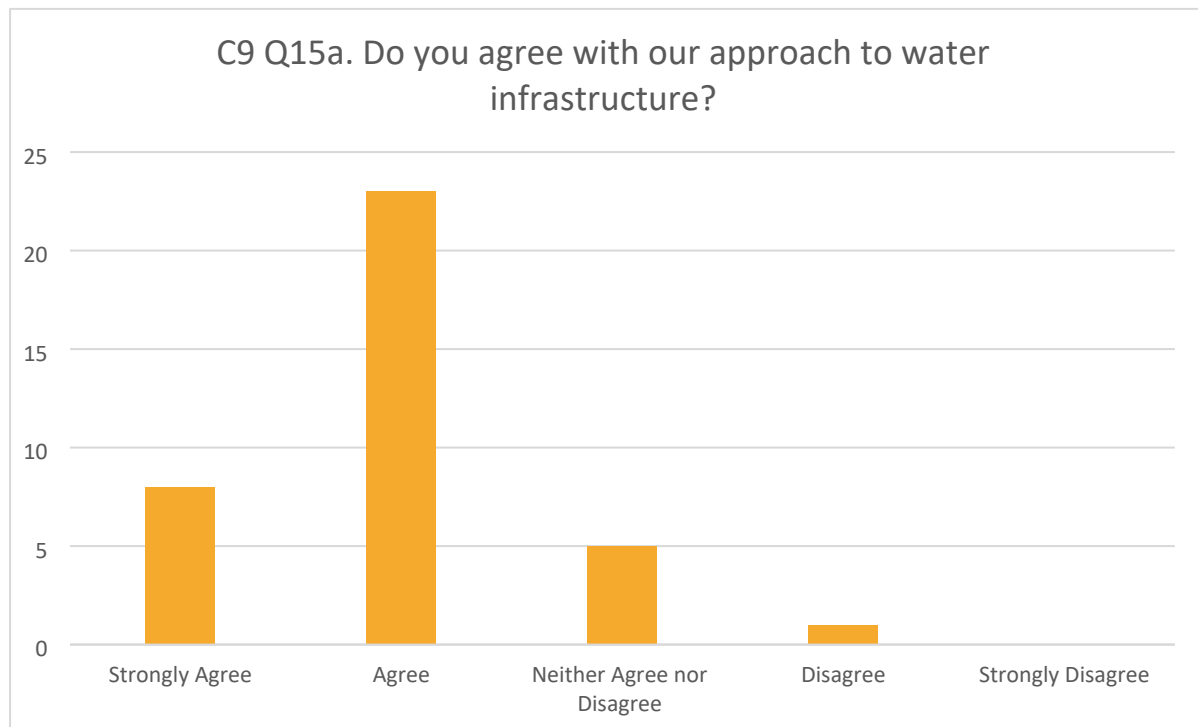
Officer Response:

The responses highlight the support for, and importance of, retaining community facilities. Going forward, the policy must retain an element of flexibility, and we will consider the feedback given to refine our approach.

Policy IN2 - Water Infrastructure

39 responses

84% of respondents agreed with our approach to water infrastructure, including Southern Water.



There was general support for this policy but there are concerns from some respondents around the management and lack of existing infrastructure to cope with waste water on new developments. Thames Water suggested that policies W1 and IN2 reference each other. Also, grey water recycling and rainwater harvesting should be encouraged in new developments.

Officer Response:

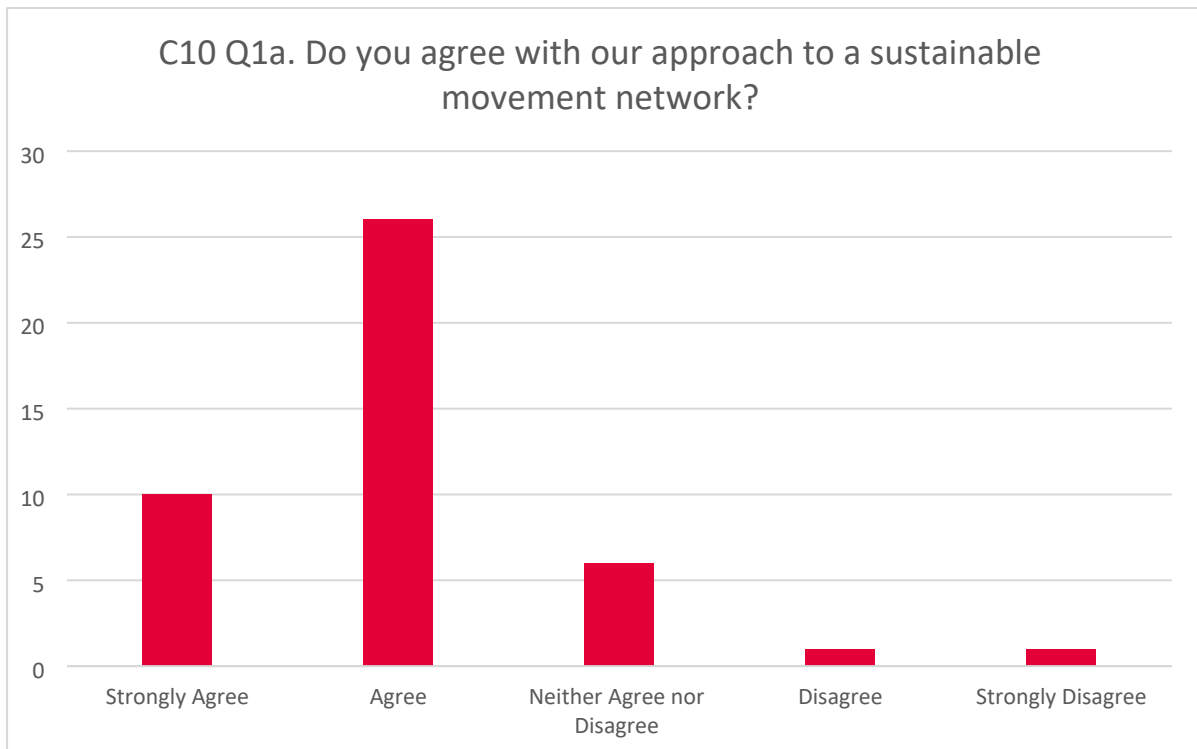
We are aware that there are local concerns about waste water and we will take these on board in refining the policy. Over the coming months we will be working closely with water providers to ascertain what new/improved water infrastructure is needed over the plan period to support the development proposed, at District level but also with our neighbours in respect of cross-boundary needs. Projects identified will then be included within the Infrastructure Delivery Plan (IDP), clearly set out alongside costs, any funding gaps and likely delivery timescales. The IDP will then be used to support the Local Plan to ensure the timely delivery of water infrastructure.

Chapter 10 - Transport

Policy T1 - Sustainable Movement Network

46 responses

59% of respondents agree with our approach to a sustainable movement network.



Many comments highlighted the differing transport needs of urban and rural areas. Further to this, comments raised the rural nature of the district alongside lack of public transport results in reliance on private cars. In regard to lack of public transport, respondents noted there are difficulties travelling outside of the district, the need for better public transport for journeys in and out of the district and the need for better journeys for school children to schools.

Concerns were also raised on the lack of infrastructure needed for low carbon journeys, for example, electric charging points and connected footpaths and cycle routes. It was suggested the policy should have some flexibility as not all new development may be located near existing public transport, particularly in rural areas. The need for cross boundary transport networks should also be acknowledged in the policy.

Officer Response:

It is acknowledged that the rural nature of the District presents transport challenges increasing reliance on private vehicles. It is also acknowledged SDC is

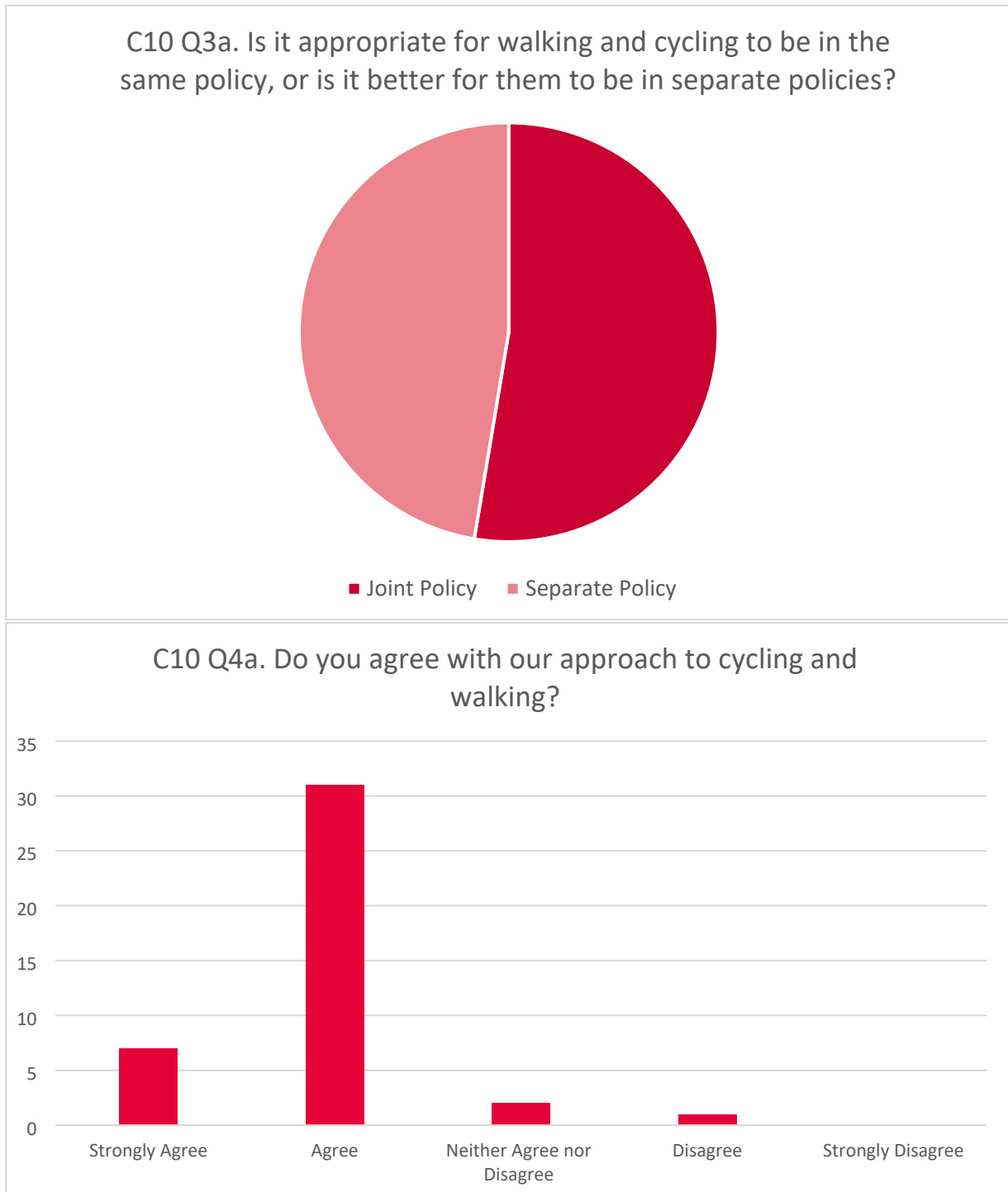
not the local transport authority and public transport relies on external operators. SDC will continue to engage with public transport providers and Kent County Council to ensure the impact of new development and transport requirements can be considered. Work on the Strategic Transport Study is taking place in conjunction with Tonbridge and Malling Borough Council to assess the impact of proposed development on key roads and junctions, including the Strategic Road Network, as managed by Highways England. The baseline work, which establishes the current state of congestion on the highways network, and the state of congestion at 2040 with existing growth, is now complete. The next stage is to use the model to test potential growth options/scenarios, to understand their impact on the road network and consider potential mitigations. Further to this, the Infrastructure Delivery Plan will evolve throughout the production of the Local Plan in consultation with infrastructure providers to identify the strategic infrastructure requirements, to support planned growth.

Policy T2 - Cycling and Walking

45 responses

53% of respondents thought walking and cycling can be covered in the same policy whilst 47% of respondents thought they should be separated.

76% of respondents agreed with our approach to cycling and walking.



Respondents were split about whether walking and cycling should be covered in the same policy, but many noted that this would facilitate a joined up and integrated approach. Comments were also raised on the need for better cycle networks but the difficulty of this due to lack of existing joined up routes and paths.

Other notable comments raised the lack of cycling interventions and segregation of cycling and walking from cars in the district. Respondents felt that new developments should be well connected with existing settlements through improved pedestrian and cycle links. Suggestions were also given for the integration of walking and cycling with public transport provision where appropriate.

Officer Response:

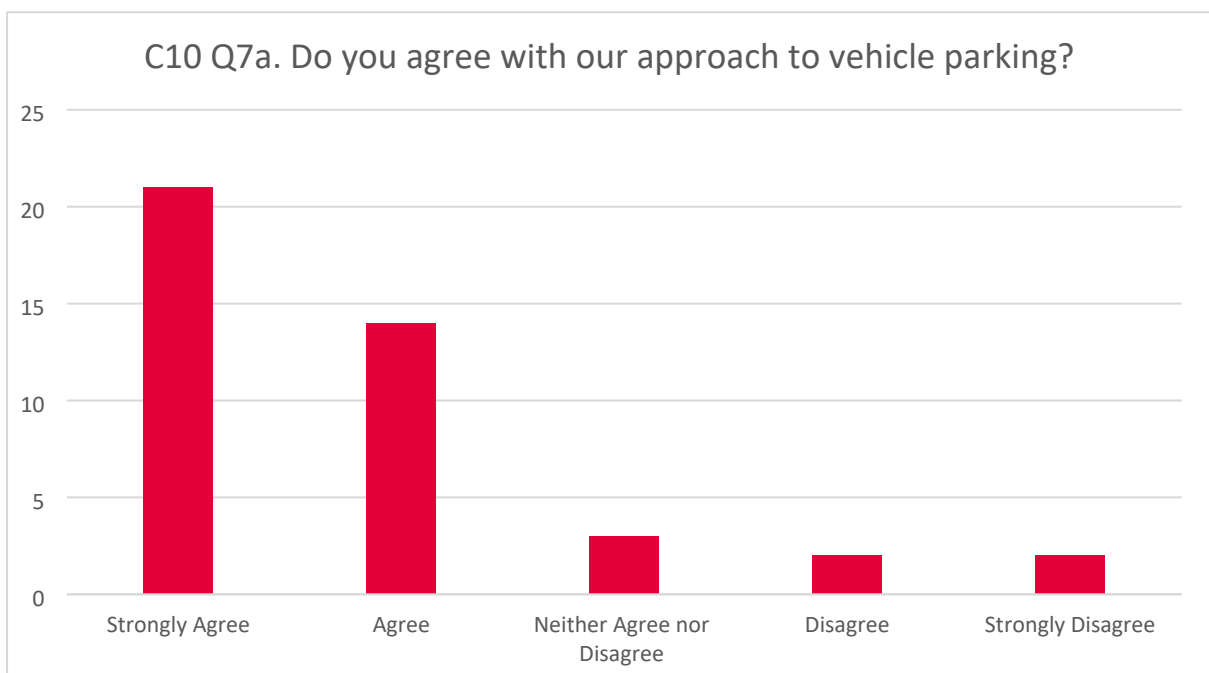
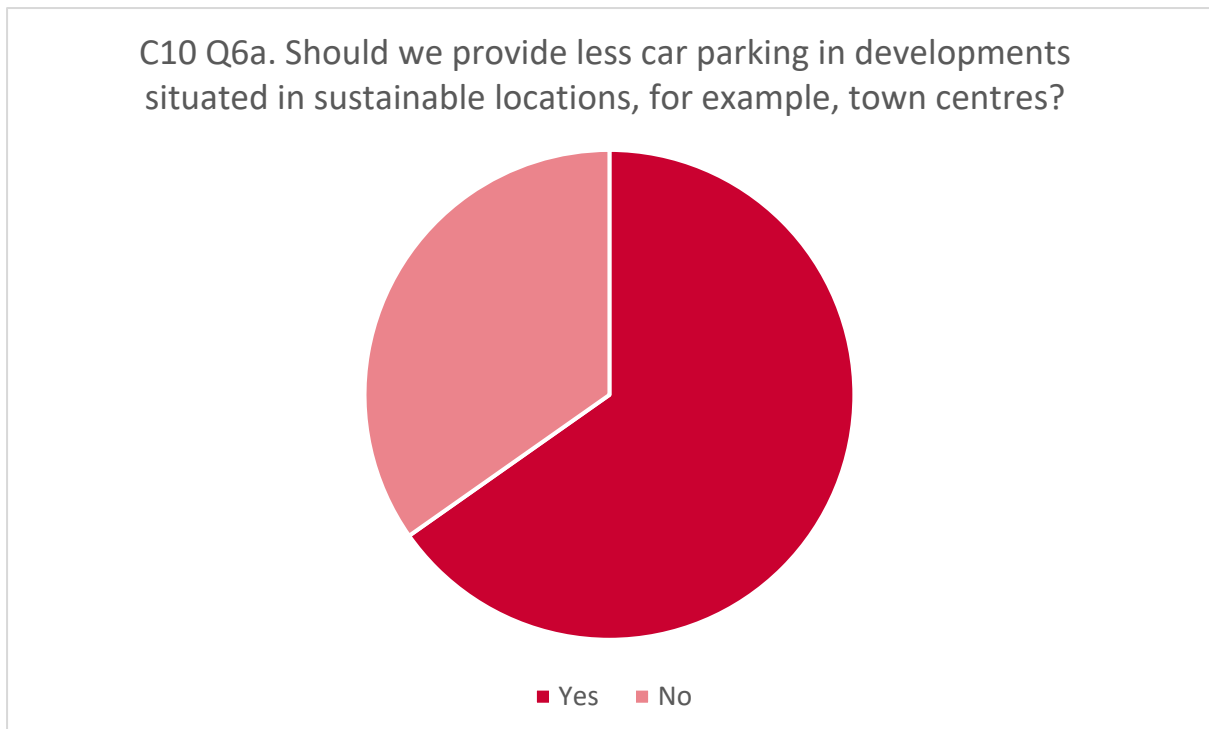
Work is ongoing to identify opportunities for cycling and walking improvements. Since the Regulation 18 consultation concluded the Sevenoaks Urban Area Local Cycling and Walking Infrastructure Plan (LCWIP) was completed. LCWIPs are a strategic approach to identifying cycling and walking improvements required at the local level. A LCWIP will be carried out for Swanley Town and is currently in progress. We will continue to engage with Kent County Council as the local transport provider alongside encouraging active travel to be embedded in strategic development sites.

Policy T3 - Vehicle Parking *

176 responses

65% of respondents did not agree that we should provide less car parking in sustainable locations. The remaining 35% of respondents agreed with the proposals to provide less car parking in developments in sustainable locations, such as town centre locations.

50% of respondents agree with our approach to vehicle parking.



Respondents highlighted the lack of public transport, particularly in rural areas, and that better and affordable public transport is necessary to have an alternative to driving a car. The cost of car parking being a deterrent for visitors and impact on high streets was also mentioned. Other notable comments also suggested the level of existing car parking should be maintained with electric charging points included in public car parks. Concern was expressed that less car parking would have an impact on surrounding streets and businesses. Comments raised that KCC's parking standards are out of date and subject to change having undergone a consultation as part of the Kent Design Guide between November 2021- January 2022. Moreover, comments also suggested formulating car parking standards related to district car ownership and parking provision should be appropriate to density.

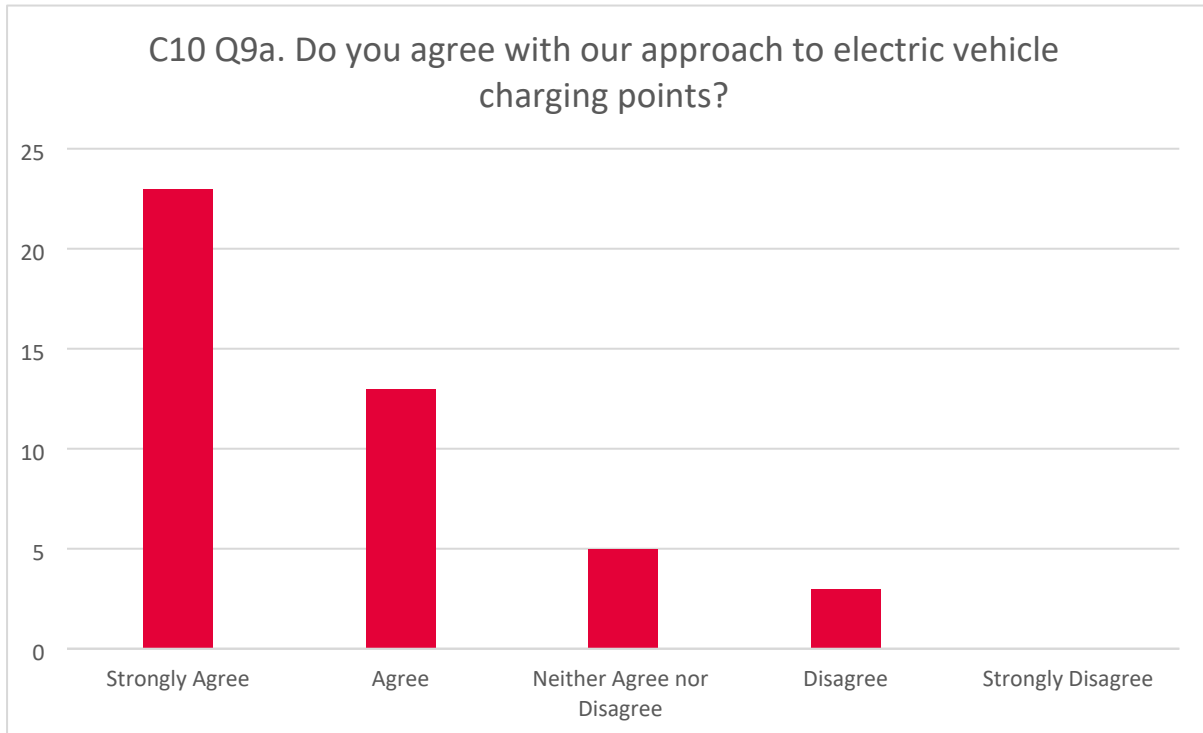
Officer Response:

It is noted that an appropriate level of car parking is an important matter to respondents especially taking into account public transport provision. We will consider the feedback given to refine our vehicle parking policy, in consultation with KCC.

Policy T4 - Electric Vehicle Charging Points

44 responses

81% of respondents either Agree or Strongly Agree with our approach to electric charging vehicle points. A further 11% were neutral to our approach.



Respondents highlighted that off-street charging should be considered in the policy. Comments also suggested the policy should have more flexibility where less provision could be justified. Also, it was noted that electric charging vehicle points are now covered under Building Control regulations.

Officer Response:

We will review and refine the policy in light of the inclusion of electric charging points in Building Control regulations to identify any circumstances which should be considered.