

## SDC Comments Swanley Neighbourhood Plan Regulation 14

<b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b> <b>Sustainable development</b>	<b>SDC Comment</b>
<p><b>NP Policy SwSD1 – Green Belt</b> Developments on Green Belt Land as defined by Sevenoaks are not supported. Developments on previously developed brown field sites on Green Belt land are supported.</p>	<p>This policy is less nuanced than the NPPF. PDL in the Green Belt can be acceptable but where it meets the criteria set down in the NPPF.</p>
<p><b>NP Policy SwSD2 – Swanley Town Centre</b> Development proposals that result in a net loss of retail and other service-related spaces (Use Class E) classes on sites in Swanley Town Centre (see Town Centre Map), other than those which are permitted development will not be supported.</p>	<p>Terminology needs to reflect terminology used in the Use Classes Order so it should state 'Commercial, Business and Service'. Should the word 'net' be deleted? Should it say something around subject to marketing etc.</p> <p>SDC Town Centre Strategy is now available on the SDC website. Plan 2040 also includes an emerging Swanley Town Centre policy informed by Evidence Base.</p>
<p><b>NP Policy SwSD3 – Preventing the merging of Swanley Village with Swanley Town</b> Development proposals which result in the physical or visual merging of Swanley Village with Swanley Town will not be supported.</p>	
<b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b> <b>Community Infrastructure</b>	<b>SDC Comment</b>
<p><b>NP Policy SwC1 – Health Facilities in Swanley</b> Development proposals for health facilities in Swanley will be supported where they are:  <ul style="list-style-type: none"> <li>A. Located in Swanley Town Centre</li> <li>B. Have adequate parking for visitors, patients and staff</li> </ul>                     Provide facilities for social interaction for patients and visitors and health related education for patients and health professionals.</p>	<p>It may help if the policy refers to the map showing the town centre boundaries and if the last sentence is set down as two separate bullet points.</p>
<p><b>NP Policy SwC2 – Open Space</b> Development proposals that result in any loss of existing public green spaces as shown on the map, across all types within the Neighbourhood Plan area will be supported only where</p>	<p>As noted in our previous comments, if these Open Spaces are already designated then there is no need to</p>

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<p>replacement green spaces are provided for public use which are suitably located and equal or superior in terms of size and quality</p>	<p>designate them again. If new sites have been identified, you may wish to designate them as Local Green Spaces. LGSs have to be assessed against the NPPF tests (para 102) and require consultation with landowners.</p> <p>It is necessary to consider whether this policy does anything different from current policy. Policy SP10 seeks to retain open space etc, only allowing its loss in exceptional circumstances where replacement provision of at least equivalent value to the local community is provided.</p> <p>Plus need to be consistent in terminology, as it refers to open space and public green spaces.</p> <p>May need to specify which map for clarity.</p>
<p><b>NP Policy SwC3 – Indoor Sport facilities.</b> Development proposals that provide indoor dry sports facilities are supported, subject to other policies in the Neighbourhood Plan</p>	<p>What's meant by dry? Does this mean without swimming pools? Presumably it should say something about being accessible to the public and more about the location.</p>
<p><b>NP Policy SwC4 – CIL Investments.</b> The provision of a multifunction Indoor sports facility is strongly supported by the Neighbourhood Plan for further investigation and implementation and should be a priority for investment of Community Infrastructure Levy by Swanley Town Council and should be for Sevenoaks District Council</p>	<p>Should the title of this be changed? This doesn't read as a planning policy used in the determination of planning applications. It could be listed as a project where the Town Council supports investigation and implementation, with a separate list setting down what Swanley TC will either direct their CIL funding</p>

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	towards or which they will seek to influence with respect to Sevenoaks.
<p><b>NP Policy SwC5 – Community Buildings.</b> Proposals that result in the loss of existing community buildings will not be supported unless there is clear evidence that:</p> <p>a) There is no need for the facility (in terms of the current capacity of existing provision, its opening times, location, accessibility, and range of facilities available to local people and businesses) or suitable alternative facilities of a similar size and quality are re-provided as part of the proposal.</p> <p>b) proposals offer alternative benefits to the community in terms of access to space to assemble, worship, participate in educational activities and personal or civic celebrations</p>	It needs to be made clear whether proposals need to meet both criteria or just one of the criteria. It should also probably include something around being in an appropriate/accessible location.
<p><b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b> <b>Conservation and Heritage</b></p>	<p><b>SDC Comment</b></p>
<p><b>SwDC&amp;H1 Tall buildings</b> Development proposals for tall buildings should take account of the definitions provided in the Neighbourhood Plan for the different character areas of Swanley. Such proposals should:</p> <ul style="list-style-type: none"> <li>• Have good access to public transport</li> <li>• Contribute to improving the permeability of the site and wider area, wherever possible</li> <li>• Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level</li> <li>• Incorporate publicly accessible amenity space and local play areas within the site area.</li> <li>• Where appropriate, provide additional green spaces in the form of roof gardens for residents of the development</li> <li>• Have ground floor activities that provide a positive relationship to the surrounding streets</li> <li>• Incorporate the highest standards of architecture and materials, including sustainable design and construction practices</li> <li>• Should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference</li> <li>• The impact of tall buildings proposed should be given particular consideration in relation to their impact on local or strategic views both from the designated Green Belt land which surrounds Swanley and from Swanley to designated Green Belt land.</li> </ul>	Should the policy include the definition?
<p><b>Policy SwDC&amp;H2: Swanley Village Design Guidelines</b></p>	Could a reference to the location of the map be given or a map be included.

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<p>Development proposals for Swanley Village, should demonstrate how the overarching design and architectural design principles in the Design Guide have been applied to proposals within both the New Swanley Village area and, where applicable, the Conservation area as defined in the Guide.</p>	<p>Could it just stop after Design Guide have been applied?</p>
<p><b>Policy SwDC&amp;H3 – Heritage Asset Protection and Enhancement</b> It is proposed that the murals of William Mitchell, located in Swanley Town Centre are allocated as non-designated heritage assets to ensure their protection into the future</p>	<p>There is nothing in this policy about enhancement, so the title needs changing. Has an assessment been undertaken to identify non-designated heritage assets and what criteria has been used. If this has been undertaken, and there are other assets, it may be beneficial to list and map these rather than listed buildings which are already identified and protected.</p>
<p><b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b> <b>Housing</b></p>	<p><b>SDC Comment</b></p>
<p><b>SwH1 Energy Efficient and Healthy Homes</b> All new housing developments shall be built to the highest standards of thermal insulation, air tightness, and with double glazing as a minimum requirement. New homes should be designed to meet an Energy Performance Certificate rating of A to reduce costs in use and contribute to reducing climate change impacts associated with the use of energy. Ventilation needs careful design with high air tightness building fabric construction. Wherever feasible all homes (including areas of circulation), should have the maximum possible natural ventilation via openable windows. Where mechanical ventilation is used measures should be incorporated to prevent: • External noise transfer from outside the building. • Cross talk between internal rooms. • Ventilation Plant noise</p>	<p>As noted previously, as this goes beyond the requirements for Building Control, it should be supported by evidence and tested for viability.</p>
<p><b>SwH2 Housing Space standards</b> Homes should meet the Government’s nationally described space standards (NDSS) guidelines as a minimum. Extensive tree and shrub planting shall be incorporated into all developments to provide a healthy and visually pleasing environment. Designs shall be inclusive for all members of society and cater for those with disabilities and the infirm wherever feasible. Housing layouts must demonstrate how homes meet the storage requirements in the NDSS without being impacted by plant for mechanical ventilation and heating kit</p>	<p>What is the justification for this? As previously, it will need to be caveated – so ‘where appropriate/feasible – unless overriding reasons’. Second sentence doesn’t appear to be relevant to housing space standards and the last sentence is slightly unclear.</p>

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<p><b>SwH3 Private Amenity Space for New Homes</b> All new homes where feasible should have access to outdoor space in the form of a private garden, balcony or patio. These should be additional to the Gross Internal Floor Area minimum spaces sizes provided in the NDSS</p>	<p>The second sentence doesn't seem particularly relevant.</p>								
<p><b>SwH4 Homes for Work and study</b> All homes should, where feasible, have dedicated working space with natural light.</p>									
<p><b>SwH5 Housing Density</b> Housing developments in the Neighbourhood Plan area are expected to deliver the following densities where feasible subject to meeting the other policies in the Neighbourhood Plan.</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 30%;">Location</td> <td>Density</td> </tr> <tr> <td>Swanley Town centre</td> <td>100 DPH</td> </tr> <tr> <td>Rest of Swanley</td> <td>50 DPH</td> </tr> <tr> <td colspan="2">Edge of Swanley (sites adjacent to the Green Belt Boundary) and Swanley Village 30 DPH</td> </tr> </table>	Location	Density	Swanley Town centre	100 DPH	Rest of Swanley	50 DPH	Edge of Swanley (sites adjacent to the Green Belt Boundary) and Swanley Village 30 DPH		<p>Could more clearly reference Swanley Town. Overriding consideration in policy SP7 is that it should not compromise the distinctive character of the area. This policy may benefit from having a similar line. May also need to be clearer about the evidence base underpinning the proposed higher densities.</p>
Location	Density								
Swanley Town centre	100 DPH								
Rest of Swanley	50 DPH								
Edge of Swanley (sites adjacent to the Green Belt Boundary) and Swanley Village 30 DPH									
<p><b>NP Policy SwH6 Public Amenity Space</b> New housing developments should include Publicly accessible Amenity Green Spaces based on 0.60 Ha of area per 1000 new residents to be accommodated within the development. Amenity green spaces/roofs shall be provided for all commercial and community infrastructure developments. There is a deficit of AGS in Swanley and therefore further developments on AGS land is not supported</p>	<p>Terminology needs to be used consistently, this refers to Public Amenity Space and Publicly accessible Amenity Green Spaces. Need to think about how this policy would work, particularly on smaller sites.</p>								
<p><b>NP Policy SwC7 – Children and Young Peoples Play Space</b> Swanley has a deficit of play space for children and young people. All new developments in excess of 5 dwellings must include a Local Area for Play (LAP) and all developments in excess of 10 dwellings a Locally Equipped Area for play (LEAP)</p>	<p>The first line essentially comprises justification and may sit better in the supporting text.</p> <p>Policy SP10 only requires xx where there is an existing shortage or where the proposal would result in a shortfall. Is it justified to ask for this where neither of these triggers exist? Is it also justified in terms of viability?</p> <p>In terms of the wording of the policy, is it requiring LAP for schemes of 5-10 dwellings but above 10, it is requiring</p>								

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	<p>LEAP or is it asking schemes which are 5 and above and more than 10 dwellings to provide both? Does this need to include reference to the need to provide details of its maintenance? Should it be requiring provision on site or allow for contributions to off-site provision where more appropriate?</p>
<p><b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b> <b>Employment and Economy</b></p>	<p><b>SDC Comment</b></p>
<p><b>NP Policy SwEE1: Improving and increasing employment on existing employment sites</b> Proposals to upgrade, intensify or extend the employment sites on Maps EE1-1 and EE1-2 are supported</p>	<p>Some of these sites are located in the Green Belt, so their expansion is likely to comprise inappropriate development. Goes further than LP policy EMP1 which sets out that sites will be retained, intensified and regenerated for B1-B8 uses.</p>
<p><b>NP Policy SwEE2: Loss of Employment uses</b> Proposals for the redevelopment or change of use of land or buildings in employment use shown on Map EE1-1, EE1-2 and EE2 to non-employment uses, other than those which are permitted development, will only be permitted when: a) Marketing of the site over a period of a minimum of 12 months demonstrates that there is no realistic prospect of the use of the site for employment purposes; or b) The strategic need for the proposed use clearly exceeds the need for continued use for employment purposes.</p>	<p>As per our previous comments, this needs to be evidenced and more detail provided e.g. what would be required for marketing. Adopted policy EMP5 only asks for 6 months, so what is the justification for asking for longer.</p>
<p><b>NP Policy SwEE3: Small employment sites</b> Proposals for other smaller employment sites will be permitted where they do not conflict with other policies in this Plan and provided that all the following criteria are met so that proposals: a) Do not involve the loss of dwellings b) Contribute to the character and vitality of the local area c) Are well integrated into and complement existing clusters of activity d) Protect any neighbouring residential amenity e) Do not adversely impact upon road safety f) Enhance the overall development and provision of employment and self-employment space g) Do not adversely affect the attractiveness of the local countryside</p>	<p>Perhaps re-word as it requires both employment and self-employment space but this could be addressed by adding 'including'.</p>

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<p><b>NP Policy SwEE4</b>  Proposals for hotel accommodation and visitor facilities within the Neighbourhood Plan area will be supported where they do not conflict with other policies in this Plan and provided that all the following criteria are met so that proposals: a) Do not involve the loss of dwellings b) Contribute to the character and vitality of the local area c) Are well integrated into and complement existing clusters of business activity d) Are well provided with parking and located close to public transport connections e) Protect any neighbouring residential amenity f) Do not adversely impact upon road safety g) Enhance the development and provision of employment and self-employment h) Do not adversely affect the attractiveness of the local countryside</p>	<p>Title is missing. As mentioned in our previous comments, should this be directing this type of development to the town centre boundary. As currently written it relates to the whole of the parish. How can hotel accommodation enhance self-employment?</p>
<p><b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b>  <b>Transport</b></p>	<p><b>SDC Comment</b></p>
<p><b>SwT1 – Planting of Trees</b>  All new developments close to main transport corridors, indicated in AQ16, (see Map of Transport Study proposals) where pollution is a problem shall incorporate extensive tree planting as part of the development</p>	<p>The mapping indicates two points; clarity may be needed as to where precisely this policy applies. Also what is meant by extensive? This has to be balanced with providing parking spaces and useable amenity space etc.</p>
<p><b>NP Policy SwT2 – Road Improvements</b>  The road improvements indicated in HI12 to HI92, CR12 and TM12 are supported measures to be funded by Swanley Town Council and Sevenoaks District Council via Community Infrastructure Levy:</p> <ul style="list-style-type: none"> <li>b. A new all movement junction on the A20 to the west of Swanley to help alleviate congestion within the town centre by providing an alternative route to western Swanley and areas to the north such as Dartford, without having to route through Swanley Town Centre or double back from Sidcup.</li> <li>c. New link road from Birchwood Road to the B2173 to avoid narrow section at the southern end on approach to junction with B2173. This measure would be designed to alleviate congestion and improve safety at the Birchwood Road/B2173 signalised junction</li> <li>d. Improving wayfinding including signing to car parks, Swanley Park and other key attractions</li> <li>e. All pedestrian crossings to be upgraded to meet all current DDA requirements.</li> <li>f. Upgrade the pelican crossing to the high Street</li> <li>g. Re-surface and improve the lighting and feel of Azalea drive as the gateway to Swanley station</li> </ul>	<p>It may be better to set these road improvement projects out in a separate section, as opposed to within a policy. A number of the projects fall outside of planning e.g. providing yellow box marking and/or outside of SDC's control. In addition, it may be better to set out separately the types of projects/schemes that Swanley TC will contribute funding towards from their CIL receipt.</p>

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<p>h. Provide yellow box marking at the Goldsel Road/High Street roundabout junction</p> <p>i. Introduce physical measures on Salisbury Avenue to prevent through movement and thus rat running from B2173 London Road</p> <p>j. Move no entry signage on Nightingale Way to adjacent ASDA access to clarify that there is no vehicular access on Nightingale Way and the pedestrianised area</p>	
<p><b>SwT3 – Cycling</b></p> <p>Cycling is encouraged as an alternative mode of transport to the motor car on safe, designated cycle routes whenever possible to reduce pollution and traffic congestion. All new developments should incorporate segregated cycle access ways and adequate storage for bicycles in accordance with Policy SwT6.</p> <p>New cycle routes recommended in the SWECO report are supported:</p> <ol style="list-style-type: none"> <li>1. Cycle link from existing London Road cycle lane to St Mary's Road (along Oliver Road, Ruxton Close and existing path) - SDC Cycling Strategy Route 14</li> <li>2. West-east cycle route to the north of the town centre (along Hilda May Avenue, Northview and Woodlands Rise) - SDC Cycling Strategy Route 16</li> <li>3. Cycle link between Woodlands Rise and town centre (upgrade existing public footpath 0262/SD81/2) - SDC Cycling Strategy Route 17</li> <li>4. Cycle link from Swanley to Hextable (through Swanley Park and along existing footpath 0305/SD69/1) - SDC Cycling Strategy Route 18</li> <li>5. West-east cycle link from station to London Road (along Salisbury Avenue, restricted byway 0262/SD88/1; Glendale; Pinks Hill; Cranleigh Drive; Existing cycleway; Goldsel Road; Azalea Drive and Station Road) - SDC Cycling Strategy Route 20</li> <li>6. East-west cycle route to the station from London Road (along Salisbury Avenue, St George's Road, London Road, Goldsel Road and Station Approach) - SDC Cycling Strategy Route 21 A</li> </ol> <p>A new Cycle Hub at Swanley station should also be provided as recommended by the SWECO report</p>	<p>Cycle routes support - sits outside of planning but could be set out in a section outlining other aspirations. As mentioned in previous comments, this may be better supported by producing a LCWIP. Are segregated cycle ways achievable or necessary on all sites? Perhaps think about the wording.</p> <p>You may be aware that SDC have received some funding towards an LCWIP for Swanley. Further details will follow.</p>



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<p><b>SwT4 – Walking</b> Development proposals should incorporate safe pedestrian footpaths throughout the development and link with other existing pedestrian routes where appropriate and relevant.</p>	<p>As noted previously, this is supported but you may want to expand to include applying active travel principles for all ages and abilities, rather than just walking.</p>
<p><b>SwT5 – Car and Cycle Parking</b> Development proposals for new residential development that require their parking needs to be met on street are not appropriate in Swanley. Car and cycle parking for residential development in Swanley should as far as possible provide: a) Off street vehicle parking to be contiguous with and part of each property rather than as part of a shared arrangement Car and Cycle Parking b) Shared parking areas are to be designed to Secure by Design standards and each space clearly visible from the property is serves wherever possible. c) Parking provision will be required to meet the standards set out below unless there is a clear justification for the application of a lower standard to achieve sustainable development: Car Spaces * Cycle Spaces * • 1 bed house/apartment 1.5 + 1 • 2 bed house/apartment 2 2 • 3 bed house/apartment 2 2 • 4 + bed house/apartment 3 2 d) Car and Cycle spaces should be provided for visitors at a rate of 1 space per 8 homes. e) All car parking spaces should have access to electric vehicle charging points. f) A garage will be acceptable as a parking space provided that its internal dimensions are at least 3 m wide x 6 metres long. Tandem Parking should only be permitted where there is no suitable alternative. Space dimensions should be 4.8 m x 2.4 m for cars, and 2 m x 0.75 m for cycles. * Off road + Rounded down</p>	<p>As mentioned in our previous comments, these will need to be considered in relation to KCC’s standards and they should be consulted. If these do not accord with KCC standards, then a clear justification will be needed.</p> <p>Link to evidence base which supports these standards?</p>
<p><b>SwT6 Access for Vehicles, Pedestrians and Bicycles</b> Development proposals should provide adequate width roadways to cater for domestic traffic as well as emergency vehicles such as ambulances, fire engines and refuse collection vehicles. a) Residential premises with more than 50 dwellings shall have minimum of two access roads onto the main carriageways. b) All developments shall have well-lit artificial lighting to roads and footpaths using energy efficient LED lighting. c) Combined road and footpaths are only acceptable in smaller developments of not more than 10 dwellings. d) All developments should have dedicated cycle ways.</p>	<p>As mentioned above and before, many of these are covered by KCC.</p>
<p><b>SwT7 – Transport Infrastructure Planning</b> The proposals indicated in below, are supported by the Neighbourhood Plan for further investigation and feasibility of implementation and are offered as a project for investment of Community Infrastructure Levy by Swanley Town Council and Sevenoaks District Council: A</p>	<p>The proposals listed could be added to a section outlining projects that the TC support, with a separate section outlining the type of things this NP would like to put</p>

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corridor Study of the lanes around Hextable Swanley and Crockenhill to establish where improvements can be made to facilitate the safe movement of vehicles along these roads for existing and future users

forward for funding contributions from CIL. Needs to replace 'investment' with 'funding'. Note that this corridor study extends beyond Swanley's area.