

Sevenoaks District Council

Sevenoaks Local Plan Proposed Submission Version

Statement of Main Issues

April 2019

(SDC007)

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1. Introduction

- 1.1 This document provides a summary of the Main Issues arising from the consultation on the Proposed Submission Version (December 2018), in compliance with Regulation 22 (c) (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 require Local Planning Authorities to prepare “a summary of the main issues raised in those representations”. Although a Main Issue is not defined in legislation or guidance, it is generally accepted to mean an issue that goes to the heart of the soundness of the Plan. Guidance from the Planning Inspectorate (2016) confirms this, defining ‘Main Issues’ as “key issues on which the soundness of the plan will depend”.
- 1.3 Whilst the broad headings set out in this report can be regarded as main issues, the Council has included sub-issues within them to provide further illustration of the main issue itself. In so doing, this is not to necessarily imply that these sub-issues are Main Issues themselves.

2. Structure of this report

- 2.1 This report sets out the main issues raised in relation to the consultation on the Regulation 19 Proposed Submission Version (December 2018) of the Local Plan.
- 2.2 Chapter 3 of this report provides an overview of the number of representations received and highlights which sites and policies within the Plan received the most comments.
- 2.3 Chapter 4 of this report outlines the main issues that have been raised by representations on the **policies** within the Plan and the Council response to these issues. Appendix 1 sets out a summary of the representations received on each of the twenty one policies contained within the Plan.
- 2.4 Chapter 5 of this report outlines the main issues that have been raised by representations on the **sites** within the Plan and the Council response to these issues. Appendices 2, 3 and 4 set out summaries of the representations received on each of the housing and mixed use sites, employment sites and Gypsy and Traveller sites contained within the Plan
- 2.5 The Council response to each individual Regulation 19 representation is set out in the Consultation Statement Appendix I (SDC006).
- 2.6 A schedule of modifications proposed as a result of the Regulation 19 consultation and factual updates / clarifications will follow shortly.

2.7 It should be noted that several thousand comments were made as part of the Regulation 19 consultation. Therefore, this document is a summary of the main issues raised and does not attempt to cover every issue. The Council is happy to provide further clarification on issues raised in this statement and this can be addressed through the examination process.

3. Number of representations made pursuant to Regulation 20.

3.1 For full details of the consultation, please see the Consultation Statement (SDC006).

3.2 In summary, representations were made by **1,956** organisations and individuals and a total of **3,566** comments were made. The comments were split evenly between sites and policies.

Comments on sites	1,645 (46.1%)
Comments on policies	1,907 (53.5%)
Comments on general chapters/appendices	14 (0.4%)
TOTAL comments	3,566

3.3 The **sites** which generated the most representations were:

Site Ref	Site Name	No. of comments
ST2-57	Fort Halstead, Crow Drive, Halstead	352
ST2-60	Oasis Academy, Egerton Avenue, Hextable	226
ST2-28	Land at Pedham Place	155
ST2-67	Land south of Noahs Ark, Kemsing	89
EMP1-28	Bartram Farm, Old Otford Road, Sevenoaks	66

3.4 The policies which generated the most representations were:

Policy Ref	Policy Name	No. of comments
Policy ST2	Housing and Mixed Use Sites Allocations	1,216
Policy ST1	A Balanced Strategy for Growth in a Constrained District	445

Policy T1	Transport and Infrastructure	48
Policy EMP1	Supporting a Vibrant and Balanced Economy	21
Policy H5	Housing Density	21

3.5 The Regulation 19 consultation asked particular questions, and the results of these is as follows:

Table 3.4: Responses to questions of soundness		
Question	Yes	No
Is the Plan sound?	1,271	2,295*
Is the Plan Legally Compliant?	2,169	1,397
Has the Plan complied with the Duty to Co-operate?	2,292	1,274

*All objections to individual sites are included in this category

4. Policies - Summary of main issues raised and Council responses

4.1 In terms of the Main Issues that are raised by representations on policies, these are outlined below, together with the Council’s response to these Issues. The Main Issues to arise from representations can be broadly grouped under the following areas:

- Housing Need (Table 4.1)
- Plan Period (Table 4.2)
- Green Belt (Table 4.3)
- Housing Choices (Table 4.4)
- Economy and town centres (Table 4.5)
- Transport and Infrastructure (Table 4.6)
- Natural Environment (Table 4.7)
- Historic and built environment (Table 4.8)
- Health, Open Space and Climate Change (Table 4.9)

4.2 Overall summaries of the key points raised in the representations in relation to each of the twenty-one policies are set out in Appendix 1.

4.3 The tables below set out each of the main issues identified, a summary of the representations received, the relevant policies and the Council’s response.

Table 4.1: Housing Need, Strategy for Growth	
Main Issue	<p>Comments related to the proposed, district-wide development strategy, particularly the balance between meeting housing need and Green Belt protection, and the link to infrastructure in making an ‘exceptional circumstances’ case for Green Belt amendment.</p> <p>The definition of brownfield land was also raised in several comments and the re-use of land in a broader sense. Many respondents commented on the distribution of development, citing an imbalance in the NW of the District.</p>
Relevant Policies	ST1-ST2
Council Response	<p>Development strategy focuses on increasing density within existing settlements, building on previously developed or brownfield land and only then considering the contribution of greenfield Green Belt land. In considering the Green Belt release, the Council has considered the Green Belt performance (as assessed through the Green Belt Assessment), the sustainability of the site (as assessed through the SA), and the infrastructure proposals.</p> <p>In relation to the Duty-to-Cooperate process and Statements of Common</p>

	<p>Ground, these are submitted with the Local Plan for examination, but to date, no authorities have been able to assist with unmet housing need. Further information contained within the Duty to Co-operate Statement.</p> <p>In relation to the distribution of development, there a number of brownfield or previously developed sites in the NW of the District which are considered sustainably located and suitable for development. The largest proposed allocation in this area is for Fort Halstead, which already has outline planning permission. Although the settlement pattern in this area of the District is predominantly villages, they are well-connected by road and rail and have a number of local services.</p> <p>The broader re-use of previously worked land has been discussed as part of the plan review process and the inclusion of these sites is considered justified, based on SA performance and the importance of recycling previously worked land in a constrained environment. The NPPF exclusions relate to the DM process.</p>
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Table 4.2: Plan Period and Base Date	
Main Issue	Some comments regarding clarification on the Plan Period, whether it covers at least a 15 year period and whether it should commence at 2019.
Relevant Policies	ST1-ST2
Council Response	<p>As part of the submission review process, we propose a 16 year plan (2019-35). This is due to the use of the government’s standardised methodology for calculating housing need, which already accounts for any earlier shortfall.</p> <p>Housing need (based on the government’s standardised methodology) is 707 units per annum, so 707 x 16 years = 11,312 homes required over the 16 year plan period.</p>

Table 4.3: Green Belt	
Main Issue	A number of comments related to scale/grain of Green Belt Assessment evidence base. Many respondents (general public) did not support any development in the Green Belt, whereas others (promoters) suggested that additional Green Belt sites should be included in the Plan to meet housing need.
Relevant Policies	ST1-ST2, GB1
Council Response	The Green Belt Assessment splits the district into parcels and classifies them as either strong, moderate or weak performing Green Belt, based on the 5 purposes outlined in national policy (the NPPF). It also identifies 31 weak-performing sub-areas, or ‘recommended areas’ for potential development, which have informed our site selection process. A number of Green Belt sites are included in the Plan, both on brownfield land and strategic greenfield Green Belt sites. The Council believes the Plan strikes the right balance in meeting housing need in a constrained environment

Table 4.4: Housing Choices	
Main Issue	<ul style="list-style-type: none"> - Development industry suggested that the requirement to build all new homes to meet the optional technical standard M4(2) for accessible and adaptable dwellings is too restrictive and should be reduction - Concern that the small sites requirement for affordable housing is contrary to national policy - In relation to the provision of local needs housing in rural areas, development industry argues that the limit to the provision of market homes on cross-subsidy sites is too restrictive. - Some concern that proposed increased densities are too high but acknowledge that the efficient use of land in built up areas reduces the pressure on the Green Belt - Kent Downs AONB expressed concern about Gypsy and Traveller sites within the AONB and the potential negative impact
Relevant Policies	H1-H5
Council Response	<p>Inclusion of these housing policies is evidence-led, supported by the Strategic Housing Market Assessment (SHMA) and the Local Housing Needs Study (LHNS). The evidence showed a clear need for housing to support an aging population, as well as a need to provide smaller homes in both urban and rural locations, and to provide affordable housing.</p> <p>Much of the housing that is currently developed in the District has been delivered on smaller sites and we have successfully sought affordable housing contributions in these cases, which has made a significant contribution to the overall affordable housing provision in the District. It is therefore argued that there are local circumstances to justify a lower threshold. Increasing densities on sites within existing settlements (which make up only 7% of the District) promotes sustainable development close to facilities and services in accordance with national policy.</p> <p>All Gypsy and Traveller sites will be expected to be in accordance with national and local policy and those within the AONB must be sensitively designed.</p>

Table 4.5: Economy and town centres	
Main Issue	<ul style="list-style-type: none"> - General support for the policy, only one respondent stated that the policy was too restrictive for smaller sites. - Clarification sought on how the retail needs of the District will be met over the Plan period
Relevant Policies	EMP1-3
Council Response	<p>Economic Needs Study outlines that existing employment base should be retained to maintain employment baseline. Substantial floorspace lost to residential conversion since the changes to PD rights in 2013 and the three SDC exemption areas expire in 2019 (Sevenoaks was one of only six authorities outside London to benefit from exemption areas, acknowledging the pressure</p>

	<p>faced by our employment sites).</p> <p>Retail Study outlines the changing nature of the high street and recommends maximum flexibility in terms of the provision of retail floor space over the plan period by allocating it to the District's top-tier settlements and local service centres as per the Settlement Hierarchy. The Study also suggests that a locally set threshold for a retail impact assessment will ensure the vibrancy and vitality of the District's retail centres.</p>
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Table 4.6: Infrastructure and transport	
Main Issue	Concerns regarding the certainty of how and when infrastructure will be delivered as part of a scheme, particularly in relation to strategic sites.
Relevant Policies	T1
Council Response	Our Infrastructure Delivery Plan (IDP) has recently been updated (and as a live document, will continue to be updated as the Plan progresses). This sets out the infrastructure requirements associated with the proposed development, the sources or funding and delivery. The Council has an adopted CIL in place and continues to seek S106 funding for site specific matters and affordable housing.

Table 4.7: Natural Environment	
Main Issue	<p>Kent Downs AONB Unit raised concerns regarding major development within the AONB and requested wording from national policy to be included in Policy LA1. Natural England suggested a minor wording change for clarity to Policy LA1.</p> <p>There was general support for policy WN1 including the requirement for biodiversity net gain.</p> <p>Support for Ashdown Forest policy AF1 seeking to mitigate visitor impact.</p>
Relevant Policies	LA1, AF1, WN1
Council Response	<p>Policy LA1 is consistent with, and does not repeat, national policy.</p> <p>Ashdown Forest policy developed in communication with Natural England and joint officer working group, supported by associated Statement of Common Ground.</p>

Table 4.8: Historic and built environment	
Main Issue	<p>Some concerns regarding the Design Review Panel process. One respondent disagreed with the use of the SPD, another stated that the panel should only apply to major developments.</p> <p>Concerns regarding The Historic Environment Review (HER) evidence base document.</p>

	Requests for New Ash Green (NAG) to be identified in relation to the historic environment.
Relevant Policies	EN1, HEN1, HEN2
Council Response	<p>The Design Review Panel process is set out in the SPD and has been subject to public consultation alongside the Local Plan. Sites will be considered on a case by case basis.</p> <p>The HER is one of a number of documents that informs the Local Plan and is considered a robust evidence base. Comments related to an earlier draft of the document which has since been updated. The policy does not identify specific historic developments and therefore it would be inappropriate to reference NAG.</p>

Table 4.9: Health, Open Space and Climate Change

Main Issue	<ul style="list-style-type: none"> - Industry (KFC) response regarding assumption that hot food takeaways have significant health impacts over other food and drink uses. - Concern regarding air quality monitoring and mitigation and changing national policy - Clarification needed on water consumption target. - Public Rights of Way (PROW) Improvement Plan should be referenced and more account taken of impact on PROW in development schemes. - Additional open space sites, with limited information, were suggested by a Parish Council
Relevant Policies	HE1, CC1, OS1, EN1
Council Response	<ul style="list-style-type: none"> - Policy HE1 seeks Health Impact Assessment on any other uses that could be considered to have a detrimental impact on physical or mental health. - Decision-making can take account of future changes in National Policy. Environmental Health monitor AQMA's as required. The incorporation of new green infrastructure to reduce the causes and effects of climate change is incorporated into Policy EN1. - Minor amendment proposed to clarify water consumption target 'up to 110 litres'. - The design policy EN1 (and appendix 1) ensures that existing public rights of way should be respected and enhanced and the Improvement Plan will be referenced in the evidence base list. - Insufficient information was provided as to the location and extent of the additional open space sites and therefore an assessment cannot be made at this time.

5. Sites - Summary of main issues raised and Council responses

5.1 In terms of the Main Issues that are raised by representations on sites, these are outlined below, together with the Council's response to these Issues. The Main Issues to arise from representations can be broadly grouped under the following areas:

- Housing and Mixed Use sites
 - General (Table 5.1)
 - Minerals Safeguarding (Table 5.2)
 - Infrastructure (Table 5.3)
 - Highways (Table 5.4)
 - Health (Table 5.5)
 - Natural Environment / AONB (Table 5.6)
 - Strategic sites:
 - Sevenoaks Quarry (ST2-13) (Table 5.7)
 - Four Elms Road, Edenbridge (ST2-33) (Table 5.8)
 - Fort Halstead (ST2-57) (Table 5.9)
 - Pedham Place (ST2-28) Broad Location for Growth (Table 5.10)
- Employment sites (Table 5.11)
- Gypsy and Traveller sites (Table 5.12)
- Omissions sites (Table 5.13)

5.2 Overall summaries of the key points raised in the representations in relation to each of the sites are set out in Appendices 2-4.

5.3 The tables below set out each of the main issues identified, a summary of the representations received, the relevant policies and the Council's response.

Table 5.1: Housing and Mixed Use sites – General	
Main Issue	<p>Comments mainly related to support for the non-inclusion of omissions sites or objection to the inclusion of larger sites. The three proposed sites which received the most responses were:</p> <p>ST2-57 – Fort Halstead</p> <p>ST2-60 – Oasis Academy, Hextable</p> <p>ST2-28 – Land at Pedham Place</p> <p>Site ST2-67 – Land south of Noahs Ark, Kemsing also received a large number of comments regarding land availability.</p>
Relevant Policies	ST2

Council Response	<p>For response on ST2-57 – Fort Halstead and ST2-28 – Land at Pedham Place, please see section on strategic sites.</p> <p>Comments on ST2-60 (Oasis Academy, Hextable) focused on the loss of community facilities at the Howard Venue and associated parking. However the Venue and parking is to be retained and this is set out in the proposed allocation. Comments also on transport and access to site.</p> <p>Comments on ST2-67 (Land south of Noahs Ark, Kemsing) focused on land ownership and land availability issues. A modification is now proposed to delete this site from the Plan (22 units).</p> <p>Site ST2-71 – (Rajdani, London Road, West Kingsdown) was withdrawn by the landowner and therefore a modification is proposed to delete this site from the Plan (20 units).</p>
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Table 5.2: Housing and Mixed Use sites - Minerals Safeguarding

Main Issue	Minerals safeguarding issues were raised by KCC and other SE waste and minerals authorities, particularly in relation to the Sevenoaks Quarry site (ST2-13).
Relevant Policies	ST2. ST2-13
Council Response	Tarmac (ST2-13) has confirmed in a statement to Kent County Council that it has no intention of sterilising the resource and stopping mineral operations at Sevenoaks Quarry to develop housing but that the proposals are to be phased alongside and beyond the permitted minerals scheme.

Table 5.3: Housing and Mixed Use sites – Infrastructure

Main Issue	Number of comments raising concerns regarding the impact of proposed development on infrastructure and the potential inability of existing infrastructure to cope with additional population.
Relevant Policies	ST2
Council Response	Kent County Council has provided a detailed summary of the infrastructure requirements resulting from the planned development, which has fed into the Infrastructure Delivery Plan (IDP). The provision of community infrastructure is an integral part of our development strategy and a wide range of facilities, including schools and a hospital, will be delivered on the larger strategic sites.

Table 5.4: Housing and Mixed Use sites – Highways and Transport

Main Issue	Highways England support reduction of traffic impacts through sustainable measures and apply physical highway improvements as a last resort where there remains residual impact on the SRN. Concerns over the cumulative effects of
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	<p>development on the Strategic Road Network (SRN) with the amount of proposed growth in the Plan. This includes M25 Junction 3-5, M20 Junction 1, M26 & A21. Request further information/data to assess modelling and would expect any improvements to be funded by the developer.</p> <p>A number of comments raising concerns regarding congestion and lack of capacity on the public transport as a result of proposed development in the Plan</p> <p>Kent County Council Highways have provided a detailed summary of all sites within the Plan and have outlined the requirements for further details and physical improvements to mitigate any impacts on the local highway network.</p> <p>Transport for London supports the Plan, its aims to increase sustainable transport options and reduce congestion.</p>
Relevant Policies	ST2
Council Response	<p>In relation to the comments from Highways England, further information/data has been sent to Highways England for review. Highways England is working through any infrastructure requirements and mitigation measures required for strategic sites. Kent County Council, as Highways Authority, is reviewing Transport Assessments and working through highways infrastructure requirements and mitigation measures required for strategic sites.</p>

Table 5.5: Housing and Mixed Use sites – Health	
Main Issue	<p>Dartford Gravesham & Swanley CCG noted that developer funding would be required to provide additional GP capacity to support the population growth expected.</p> <p>NHS Property supported the inclusion of the Sevenoaks Hospital site and reconfirmed that redevelopment of the site is subject to the confirmation of health commissioning requirements. They also support inclusion of Edenbridge & District War Memorial Hospital.</p> <p>The Kent Community Health NHS Foundation Trust supports the provision of the integrated health and well-being hub in Edenbridge.</p>
Relevant Policies	ST2, HE1
Council Response	<p>Health and well-being are considered across the policies and sites within this Plan, including through Policy HE1 (Health and well-being).</p> <p>Requirements for medical and GP facilities resulting from the existing and planned development has fed into the Infrastructure Delivery Plan (IDP), and direct developer provision or funding (via S106 or CIL) will be required.</p> <p>Early delivery of the Edenbridge Integrated Health and well-being centre supported through proposed site allocation ST2-34.</p>

Table 5.6: Housing and Mixed Use sites - Natural Environment / AONB

Main Issue	<p>Natural England (NE) agrees with the conclusions of the Habitats Regulations Assessment (HRA) that no adverse effect on the integrity of Ashdown Forest is expected to result from development provided by the Sevenoaks Local Plan, even in combination with other plans and projects.</p> <p>Natural England objects to the allocation of Pedham Place in relation to adverse impact on the AONB.</p> <p>Kent Downs AONB units object to a number of sites within the plan in relation to adverse impact on the AONB including Pedham Place.</p>
Relevant Policies	ST2, ST2-28
Council Response	<p>NE comments on HRA welcomed.</p> <p>NE comments on Pedham Place (broad location for growth) noted. Council has facilitated a NE site visit, which resulted in additional comments, noting that development in areas screened from wider views by existing topography and landform may be of a lesser impact, informed by thorough assessment through the LVIA process, and mitigation and enhancement measures. Site promoter undertaking ongoing work in this area, which is why the site is proposed as a 'broad location for growth' rather than a site allocation (see below).</p> <p>With the exception of Pedham Place, all the sites objected to by the Kent Downs AONB have existing development. The development management process will be used to ensure that the redevelopment of these sites is in accordance with national and local policy.</p>

Table 5.7: Housing and Mixed Use sites - Sevenoaks Quarry

Main Issue	<p>Comments related to the land being in the Green Belt, that the land is still being worked for mineral extraction and it is in the Impact Risk Zone (IRZ) for Greatness Brickworks SSSI. Concerns regarding impact on infrastructure such as GP's, schools or other local amenities raised, together with the congestion at the nearby Bat and Ball road junction.</p> <p>The site has been promoted with a capacity estimate of 600 dwellings, based upon a development area of 20 hectares, at an average density assumption of 30 dwellings per hectare (dph) was assumed. Making the most effective use of land, the promoter has stated that developing the site at 40 dph could increase the overall capacity of the site to 800 dwellings.</p>
Relevant Policies	ST2-13
Council Response	<p>For minerals safeguarding issue, please see Table 5.2 above.</p> <p>Noted that the land is in the Green Belt – it is rated as weakly performing GB in our evidence base, it is land which has been worked, and it is in close proximity to our top tier settlement and bounded by road and rail.</p> <p>Impact on infrastructure noted – the site will accommodate new community</p>

	<p>infrastructure and provide funding towards existing infrastructure. Impact on Bat and Ball junction assessed via TA and being reviewed by KCC as Highways Authority.</p> <p>In relation to the nearby SSSI, Natural England will be consulted on the detailed proposals at the Development Management stage and officers will work with NE and developers to ensure there are no negative impact on the SSSI.</p> <p>Promoter comments re increased density noted. The most efficient use of Green Belt land is supported in principle, but it would need to be demonstrated that this level of development could be accommodated without additional adverse impact.</p>
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Table 5.8: Housing and Mixed Use sites - Four Elms Road, Edenbridge

Main Issue	<p>Recognition that Edenbridge requires a medical centre, and that this is the preferred location.</p> <p>Access should be provided for Town Station Cottages as part of the proposal.</p> <p>Site specific details raised regarding transport and access to site.</p>
Relevant Policies	ST2-33, ST2-34
Council Response	<p>Kent Community Health NHS Foundation Trust publicised its decision (Nov18) to select land east of Bray Road owned by Kent County Council (KCC) as its preferred site for a new medical hub in the Town. Cooper Estates maintains the option to use part of its adjacent land as a site for the medical hub, including in the event that this social and community infrastructure cannot be delivered on the KCC owned part of the site. Statement of Collaboration prepared by joint-landowners to outline masterplan and delivery for the combined site.</p> <p>Masterplan provides access improvements for Town Station Cottages. Local residents will be consulted on the detailed proposals at the Development Management stage and officers will work with all parties to ensure satisfactory access improvements are delivered.</p> <p>Transport and Access issued being considered via TA, in review with Kent County Council as Highways Authority. Site benefits from an existing access and access improvements proposed as part of the scheme.</p>

Table 5.9: Housing and Mixed Use sites - Fort Halstead

Main Issue	<p>Objection of the increase of 300 units / increase in density on the site as already has outline planning permission for 450 units.</p> <p>Consideration should be given to the site location within the AONB.</p> <p>Concerns expressed by local residents regarding the overdevelopment of the surrounding area, the protection of wildlife and the pressure on existing local infrastructure.</p>
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Relevant Policies	ST2- 57
Council Response	<p>Site benefits from outline permission for mixed use employment-led development including 450 units and proposed allocation seeks to increase the number of residential units to 750, to promote the efficient use of land which is subject to Green Belt release.</p> <p>Site is brownfield land and is already well-screened from surrounding area. The development management process will be used to ensure that the redevelopment of the site is in accordance with national and local policy in relation to AONB and wildlife.</p> <p>In relation to the surrounding area, there a number of brownfield or previously developed sites which are considered sustainably located and suitable for development, the largest of which is Fort Halstead. Although the settlement pattern in this area of the District is predominantly villages, they are well-connected by road and rail and have a number of local services, or will provide new community infrastructure.</p> <p>Impact on infrastructure noted – the site will accommodate new community infrastructure and provide funding towards existing infrastructure.</p> <p>Infrastructure providers have inputted into the Local Plan and schemes will be delivered in accordance with the IDP.</p>

Table 5.10: Broad Location for Growth	
Main Issue	<p>A number of comments related to the site at Pedham Place (ST2-28), focusing on traffic/transport and AONB/Green Belt issues and also on the deliverability of this site since it is not proposed as a site allocation, but rather a ‘broad location for growth’, to be re-considered as part of the subsequent Plan review.</p> <p>Comments related to whether this site should be included in Plan, whether it should be removed from the Green Belt and whether it should be considered as part of the housing supply.</p> <p>Promoters outline the need for Pedham Place to be allocated for development, rather than the current proposed designation as a broad location of growth. The promoters state that this change is considered vital to ensuring the plan’s development needs are met as fully as possible.</p>
Relevant Policies	ST2 – 28
Council Response	<p>Pedham Place was identified as a Broad Location for Growth on the basis of the information submitted by the site promoter at the Regulation 18 consultation stage. There are a number of outstanding issues relating to the proposals, for example related to transport and the natural environment and therefore this is considered an appropriate approach for this site. Discussions with all stakeholders will continue up to and during the course of the examination process.</p>

Table 5.11: Employment sites

Main Issue	<p>The policy was generally supported by respondents. Existing sites in AONB that are subject to intensification or regeneration should enhance the AONB.</p> <p>Number of comments on EMP1-28 (Bartram Farm) regarding Green Belt 'Strategic Gap' between Sevenoaks and Otford, including impact on rural environment, biodiversity, noise, air quality and light and actual demand for additional industrial estates.</p>
Relevant Policies	EMP1
Council Response	<p>All but three of the sites are existing employment allocations and AONB comments noted.</p> <p>In relation to Bartram Farm (EMP1-28) it is acknowledged that this site is within the Green Belt. However, it is partially weak performing Green Belt which is strongly bounded by the M26 to the North (which separates the site from Otford) and by rail and road corridors to the East and West. This site is adjacent to the District's largest existing employment site (the Vestry estate) and adjacent to the District's largest settlement (Sevenoaks). Therefore the inclusion of this site is in accordance with our employment strategy and evidence base.</p> <p>The Economic Needs Study identifies the level of employment provision required over the Plan period.</p>

Table 5.12: Gypsy and Traveller Sites

Main Issue	<p>The policy was generally supported by respondents. A number of promoters disagreed with the exclusion of their sites. Some respondents in Edenbridge felt there were too many pitches in Edenbridge. The Kent Downs AONB unit were concerned about sites within the AONB and the potential negative impact.</p>
Relevant Policies	H4
Council Response	<p>In relation to comments regarding a disproportionate level of sites near to Edenbridge, 32 pitches are proposed across 2 sites. However 27 of these are existing pitches (5 are new proposed pitches) and therefore the distribution of provision is largely related to the distribution of existing sites.</p> <p>All Gypsy and Traveller sites will be expected to be in accordance with national and local policy and those within the AONB must be sensitively designed.</p>

Table 5.13: Omissions sites

Main Issue	<p>Large number of comments related to support for the non-inclusion of omission sites. A vast majority of these responses were in relation to Broke Hill Golf Course (MX41), the Which Way Westerham proposal (HO371, HO372, HO373, HO374 and EM17) and Corinthians and Banckside (MX52 and MX53). Representations</p>
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	made by site promoters of omitted sites are also listed under this policy.
Relevant Policies	ST2
Council Response	Comments on omissions sites noted. However these sites do not form part of the Submitted Plan. Site appraisals provide further details as to why these sites were not included in the Regulation 19 Plan.

Appendix 1 – Summary of comments on Policies:

Policy	Number of Comments
ST1 – A Balanced Strategy for Growth in a Constrained District	445
<p><i>Comments related to the proposed, district-wide development strategy, particularly the balance between meeting housing need and Green Belt protection, and the link to infrastructure in making an ‘exceptional circumstances’ case for Green Belt amendment. In considering the Green Belt release, the Council has considered the Green Belt performance, the sustainability of the site (as assessed through the SA), and the infrastructure proposals. A number of comments related to scale/grain of Green Belt Assessment evidence base, which splits the whole district into parcels and classifies them as either strong, moderate or weak performing Green Belt, based on the 5 purposes outlined in national policy (the NPPF). It also identifies 31 weak-performing sub-areas, or (recommended areas’) for potential development. The definition of brownfield land was also raised in several comments, and the re-use of land in a broader sense. A number of respondents proposed a more ‘dispersed’ approach and noted that there are a number of proposed allocation the NW of the District, but this is primarily due to the distribution of existing brownfield land. Similarly, a number of comments were made on Pedham Place, and why it has been identified as a ‘broad location for growth’ rather than a site allocation. Comments also related to the Duty-to-Cooperate process and Statements of Common Ground, which will be submitted with the Local Plan for examination including with authorities which share the HMA. To date, no authorities have been able to assist with unmet housing need, although DTC discussions will continue to progress up to submission.</i></p>	
ST2 – Housing and Mixed Use Site Allocations	1216
<p><i>Comments mainly related to support for the non-inclusion of omission sites to objection to the inclusion of larger sites. A vast majority of these responses were in relation to Broke Hill Golf Course (MX41), the Which Way Westerham proposal (HO371, HO372, HO373, HO374 and EM17) and Corinthians and Bancksides (MX52 and MX53). Representations made by site promoters of omitted sites were also listed under this policy.</i></p>	
H1 – Market and Affordable Housing Mix	17
<p><i>Representations showed strong support for increasing the proportion of smaller units, allowing older people to downsize and first time buyers to move onto the housing ladder. Comments suggested that the Policy should go further to meet the needs of an ageing population. The development industry argues that the requirement to build all new homes to meet the optional technical standard M4(2) for accessible and adaptable dwellings is too restrictive and should be reduced.</i></p>	
H2 – Provision of Affordable Housing	15
<p><i>Representations showed strong support for the provision of affordable housing on new developments. There was some concern that the small sites requirement is contrary to policy.</i></p>	

H3 – Housing in Rural Areas	10
<i>Representations showed strong support for the provision of local needs housing in rural areas. The development industry argues that the limit to the provision of market homes on cross-subsidy sites is too restrictive.</i>	
H4 – Provision of the Gypsy and Traveller Community	12
<i>The policy was generally supported by respondents. The promoter of an omitted greenfield site disagreed with the exclusion of their site. The promoters of 2 omitted sites within the AONB (one with a pending planning application) disagreed with the exclusion of their site from the Local Plan. Some respondents in Edenbridge felt there were too many pitches in Edenbridge. One respondent stated that some sites would be too large and should only accommodate up to 10 pitches. The Kent Downs AONB unit were concerned about sites within the AONB and the potential negative impact.</i>	
H5 – Housing Density	21
<i>Representations showed a mixed response, there was support for the policy but there was also some concern that 60 Dwellings Per Hectare (DPH) is too high. Comments acknowledged that the efficient use of land in built up areas reduces the pressure on the Green Belt.</i>	
EMP1 – Supporting a Vibrant and Balanced Economy	21
<i>The policy was generally supported by respondents. An additional site was promoted for allocation in the Swanley area. The site had been promoted for housing up to this point. The promoters of an omitted greenfield site disagreed with the exclusion of their site. One respondent stated that the policy is too restrictive and that small sites should be allowed to redevelop for housing without any restrictions relating to the existing employment use.</i>	
EMP2 – Town and Local Centres	10
<i>General support for the re-use of retail units to aid the intensification and regeneration of the Local Plan. Clarification on how the retail needs of the District will be met over the Plan period.</i>	
EMP3 – Tourism and Rural Economy	3
<i>There was general support of this policy. Reference was made to the Kent Downs AONB Management Plan.</i>	
T1 – Transport and Infrastructure	48
<i>There was general support for the policy in providing more sustainable transport and delivering infrastructure in support with the appropriate transport partners/providers. However, some views expressed concern on the certainty of when infrastructure will be delivered as part of a scheme. There was support for the provision of electric vehicle</i>	

<i>charging points within new developments.</i>	
LA1 – Landscape and Areas of Outstanding Natural Beauty	13
<i>General support for the policy. Minor changes proposed by Natural England regarding the wording for AONBs. Kent Downs AONB unit requested wording from national policy to be included regarding major developments.</i>	
GB1 – Development in the Green Belt	10
<i>Some comments support the policy and approach to Green Belt. Discriminates against small brownfield sites in the Green Belt which offer less than 5 residential units. No policy beyond residential extensions. Some comments on amending Green Belt boundaries.</i>	
AF1 – Ashdown Forest	1
<i>There was general support for this policy.</i>	
WN1 – Safeguarding Places for Wildlife and Nature	16
<i>There was general support for this policy and for the requirement for net gain in biodiversity.</i>	
EN1 – Design Principles	10
<i>There was general support for this policy. One respondent raised concerns that the Design Review Panel process should be set out in the Local Plan rather than an SPD. Another commented that the Panel should only be used for major developments.</i>	
HEN1 – Historic Environment	7
<i>There was general support for this policy. Requests for New Ash Green to be identified in chapter/policy. Concerns regarding The Historic Environment Review for Sevenoaks District.</i>	
HEN2 – Heritage Assets	5
<i>There was general support for this policy. Concerns regarding The Historic Environment Review for Sevenoaks District.</i>	
HE1 – Health Wellbeing and Air Quality	6
<i>There was some support for this policy. Policy assumes hot food takeaways have significant health impacts over other food and drink uses. Concern regarding air quality monitoring and mitigation.</i>	
CC1 – Climate Change, Flooding and Water Management	7
<i>There was general support for this policy. Clarification needed on water consumption target.</i>	
OS1 – Open Space, Sport and Leisure	14

There was general support for this policy. KCC Public Rights of Way Team request for the Improvement Plan to be referenced. Some additional sites have been suggested by a Parish Council however insufficient information was provided as to the location and extent and therefore an assessment cannot be made at this time.

Appendix 2 – Summary of comments on Housing and Mixed Use Site Allocations

ST2 Site	Number of Comments
1 – Delivery and Post Office / BT Exchange, South Park, Sevenoaks	2
<i>Comments were in support of this site. Site specific details raised regarding transport and access to site.</i>	
2 – 5 Crownfields, Sevenoaks	2
<i>Comments were in support of this site. Site specific details raised regarding transport and access to site.</i>	
3 – 15 St Botolphs Road, Sevenoaks	2
<i>Comments were in support of this site. Site specific details raised regarding transport and access to site.</i>	
4 – School House, Oak Lane and Hoggarden Lane, Sevenoaks	2
<i>Comments in support of site, although showed concern for number of dwellings allocated to this site in the Local Plan. Site specific details raised regarding transport and access to site.</i>	
5 – Johnsons, Oak Lane and Hoggarden Lane, Sevenoaks	1
<i>Comments were in support of site. Site specific details raised regarding transport and access to site.</i>	
6 – Sevenoaks Hospital, Hospital Road, Sevenoaks (replacement facilities to serve the local community to be provided on-site or nearby as part of any redevelopment scheme)	5
<i>Comments raised objections to the inclusion of this site in the Local Plan, due to the loss of the hospital in Sevenoaks. It was suggested that a new site be bought forward for replacement facilities. Site lies within an Impact Risk Zone (IRZ) for Sevenoaks Gravel Pits SSSI. Site specific details raised regarding transport and access to site.</i>	
7 – Sevenoaks Community Centre, Otford Road, Sevenoaks	3
<i>Comments objected to the loss of community facilities, and highlighted air pollution issues at the Bat and Ball junction. Site lies within an Impact Risk Zone (IRZ) for Sevenoaks Gravel Pits SSSI. Site specific details raised regarding transport and access to site.</i>	
8 – Cramptons Road Water Works, Sevenoaks	2
<i>Site lies within an Impact Risk Zone (IRZ) for Sevenoaks Gravel Pits SSSI. Site specific details raised regarding transport and access to site.</i>	

9 – Sevenoaks Gasholders, Cramptons Road, Sevenoaks	3
<i>Site lies within an Impact Risk Zone (IRZ) for Sevenoaks Gravel Pits SSSI. Site specific details raised regarding transport and access to site.</i>	
10 – Sevenoaks Town Council Offices, Bradbourne Vale Road, Sevenoaks	2
<i>Site lies within an Impact Risk Zone (IRZ) for Sevenoaks Gravel Pits SSSI. Site specific details raised regarding transport and access to site.</i>	
11 – Sevenoaks Adult Education Centre, Bradbourne Road, Sevenoaks	6
<i>Comments objected to the loss of community facilities, and also raised concerns for infrastructure provision, particularly the road network and congestion. Site specific details raised regarding transport and access to site.</i>	
13 – Sevenoaks Quarry, Bat and Ball Road, Sevenoaks	22
<i>Concerns that the site is in the Impact Risk Zone (IRZ) for Greatness Brickworks SSSI. The land is Green Belt land and should not be developed. Concerns that the site is still in use and should only be developed when surplus to requirement. Concerns that there is no provision for infrastructure such as GP's, schools or other local amenities. The congestion at Bat and Ball junction is highlighted in responses. Site specific details raised regarding transport and access to site.</i>	
15 – Chaucers of Sevenoaks, London Road, Dunton Green	3
<i>Consideration should be given to the sites location within the AONB. Site specific details raised regarding transport and access to site.</i>	
16 – Swanley Centre, Nightingale Way, Swanley	20
<i>Comments objected to this site due to concerns for already congested roads and pressure on existing local infrastructure. Comments referred to a Planning Application for the site currently undergoing an appeal. Concerns that too many units are proposed. Site specific details raised regarding transport and access to site.</i>	
17 – Bevan Place, Swanley	10
<i>Although comments appreciate the need for new housing, there were concerns that the proposed allocation for this site is too high. Concerns for pressure on existing local infrastructure. Site specific details raised regarding transport and access to site.</i>	
18 – Bus Garage and Kingdom Hall, London Road, Swanley	11
<i>Concerns that the proposed allocation for this site is too high. Concerns for pressure on existing local infrastructure. Site specific details raised regarding transport and access to</i>	

<i>site.</i>	
19 – The Woodlands, Hilda May Avenue, Swanley	7
<i>Concerns for pressure on existing local infrastructure. Site specific details raised regarding transport and access to site.</i>	
20 – White Oak Leisure Centre, Hilda May Avenue, Swanley (as part of a leisure centre replacement programme)	13
<i>Concerns for the loss of a community and leisure facility. Need for a replacement facility to be provided, including a swimming pool. Site specific details raised regarding transport and access to site.</i>	
21 – Land between 16 and 32 Alder Way, Swanley	10
<i>Retention or diversion of Public Right of Way (PRoW) required. Concerns for how existing local infrastructure will cope with development allocations in the Local Plan, in particular the existing road network and congestion. Site specific details raised regarding transport and access to site.</i>	
22 – Former Birchwood Primary School, Russett Way, Swanley	5
<i>Concerns over lack of infrastructure, in particular education provision, given the cumulative impact of the development allocations in the Local Plan. Site specific details raised regarding transport and access to site.</i>	
23 – Upper Hockenden Farm, Hockenden Lane, Swanley	3
<i>Concern for how the existing local infrastructure will cope with the proposed development, particularly the road network and effect on congestion. Site specific details raised regarding transport and access to site.</i>	
24 – Harringtons Nursery, Highlands Hill, Swanley	7
<i>Concerns for impact on congestion in Swanley. Existing local infrastructure is inadequate to cope with development. Site specific details raised regarding transport and access to site.</i>	
25 – Swanley Village Nursery, Swanley Village Road, Swanley Village	7
<i>Comments in support of site. Comments objecting to site with concerns about the pressure on existing local infrastructure, in particular GP's and congestions. Concerns that the land is not brownfield. Site specific details raised regarding transport and access to site.</i>	
26 – Land rear of Cedar Lodge, Wood Street, Swanley Village	6
<i>Comments in support of site. Suggestion to include land parcel adjacent to site for development. Concerns for pressure on existing local infrastructure, in particular GP's and</i>	

<i>congestion. Site specific details raised regarding transport and access to site.</i>	
27 – Land south of Wood Street, Swanley Village	5
<i>Comments in support of site. Concerns for pressure on existing local infrastructure, in particular GP's and congestion. Site specific details raised regarding transport and access to site.</i>	
28 – Land at Pedham Place	155
<i>Concerns for pressure on existing local infrastructure, in particular the road network around Pedham Place and into Swanley. Objection that the proposals meet the 'Exceptional Circumstances' test. Concerns that development should not take place on greenfield Green Belt land and in an Area of Outstanding Natural Beauty. Concerns that the development would encroach on Farningham and Eynsford. The character and views of the area would be spoilt. Site specific details raised regarding transport and access to site.</i>	
29 – Station Approach, Edenbridge	3
<i>General support for site as this is brownfield land. Suggestion to consider site solely for residential development. Site specific details raised regarding transport and access to site.</i>	
30 – Open space at Stangrove Estate, Crouch House Road, Edenbridge	50
<i>Concerns for loss of recreation and open space. Concerns on pressure of existing local infrastructure, in particular the impact on parking and the road network. Site specific details raised regarding transport and access to site.</i>	
31 – Kent and Surrey Driving Range, Crouch House Road, Edenbridge	6
<i>Concerns for the loss of a leisure/recreation facility in Edenbridge. Objection to building on Green belt land. Lack of infrastructure to support development, in particular public transport and the surrounding road network. Site specific details raised regarding transport and access to site.</i>	
32 – Edenbridge and District War Memorial Hospital, Mill Hill, Edenbridge	7
<i>Support for redevelopment of site, medical centre to be re-provided at the Four Elms Road site. Heritage aspect of hospital should be protected. Concerns for ownership of land. Site specific details raised regarding transport and access to site.</i>	
33 – Land South of Four Elms Road, Edenbridge	25
<i>Recognition that Edenbridge requires a medical centre, and that this is the preferred location, however there are concerns for accessibility. Access should be provided for Town Station Cottages as part of the proposal. Site specific details raised regarding transport and</i>	

<i>access to site.</i>	
34 – Land east of Bray Road, Edenbridge	25
<i>Recognition that Edenbridge requires a medical centre, and that this is the preferred location, however there are concerns for accessibility. Access should be provided for Town Station Cottages as part of the proposal. Site specific details raised regarding transport and access to site.</i>	
35 – Currant Hill Allotments, Westerham	6
<i>Consideration should be given to the sites location within the AONB. Concerns for the loss of community facilities and school playing fields. Site specific details raised regarding transport and access to site.</i>	
36 – Land between Granville Road and Farleycroft, Westerham	4
<i>Consideration should be given to the sites location within the AONB. Concerns on access capability of site. Site specific details raised regarding transport and access to site.</i>	
37 – New Ash Green Village Centre, New Ash Green	39
<i>Concerns relating to the architectural character of New Ash Green. Suggestion that any redevelopment should retain the original character. Concerns for the negative impact on existing local infrastructure. Site specific details raised regarding transport and access to site.</i>	
38 – The Manor House, North Ash Road, New Ash Green	43
<i>Concerns for the increase in traffic which would result from this development. Concerns for the pressure on infrastructure, in particular the existing road network, schools and medical facilities.</i>	
39 – The Forge, Ash Road, Ash	18
<i>Further development of New Ash Green will put a strain on local infrastructure, in particular the road network, congestion and parking as well as GP's. Site specific details raised regarding transport and access to site.</i>	
40 – Oast House Nursery, Ash Road, Ash	14
<i>Concerns that the site is horticultural use in the Green Belt and there is no case for very special circumstances. Careful consideration should be given to the number of units and the style of development. Site specific details raised regarding transport and access to site.</i>	
41 – Otford Builders Merchants, High Street, Otford	4
<i>Support for allocation of site. Consideration should be given to the sites location within the AONB.</i>	

42 – Land south of Orchard House, Ash Road, Hartley	6
<i>Concerns regarding the pressure on existing local infrastructure, in particular the road network and public transport provision. Site specific details raised regarding transport and access to site.</i>	
43 – Chelsfield Depot, Shacklands Road, Badgers Mount	7
<i>Consideration should be given to the sites location within the AONB. Concerns regarding the lack of infrastructure to support development, in particular public transport. Concerns that the density of the site is too high.</i>	
44 – Land west of the roundabout, London Road, Badgers Mount	3
<i>Consideration should be given to the sites location within the AONB. Concerns that density of site is too high.</i>	
45 – Calcutta Club and Polhill Business Centre, London Road, Badgers Mount	8
<i>Consideration should be given to the sites location with regards to the AONB. Concerns that density is too high. Site specific details raised regarding transport and access to site.</i>	
46 – Highways Depot, Tonbridge Road, Chiddingstone Causeway	3
<i>There was general support for this site allocation. Concerns that density is too high.</i>	
47 – Land rear of Brickyard Cottages, Tonbridge Road, Chiddingstone Causeway	6
<i>Consideration should be given to the sites location with regards to the AONB. Concerns that a section of the Chiddingstone Old Clay Pits Local Wildlife Site is within the site boundary.</i>	
48 – Middle Farm Nursery, Cray Road, Crockenhill	63
<i>Consideration should be given to the sites location within the AONB. Concerns that the land is not brownfield land and should not be developed. Objection due to the pressure on existing local infrastructure, in particular the road network and traffic. Site specific details raised regarding transport and access to site.</i>	
49 – Wested Farm, Eynsford Road, Crockenhill	43
<i>Concerns that the land is not brownfield land and should not be developed. Concerns for pressure on existing local infrastructure, in particular public transport, the road network and pedestrian routes. Site specific details raised regarding transport and access to site.</i>	
50 – Gorse Hill Nursery, Gorse Hill, Farningham	7
<i>Site specific details raised regarding transport. Concern that density is too high and that the site is rural and isolated from local amenities. Concerns for local infrastructure, in particular</i>	

<i>GP's.</i>	
51 – Maplescombe Farm, Maplescombe Lane, Farningham	3
<i>Concerns for access to site, and accessibility for pedestrians, cyclists and other modes of sustainable transport. Concerns for infrastructure, in particular public transport and GP's. Concerns that the site would cause harm to the AONB setting.</i>	
52 – Fawkham Business Park, Fawkham Road, Fawkham	26
<i>Concerns for the loss of employment land on the site. Concerns for existing local infrastructure, in particular the surrounding road network and effect on traffic. Concerns for the effect on the adjacent Green Belt land.</i>	
53 – Grange Park Farm, Manor Lane, Fawkham	41
<i>Concerns for the pressure on existing local infrastructure, in particular the access to the site, the surrounding road network and the impact on equestrian use of the area. Site specific details raised regarding transport and access to site.</i>	
54 – Highfield Farm and Knocka Villa, Crow Drive, Halstead	5
<i>Consideration should be given to the sites location within the AONB.</i>	
55 – Deer Leap Stud Farm, Knockholt Road, Halstead	4
<i>Concerns for infrastructure, in particular the increase in traffic and access to site. Concerns density is too high.</i>	
56 – Oak Tree Farm, London Road, Halstead	2
<i>Access to site requires widening. Concerns over distance from site to local services. Suggestion that density should be low to reflect local character. Site specific details raised regarding transport and access to site.</i>	
57 – Fort Halstead, Crow Drive, Halstead	352
<i>Consideration should be given to the site's location within the AONB. Concerns for the overdevelopment of land parcel 76, the protection of wildlife, the pressure on existing local infrastructure and the proposed housing density of the site. Objection of the increase of 300 units on the site as 450 already have outline planning permission. Site specific details raised regarding transport and access to site.</i>	
58 – College Road Nurseries, College Road, Hextable	11
<i>Suggestion to incorporate wider site area in allocation. Improvements to infrastructure, in particular the road network, are needed as part of this proposal. Site specific details raised regarding transport and access to site.</i>	

59 – Egerton Nursery, Egerton Avenue, Hextable	30
<i>Suggestion that the wider site boundary should be allocated in the Local Plan. Concerns for pressure on existing local infrastructure, in particular the surrounding road network and congestion. Site specific details raised regarding transport and access to site.</i>	
60 – Oasis Academy, Egerton Avenue, Hextable	226
<i>Concerns for the loss of community facilities at the Howard Venue. Concerns for parking provision. Concerns for impact on surrounding road network. Site specific details raised regarding transport and access to site.</i>	
61 – Rowhill Farm, Top Dartford Road, Hextable	3
<i>Concerns for impact on existing local infrastructure, in particular GP's and the surrounding road network. Site specific details raised regarding transport and access to site.</i>	
62 – Top Dartford Road, Hextable	3
<i>Concerns for how existing infrastructure, in particular the road network ad GP services, would cope with the proposed allocations in the Local Plan. Density and number of units too high for site. Site specific details raised regarding transport and access to site.</i>	
63 – Gills Farm, Gills Road, South Darent	3
<i>Concerns for impact on local equine community. Concerns for pressure on existing local infrastructure, in particular the surrounding road network and public transport. Site specific details raised regarding transport and access to site.</i>	
64 – Land at Oakview Stud Farm, Lombard Street, Horton Kirby	5
<i>Concerns that the site is not brownfield land. Site specific details raised regarding transport and access to site.</i>	
65 – The Cottage, Holmesdale Road, South Darent	7
<i>Concerns for pressure on existing local infrastructure, in particular the road network, traffic and access to site. Site specific details raised regarding transport and access to site.</i>	
66 – Land south of West End, Kemsing	14
<i>Concerns that the site is not brownfield and will result in urban sprawl. Increased noise, air and light pollution. Site specific details raised regarding transport and access to site.</i>	
67 – Land south of Noahs Ark, Kemsing	89
<i>Responses on this site highlighted landownership issues. Consideration should be given to the sites location with regards to the AONB. Responses also had concerns for flooding and the pressure on existing local infrastructure, in particular the surrounding road network and</i>	

<i>school provision. Site specific details raised regarding transport and access to site.</i>	
68 – Meadow Cottage, Goathurst Common, Ide Hill	7
<i>Concerns that site is located within the Green Belt and is adjacent to a SSSI. Consideration should be given to the sites location within the AONB. Site specific details raised regarding transport and access to site.</i>	
69 – JD Hotchkiss Ltd, London Road, West Kingsdown	3
<i>Objection to site regarding the loss of employment. Site specific details raised regarding transport and access to site.</i>	
70 – Florence Farm Mobile Home Park, Main Road, West Kingsdown	4
<i>Suggestion that site should be allocated for affordable housing only. Site specific details raised regarding transport and access to site.</i>	
71 – Rajdani, London Road, West Kingsdown	2
<i>Site no longer available for allocation in the Local Plan.</i>	
72 – Terrys Lodge Farm, Terrys Lodge Road, Wrotham	4
<i>Consideration should be given to the sites location within the AONB. Site specific details raised regarding transport and access to site.</i>	

Appendix 3 - Summary of comments on Employment Allocations

EMP1 Sites	Number of Comments
1 – Vestry Road, Sevenoaks	0
<i>There were no responses on this site.</i>	
2 – Bat and Ball Enterprise Centre, Sevenoaks	0
<i>There were no responses on this site.</i>	
3 – British Telecom, Sevenoaks	0
<i>There were no responses on this site.</i>	
4 – Erskine House, Sevenoaks	0
<i>There were no responses on this site.</i>	
5 – Hardy’s Yard, Riverhead	0
<i>There were no responses on this site.</i>	
6 – High Street, Sevenoaks	0
<i>There were no responses on this site.</i>	
7 – London Road, Sevenoaks	0
<i>There were no responses on this site.</i>	
8 – Morewood Close, Sevenoaks	1
<i>The current landowner wishes for the employment allocation to be removed.</i>	
9 – South Park, Sevenoaks	0
<i>There were no responses on this site.</i>	
10 – Lime Tree Walk, Sevenoaks	0
<i>There were no responses on this site.</i>	
11 – Wested Lane Industrial Estate, Swanley	1
<i>Additional requirement in Design Guidance - Any intensifications or regeneration of the site shall enhance the AONB in its design, scale and materials.</i>	
12 – Swanley Town Council Offices, Swanley	0

<i>There were no responses on this site.</i>	
13 – Swan Mill, Goldsel Road, Swanley	1
<i>Concerns that infrastructure would not cope with allocation.</i>	
14 – Media House, Swanley	0
<i>There were no responses on this site.</i>	
15 – Moreton Industrial, Swanley	0
<i>There were no responses on this site.</i>	
16 – Park Road Industrial Estate, Swanley	0
<i>There were no responses on this site.</i>	
17 – Southern Cross Industrial Estate, Swanley	1
<i>Additional requirement in Design Guidance – Any intensification or regeneration of the site shall enhance the AONB in its design, scale and materials.</i>	
18 – Teardrop Industrial Estate, Swanley	1
<i>Additional requirement in Design Guidance – Any intensification or regeneration of the site shall enhance the AONB in its design, scale and materials.</i>	
19 – The Technology Centre, Swanley	0
<i>There were no responses on this site.</i>	
20 – Broom Hill, Swanley	1
<i>Concerns that the land is Green Belt.</i>	
21 – Station Road, Edenbridge	1
<i>Amount of development in Edenbridge ST2-33 and EMP1-21 is likely to have an impact upon the rail network.</i>	
22 – Edenbridge/Warsop Trading Centre	0
<i>There were no responses on this site.</i>	
23 – Westerham Trading Centre, Westerham	3
<i>Consideration should be given to the site’s location within the AONB. Additional requirement in Design Guidance – Any intensification or regeneration of the site shall enhance the AONB</i>	

<i>in its design, scale and materials.</i>	
24 – Blue Chalet Industrial Park, West Kingsdown	2
<i>Consideration should be given to the site's location within the AONB. Additional requirement in Design Guidance – Any intensification or regeneration of the site shall enhance the AONB in its design, scale and materials.</i>	
25 – West Kingsdown Industrial Estate, West Kingsdown	0
<i>There were no responses on this site.</i>	
26 – Horton Kirby Trading Estate, South Darenth	0
<i>There were no responses on this site.</i>	
27 – Sevenoaks Garden Centre, Main Road, Sevenoaks	9
<i>Consideration should be given to the site's location within the AONB. Concerns for infrastructure, loss of Green Belt and other site constraints. Suggestions for further design guidelines.</i>	
28 – Bartram Farm, Old Otford Road, Sevenoaks	66
<i>Concerns that this proposal will impact on the Strategic Gap between Sevenoaks and Otford. The land is Green Belt. Negative impact on rural environment, biodiversity, noise, air quality and light. No demand for additional industrial estates – already room on Vestry Estate.</i>	
29 – Former Park and Ride, Otford Road, Sevenoaks	3
<i>Recognised that the site is within the Impact Risk Zone (IRZ) for Sevenoaks Gravel Pits SSSI.</i>	
30 – North Downs Business Park, Dunton Green	1
<i>Consideration should be given to the site's location within the AONB.</i>	
31 – Chaucer Business Park, Kemsing	1
<i>Consideration should be given to the site's location within the AONB.</i>	

Appendix 4 – Summary of comments on Gypsy and Traveller Site Allocations

H4 Sites	Number of Comments
1 – Bournewood Brickworks, Stones Cross Road, Crockenhill	7
<i>Infrastructure and Green Belt concerns.</i>	
2 – Early Autumn, East Hill, Shoreham	3
<i>Consideration should be given to the sites location within the AONB. Concern that the site has no room for additional pitches.</i>	
3 – St George’s Stables, Well Hill, Shoreham	3
<i>Consideration should be given to the sites location within the AONB. Concern that site is not close to existing services.</i>	
4 – Station Court, London Road, Halstead	0
<i>There were no responses on this site.</i>	
5 – Alexis Place, Hockenden Lane, Swanley	1
<i>No objection to increasing the capacity of this site.</i>	
6 – Knatts Valley Caravan Park, Knatts Valley Road, West Kingsdown	4
<i>Consideration should be given to the sites location within the AONB. Concerns that the number of pitches proposed is too high and lack of infrastructure.</i>	
7 – Hollywood Gardens, School Lane, West Kingsdown	2
<i>Consideration should be given to the sites location within the AONB. Concerns about overdevelopment.</i>	
8 – Fordwood Farm, New Street Road, Ash	0
<i>There were no responses on this site.</i>	
9 – Seven Acre Farm, Hever Road, Edenbridge	4
<i>Concerns that the site does not currently have any permission.</i>	
10 – Park Lane Farm, Park Lane, Swanley	2
<i>Objection to the expansion of this site, and concerns over effect on Green Belt land. Concerns that allocation is contrary to planning permission.</i>	

11 – Land south west of Broomhill, Button Street, Farningham	0
<i>There were no responses on this site.</i>	
12 – Land west of Romani Way, Edenbridge	4
<i>Landowner considers the wider mixed use site should be allocated in Local Plan. Disproportionate to scale of town. Site specific issues.</i>	