

Sevenoaks District Local Plan

Employment and Retail

Topic Paper

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Introduction

The key purpose of this paper to show how the policies within the Local Plan Chapter 3 – ‘Supporting a Vibrant and Balanced Economy’ have been produced and evidenced.

This paper will:

- Set out the relevant policy context both locally and nationally
- Summarise the evidence including need requirements up to 2035
- Give a brief summary and analysis of the consultation responses including from key technical specialists and stakeholders
- Set out the Local Plan Strategy and how the policies were developed

This report is structured by each of the policies included in Chapter 3:

Policy EMP1 - Supporting a Vibrant and Balanced Economy

This policy sets out the approach to non-residential development across the District including redevelopment of existing employment sites, retention of identified employment land and allocation of new employment land to meet the District’s needs up to 2035.

Policy EMP2 - Town and Local Centres

This policy sets out the approach to how the retail needs of the District will be met up to 2035 by focusing on the main town and local centres through regeneration, retention and bring vacant units back into use. The policy also looks to protect against the loss of community uses including school and community buildings.

Policy EMP3 - Tourism and Visitor Economy

This policy sets out how the tourist and visitor economy in the District will be maintained and strengthened up to 2035.

Background and Policy Context

Employment Land (EMP1)

National Context

The National Planning Policy Framework (NPPF) sets out policy for “Building a strong competitive economy” in Chapter 6.

Paragraph 81 states that:

“Planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”*

Paragraph 83 refers to the rural economy and states:

“the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”

The NPPF also states in paragraph 84:

“The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”

Local Context

The current local policy for employment land is Policy SP8 (Economic Development and Land for Business) of the Core Strategy and Policies EMP1-5 in Chapter 4 of the Allocations and Development Management Plan (ADMP).

Policy SP8 and EMP1 (Land for Business) and EMP2 (Major Developed Employment Sites in the Green Belt) protect allocated employment land (over 0.2ha) from redevelopment unless certain tests are met. These tests include marketing evidence for a period of 12 months, and viability and market evidence that there is “no reasonable prospect of their take up or continued use for business purposes during the Core Strategy period”.

ADMP policies EMP3 and EMP4 are site specific policies relating to Fort Halstead and Broom Hill respectively.

Policy EMP5 (Non-allocated Employment Sites) sets out that employment uses on unallocated employment land will also be protected unless certain conditions are met, however the tests are less stringent than for allocated sites.

Since the beginning of the Core Strategy Plan Period there has been an overall loss of employment floorspace despite the rise in population.

The District has lost 57,375 m² of employment floorspace across the District since 2008-09.

	Change in employment floorspace (m²)*
2008-09	+ 1478
2009-10	+ 1452
2010-11	- 1511
2011-12	+ 3155
2012-13	- 1733
2013-14	- 4415
2014-15	- 21,490
2015-16	- 13,909
2016-17	- 12,605
2017-18	- 7797
TOTAL	- 57,375

* Authority Monitoring Report data

These losses have ranged from changes of use of small sites to significant losses in office accommodation due to the changes in permitted development rights to allow office to residential conversions.

	B1a office space lost to residential via PD (m²)
2014-15	5379
2015-16	11,202*
2016-17	70
2017-18	1270
TOTAL	17,921

* Includes loss at Tubs Hill House

Town and Local Centres (EMP2)

National Context

The NPPF sets out policy for “Ensuring the vitality of town centres” in Chapter 7.

Paragraph 85 states that:

Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
- b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
- c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
- d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
- e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*
- f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.*

Paragraph 86 and 87 refers to the sequential test when considering town centre uses:

Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. (NPPF para. 86)

When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local

planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored. (NPPF para. 87)

Paragraph 89 sets out how the sequential test should be applied:

When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:

a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and

b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Furthermore, the Government recently consulted on changes to Permitted Development Rights in early 2019 specifically in relation to A1 (retail), A2 (financial and professional services), A5 (hot food takeaways) or other uses (Sui Generis) to become B1(a) office accommodation. These changes come into force from 25 May 2019. At the time of writing this topic paper, it is unclear how this may affect the vitality and viability of town and local centres during the new Plan period (up to 2035), but the Council will consider the future application of Article 4 Directions in relation to town centre uses.

Local Context

The current local policy for town and local centres is within Policies LO1, LO3, LO5, LO6 and LO7 of the Core Strategy and Policies TLC1-4 in Chapter 5 of the Allocations and Development Management Plan.

Policies LO3 and TLC1 are site specific to Sevenoaks town centre.

Policies LO5 and TLC2 are site specific to Swanley town centre.

Policies LO6 and TLC3 are site specific to Edenbridge town centre.

Policies LO7 and TLC4 set out policy relating to named local, village and neighbourhood centres across the District. It also provides protection for any loss in day-to-day facilities and services which serve the existing community.

All town and local centres have been performing well since the beginning of the Core Strategy period, with a majority of units being within an A1 retail use. The table below sets out the historic trends of units remaining within A1 use:

	Primary Frontage Target	2014/15	2015/16	2016/17	2017/18	2018/19
Sevenoaks	70%	71%	69%	69%	69%	69%
Swanley	70%	80%	79%	80%	80%	80%
Edenbridge	45%	51%	50%	50%	48%	48%

There has been a fluctuation in retail floor space across the District as recorded in the Annual Monitoring Reports. This is due to a number of applications coming forward to provide additional floor space (such as Waitrose in Sevenoaks Town). However, any loss in retail floor space has been through permitted development rights where A1 units are lost to other A Class uses (A2, A3, A4 and A5) or C3 residential use.

Tourism and Visitor Economy (EMP3)

National Context

The NPPF paragraph 83 identifies tourism as an important part of the rural economy. It states that planning policies should enable “*sustainable rural tourism and leisure developments which respect the character of the countryside;*”

Local Context

The current local policy for Tourism and Visitor Economy is Policy SP8 (Economic Development and Land for Business) of the Core Strategy (2011) and Policies LT1 (Tourist Accommodation and Visitor Attractions) and LT3 (Brands Hatch) of the Allocations and Development Management Plan (2015).

Policy SP8 (Economic Development and Land for Business) gives priority to tourist facilities in the conversion of buildings in rural areas, and promotes hotel development in suitable locations in Sevenoaks and Swanley.

Policy LT1 (Tourist Accommodation and Visitor Attractions) recognises the benefits of tourist accommodation and facilities for the local economy, as well as protecting tourist accommodation and visitor attractions from conversion to non-tourist uses.

Policy LT3 (Brands Hatch) is a site specific policy.

Tourism is a major contributor to economic viability and growth in Sevenoaks, with the industry worth over £230 million to the local economy and supporting over 4,500 jobs.

As of 2016, Sevenoaks District was home to 28 tourist attractions, comprising of:

- Castles: Chiddingstone Castle, Eynsford Castle, Hever Castle, Lullingstone Castle and Gardens
- Historic Houses and Stately Homes: Chartwell, Ightham Mote, Knole House, Penshurst Place and Gardens, Quebec House, Squerryes Estate
- Museums: Eden Valley Museum, Otford Heritage Centre, Shoreham Aircraft Museum
- Heritage Sites: Lullingstone Roman Village
- Vineyards and Breweries: Mount Vineyard, Westerham Brewery Company Ltd (Grange Farm)
- Community Arts Centre: The Stag Community Arts Centre, Cinema and Theatre
- Active and Outdoors: Brands Hatch Circuit, Eagle Heights
- Farms and Local Producers: Bore Place, The Hop Shop at Castle Farm
- Gardens: Chart Edge Gardens, Emmetts Garden, Riverhill Himalayan Gardens
- Walks and Open Spaces: Kent Wildlife Trust (Bough Beech), Kent Wildlife Trust (Sevenoaks Wildlife Reserve), Haysden Country Park, Lullingstone and Preston Hill

Since 2014/15 there have been 10 Planning Applications granted for tourist accommodation, and 6 for tourist attractions. There has been no net loss of tourist facilities since 2014/15 in Sevenoaks District.

In 2017, visits to Sevenoaks increased by 8.5% compared to 2015 figures, with the District welcoming 4.3 million visitors during the year.

Evidence Base

Employment Land (EMP1)

The Economic Needs Study (ENS) was published in September 2016. It was prepared jointly for Sevenoaks District and Tunbridge Wells Borough by Turley in associate with Colliers.

The Study included:

- Identifying the Functional Economic Market Area (FEMA)
- The Economic Baseline of the District
- Market context and performance
- The need for additional employment land up to 2035
- Assessments of existing allocated employment sites
- Policy recommendations

The main findings of the study were:

- The District shares a FEMA with the Boroughs of Tunbridge Wells and Tonbridge and Malling.
- The majority of the Districts employment stock ageing and is centred around Sevenoaks Town and Swanley with a distribution of small premises within rural areas.
- The vacancy rate for office accommodation is very low across the District and the loss of office floorspace has been exacerbated by the changes to permitted development rights.
- Key barriers to growth include the limited availability of land to meet demand, significant demand for land for residential development, poor availability and reliability of digital infrastructure in rural area, and transport and accessibility issues.
- The employment land need up to 2035 is:

Total Need	B1a/b	B1c/B2	B8
11.6ha	7.2ha	1.1ha	3.3ha

- Policy recommendations:
 - There is a strong qualitative and quantitative case for retaining existing employment areas
 - Allocate additional land to accommodate the Districts future needs in areas with good transport links, close to main arterial roads, and where

there is an existing critical mass of employment uses and amenities which are attractive to investors and occupiers

- Using the council's own land holdings to build speculative developments to attract inward investment.

Town and Local Centres (EMP2)

The Retail Study was published in November 2016. It was prepared for Sevenoaks District by GVA Bilfinger.

The Study included:

- Establishing the Retail baseline of the District including an assessment of the District's main town, local and neighbourhood centres
- Market context and performance including the influence of retail destinations outside of the District (excluding central London) and the impacts of online shopping on the High Street
- The need for additional convenience (food) and comparison (non-food) retail floor space up to 2035
- Policy considerations

The main findings of the Study were:

- The retail market area extends beyond the District boundaries depending on where residents choose to shop and what type of retail they are looking for
- Both comparison (non-food) and convenience (food) retail is performing well within the District but highlights the retail offer to the District is polarised with expenditure being drawn to retail locations outside of the District (i.e. Bluewater to the north, and Royal Tunbridge Wells to the south).
- Overall, despite the unsettled economic outlook in recent years, retail in the Sevenoaks District has performed rather well.
- The Retail needs of the District up to 2035 are:

Comparison (non-food) Goods Floorspace				
	2020	2025	2030 (indicative)	2035 (indicative)
Sevenoaks	3,100	7,200	12,100	17,100
Swanley	400	800	1,400	2,000
Edenbridge	300	600	1,000	1,400
Local Service Centres	200	500	900	1,200
Total	3,900	9,100	15,300	21,700
<i>Please note that the figures in this table have been rounded and therefore may not add up correctly. Please refer to the Retail Study report and appendices for further information.</i>				

Convenience (food) Goods Floorspace				
	2020	2025	2030 (indicative)	2035 (indicative)
Sevenoaks	5,200	5,700	6,200	6,500
Swanley	1,100	1,300	1,400	1,600
Edenbridge	800	900	1,000	1,000
Local Service Centres	1,100	1,200	1,200	1,300
Total	8,200	9,100	9,800	10,400
<i>Please note that the figures in this table have been rounded and therefore may not add up correctly. Please refer to the Retail Study report and appendices for further information.</i>				

- Policy considerations
 - Direct all developments of new retail & town centre uses to town centres as prescribed in the NPPF.
 - Focus new non-food development in Sevenoaks and Swanley town centres and resist open A1 use outside of defined centres.
 - For **Sevenoaks Town** considerations included focusing on the provision of non-food floor space, but recognise that there is no requirement for additional convenience goods floorspace

- For **Swanley** considerations included supporting proposals that could regenerate the town centre
- For **Edenbridge** considerations included supporting the role and function of Edenbridge as a rural service centre should be protected and enhanced over the new Local Plan period. It also recommended A qualitative need for additional supermarket provision should be provided in the town centre, at an appropriate scale and location.
- For **Neighbourhood Centres** considerations included Protecting the function and role that the local service centres provide to local communities and that the day to day shopping needs of the villages are maintained

Tourism and Visitor Economy (EMP3)

Sevenoaks District Tourist Accommodation Study

The **Sevenoaks District Tourist Accommodation Study** was published in September 2015. It was prepared for Sevenoaks District by Hotel Solutions.

The Study included:

- A detailed audit of the current supply of all forms of tourist accommodation in and immediately surrounding Sevenoaks District, and analysis to identify any clear gaps in current provision
- A review of current proposals for new hotel and visitor accommodation provision in the District
- A face-to-face/telephone survey of the managers or owners of the main hotels in the District and key hotels in the immediate surrounding area
- A review of national trends and forecasts for staying tourist markers and identification of potential local drivers of future growth in demand for accommodation
- Projections of potential future growth in demand for hotel accommodation in the District
- A telephone survey of full-service hotel developers to gauge interest in full-service hotel development at Fort Halstead, Sevenoaks town and other parts of the District.
- A review of national trend in hotel and visitor accommodation development of relevance to Sevenoaks District.

The main findings of the study were:

- The Sevenoaks District Tourist Accommodation Study shows good potential for tourist accommodation in Sevenoaks District as a result of:
 - The District being well placed to capitalise on the projected growth in the domestic short break and overseas tourist markets and the increasing demand for family and friend get togethers, celebrations and weekends away;
 - The projected growth in the District that will drive growth in weddings business and visits to friends and relatives;
 - Growing contractor demand for budget hotel accommodation as the major construction projects are progressed in surrounding areas and within the District;
 - The potential for the District to capitalise on many of the current trends in tourist accommodation development in the UK.

- The study shows potential for the following in terms of tourist accommodation development opportunities in Sevenoaks District:
 - The upgrading, development and expansion of existing hotels
 - Further luxury or boutique country house hotels, given suitable properties for conversion
 - Hotels on golf course, if acceptable in planning terms
 - High quality pub accommodation, including more boutique inns
 - Restaurants with rooms
 - Country house wedding venues
 - The upgrading of B&Bs, including some potentially to a boutique standard
 - High quality holiday cottages
 - Golf lodges on golf courses
 - Fishing lodges around fishing lakes
 - Treehouses
 - New, and improvement of existing, touring caravan and camping sites
 - Eco Camping, Camping pod developments and glamping sites
 - Spa resorts, health farms or wellness retreats
 - Children's activity holiday centres

Economic Needs Study (ENS)

The **Economic Needs Study (ENS)** with regards to tourism:

- The Study recognised the contribution to the rural economy in Sevenoaks District by both tourism and the visitor economy.

- The Study suggests that tourism should be a key focus of economic initiatives in West Kent

- The ENS suggests that Sevenoaks District Council will support tourism investment, and will work with local businesses to facilitate growth and marketing.

Consultation analysis

The Local Plan has been subject to three public consultations along with input from technical specialists, stakeholders and interested parties throughout its development. Further information is provided within the Consultation Statement.

Employment Land (EMP1)

Consultation input has been sought from various parties at these stages in the policy development process:

Evidence Base

The commercial industry were invited to input their views into the Economic Needs Study. A commercial agent forum was held in March 2016. This qualitative evidence was included in the study and used to develop findings and recommendations.

Issues and Options

The issues and options consultation document sought views on the objective to “Support a vibrant local economy both urban and rural”. There were 4 technical questions (T16-19) relating to protecting existing employment land and office space, and allocating new land. We received 117 responses to these questions.

In summary these responses were:

- Support for protecting employment land from being redeveloped,
- Desire to see the employment stock redeveloped to provide modern fit for purpose premises.
- Flexibility for existing rural employment areas.
- Majority favoured more protection for unallocated sites through longer marketing requirements to ensure existing sites are not lost without proper consideration.
- Majority agreed with the proposal for non-residential sites to consider redevelopment to other employment generating uses before housing.
- SDC should meet its employment needs in full in sustainable locations by extending existing sites, mixed use sites and redevelopment of poorly performing developed green belt sites.
- There was strong support for the use of Article 4 directions to remove permitted development rights on office accommodation on allocated employment sites.

Draft Local Plan

The Draft Local Plan included a first draft of new Policy EMP1. The draft policy:

- Retained existing employment sites (allocated and non-allocated) unless strict tests have been met
- A set order of redevelopment to ensure uses that generate employment are considered before wholly residential schemes
- Potential site allocation options

The consultation sought views on the policy content as well as the potential site allocation options. The site options identified considerably more land than was needed to ensure that view and technical information could be gathered on all the suitable site.

The tests set out in the policy for redevelopment of employment sites were based on the adopted Core Strategy and ADMP but updated to provide clarity and further protection for the Districts existing employment sites.

44 comments were received on the policy. In summary these were:

- Commercial sites should be protected against change of use to protect local employment.
- Developers manipulate the viability of commercial sites in order to obtain change of use to residential.
- There is the view that sensitive residential building on commercial sites in the middle of towns or villages relieves pressure on building on greenfield sites and can add to the attractiveness of the area.
- Consideration should be given to promote mixed home/business use to help solve the change of use problems.

Site Appraisals

The council received 26 sites for consideration for employment use. Each site was appraised for its suitability through the Strategic Housing and Economic Land Availability Assessment, Sustainability appraisal and site appraisal document.

A stage 1 appraisal (pre Draft Local Plan) identified that 9 sites were potentially suitable for employment allocation and were included in the DLP consultation.

Following the consultation each of these sites were subject to a stage 2 appraisal taking account of additional information with regards to suitability.

The site appraisal methodology includes details of the appraisal process which technical specialists were specifically consulted during the process.

With regards to economic land the following advice from the specialists was useful in determining which sites should be allocated:

- Sites close to junctions of the Strategic Road Network should consider the impact of additional vehicles including types of vehicles (HGVs/Cars), speed of vehicles, times of access and number of trips. (Highways England)
- Impact of sites on the character of the Area of Outstanding Natural Beauty (AONB Units)
- Access to the site and potential impact on the wider road network (KCC Highways)

Proposed Submission Version

Policy EMP1 – Supporting a Vibrant and Balanced Economy has been included in the Proposed Submission Version of the Local Plan.

It includes:

- the intention to retain all existing employment areas unless specific tests are met,
- promotion of employment generating uses before residential in any redevelopment schemes,
- allocation of existing employment sites to be retained in employment use including major developed employment sites in the green belt
- allocation of 3 new employment sites
- the intention to serve Article 4 directions on office accommodation on allocated employment sites
- support for the rural economy through flexibility diversification and maintenance

The policy received 20 comments. A summary of these were:

- 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.
- Dunton Green Parish Council did not want any Green Belt sites allocated.
- 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.

Town and Local Centres (EMP2)

Consultation input has been sought from various parties at these stages during the policy development process:

Evidence Base

A resident household survey was commissioned by GVA Bilfinger to support the production of the Retail Study. This provided quantitative and qualitative evidence and was used to inform the overall conclusions and policy considerations.

Issues and Options

The issues and options consultation document sought views on the objective to “Support lively communities with well performing town and village centres which provide a range of services, facilities and infrastructure”. There were 5 technical questions (T21-25) relating to allocating land for retail use, how the distribution of additional floor space should be allocated and views on a locally set threshold for retail impact assessments. We received 74 answers to these questions.

In summary, the responses included:

- Support for allocating additional retail floor space within existing town centres;
- That comparison (non-food) and convenience (food) floor space should be distributed proportionally across the District;
- A mixture of opinions regarding the locally set threshold for requiring retail impact assessments.
- Concerns regarding car parking and improvements to public transport to access towns and local centres better.

Draft Local Plan

The Draft Local Plan included a first draft of new Policy EMP2 and sought views on the policy’s content. The draft policy included:

- Sought to encourage town centre uses and additional retail floor space within the District’s most sustainable settlements;
- Encouraging the regeneration of town centres with an element of residential use;
- Introducing a locally set threshold for retail impact assessments; and
- Seek to retain and protect community uses including school and community buildings.

The draft policy was based on existing policies as set out in the Core Strategy, and Allocations and Development Management Plan. The existing policies have been updated in light of recent evidence.

28 comments were received on the draft policy. In summary, the responses were:

- Support for protecting community uses;
- Improve the levels of car parking within town and local centres;
- Restricting out-of-centre uses
- Mixed support for the locally set threshold to require a retail impact assessment

Site Appraisals

As part of the Council's Call for Sites, we received no submissions specifically for retail use.

The Call for Sites remained open throughout the Local Plan Issues and Options and Draft Local Plan consultations. To date, no submissions have been received for solely retail use. However, some limited retail provision was identified in mixed use proposals for potential strategic / "exceptional circumstances" allocations.

Proposed Submission Version

Policy EMP2 – Town and Local Centres has been included in the Proposed Submission Version of the Local Plan.

It includes:

- Distributing the retail need for additional floor space to the most sustainable locations according to the District Settlement Hierarchy;
- Focusing on the redevelopment, regeneration and intensification of town centre uses within the District's main town and local centres;
- The parameters for a locally set threshold for a retail impact assessment; and
- Ensuring that any loss of community uses (including school and community buildings) are resisted.

The policy received 9 comments which included:

- Clarification on how the retail needs of the District will be met over the Plan period;
- Support for the reuse of existing retail units to aid the intensification and regeneration of town and local centres;
- Mixed views on the designation of out-of-centre retail locations which have become established retail destinations in their own right.

Tourism and Visitor Economy (EMP3)

Consultation has been sought from various parties at these stages in the policy development process:

Issues and Options

The Issues and Options (Reg. 18) consultation document sought views on the objective to “Support a vibrant local economy both urban and rural”. Technical question T20 related to Tourism and asked:

- Should there be a policy to protect, support and encourage tourism businesses, visitor accommodation and visitor attractions, including heritage assets? This could include only allowing their loss if a clear justification is provided?

We received 20 responses to this question. In summary these responses were:

- The policy was generally supported by respondents
- Recommendations to actively promote historic estates, B&Bs, cycle path strategy and sustainable tourism throughout the region.
- Local Plan could provide specific policy criteria that facilitates appropriate expansion (including within Green Belt and AONB locations) and any related infrastructure requirements
- Note that ‘visitor attraction’ should be well defined so as not to be used as an argument by groups who wish to object to development

Draft Local Plan

The Draft Local Plan included Tourism as part of Policy 14 – Town and Local Centres. The draft policy:

- Supported and gave criteria for proposals to provide new sustainable tourism development including hotels, guesthouses, bed and breakfast, outdoor accommodation, self-catering accommodation and new visitor attractions.

We received 28 comments on this policy. In summary these responses were:

- The ‘Tourism and Visitor Economy’ section of the policy was generally supported by respondents.
- Suggestion to include this as a standalone policy

Site Appraisals

As part of the Council’s Call for Sites process, we received no submissions specifically related to Tourism. However, where we received submissions for mixed-use sites, 5 submissions proposed a Tourism element.

Each site was appraised for its suitability through the Strategic Housing and Economic Land Availability Assessment, Sustainability Appraisal and Site Appraisal document.

A Stage 1 appraisal (pre-Draft Local Plan) identified that 3 of these sites were potentially suitable for inclusion in the Local Plan.

Following the Draft Local Plan consultation, each of these sites were subject to a Stage 2 appraisal, taking account of additional information with regards to suitability.

The site appraisal methodology includes details of the appraisal process which technical specialists were specifically consulted during the process.

Proposed Submission Version

Following suggestions in the Draft Local Plan consultation to include Tourism in a separate policy, Policy EMP3 – Tourism and Visitor Economy has been included in the Proposed Submission Version of the Local Plan.

The policy:

- Supports and gives criteria for proposals to provide new sustainable tourism development including hotels, guesthouses, bed and breakfast, outdoor accommodation, self-catering accommodation and new visitor attractions.

The policy received 3 comments. A summary of these were:

- The policy was generally supported by respondents
- Reference was made to the Kent Downs AONB Management Plan

Strategy and Policy

Employment Land (EMP1)

The Local Plan Strategy for meeting the economic needs of the District was developed after reviewing the evidence base, following consultation and in light of available land.

The strategy consisted of two aspects:

1. Retain existing employment land
2. Identify new land for employment allocation

1. Retention of existing employment land

There are currently 30 existing large employment sites (over 0.2ha) which provide 89.1ha land for office accommodation, warehousing and industrial uses. These areas are protected by adopted policy to remain in employment use and the draft Local Plan continues to protect these areas as well as allowing flexibility for changes in employment practice and technical requirements.

Existing employment areas not specifically identified in the Local Plan will also be protected. This is especially important to support the rural economy and to make the best use of previously developed land and buildings across the District.

Consideration was given to allocating existing smaller employment land for retention however, given the number of small scale employment sites making a small but vital contribution to the local and wider economy there was a risk that areas not identified would become more vulnerable to redevelopment.

Therefore, Policy EMP1 seeks to retain and protect all land and buildings in employment use. All non-residential uses will also be protected and where redevelopment is considered appropriate employment generating uses must be considered before a wholly residential scheme in accordance with paragraph 83 of the NPPF.

2. Identifying new land for employment allocation

Retaining existing employment land is not enough. If the District is going to remain economically active and vibrant, more land is required to meet future needs.

As the District is highly constrained with 93% Green Belt and 61% AONB it is not possible for the additional 11.6ha to be accommodated in the 7% of land not designated as Green Belt.

Landowners and promoters were invited to submit land for new employment use through the Councils “**Call for Sites**” process. A number of land parcels were submitted, however none of these sites were located outside of the Green Belt.

We have been working with our neighbouring authorities through the **Duty to Co-operate** process to establish if they have land available to meet our future employment needs. With a particular focus on the authorities within our Functional Economic Market Area (Tunbridge Wells and Tonbridge and Malling) as well as those authorities with whom we share strong economic links such as Bromley, Bexley and Dartford. Unfortunately, to date, no other authorities have identified any ability to assist Sevenoaks with any unmet employment need.

It was therefore necessary to consider whether appropriate Green Belt land may be needed to meet the 11.6ha of economic land.

The location of economic and employment land, and therefore jobs, is particularly important. Workers need to be able to have access to jobs and services and the employment providers need to have good access to transport links especially where large and heavy good vehicles are necessary.

Sustainable employment land is also best placed in areas where the potential employment use will not have an unacceptable impact on the living conditions of existing and future residents.

Following these principles, the strategy for identifying new sustainable employment land was developed:

- a. Sites close to the existing transport network, particularly the strategic road and rail network
- b. Sites adjacent to or close to existing protected employment land
- c. Sites on the edge of existing settlements

Sites were not considered sustainable if they did not meet any of these criteria and this is reflected in the site appraisals.

Employment land can also be provided as part of mixed use schemes subject to type of use and layout. This is particularly true for office accommodation which can relate well to residential development and for which the District has a particular need.

In order to ensure the best land is allocated for employment, the draft Local Plan identified sites that add up to a greater level of employment land than is needed as potential options.

Following the consultation, further information and analysis the following sites have been allocated as employment land in the Local Plan:

Site Reference	Address	Site Area	Employment Use
EMP1 - 27	Sevenoaks Garden Centre, Main Road, Sundridge	1.68ha	B1 (a)
EMP1- 28	Bartram Farm, Old Otford Road, Sevenoaks	11.92ha	B1-B8
EMP1 - 29	Former Park and Ride, Otford Road, Sevenoaks	0.75ha	B1

The sites are in sustainable locations close to Sevenoaks Urban Area with excellent transport links.

EMP1-27 is located within the AONB however; the site has existing development. Highways England raised concern about slow moving HGVs accessing the Strategic Road Network at Junction 5 of the M25. Therefore, considering the AONB designation and the road safety concerns, the site has been allocated for office accommodation only.

EMP1 - 28 is located between Sevenoaks Urban Area and Otford. However, it is bounded by the M26 to the north providing a strong new defensible green belt boundary and preventing the merging of the two settlements. The allocation also includes a buffer zone to the north for flooding, landscaping, biodiversity and air quality reasons. The existing residential units will also be excluded where they are not available for development and a buffer zone will be expected to be provided to mitigate the impact of the surrounding development. This will reduce the available land by approximately 2ha.

EMP - 29 is land owned by Sevenoaks District Council. It is currently an area of hard standing and the site area has already been reduced to take account of the adjacent Site of Special Scientific Interest. The land is suitable for B1 use and follows the recommendation of the ENS to use Council owned land to attract inward investment.

In addition, to support the economic vitality of the District and to make the best use of land a number of the mixed use housing sites also include some commercial and employment land.

Site Reference	Address
ST2 - 7	Sevenoaks Community Centre, Otford Road, Sevenoaks
ST2 - 23	Upper Hockenden Farm, Hockenden Lane, Swanley
ST2 - 28	Land at Pedham Place
ST2 - 29	Station Approach, Edenbridge
ST2 - 37	New Ash Green Village Centre
ST2 - 38	The Manor House, North Ash Road, New Ash Green
ST2 - 57	Fort Halstead, Crow Drive, Hextable
ST2 - 63	Gills Farm, Gills Road, South Darenth

Town and Local Centres (EMP2)

The Local Plan Strategy for meeting the retail needs of the District was developed after reviewing the evidence base, following consultation and consideration of any available land submitted for retail use.

There are 54 settlements in the District and a number of these towns, local centres and villages are protected by adopted policy to maintain day-to-day service provision for the local communities they serve. A majority of the settlements are protected under current adopted policy. The submitted Local Plan continues to protect these retail areas while adopting a more flexible approach to meet the District's additional needs for retail, services and leisure. Draft policy also allows consideration for residential elements to support the viability of mixed-use proposals.

Existing retail areas not specifically identified in the Local Plan will also be protected. This includes areas where a retail offering has been identified (such as a parade or cluster of retail units) which have not been previously allocated. This includes:

- Swanley – Azalea Drive
- Swanley – Birchwood Corner, London Road
- Eynsford – High Street
- Hartley – The Parade
- Horton Kirby – Esparto Way, Holmesdale Road and Horton Road

This also includes out-of-centre retail areas which have been established and have become a retail destination within their own right. This includes:

- Sevenoaks – Otford Road Retail Area North
- Sevenoaks – Otford Road Retail Area South
- Riverhead – Aisher Way
- Badgers Mount – Polhill Garden Centre
- Knockholt – Coolings Nursery, Rushmore Hill

Therefore, EMP2 seeks to protect and retain existing retail areas, which were previously allocated under the adopted policy. The new policy will also seek to protect and retain identified non-allocated retail areas within settlements as well as areas which have become shopping destinations within their own right. By doing so, it supports the Local Plan objectives to support the District's economic prosperity and to make the best use of previously developed land and buildings across the District.

However, the use of existing retail areas under established policy will not be enough to meet the District's objectively assessed needs for additional retail floor space across the District over the new Plan period.

As the District is highly constrained with 93% designated as Green Belt, and the NPPF adopts a "town centres first" approach, it is unlikely that the provision of floor

space will come from the allocation of sites within the Green Belt, except in relation to the larger strategic sites which will accommodate mixed use development.

Landowners and promoters were invited to submit land for new retail use through the Councils “**Call for Sites**” process, which ran from September 2015 to October 2018. This also accounts for the number of public consultations on the Local Plan which were held during this time.

As a result, no sites came forward for the sole purpose to provide new retail floor space. Limited retail use came forward as part of strategic, mixed use schemes within the Green Belt but it was evident that this would not be enough to meet the retail needs of the District up to 2035.

Considering that no new sites for retail use came forward during the preparation of the Local Plan, an appropriate strategy was developed to meet the retail need in accordance with the NPPF.

The delivery of additional retail floor space is directed towards the District’s most sustainable settlements as described by the Settlement Hierarchy, and makes the best use of suitable land within these centres. This does not include car parks as any loss could lead to undermining the viability and vibrancy of the town and local centres.

Retail provision can also be provided as part of mixed use schemes. This could include part of an employment allocation or part of a residential scheme at the ground floor.

In addition, the provision of retail floor space should be located in suitable, sustainable locations, which can be accessed, by car and/or public transport.

Therefore, the strategy to provide additional retail floor space includes three aspects:

- Redeveloping, regenerating and intensifying existing town centres;
- Allocating additional retail floor space within suitable employment or mixed use allocations; and
- Providing additional retail floor space on suitable brownfield land located close to transport hubs.

In conclusion, by developing this strategy, it provides flexibility for the District to meet its retail needs in sustainable locations, whilst adhering to the NPPF “town centres first” approach.

Conclusion

The Employment and Retail topic paper sets out the background for how **Policy EMP1 – Supporting a Vibrant and Balanced Economy, Policy EMP2 – Town and Local Centres and Policy EMP3 – Tourism and Visitor Economy** have been developed in the context of national and local planning policy. The development of these policies have also been informed by local evidence gathered to support the Local Plan including:

- Economic Needs Study (September 2016)
- Retail Study (November 2016)
- Sevenoaks District Tourist Accommodation Study (September 2015)

The evidence produced establishes the existing conditions for Employment, Retail and Tourist provisions within Sevenoaks District, and highlights potential issues that need to be addressed as a result of the planned growth in the Local Plan. In addition to this, the evidence base sets out recommendations or policy considerations that the Local Plan utilises to address the Employment, Retail and Tourist issues raised.

The development of **Policy EMP1 – Supporting a Vibrant and Balanced Economy, Policy EMP2 – Town and Local Centres and Policy EMP3 – Tourism and Visitor Economy** has also accounted for all comments submitted during the public consultation sessions for the Local Plan including:

- Local Plan Issues and Options (Regulation 18) Consultation (July 2017)
- Draft Local Plan (Regulation 18) Consultation (July 2018)
- The Proposed Submission Version of the Local Plan (Regulation 19) Consultation (December 2018)

It is through the process of evidence gathering and public consultation that the following policies have been included in the Local Plan:

Policy EMP1 - Supporting a Vibrant and Balanced Economy

This policy sets out the approach to non-residential development across the District including redevelopment of existing employment sites, retention of identified employment land and allocation of new employment land to meet the District's needs up to 2035.

Policy EMP2 - Town and Local Centres

This policy sets out the approach to how the retail needs of the District will be met up to 2035 by focusing on the main town and local centres through regeneration, retention and bringing vacant units back into use. The policy also looks to protect against the loss of community uses including school and community buildings.

Policy EMP3 - Tourism and Visitor Economy

This policy sets out how the tourist and visitor economy in the District will be maintained and strengthened up to 2035.