

## Sevenoaks Local Plan Examination

### Existing Infrastructure Deficiencies Note

October 2019

#### **1 Introduction**

- 1.1 This note is submitted by Sevenoaks District Council to the Local Plan examination in response to questions raised in week 2 about evidence of existing infrastructure deficiencies. Such questions arose particularly in the context of remedying such deficiencies being a consideration which the Local Plan takes into account as relevant to the determination of exceptional circumstances (para. 1.12).
- 1.2 This note brings together evidence explaining existing infrastructure deficiencies.
- 1.3 The National Planning Policy Framework (NPPF) **[OD001]** and Planning Practice Guidance (PPG) **[OD002]** stress the importance of taking a positive, proactive approach to local plan-making and the strategic priorities of an area. The expectation of the NPPF is that local planning authorities look beyond the requirement to meeting housing need, and focus on creating sustainable communities during the course of the plan period and beyond.
- 1.4 The NPPF is clear that infrastructure should be integrated with future development and that should be considered as part of the plan-making process and should include the provision of infrastructure and community facilities at the local level. The NPPF also highlights the role which developer contributions play in supporting the delivery of infrastructure. Local Plans should set out from the outset the contributions which are expected to come forward from development while not undermining the delivery of the Plan (NPPF paragraph 34)<sup>1</sup>.
- 1.5 Planning practice guidance for Local Plans emphasises the importance of engaging with infrastructure providers early in the plan-making process, as it is essential to understand their investment plans, development strategies and critical dependencies<sup>2</sup>.
- 1.6 The Local Plan sets out the strategic priorities of Sevenoaks District and includes a number of non-strategic policies to manage development, as well as influence the provision of infrastructure to meet the needs of both the existing community and the new development.
- 1.7 The Sevenoaks Infrastructure Delivery Plan (IDP) **[INS001]** is an evidence base document that supports the Local Plan and its objectives to create sustainable and connected communities. The IDP provides a summary of the infrastructure required for the District, according to the level of development proposed to meet the District's needs for housing, employment and retail. The full methodology for

---

<sup>1</sup> National Planning Policy Framework 2019

<sup>2</sup> National Planning Practice Guidance (March 2019) – Plan Making (Paragraph 59 Reference ID: 61-059-20190315)

preparing the IDP and how infrastructure is intended to be funded is set out in the IDP, Policy T1 (Transport and Infrastructure) of the submitted Local Plan [SDC001] and in the Council's note on Infrastructure Policy [ED28]. All documents referenced to can be found within the Council's [Local Plan Examination Library](#).

## **2 Infrastructure Deficiencies within the District**

- 2.1 The identification of existing infrastructure deficiencies has been considered throughout the plan-making process. This has been included from the outset with the Council consulting with local town and parish councils, and community groups to understand the existing issues and possible opportunities that the Local Plan could address.
- 2.2 Further consultation with the public was carried out during the plan-making process including the Local Plan Issues & Options consultation [OD005] and the Draft Local Plan consultation [OD006], where there was a focus on the importance of infrastructure within the new Local Plan.
- 2.3 Where existing issues surrounding infrastructure arose, the Council discussed potential infrastructure requirements with infrastructure providers to understand the level of infrastructure deficiency within Sevenoaks District. Furthermore, this has been documented through the Duty to Cooperate discussions [SUP006 to SUP006d].
- 2.4 Infrastructure planning is an iterative process and as such, the IDP will be treated as a "live" document. An update is currently being prepared and future iterations of the IDP will be reviewed regularly. This may include (but not limited to):
  - Updating projects where feasibility assessments and studies becomes available to deliver the infrastructure;
  - Where bids have been successful for securing funding at a national, regional or local level; and
  - Where the infrastructure project has been completed/delivered.
- 2.5 In broad terms the key infrastructure deficits across Sevenoaks District which have been identified include:
  - An insufficient number of school places, especially for those in secondary education (raised by Kent County Council Education in the Infrastructure Delivery Plan [INS001])
  - A lack of capacity within GP surgeries (raised by West Kent Clinic Commissioning Group (WKCCG) and Dartford, Gravesham & Swanley Clinic Commissioning Group (DGSCCG) in the Infrastructure Delivery Plan [INS001])
  - Lack of capacity at key junctions on the local highway and strategic road network (raised by Kent County Council Highways and highlighted within the transport evidence base [TRA001, TRA002 & TRA003])
  - Significant deficit in equipped Children and Young Peoples play space, Youth Football pitches and non-turf cricket pitches. There is also a deficiency in fitness stations across the District (as demonstrated in the Open Space evidence base [OS001]).

- The existing water and wastewater networks in some areas of the District (mainly within northern and southern areas of the District) are at capacity and require improvements (as described by Southern Water and Thames Water in the Infrastructure Delivery Plan [INS001])
- There is an existing deficiency in flooding infrastructure across the District (as raised by the Environment Agency in the Infrastructure Delivery Plan [INS001])

The table below (Table 1) sets out the existing infrastructure deficiencies by the four main settlements within the District (Sevenoaks Urban Area, Swanley, Edenbridge and Westerham).

2.6 It is important to note that whilst the list of existing infrastructure deficiencies are strategic in nature, it is not exhaustive. The Council recognises that communities also have localised infrastructure requirements to address specific localised needs. The Council is committed to supporting local infrastructure projects that come forward to meet a localised need by working with town and parish councils, as well as identifying localised infrastructure projects through the production of Neighbourhood Plans and funding bids to the Council's Community Infrastructure Levy (CIL) Spending Board. This can include (but is not limited to):

- Localised road and transport projects
- Localised green infrastructure
- The upgrading of local community facilities
- Localised flooding prevention/mitigation
- Enhancing and improving children's play areas and open spaces for the local community
- Expanding medical premises for local GP practices.

Table 1 - Existing Infrastructure Deficiencies by Settlement

Settlement	Type of Infrastructure	Commentary
Sevenoaks Urban Area	Transport	Network Rail has stated in Duty to Cooperate discussions that parts of the network are congested and there are passenger capacity issues due to the services that run into London termini. This is identified in Network Rail’s Kent Route Study ( <a href="#">Reg. 18 Consultation</a> response DLPP1019 and Duty to Cooperate Statement Appendix 2 Statutory Consultees [SUP006b] pg 98 - 111)
		Kent County Council have stated in various submissions to the Local Plan and through Duty to Cooperate discussions that there are a number of existing transport deficiencies in Sevenoaks including: <ul style="list-style-type: none"> <li>• Bat &amp; Ball junction is at capacity</li> <li>• Lack of sustainable transport measures to ease congestion (i.e. pedestrian and cycling)</li> <li>• Capacity to the mini roundabouts at Riverhead is nearing its limit (Infrastructure Delivery Plan [INS001] Appendix A pg.39-42)</li> </ul>
	Education	<p>Kent County Council have stated that primary and secondary school places are currently limited as referenced in the Commissioning Plan 2018-2022. (Infrastructure Delivery Plan [INS001] Appendix A pg.29)</p> <p><b>Primary Education (Representations in number order including Representor ID Numbers [SDC005] LPS2010 - T1 Transport &amp; Infrastructure)</b>  <i>KCC Education “The new primary demand generated from the Sevenoaks North developments cannot be accommodated within existing capacity. Neither is there scope for further expansions to existing schools.”</i></p> <p><b>Secondary Education (Representations in number order including Representor ID Numbers [SDC005] LPS2010 - T1 Transport &amp; Infrastructure)</b></p>

Settlement	Type of Infrastructure	Commentary
		<i>KCC Education “There is no surplus capacity in any secondary schools in Sevenoaks, and there is no scope for any of the existing schools to be expanded further. A new school is therefore required, ideally in Sevenoaks town, or nearby.”</i>
	Health and Social Care	West Kent Clinical Commissioning Group (WKCCG) state that existing surgeries within the town and surrounding areas are at capacity and there is a need for further health and medical services. <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.37)</b>
	Flooding	There is an existing requirement from the Environment Agency to improve flood defences in Dunton Green and Riverhead to protect businesses, homes and a residential care home. Further existing need to improve flood defences for Otford and the Greatness areas for Watercress and Honey Pot Lanes. The Environment Agency has also stated that there is a need to increase the existing flood storage capacity at Sevenoaks Wildlife Reserve <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.33)</b>
	Community Infrastructure and Open Space	There is a significant deficit of equipped play space for Children & Young People across the District <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg14-17)</b> . A deficit of dedicated Youth 11 v 11 football pitches and non-turf cricket pitches, and hockey pitches are at capacity <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg32-33)</b> .
Swanley	Transport	Highways England have stated that M20 between Junctions 3-8, and M25 Junction 3 are known to be currently experiencing heavy congestion, particularly in the peak hours. <b>(Representations in number order including Representor ID Numbers [SDC005] LPS2122 - T1 Transport &amp; Infrastructure)</b>
		Network Rail has stated in Duty to Cooperate discussions that parts of the network are congested and there are passenger capacity issues due to the services that run into London termini. This is identified in Network Rail’s Kent

Settlement	Type of Infrastructure	Commentary
		<p>Route Study (Reg. 18 Consultation response DLPP1019 <a href="https://planningconsult.sevenoaks.gov.uk/consult.ti/dlp2018/">https://planningconsult.sevenoaks.gov.uk/consult.ti/dlp2018/</a>)  <b>(Duty to Cooperate Statement Appendix 2 Statutory Consultees [SUP006b] pg 98 - 111)</b></p> <p>Kent County Council have stated in various submissions to the Local Plan and through Duty to Cooperate discussions that there are a number of existing transport deficiencies in Swanley including:</p> <ul style="list-style-type: none"> <li>• Road capacity issues along the B2173 London Road</li> <li>• Lack of sustainable transport measures to ease congestion(i.e. pedestrian and cycling)</li> <li>• Lack of public transport for Swanley and the surrounding areas inc. Hextable &amp; Crockenhill.</li> </ul> <p><b>(Infrastructure Delivery Plan [INS001] Appendix A pg.39-42)</b></p>
	Education	<p>Kent County Council have stated that primary and secondary school places are currently limited as referenced in the Commissioning Plan 2018-2022.  <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.30)</b></p> <p><b>Primary Education (Representations in number order including Representor ID Numbers [SDC005] LPS2010 - T1 Transport &amp; Infrastructure)</b> - comments raised by Kent County Council refer to a number of primary schools in Swanley and the surrounding areas stating that a majority of schools are at capacity.</p> <p><b>Secondary Education (Representations in number order including Representor ID Numbers [SDC005] LPS2010 - T1 Transport &amp; Infrastructure)</b>  <i>KCC Education “Orchard Academy is virtually full. There is no surplus capacity in Dartford. Could NOT accommodate a PPR of 822. A PPR of 882 for secondary would require a new 6FE Secondary school. This would need a site of between 5.5 - 6.5 hectares and a build cost likely to be in the £25m - £30m range. If Pedham Place is not included, the total number of new dwellings reduces to</i></p>

Settlement	Type of Infrastructure	Commentary
		<i>1,517. This equates to a PPR of 304 secondary students, which could NOT be accommodated within existing provision. This would require a 2.5FE expansion to an existing school. However, Orchard Academy could not accommodate a 2.5FE expansion on its existing site. The only viable solution would be to include Pedham Place and build a new 6FE secondary school.</i>
	Health and Social Care	Dartford, Gravesham and Swanley Clinical Commissioning Group (DGSCCG) have stated that there is an existing requirement for further health services across the whole DGSCCG area within Sevenoaks District, which includes the parishes of Swanley, Hextable, Farningham, New Ash Green, Hartley, Fawkham, and Horton Kirby & South Darenth. <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.36)</b>
	Community Infrastructure and Open Space	There is a significant deficit of equipped play space for Children & Young People across the District <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg14-17)</b> . A deficit of dedicated Youth 11 v 11 football pitches and non-turf cricket pitches <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg32-33)</b> .
		There is a an existing deficit in pay and play facilities due to aging leisure facilities at White Oak Leisure Centre <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg 48)</b>
	Utilities	Thames Water have described the water supply and wastewater networks in the Swanley area to be at capacity. Future works would be required to upgrade the existing infrastructure to accommodate future additional capacity. <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.43) (Representations in number order including Representor ID Numbers [SDC005] LPS2750 - ST2 Housing and Mixed Use Site Allocations)</b>
Edenbridge	Transport	Kent County Council have stated in various submissions to the Local Plan and through Duty to Cooperate discussions that there are a number of existing transport deficiencies in Edenbridge including:

Settlement	Type of Infrastructure	Commentary
		<ul style="list-style-type: none"> <li>• A number of junctions across the area nearing or at capacity</li> <li>• Lack of sustainable transport measures to ease congestion (i.e. pedestrian and cycling)</li> </ul> <p><b>(Infrastructure Delivery Plan [INS001] Appendix A pg.39-42)</b></p> <p>Network Rail has stated in Duty to Cooperate discussions that parts of the network are congested and there are passenger capacity issues due to the services that run into London termini. This is identified in Network Rail’s Kent Route Study (<b>Reg. 18 Consultation response DLPP1019</b> <a href="https://planningconsult.sevenoaks.gov.uk/consult.ti/dlp2018/">https://planningconsult.sevenoaks.gov.uk/consult.ti/dlp2018/</a>) <b>(Duty to Cooperate Statement Appendix 2 Statutory Consultees [SUP006b] pg 98 - 111)</b></p>
	Education	<p>Kent County Council have stated that primary and secondary school places are currently limited as referenced in the Commissioning Plan 2018-2022. <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.30)</b></p> <p><b>Primary Education (Representations in number order including Representor ID Numbers [SDC005] LPS2010 - T1 Transport &amp; Infrastructure)</b>  <i>KCC Education “Could accommodate most of this PPR, but this would fill the school completely. There is no capacity in any other nearby schools. Some CIL funding might be required to upgrade school accommodation.”</i></p> <p><b>Secondary Education (Representations in number order including Representor ID Numbers [SDC005] LPS2010 - T1 Transport &amp; Infrastructure)</b>  <i>KCC Education “The total number of new dwellings in the southern half of Sevenoaks district would generate 5FE of secondary need. There is no surplus capacity in any secondary schools in Sevenoaks, and there is no scope for any of the existing schools to be expanded further. A new school is therefore required, ideally in Sevenoaks town, or nearby.”</i></p>

Settlement	Type of Infrastructure	Commentary
	Health and Social Care	West Kent Clinical Commissioning Group (WKCCG) state that existing surgeries are capacity and that there is an existing need for better health and medical services in Edenbridge, as evidenced by the need to consolidate existing services into a single health and wellbeing hub. <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.38)</b>
	Community Infrastructure and Open Space	There is a significant deficit of equipped play space for Children & Young People across the District <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg14-17)</b> . A deficit of dedicated Youth 11 v 11 football pitches and non-turf cricket pitches <b>(Open Space, Sport &amp; Leisure Study - Initial Findings (March 2017) [OS001] pg32-33)</b> .
	Utilities	Southern Water have described the wastewater network in the Edenbridge area to have limited capacity. Future works would be required to upgrade the existing infrastructure to accommodate future additional capacity. <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.42) (Representations in number order including Representor ID Numbers [SDC005] LPS262 &amp; LPS 264 - Site Specific Comments)</b>
Westerham	Flooding	There is an existing requirement from the Environment Agency to improve flood defences along the Upper Darent corridor which includes the areas of Westerham, Brasted and Sundridge to protect businesses, homes and the local road network, mainly the A25 <b>(Infrastructure Delivery Plan [INS001] Appendix A pg.32)</b>
	Transport	There is an existing deficiency in public transport available to the town with no train station and limited bus services that operate infrequently (on average once an hour) and a number of school time only services for school children <b>(Sevenoaks District Transport Assessment [TRA001] p92-94)</b>
	Health and Social Care	West Kent Clinical Commissioning Group (WKCCG) states that “Whilst the patient pressure indicator from the premises survey is ‘high’ there is not an existing need leading the general practice exploring options for new premises at this time. More detailed discussions would be required to develop detailed

Settlement	Type of Infrastructure	Commentary
		plans for a new practice. Any new premises developments regardless of funding source, are required to be submitted for consideration through CCG governance due to the revenue implications.” (Infrastructure Delivery Plan [INS001] Appendix A pg.39)