

# Swanley Neighbourhood Plan

**POST REGULATION 14 CONSULTATION  
STATEMENT  
OCTOBER 2023**

# Swanley Neighbourhood Plan Post Regulation 14 Consultation Statement

## August 2023

### Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Swanley Neighbourhood Plan.

A previous Consultation Statement which covered consultation activities undertaken to develop the Swanley Neighbourhood Plan up to the Regulation 14 consultation requirements of Neighbourhood Plan Regulations (as amended) also supports the final Submission version of the Neighbourhood Plan.

The legal basis of this Consultation Statement is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations (as amended), which requires that a consultation statement should:

- Contain details of the persons and bodies who were consulted about the proposed Neighbourhood Plan.
- Explain how they were consulted.
- Summarise the key issues and concerns raised by the persons consulted; and
- Describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

The policies contained in the Swanley Neighbourhood Plan are as a result of consultation with the community and businesses within the town. This has been resourced and coordinated by Swanley Town Council (STC) and the Neighbourhood Plan Steering Group.

### Summary of Previous Consultations

The Consultation Statement of November 2022 details all the consultations that took place to inform the development of the Neighbourhood Plan and its emerging policies up to production of the Regulation 14 version.

This included Workshops and a questionnaire in 2018 and face to face events and a survey in 2021. All of these methods were open to local businesses too and publicity for consultees was made available online and in hard copy.

These consultations identified the key issues which were to be addressed including the provision of Community Infrastructure, the form and nature of development that suited the character of the Neighbourhood Plan area, the protection of Open Space and the Green Belt and the need to address issues of air quality and sustainable transport.

As a result of all the consultations held, the Neighbourhood Plan policies were amended, and new evidence was collected to support the intention to provide locally distinctive policies that are clear to guide development in the future. In particular, a character assessment of the Neighbourhood Plan Area was undertaken to inform policies on development and its effects on the character of the area.

In addition, chapters in the plan were reorganised and renamed and policies amended to assist with clarity.

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### The Regulation 14 Consultations

The regulation 14 consultation on the Swanley Neighbourhood Plan (SSNP) took place between 9<sup>th</sup> January 2023 and 20<sup>th</sup> February 2023, led by Swanley Town Council (STC).

To promote it a leaflet drop was made to all households and businesses in Swanley to draw attention to the consultation and comments form that was available online and to the possibility of viewing it in hard copy and filling in a hard copy comments form.

Pull up banners also advertised the consultations which were located and rotated at the Civic Centre, Oaks Surgery and ASDA.

The Plan and form were advertised on the Neighbourhood Plan section of the Town Council web site.

In addition, it was posted on Facebook on 9<sup>th</sup> January, 25<sup>th</sup> January and 30<sup>th</sup> January. These posts were seen by 1,368 users and 71 users who engaged with it by liking sharing or clicking on it.

Hard copies of the plan and comments forms were made available throughout the consultation period at Swanley Link Library and at the Civic Centre (Town Council offices)

Statutory consultees were provided with access to the Regulation 14 version of the Swanley Neighbourhood Plan in order that they might comment.

### Responses to the Consultation

#### Residents

A total of 14 responses. 1 of these was from STC.

4 were in complete agreement with the SNP policies. One was only tangentially related to the SNP in that it opposed the development of flats at first floor level opposite Berkeley Court.

Some of the comments fell outside of planning control and therefore the SNP, such as incentives for small businesses, free parking, and concessions for some groups to sports facilities.

Many suggested small corrections of fact or working to improve clarity and strengthening wording or additions associated with providing further evidence or views in support of the SNP policies.

**Response.** Corrections and additional points in relation to the evidence supporting policies were made.

#### Businesses

Two businesses made comments, suggesting that the SNP did not align with the NPPF in relation to a positive approach to new development and alleging a lack of consultation, particularly with landowners and businesses.

**Response** - The previous consultation statement for Pre-Regulation 14 activity makes clear that all residents and business were made aware via door-to-door information on the

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consultation opportunities. Initial workshops held at the start of the SNP development process did see attendances by landowners. COVID related shutdowns and home working for businesses may have affected the flow of information but every effort was made to address this by using online access to documents and surveys for people to provide their views.

One responder was specifically promoting a proposed development to the rear of Archer way which is in the Green Belt.

Both suggested more clarity in relation to the SNP evidence base related to housing.

**Response** Review and detail of references to NPPF, housing sites allocations in the previous 2018 version of the SDC Local Plan and the Swanley SNP housing sites schedule to update it to include permissions applied for and their outcome since 2020. As the SNP was also updated with Census 2021 information that had not been previously available, relevant amendments were made to references to overall population and household numbers, car ownership and so on. Further Sevenoaks District Council evidence documents related to housing design and character and air pollution have also been included in the revised post Regulation 14 version of the Neighbourhood Plan.

### Statutory Authorities

The following provided comments:

Authority	Summary of comments	Action
Crockenhill Parish Council	Wishes to work more closely with STC on health, cemetery provision and infrastructure. Notes the SNP transport policies based on the SWECO report but concerned about the policy towards a feasibility study on improvement of lanes in the SNP area and adjacent Parishes. Wishes to have a reference to ensure that parishes are consulted fully on the details of the feasibility.	Transport policies related to the need for new infrastructure now included in <b>new SNP chapter 11 Proposals to achieve the Swanley Neighbourhood Plan Vision and Objectives</b> and reference made to the need for close working and consultation with parish councils adjacent to the Neighbourhood Plan area.
Kent County Council	Suggests reference to Sustainable Urban Drainage Systems, and the Rights of Way Improvement Plan, and suggests additions to cycling routes in the SNP and a SNP policy towards biodiversity.	All additions made to narrative and new <b>Policy SwC4</b> on SUDS added. Addition made to <b>Policy SwC2</b> to ensure measurable biodiversity gains achieved.
National Grid	No comments but provided map of National grid Assets should the Plan allocate sites	Action None required since SNP is not allocating sites
National Health Service	Confirms commitment to new Heath facility but asks for removal of floor space requirement and commitment to non-GP space needed.	Removed reference to the non-clinical space from the policy and from the SNP narrative.
National Highways	Overall, National Highways are in support of the relevant policies included within the Draft Swanley	No changes required. Sevenoaks District Council as Local Planning Authority will implement

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<b>Authority</b>	<b>Summary of comments</b>	<b>Action</b>
	Neighbourhood Plan. It should be acknowledged that the implementation of any policy which impacts the operation of the SRN will involve National Highways as a stakeholder. Measures promoting sustainable transport usage and safety, while reducing congestion are in line with the thoughts of National Highways.	requirements for transport assessments
Southern water	No comments	
Transport for London	Proposed changes to SNP objective in relation to transport to remove personal mobility (which suggests car use) and suggests re-wording to “To enable improved access to services and support more active travel”. Also requests acknowledging the role of TFL in relation to proposals for road improvements, particularly the A20. Also states that they would “encourage you to consider whether car free development or reduced levels of car parking would be appropriate in well-connected locations in Swanley, close to the rail station and town centre facilities”.	No changes have been made to this policy based on current patterns of car ownership and use and public transport provision. There is not necessarily any conflict with supporting active travel and supporting car use where appropriate.
Sevenoaks District Council	Two documents were submitted – one relating to layout format and mapping and the need to reference more up to date information where relevant. The second relates to individual comments on the policies and the evidence underpinning them.	Significant changes made to layout formatting, maps, and references to updated SDC evidence documents.

<b>SDC Comments on Policy</b>		
<b>PROPOSED NEIGHBOURHOOD PLAN POLICY Sustainable development</b>	<b>SDC Comment</b>	<b>Response</b>
<b>SNP Policy SwSD1 – Green Belt</b> Developments on Green Belt Land as defined by	This policy is less nuanced than the NPPF. PDL in the Green Belt can be acceptable	Policy re-worded to <b>SwSD1</b> The Neighbourhood Plan recognises that there are

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<p>Sevenoaks are not supported. Developments on previously developed brown field sites on Green Belt land are supported.</p>	<p>but where it meets the criteria set down in the NPPF.</p>	<p>Green Belt sites in the Neighbourhood Plan area that are poorly performing against the purposes set out in the National Planning Policy Framework. Such sites may come forward for development, through allocation in the new Sevenoaks Local Plan. These may have potential to deliver benefits that should be secured through the design, layout, and use of each site. In these cases, they will be supported only where they meet all the policies in the Swanley Neighbourhood Plan and are supported by public transport infrastructure.</p> <p>Development proposals on Green Belt sites other than those listed as poorly performing will not be supported".</p>
<p><b>SNP Policy SwSD2 – Swanley Town Centre</b>  Development proposals that result in a net loss of retail and other service-related spaces (Use Class E) classes on sites in Swanley Town Centre (see Town Centre Map), other than those which are permitted development will not be supported.</p>	<p>Terminology needs to reflect terminology used in the Use Classes Order so it should state 'Commercial, Business and Service'. Should the word 'net' be deleted? Should it say something around subject to marketing etc.</p> <p>SDC Town Centre Strategy is now available on the SDC website. Plan 2040 also includes an emerging Swanley Town Centre policy informed by Evidence Base.</p>	<p>Retained net in policy which is to ensure that on any site there is no overall loss of Class E uses. Added the following "Proposed changes of use from Class E will need to be justified with evidence of their non-viability and demonstrate that every effort has been made to market them in their current use".</p>
<p><b>SNP Policy SwSD3 – Preventing the merging of Swanley Village with Swanley Town</b>  Development proposals which result in the physical</p>	<p>No comment</p>	<p>No action required</p>

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<p>or visual merging of Swanley Village with Swanley Town will not be supported.</p>		
<p style="text-align: center;"><b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b> <b>Community Infrastructure</b></p>	<p style="text-align: center;"><b>SDC Comment</b></p>	<p style="text-align: center;"><b>Response</b></p>
<p><b>SNP Policy SwC1 – Health Facilities in Swanley</b> Development proposals for health facilities in Swanley will be supported where they are:</p> <ul style="list-style-type: none"> <li>A. Located in Swanley Town Centre</li> <li>B. Have adequate parking for visitors, patients, and staff.</li> </ul> <p>Provide facilities for social interaction for patients and visitors and health related education for patients and health professionals.</p>	<p>It may help if the policy refers to the map showing the town centre boundaries and if the last sentence is set down as two separate bullet points.</p>	<p>Suggested change made.</p>
<p><b>SNP Policy SwC2 – Open Space</b> Development proposals that result in any loss of existing public green spaces as shown on the map, across all types within the Neighbourhood Plan area will be supported only where replacement green spaces are provided for public use which are suitably located and equal or superior in terms of size and quality.</p>	<p>As noted in our previous comments, if these Open Spaces are already designated then there is no need to designate them again. If new sites have been identified, you may wish to designate them as Local Green Spaces. LGSs have to be assessed against the NPPF tests (para 102) and require consultation with landowners.</p> <p>It is necessary to consider whether this policy does anything different from current policy. Policy SP10 seeks to retain open space etc, only allowing its loss in exceptional circumstances where replacement provision of at least equivalent value to the local community is provided.</p> <p>Plus need to be consistent in terminology, as it refers to</p>	<p>As also previously noted to SDC, the current Local Plan overestimates open space in Swanley and not all sites are included in the evidence base or are incorrectly classified in terms of type. As a result of the map the current Local Plan policy does not identify nor protect all open spaces in Swanley. This has been made clearer in the plan narrative. Agreed to address issues of terminology and map titles.</p>

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	<p>open space and public green spaces.</p> <p>May need to specify which map for clarity.</p>	
<p><b>SNP Policy SwC3 – Indoor Sport facilities.</b>  Development proposals that provide indoor dry sports facilities are supported, subject to other policies in the Neighbourhood Plan</p>	<p>What's meant by dry? Does this mean without swimming pools? Presumably it should say something about being accessible to the public and more about the location.</p>	<p>Dry facilities do mean without swimming pools. There is under provision so new proposals should be considered but as the policy says, subject to the application of other SNP plan policies. However, for clarity and consistency support for new facilities is now included in new <b>SNP Chapter 11 Proposals to achieve the Swanley Neighbourhood Plan Vision and Objectives</b></p>
<p><b>SNP Policy SwC4 – CIL Investments.</b>  The provision of a multifunction Indoor sports facility is strongly supported by the Neighbourhood Plan for further investigation and implementation and should be a priority for investment of Community Infrastructure Levy by Swanley Town Council and should be for Sevenoaks District Council</p>	<p>Should the title of this be changed? This doesn't read as a planning policy used in the determination of planning applications. It could be listed as a project where the Town Council supports investigation and implementation, with a separate list setting down what Swanley TC will either direct their CIL funding towards or which they will seek to influence with respect to Sevenoaks.</p>	<p>This policy has been deleted and the support for new facilities included in new <b>SNP Chapter 11 Proposals to achieve the Swanley Neighbourhood Plan Vision and Objectives</b></p>
<p><b>SNP Policy SwC5 – Community Buildings.</b>  Proposals that result in the loss of existing community buildings will not be supported unless there is clear evidence that:  a) There is no need for the facility (in terms of the current capacity of existing provision, its opening times, location, accessibility, and range of facilities available to local people and businesses) or suitable alternative facilities of a similar size and quality are re-provided as part of the proposal.</p>	<p>It needs to be made clear whether proposals need to meet both criteria or just one of the criteria. It should also probably include something around being in an appropriate/accessible location.</p>	<p>Re- worded to "will not be supported unless there is evidence that the following two criteria are met:"</p>



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<p>b) proposals offer alternative benefits to the community in terms of access to space to assemble, worship, participate in educational activities and personal or civic celebrations</p>		
<p><b>PROPOSED NEIGHBOURHOOD PLAN POLICY Conservation and Heritage</b></p>	<p><b>SDC Comment</b></p>	<p><b>Response</b></p>
<p><b>SwDC&amp;H1 Tall buildings</b>  Development proposals for tall buildings should take account of the definitions provided in the Neighbourhood Plan for the different character areas of Swanley. Such proposals should:</p> <ul style="list-style-type: none"> <li>• Have good access to public transport</li> <li>• Contribute to improving the permeability of the site and wider area, wherever possible</li> <li>• Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain, and public realm (including landscape features), particularly at street level</li> <li>• Incorporate publicly accessible amenity space and local play areas within the site area.</li> <li>• Where appropriate, provide additional green spaces in the form of roof gardens for residents of the development</li> <li>• Have ground floor activities that provide a positive relationship to the surrounding streets</li> <li>• Incorporate the highest standards of architecture and materials, including</li> </ul>	<p>Should the policy include the definition?</p>	<p>Previous iteration of the SNP did include this but SDC advised to remove it.</p> <p>Policy amended to read “Development proposals for tall buildings (<i>A tall building for the Swanley Neighbourhood Plan area is defined as a building that is over 4 storeys or 12 metres in height</i>) should take account of their impact on the different character areas of Swanley. Such proposals should: ...</p>

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<p>sustainable design and construction practices</p> <ul style="list-style-type: none"> <li>• Should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation, and telecommunication interference</li> <li>• The impact of tall buildings proposed should be given particular consideration in relation to their impact on local or strategic views both from the designated Green Belt land which surrounds Swanley and from Swanley to designated Green Belt land.</li> </ul>		
<p><b>Policy SwDC&amp;H2: Swanley Village Design Guidelines</b> Development proposals for Swanley Village, should demonstrate how the overarching design and architectural design principles in the Design Guide have been applied to proposals within both the New Swanley Village area and, where applicable, the Conservation area as defined in the Guide.</p>	<p>Could a reference to the location of the map be given or a map be included. Could it just stop after Design Guide have been applied?</p>	<p>This policy wording was suggested after previous SDC responses to SNP policies. Discussion with the SDC conservation team took place which suggested this wording because Conservation Area policy applies in some areas covered by the Design Guide but not others (new Swanley Village area)</p>
<p><b>Policy SwDC&amp;H3 – Heritage Asset Protection and Enhancement</b> It is proposed that the murals of William Mitchell, located in Swanley Town Centre are allocated as non-designated heritage assets to ensure their protection into the future</p>	<p>There is nothing in this policy about enhancement, so the title needs changing. Has an assessment been undertaken to identify non-designated heritage assets and what criteria has been used. If this has been undertaken, and there are other assets, it may be beneficial to list and map these rather than listed buildings which are already identified and protected.</p>	<p>Agreed to change title. A character assessment has been undertaken where potential NDHA were identified. This policy has been re-worded to include both the murals and other sites with specific evidence to support each site in the evidence base.</p>
<p style="text-align: center;"><b>PROPOSED NEIGHBOURHOOD PLAN POLICY Housing</b></p>	<p style="text-align: center;"><b>SDC Comment</b></p>	<p style="text-align: center;"><b>Response</b></p>

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<p><b>SwH1 Energy Efficient and Healthy Homes</b>  All new housing developments shall be built to the highest standards of thermal insulation, air tightness, and with double glazing as a minimum requirement. New homes should be designed to meet an Energy Performance Certificate rating of A to reduce costs in use and contribute to reducing climate change impacts associated with the use of energy. Ventilation needs careful design with high air tightness building fabric construction. Wherever feasible all homes (including areas of circulation), should have the maximum possible natural ventilation via openable windows. Where mechanical ventilation is used measures should be incorporated to prevent:</p> <ul style="list-style-type: none"> <li>• External noise transfer from outside the building.</li> <li>• Cross talk between internal rooms.</li> <li>• Ventilation Plant noise</li> </ul>	<p>As noted previously, as this goes beyond the requirements for Building Control, it should be supported by evidence and tested for viability.</p>	<p>Amend to “All new homes should as far as possible aim to meet an Energy Performance Certificate rating of B to reduce costs in use and contribute to reducing climate change impacts associated with the use of energy” The detail has been removed so it is left to the developer to meet the standard. This is justified on the basis that in 2021 Sevenoaks new houses were meeting B grade EPC ratings and flats only C. Existing flats and houses have a performance rating of only D.</p>
<p><b>SwH2 Housing Space standards</b>  Homes should meet the Government’s nationally described space standards (NDSS) guidelines as a minimum. Extensive tree and shrub planting shall be incorporated into all developments to provide a healthy and visually pleasing environment. Designs shall be inclusive for all members of society and cater for those with disabilities and the infirm wherever feasible. Housing layouts must demonstrate how homes meet the storage requirements in the</p>	<p>What is the justification for this? As previously, it will need to be caveated – so ‘where appropriate/feasible – unless overriding reasons’. Second sentence doesn’t appear to be relevant to housing space standards and the last sentence is slightly unclear.</p>	<p>Justification is to ensure that homes are excellent quality, future proofed and more likely to enable residents to stay in Swanley,  The last sentence is to ensure that the built in storage requirements in the NDSS have been maximised (the NDSS standard makes some allowance for storage for heating plant) For consistency all elements of the policy will be should rather than must. <b>New Policy SwH2</b> removes reference to provision of</p>

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<p>NDSS without being impacted by plant for mechanical ventilation and heating kit.</p>		<p>tree and shrub planning due to relevance.</p>
<p><b>SwH3 Private Amenity Space for New Homes</b> All new homes where feasible should have access to outdoor space in the form of a private garden, balcony, or patio. These should be additional to the Gross Internal Floor Area minimum spaces sizes provided in the NDSS</p>	<p>The second sentence doesn't seem particularly relevant.</p>	<p>No change. The NDSS does not specify provision of outdoor spaces and the space standard is based on Gross Internal Floor area. This is defined in the RICS 2015 code of measuring practice as the area of a building measured to the internal face of the perimeter walls at each floor level. However, it specifically excludes external open sided balconies. To ensure that the requirement of outdoor space in flats does not have a negative impact on the adherence to NDSS standards for space this addition makes it clear that this should be in addition to the NDSS space standards.</p>
<p><b>SwH4 Homes for Work and study</b> All homes should, where feasible, have dedicated working space with natural light.</p>	<p>No comment</p>	<p>No action required</p>
<p><b>SwH5 Housing Density</b> Housing developments in the Neighbourhood Plan area are expected to deliver the following densities where feasible subject to meeting the other policies in the Neighbourhood Plan. Location Density Swanley Town centre 100 DPH Rest of Swanley 50 DPH Edge of Swanley (sites adjacent to the Green Belt</p>	<p>Could more clearly reference Swanley Town. Overriding consideration in policy SP7 is that it should not compromise the distinctive character of the area. This policy may benefit from having a similar line. May also need to be clearer about the evidence base underpinning the proposed higher densities.</p>	<p>Agreed to have a similar line to SDC current Local Plan policy SP7 – evidence base relates to densities already being approved in the TC area based on current SDC Local Plan policy and in Swanley as a whole which currently exceed current Local Plan guidelines</p>

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Boundary) and Swanley Village 30 DPH		
<p><b>SNP Policy SwH6 Public Amenity Space</b> New housing developments should include Publicly accessible Amenity Green Spaces based on 0.60 Ha of area per 1000 new residents to be accommodated within the development. Amenity green spaces/roofs shall be provided for all commercial and community infrastructure developments. There is a deficit of AGS in Swanley and therefore further developments on AGS land is not supported</p>	<p>Terminology needs to be used consistently, this refers to Public Amenity Space and Publicly accessible Amenity Green Spaces. Need to think about how this policy would work, particularly on smaller sites.</p>	<p>Agreed to clarify and make consistent</p>
<p><b>SNP Policy SwC7 – Children and Young Peoples Play Space</b> Swanley has a deficit of play space for children and young people. All new developments in excess of 5 dwellings must include a Local Area for Play (LAP) and all developments in excess of 10 dwellings a Locally Equipped Area for play (LEAP)</p>	<p>The first line essentially comprises justification and may sit better in in the supporting text.</p> <p>Policy SP10 only requires xx where there is an existing shortage or where the proposal would result in a shortfall. Is it justified to ask for this where neither of these triggers exist? Is it also justified in terms of viability?</p> <p>In terms of the wording of the policy, is it requiring LAP for schemes of 5-10 dwellings but above 10, it is requiring LEAP or is it asking schemes which are 5 and above and more than 10 dwellings to provide both? Does this need to include reference to the need to provide details of its maintenance? Should it be requiring provision on site or allow for contributions to off-site provision where more appropriate?</p>	<p>Agreed to clarify re triggers and size of schemes and make supporting narrative clear that it is Swanley’s overall deficiency which is driving the need for the policy. Agreed to clarify that on site is preferable and off site should be within walking distance (400m)</p>
<b>PROPOSED NEIGHBOURHOOD PLAN POLICY</b>	<b>SDC Comment</b>	<b>Response</b>

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<b>Employment and Economy</b>		
<p><b>SNP Policy SwEE1: Improving and increasing employment on existing employment sites.</b>  Proposals to upgrade, intensify or extend the employment sites on Maps EE1-1 and EE1-2 are supported</p>	<p>Some of these sites are located in the Green Belt, so their expansion is likely to comprise inappropriate development. Goes further than LP policy EMP1 which sets out that sites will be retained, intensified, and regenerated for B1-B8 uses.</p>	<p>Removed extend from the policy due to their location in Green Belt. Map now covers only non-Green belt sites</p>
<p><b>SNP Policy SwEE2: Loss of Employment uses.</b>  Proposals for the redevelopment or change of use of land or buildings in employment use shown on Map EE1-1, EE1-2 and EE2 to non-employment uses, other than those which are permitted development, will only be permitted when: a) Marketing of the site over a period of a minimum of 12 months demonstrates that there is no realistic prospect of the use of the site for employment purposes; or b) The strategic need for the proposed use clearly exceeds the need for continued use for employment purposes.</p>	<p>As per our previous comments, this needs to be evidenced and more detail provided e.g., what would be required for marketing. Adopted policy EMP5 only asks for 6 months, so what is the justification for asking for longer.</p>	<p>Folling changes made - Marketing – registration with an agent, notification on site.</p> <p>12 months proposed due to loss of employment space in the SNP area including at Broom Hill which is designated in the current LP for employment uses but is now mixed. Maps now include green belt and non-green belt sites as policy focuses on protection of employment uses.</p>
<p><b>SNP Policy SwEE3: Small employment sites</b>  Proposals for other smaller employment sites will be permitted where they do not conflict with other policies in this Plan and provided that all the following criteria are met so that proposals: a) Do not involve the loss of dwellings b) Contribute to the character and vitality of the local area c) Are well integrated into and complement existing clusters of activity d) Protect any neighbouring residential amenity e) Do not adversely impact upon road safety f)</p>	<p>Perhaps re-word as it requires both employment and self-employment space, but this could be addressed by adding 'including'.</p>	<p>Addition made</p>

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<p>Enhance the overall development and provision of employment and self-employment space g) Do not adversely affect the attractiveness of the local countryside</p>		
<p><b>SNP Policy SwEE4</b>  Proposals for hotel accommodation and visitor facilities within the Neighbourhood Plan area will be supported where they do not conflict with other policies in this Plan and provided that all the following criteria are met so that proposals: a) Do not involve the loss of dwellings b) Contribute to the character and vitality of the local area c) Are well integrated into and complement existing clusters of business activity d) Are well provided with parking and located close to public transport connections e) Protect any neighbouring residential amenity f) Do not adversely impact upon road safety g) Enhance the development and provision of employment and self-employment h) Do not adversely affect the attractiveness of the local countryside</p>	<p>Title is missing. As mentioned in our previous comments, should this be directing this type of development to the town centre boundary. As currently written, it relates to the whole of the parish. How can hotel accommodation enhance self-employment?</p>	<p>The name of the policy is hotel accommodation and visitor facilities. Criteria c) is intended to direct such development to the defined Town Centre and other clusters of business activity. Reference to self-employment relates to Visitor facilities as they may be multi use (craft or artists' studios for example)</p>
<p style="text-align: center;"><b>PROPOSED  NEIGHBOURHOOD PLAN  POLICY  Transport</b></p>	<p style="text-align: center;"><b>SDC Comment</b></p>	<p style="text-align: center;"><b>Response</b></p>
<p><b>SwT1 – Planting of Trees</b>  All new developments close to main transport corridors, indicated in AQ16, (see Map of Transport Study proposals) where pollution is a problem shall incorporate extensive tree planting as part of the development</p>	<p>The mapping indicates two points; clarity may be needed as to where precisely this policy applies. Also, what is meant by extensive? This has to be balanced with providing parking spaces and useable amenity spaces etc.</p>	<p>Agreed remove extensive and name the relevant roads</p>

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<p><b>SNP Policy SwT2 – Road Improvements</b></p> <p>The road improvements indicated in HI12 to HI92, CR12 and TM12 are supported measures to be funded by Swanley Town Council and Sevenoaks District Council via Community Infrastructure Levy:</p> <p>b. A new all movement junction on the A20 to the west of Swanley to help alleviate congestion within the town centre by providing an alternative route to western Swanley and areas to the north such as Dartford, without having to route through Swanley Town Centre or double back from Sidcup.</p> <p>c. New link road from Birchwood Road to the B2173 to avoid narrow section at the southern end on approach to junction with B2173. This measure would be designed to alleviate congestion and improve safety at the Birchwood Road/B2173 signalised junction.</p> <p>d. Improving wayfinding including signing to car parks, Swanley Park and other key attractions.</p> <p>e. All pedestrian crossings to be upgraded to meet all current DDA requirements.</p> <p>f. Upgrade the pelican crossing to the high Street.</p> <p>g. Re-surface and improve the lighting and feel of Azalea drive as the gateway to Swanley station.</p> <p>h. Provide yellow box marking at the Goldsel Road/High Street roundabout junction.</p> <p>i. Introduce physical measures on Salisbury Avenue to prevent through</p>	<p>It may be better to set these road improvement projects out in a separate section, as opposed to within a policy. A number of the projects fall outside of planning e.g., providing yellow box marking and/or outside of SDC’s control. In addition, it may be better to set out separately the types of projects/schemes that Swanley TC will contribute funding towards from their CIL receipt.</p>	<p>Now included in new <b>SNP chapter 11 Proposals to achieve the Swanley Neighbourhood Plan Vision and Objectives</b></p>
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<p>movement and thus rat running from B2173 London Road</p> <p>j. Move no entry signage on Nightingale Way to adjacent ASDA access to clarify that there is no vehicular access on Nightingale Way and the pedestrianised area.</p>		
<p><b>SwT3 – Cycling</b></p> <p>Cycling is encouraged as an alternative mode of transport to the motor car on safe, designated cycle routes whenever possible to reduce pollution and traffic congestion. All new developments should incorporate segregated cycle access ways and adequate storage for bicycles in accordance with Policy SwT6. New cycle routes recommended in the SWECO report are supported:</p> <ol style="list-style-type: none"> <li>1. Cycle link from existing London Road cycle lane to St Mary's Road (along Oliver Road, Ruxton Close and existing path) - SDC Cycling Strategy Route 14</li> <li>2. West-east cycle route to the north of the town centre (along Hilda May Avenue, Northview, and Woodlands Rise) - SDC Cycling Strategy Route 16</li> <li>3. Cycle link between Woodlands Rise and town centre (upgrade existing public footpath 0262/SD81/2) - SDC Cycling Strategy Route 17</li> <li>4. Cycle link from Swanley to Hextable (through Swanley Park and along existing footpath 0305/SD69/1) - SDC Cycling Strategy Route 18</li> </ol>	<p>Cycle routes support - sits outside of planning but could be set out in a section outlining other aspirations. As mentioned in previous comments, this may be better supported by producing a LCWIP. Are segregated cycle ways achievable or necessary on all sites? Perhaps think about the wording.</p> <p>You may be aware that SDC have received some funding towards an LCWIP for Swanley. Further details will follow.</p>	<p>Now included in new <b>SNP chapter 11 Proposals to achieve the Swanley Neighbourhood Plan Vision and Objectives</b></p> <p>References to current Local Cycling and Walking Infrastructure Plan (LCWIP) development also included</p>

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<p>5. West-east cycle link from station to London Road (along Salisbury Avenue, restricted byway 0262/SD88/1; Glendale; Pinks Hill; Cranleigh Drive; Existing cycleway; Goldsel Road; Azalea Drive and Station Road) - SDC Cycling Strategy Route 20</p> <p>6. East-west cycle route to the station from London Road (along Salisbury Avenue, St George's Road, London Road, Goldsel Road and Station Approach) - SDC Cycling Strategy Route 21 A new Cycle Hub at Swanley station should also be provided as recommended by the SWECO report</p>		
<p><b>SwT4 – Walking</b>  Development proposals should incorporate safe pedestrian footpaths throughout the development and link with other existing pedestrian routes where appropriate and relevant.</p>	<p>As noted previously, this is supported but you may want to expand to include applying active travel principles for all ages and abilities, rather than just walking.</p>	<p>Active travel includes scootering and wheelchairs but is mainly concerned with walking and cycling which is why 2 policies are in the SNP. Segregation is considered to be a key element of these policies to ensure walker and cyclist safety from powered means of transport given that e scooters are legal to use on private land but not public roads or pavements.</p>
<p><b>SwT5 – Car and Cycle Parking</b>  Development proposals for new residential development that require their parking needs to be met on street are not appropriate in Swanley. Car and cycle parking for residential development in Swanley should as far as possibly provide a) Off street vehicle parking to be contiguous</p>	<p>As mentioned in our previous comments, these will need to be considered in relation to KCC's standards and they should be consulted. If these do not accord with KCC standards, then a clear justification will be needed.</p> <p>Link to evidence base which supports these standards?</p>	<p>KCC did not respond to the Regulation 14 consultation in relation to transport.</p> <p>The average car/van ownership in Swanley is 1.3 cars per household according to the 2021 UK Census. This is an increase from 1.24 cars per household in the 2011 UK Census.</p>

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<p>with and part of each property rather than as part of a shared arrangement          Car and Cycle Parking b) Shared parking areas are to be designed to Secure by Design standards and each space clearly visible from the property is serves wherever possible. c) Parking provision will be required to meet the standards set out below unless there is a clear justification for the application of a lower standard to achieve sustainable development:          Car Spaces * Cycle Spaces          * • 1 bed house/apartment 1.5 + 1 • 2 bed house/apartment 2 2 • 3 bed house/apartment 2 2 • 4 + bed house/apartment 3 2 d) Car and Cycle spaces should be provided for visitors at a rate of 1 space per 8 homes. e) All car parking spaces should have access to electric vehicle charging points. f) A garage will be acceptable as a parking space provided that its internal dimensions are at least 3 m wide x 6 metres long. Tandem Parking should only be permitted where there is no suitable alternative. Space dimensions should be 4.8 m x 2.4 m for cars, and 2 m x 0.75 m for cycles. * Off road + Rounded down</p>		<p>Our transport evidence document map shows on-road parking restrictions are extensive throughout the town requiring sufficient off-street parking facilities for new developments.</p>
<p><b>SwT6 Access for Vehicles, Pedestrians and Bicycles</b>          Development proposals should provide adequate width roadways to cater for domestic traffic as well as emergency vehicles such as ambulances, fire engines and refuse collection vehicles.</p>	<p>As mentioned above and before, many of these are covered by KCC.</p>	<p>This policy is intended to prevent development from being inadequately provided with such infrastructure such as at Downs View by Persimmon</p>

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<p>a) Residential premises with more than 50 dwellings shall have minimum of two access roads onto the main carriageways.</p> <p>b) All developments shall have well-lit artificial lighting to roads and footpaths using energy efficient LED lighting.</p> <p>c) Combined road and footpaths are only acceptable in smaller developments of not more than 10 dwellings.</p> <p>d) All developments should have dedicated cycle ways.</p>		
<p><b>SwT7 – Transport Infrastructure Planning</b></p> <p>The proposals indicated in below, are supported by the Neighbourhood Plan for further investigation and feasibility of implementation and are offered as a project for investment of Community Infrastructure Levy by Swanley Town Council and Sevenoaks District Council: A corridor Study of the lanes around Hextable Swanley and Crockenhill to establish where improvements can be made to facilitate the safe movement of vehicles along these roads for existing and future users.</p>	<p>The proposals listed could be added to a section outlining projects that the TC support, with a separate section outlining the type of things this SNP would like to put forward for funding contributions from CIL. Needs to replace 'investment' with 'funding'. Note that this corridor study extends beyond Swanley's area.</p>	<p>Now included in new SNP chapter 11 Proposals to achieve the Swanley Neighbourhood Plan Vision and Objectives</p>