

Swanley Neighbourhood Pre Regulation Plan Consultation Statement November 2022



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1. 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. It covers consultation activities undertaken to develop the Swanley Neighbourhood Plan up to the next formal stage of consultations to fulfil Regulation 14 of the Neighbourhood Plan Regulations (as amended). A further Consultation Statement Part Two will be produced after these consultations to outline any changes to the Plan as a result of any feedback received.

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.

2. The Approach to Consultation

The Steering Group had limited resources and experience of consulting with the public. They were concerned to ensure that individual residents had the opportunity to express their views via individual surveys conducted in hard copy and on-line whilst there were no specific drafts of policy approaches for the Neighbourhood Plan that they could engage with in detail. This would guide the overall vision for the plan and its objectives.

They were also concerned that residents could be kept abreast of key stages of the Neighbourhood Plan and a page on the Town Council web site and dedicated e-mail address were established and updates provided in the Town Council newsletter the "*Town Crier*".

The approach at the start was to have public events where people could identify issues and opportunities to guide the development of the overall aims and objectives and then follow this with survey work. As the NP policies developed, this approach was widened to include face to face events in separate locations in the Town where exhibition boards summarising data about Swanley and reflecting back how the emerging Neighbourhood Plan had taken on board their views, were provided to provide context to the proposed policies to be included in the in the Neighbourhood Plan. Statutory consultees, general consultee bodies and optional consultee were

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supplied by Sevenoaks District Council and contacted with a request to respond to the consultation, those contacted are outlined in the appendix section of this document.

As with most other Neighbourhood Plan consultations, face to face events or meetings with the public were suspended by the 3 national lockdowns associated with COVID 19 in March, November 2020, and January 2021. Plans for face-to-face consultation events in 2020 were delayed by STC and the group and in the end took place in October 2021. The Neighbourhood Plan Steering Group during these periods pivoted to online meetings on zoom.

3. Timeline of Consultations

As the timeline below shows the development of the Neighbourhood Plan had a halting start after the initial enthusiasm at designation. A new Town Council Chief Executive asked the Town Councillors to re-consider what they wished to do and employed a planning advisor (Lorraine Hart) to outline the opportunities that Neighbourhood Planning might offer to the area. As a result, a Steering Group, dominated by local residents, took the process forward.

Consultations Calendar			
Year	Date	Activity	Attendance
2014	November 2014	Swanley Town Council (STC) submitted application for designation	
2018	13 th February 2018	Public workshop to introduce Neighbourhood Planning	22
	22 nd March 2018 2.30pm and 6.30 to 8pm	Public workshops to discuss scope of Neighbourhood Plan and map-based exercises to identity issues and opportunities in the Neighbourhood Plan area. Workshops were publicised via a leaflet to households in the Neighbourhood Plan area as well as postings on the STC web site.	65

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Consultations Calendar			
Year	Date	Activity	Attendance
	19 th August to 21 st September 2018	Resident questionnaire survey delivered to every household (7,500) in the Neighbourhood Plan area and available online. Outreach session to get responses to student from young people attending the Orchard Academy	495 responses
2019	Steering Group meetings	9 meetings	
	Working Group meetings	20 meetings	
2020	Steering Group Meetings	8 meetings	
	Working Group Meetings	7 meetings	
	Meeting with Sevenoaks District Planning Officers	6 th March 2020	Steering Group members and SDC Planning officers
2021	Meeting with SDC Planning officers	12 th October 2022	Steering Group Chair
	19 th October 2021 2 to 4pm & 7 to 9pm	3 staffed exhibition events focussing on the NP policies as drafted. Held in 2 different venues supplemented by an online comments form for those who could not attend via a QR code on the Town Council web site	151 individual comment forms collected
	21 st October 2021 2 to 4pm & 7 to 9pm		
	23 rd October 2021 10am to Noon and 7 to 9pm		

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Consultations Calendar			
Year	Date	Activity	Attendance
2022	Meetings with SDC Planning Officers	12 th January 2022 via zoom	6 Steering group Members including Qualifying Body representatives from Swanley Town Council 3 planning officers from SDC
		15 th February 2022 via zoom	Planning Advisor (Lorraine Hart) and one planning officer from SDC

The Neighbourhood Plan Steering Group

The Steering Group was established early in the NP process in March 2018 with an agreed term of reference. Since that time, the group has worked closely with officers of STC to develop the content of the Neighbourhood Plan based on the public consultations held in the Town.

Full records of all their meeting are in the Consultation Statement evidence base but the schedule of their meetings is shown in the table below.

SWANLEY NEIGHBOURHOOD PLAN STEERING GROUP MEETINGS SCHEDULE				
2018	2019	2020	2021	2022
14 th May	13 th February	9 th January	25 th January	24 th March
30 th May	12 th March	12 th February	4 th February 2021	26 th April
13 th June	23 rd May	12 th march	8 th March	
27 th June	20 th June	26 th May	19 th April	
26 th September	24 th July	25 th June	18 th May	
24 th October	22 nd August	2 nd October	22 nd June	
28 th November	10 th October	24 th November	3 rd August	
	7 th November	16 th December	14 th September	
	11 th December		7 th December	

In June 2018, the Steering Group established 5 working groups on the Neighbourhood Plan themes identified as important from public consultations. These groups met on a task and finish basis to draft elements of the plan, undertake research and surveys and develop topic papers on the key issues. The group themes were:

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Working Group Theme	Mailing List membership
Community health education and leisure (later re-named community infrastructure)	18
Conservation and Heritage	4
Employment and Economy	9
Housing	6
Transport	19

Full records of their meetings are included in the Consultation statement evidence base. Membership of these groups varied based on the local concerns about various themes and the topics under discussion at each meeting.

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4. Results of Consultations

a) Scoping workshops

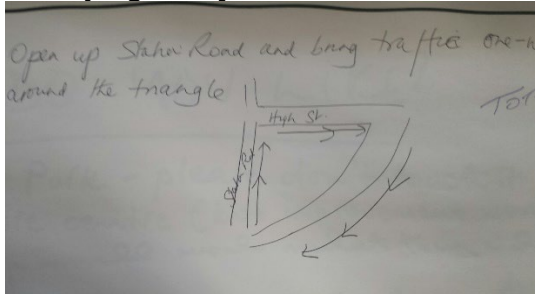
The workshops held in 2018 raised many issues, some of which were beyond the scope of planning control. Below is a summary of what people currently disliked about their area and what they liked and suggestions about what needed to be “worked on” via the Neighbourhood Plan. All entries in the table are based on written comments at the workshops and are quoted verbatim. People participating had discussions based around ward-based maps so comments made relate to the wards as set out below:

SWANLEY VILLAGE		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
Rural and agricultural heritage which puts Swanley on the map	Unplanned development in the village	“Green homes” solar panels, insulation, energy saving
The Green Belt around Swanley	Traffic using Swanley village as a cut to avoid Swanley traffic jams	Using local history group to engage in this plan
Historical town/village		Engage with local interest groups
Ability to walk across fields to Swanley		
Open spaces/fields to counteract pollution from M25 – air quality important for health of the population		

ST MARY’S WARD		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
Links Library - friendly	Not enough road sweeping	Renovate “The Woodlands” and bring it back into use as a community space – don’t sell it off
Bins emptied every week	No letter box in library or near old post office	Build a community hall for all
Garden waste recycled every two weeks	Town Centre appearance – dominated by ASDA	Provide social housing with affordable/social rents

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ST MARY'S WARD		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
	Lack of community spirit – “them” and “us” divide between social tenants and homeowners	More independent stores in Town Centre More chain stores in Town Centre

CHRIST CHURCH WARD		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
Open up Station Road and bring traffic one way around the triangle [comment supported by five ✓ and a “totally agreed”] 	Lack of social energy within the community or <u>lack of pride</u>	Better maintenance
We love Swanley Park		
Swanley park – please don't touch it! Leave “our” green lung alone!	Tall buildings – (threats of tower blocks above three stories)	Smarten up the Town Centre without over building
The leisure centre – but improvement would be welcome. Do up the existing centre – <u>don't move it!!</u>	Area is losing some of its trees	More independent shops
The recreation ground – please don't build on it	Long traffic queues – motorway and Swanley High Street	More litter bins – better enforcement related to litter
It's semi-rural setting		Building up the community – more community events, support local groups, societies, churches etc.
It's historic heritage – plants/farmland and heath – focus on the heritage for future generations		
The bakery		
Open spaces and Green Belt land.		

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CHRIST CHURCH WARD		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
Green verges and flowers on the road to Swanley from the motorway		

WHITE OAK WARD		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
Public open spaces – to be preserved – no development – this creates Swanley “Heritage”	Traffic – grid lock. Backs up onto motorway at peak hours 9 [comment supported by a ✓]	Traffic flows

SWANLEY TOWN CENTRE		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
Being so close to the country residents of Swanley currently enjoy cleanish air which I enjoy as I walk regularly in Swanley and see young families walking with their children.	When the traffic is slow during rush hour or adverse weather, I can sense that the air quality is poor. With an increase in traffic this will be the norm. This increase in pollution will not be healthy for babies, school children and the elderly with breathing issues.	
A friendly small-town atmosphere even tolerable on Wednesday when the market comes to town	Influx of a mixture of “new” residents and visitors as seen on market day with a likely increase in petty crime.	
Available parking, with ASDA currently offering “free” parking up to 2 hours	Difficulty in finding even paid for parking on Market days and with so many new homes	

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SWANLEY TOWN CENTRE		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
	proposed, parking is going to be more difficult to find	
Relative ease in exiting and entering Swanley by Road	Difficulty in exiting or entering Swanley by Road when there are traffic issues on the M25, M20 and A20. These difficulties will be compounded by an increase in the number of homes with cars	
Few high-rise buildings for allowing a village aspect though where there are tall buildings, these can cause quite strong wind tunnels	Should there be more high-rise buildings, there will be an increase in areas susceptible to high wind	
Few youths “hanging around” the town centre at night	With an increase in housing there will be an increase in youths in the Town Centre and with little for them to do, there is a chance of increased petty crime.	
Doctors’ surgeries are just about coping with existing patient requirements, but appointments are still achievable	With an increase in population there will need to be increased capacity at the existing doctors’ surgeries or new ones built to accommodate more patients	
There seems to be sufficient capacity for school children, and most are well behaved commuting to and from school	There will need to be for increased capacity at existing schools to accommodate more school children, along with	

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SWANLEY TOWN CENTRE		
LIKES	DISLIKES	THINGS THAT NEED TO BE WORKED ON
	associated transport infrastructure	
I believe that the current local bus services can be a little irregular, but they meet the current demands of residents, commuters, and school children	An increase in the Swanley population will inevitably result in an increase in transportation by way of more cars, van, lorries, buses, and taxis, resulting in increased noise and pollution	
There are sufficient retail units in Swanley to cater for the local community. There may be too many charity shops and betting shops but otherwise there seems to be a balanced retail experience	More retail outlets will inevitably result in an increase in traffic (deliveries and customers visiting the new shops and restaurants) resulting in an increase in pollution and traffic congestion	
	Schools are already full. More families with children will result in more pressure on local roads and train services for them to travel to other areas	
	No more fast-food outlets in the Town Centre	

These results were used by the Steering Group to craft a vision and themes for the development of the Neighbourhood Plan and questions for the next stage of consultation to guide the development of policy - the Residents Questionnaire Survey.

b) Residents Questionnaire

A questionnaire for residents (See consultation evidence base) was prepared and distributed to all households within the Neighbourhood Plan area (c7,500). Additionally, a targeted distribution of questionnaires was undertaken by STC and

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Steering group members with students of the Orchards Academy to ensure that the views of younger people were also captured.

Over a two-week period commencing 19th August 2018 to 21 September 2018, the number of responses received was:

- 280 hard copy questionnaires.
- 215 on-line questionnaires

The questionnaire included questions where respondents could agree/disagree with statements about a topic and score on a scale the extent of their agreement or concerns about it.

All questions allowed for additional comments to be made about the issues covered by the questionnaire which included:

Residents Questionnaire 2018 themes		
Access to the natural environment	Current Swanley Amenities	Housing density
	Future of Swanley - A draft Vision for the Neighbourhood Plan	Road safety
Affordable housing	Green Belt and open space	Strengths of the Town
Community Infrastructure	High rise development	Swanley Town Centre
Employment and business	Housing need	Weaknesses of the Town

The questionnaire also captured information about respondents themselves including their use of local amenities, their mode of travel to work, travel for pleasure and their own housing need.

The full results of the questionnaire can be found in the consultation evidence base.

In summary, it was noticeable that there was an overall consensus in responses to questions between residents and young people from the Orchard Academy. The main variations in responses between these two groups was in relation to housing types where young people had a greater preference for smaller houses and flats; on shop provision in the town centre where young people wanted to have more takeaways and restaurants and in relation to satisfaction about access to the countryside where young people were less satisfied than the overall respondents.

What the majority of respondents to the survey most valued about Swanley was its green and open spaces, the rural character of the area and access to the countryside.

In terms of the negative aspects of Swanley people were most concerned about air pollution and the volume and speed of traffic. The provision of sports, community,

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and play facilities was a primary concern too and current facilities of this type were identified as those most used by respondents.

Over 60% of those that responded agreed with the vision for the future of Swanley set out in the questionnaire:

“Swanley will accommodate change up to 2035 that retains and improved its environment and semi-rural setting and provide benefits for and sustain its community its people and its facilities and heritage”.

Given what respondents valued about Swanley questions related to the Green Belt and green space showed a majority supporting its protection from future development and most people considered high rise development in Swanley over four storeys to be unsuitable and out of character in the Town.

People did strongly agree that that there was a need for housing in Swanley and that 40% of it should be affordable. People expressed the view that all sizes of homes were needed with three-bedroom houses and flats most often mentioned and a specific concern that new homes should be accessible to those with disabilities or the elderly who were in need of specialist accommodation.

The strong value placed upon the semi-rural character of Swanley was reflected in respondents' views about housing density where a preference for 30-40 dwelling per hectare was expressed.

The concerns expressed about air pollution and traffic in the Neighbourhood Plan area influenced responses to specific questions about road safety in the Neighbourhood Plan area. There was strong support for cycle lanes, footpaths, limiting access for HGVs on country lanes and addressing congestion on some roads by the provision of better links to the A20.

This support for between pedestrian and cycle routes was also linked to questions about access to the countryside. Although most were satisfied with their access to the countryside most felt that there were barriers to access in relation to good signage and the condition of paths that deterred their use.

Responses to questions about the Town Centre showed that both residents and young people from the Orchard Academy strongly agreed that there was a need for new shops, particularly food/grocery retail and restaurants.

Finally, the need to improve employment and business opportunity with the Neighbourhood Plan area was supported by respondents. Both residents and young people thought new employment space was needed and should be provided and there was majority support for additional leisure/business visitor accommodation.

In addition to answering questions, respondents added specific comments elaborating on their answers which are summarised below:

Residents Questionnaire Comments	
Questionnaire Topic	No. of comments made
Strengths and weaknesses of Swanley	95

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The Future of Swanley	41
High Rise development	172
Future homes	56
Swanley Town Centre	99
Road safety	66
Current Swanley Amenities	17
Access to the Natural Environment	25
Other	100

Many respondents made similar comments or points made overlapped between questionnaire topics. The summary above therefore groups all the comments into topics that could be influenced by the Neighbourhood Plan since comments that related to the quality of services or issues like litter or dog fouling cannot be addressed by the Neighbourhood Plan as they are outside planning control (the granting or refusal of planning permission).

Health and Education

Analysis of the comments on all the questionnaire responses show that there were **96** comments made about the planning of health and education in the town.

For the **36** comments made about health most were related to the following:

- The need for development to be controlled into the future due to an increase in pollution and traffic that would come about if new homes were provided.
- That existing health facilities could not cope with the needs of the current population and would need to be added to if the population of the town increased.
- That protection from development for the Green Belt and Open Spaces in Swanley was needed in the future to ensure that they could continue to provide health benefit for local people.
- That cycling provision could help to improve the health of people in the town by increasing healthy lifestyles and reducing pollution from cars.
- That existing leisure facilities would need to be increased and improved in quality if the health of current and future residents is to be provided for.
- That the phasing of new development in Swanley would have to consider the availability of health facilities for current and future residents

Schools and education were mentioned in **60** comments in survey responses. These were mainly about:

- The quality of existing provision
- The ability of current provision to accommodate an increase in population.
- The need to improve roads safety around schools in Swanley.
- A lack of adult education provision in Swanley
- As with comments related to health, that the phasing of new development in Swanley would have to consider the availability of education facilities for current and future residents.

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Housing

327 additional comments were written that related to housing.

The survey data on specific response to questions shows the overall views that were expressed, that should be used as an overall guide to people's views about planning for housing.

The comments do however provide some insights into the strength of people views about the built form of housing that should be provided, the types of homes that were needed, affordability across both renting and buying and housing allocation for social housing. They give a feel for what underpins some people's views that can be addressed by gathering further evidence to inform the development of the Neighbourhood Plan's policies and proposals about:

- ❖ Housing need in Swanley in terms of overall numbers and types as well as the specific characteristics of the people that are in housing need.
- ❖ The suitability of locations in Swanley for housing development
- ❖ The provision and phasing of infrastructure needed to support an increase in the number of residents in Swanley.

Of the comments made, most were related to the overall provision of new homes. Those that expressed opposition to development of any new homes were made on the basis that:

- a) There is not a need for new housing because there were some examples of new housing development that had not been sold.
- b) That new homes would have a negative impact on Swanley in terms of its infrastructure. The most commonly mentioned concerns were:
 - Increased traffic volumes (including on the wider road network).
 - Traffic congestion and pollution.
 - The effect on the Green Belt and open spaces (both their loss and their quality)
 - The ability of existing health, education, and leisure facilities to accommodate an increased population in the town.
 - That there were better locations for housing development in Sevenoaks district and opportunities on brownfield sites in Swanley to provide new homes.
 - There was a small minority of comments on affordable housing that were negative about its provision since they associated social housing with people/families that have problems that will be a burden to the town.

Many comments were made about high rise development. The data (Responses to the questions) shows that 3-4 storey was the most favoured option in terms of height, but the comments add to this by setting out the main reasons people were concerned about high rise development of *housing*:

- That it did not suit the built character of Swanley as a town.

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- It did not accommodate the needs of children and young people for access to the outdoors and play.
- It did not accommodate the need for specific housing types that met the needs of people with health or disability issues associated with age or specific health conditions (e.g., dementia) that required housing types such as bungalows, assisted living/sheltered accommodation or care homes.

There were specific comments made that were related to the extent to which people felt that social housing was allocated to existing Swanley residents who were in housing need. Mention was made of the needs of young people sharing bedrooms and those who wished to stay in the area due to family and other connections.

Working and Employment

Those comments that were relevant to working and employment related to questions about the Town Centre, and employment and business. Below is a summary of the 300 comments made relevant to business and employment. Most were made about retailing, but some were made by respondents about other issues:

- Increasing the diversity of shops and restaurants
- Encouraging independent traders rather than chains
- Avoiding an increase in charity shops and takeaways
- Micro enterprise space on short lease terms
- Affordable workspace
- Increase in entertainment facilities - bowls, theatre, cinema.
- Address need for parking near centre
- Banking facilities

Transport

Residents Questionnaire Comments	
Questionnaire Topic Transport	No. of comments made
General Road Safety and Transport	53
Heavy Goods Traffic	12
Parking	12
Specific locations where people made suggestions or highlighted problems	31
Pedestrian facilities	6
Cycling	11
Public Transport	3
Speed	30

All these comments on transport related to the need for improvement and concerns such as safety of all road users and pollution.

The results of the scoping workshops and the residents' survey provided an especially important snapshot of the views of residents about the future of the Neighbourhood Plan area and provided the basis for the Steering Group and its

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working groups to finalise its overall vision and objectives for the plan and collecting evidence to develop its detailed content.

This process took some time, and the focus of the work was to ensure conformity with the Local Plan in both its current and emerging form to draft specific policies.

c) Face to face events 2021

The finalisation of policies for consultation was reached in the autumn of 2021 when it was decided to hold events at separate locations in the town with the policies available in draft form supported by exhibition boards. These provided a summary of previous consultations and key facts about Swanley and how they had informed the policies that were being presented for people to comment. They were asked to indicate their agreement or disagreement with the policies on a comments sheet.

(The Boards and Comments Sheet can be found in the Consultation Evidence Base).

A summary of the overall numbers of responses is shown below.

Autumn 2021 Face to Face Events	
Method	No. of Responses
Online Survey	45
19 th October event form (Swanley Village)	34
21 st October event form (Swanley)	35
23 rd October 2021 event form (Swanley)	32
Delivered by hand	5
TOTAL	151

The following tables shows the detail of the policies (Maps referenced) in the policies were on the Exhibition Boards) put before the public and the results from the Comments sheets gathered online and at the events. These indicate whether policies were supported and where no response was provided.

Autumn 2021 face to face events Consultation Results			
PROPOSED NEIGHBOURHOOD PLAN POLICY Community Infrastructure	TOTALS		
	Agree	Disagree	No Response
NP Policy SwC1 – Health Facilities in Swanley Replacement and improvement of current health facilities at the Oaks and Cedars surgeries are urgent. Development proposals for health facilities in Swanley will be supported where they are: <ul style="list-style-type: none"> Located in Swanley Town Centre Have adequate parking for visitors, patients, and staff. Provide facilities for social interaction for patients and visitors and health related education for patients and health professionals. 	64	1	2

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Autumn 2021 face to face events Consultation Results			
PROPOSED NEIGHBOURHOOD PLAN POLICY Community Infrastructure	TOTALS		
	Agree	Disagree	No Response
<p>NP Policy SwC2 – Open Space Development proposals that result in any loss of existing public green spaces as shown on the schedule and 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>New housing developments should include Amenity Green Spaces, based on 0.60 Ha of area per 1,000 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>	57	7	3
<p>NP Policy SwC3 – Children and Young Peoples Play Space 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.</p>	61	2	4
<p>NP Policy SwC4 – Indoor Sport facilities. Development proposals that provide indoor facilities, for non-water sport facilities being lost at White Oak, would be supported by the Neighbourhood Plan, subject to other policies in the Neighbourhood Plan.</p>	61	1	5
<p>NP Policy SwC5 – CIL Investments. 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 both Sevenoaks District Council and Swanley Town Council</p>	64	1	2
<p>NP Policy SwC6 – Community Buildings. Proposals that result in the loss of existing community buildings will not be supported unless there is clear evidence that:</p> <p style="margin-left: 20px;">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 style="margin-left: 20px;">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>	65	0	2

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PROPOSED NEIGHBOURHOOD PLAN POLICY Conservation and Heritage	TOTALS		
	AGREE	DISAGREE	No Response
<p>Policy SwHC1: Swanley Village Design Guidelines Development proposals for Swanley Village, in both the Conservation Area and the New Swanley Village area that are defined in the Swanley Village Design Guide should adhere to the overarching and architectural design principles contained in the Design Guide appended to the Neighbourhood Plan. <u>** Full copies of the Swanley village design Guide were available at the events</u></p>	52	1	14
<p>Policy SwHC2 – Heritage Asset Protection and Enhancement Development proposals that negatively impact the murals of William Mitchell in Swanley Town Centre in terms of their visibility and setting will not be supported unless they include plans, as appropriate, for their relocation elsewhere in Swanley Town Centre as defined in the Neighbourhood Plan or mitigation of other negative impacts from development.</p>	53	2	12
<p>Policy SwHC3 – Historic Assets Development proposals in the Neighbourhood Plan area will be expected to consider any historic assets included in the Heritage Environmental Records. Applications should show how any heritage assets in or around the development can be enhanced or any negative impacts avoided or minimised and ensure that these considerations are noticeably included in any relevant applications</p>	60	5	2

PROPOSED NEIGHBOURHOOD PLAN POLICY Employment and Economy	TOTALS		
	AGREE	DISAGREE	No Response
<p>NP Policy SwEE1: Loss of Employment uses. Proposals for the redevelopment or change of use of land or buildings in employment use to non-employment uses, other than those which are permitted development, will only be permitted when:</p> <p>(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>	57	1	9
<p>NP Policy SwEE2: Improving and increasing employment on existing employment sites. Proposals to upgrade, intensify or extend the following main employment sites listed below are supported: Park Road Industrial Estate Southern Cross Industrial Estate The Interchange/Wested Lane Industrial Estate Broom Hill Employment Area Moreton Industrial Estate</p>	58	3	6

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PROPOSED NEIGHBOURHOOD PLAN POLICY Employment and Economy	TOTALS		
	AGREE	DISAGREE	No Response
Gateway Trading Estate Swanley Village employment sites			
<p>NP Policy SwEE3: Small employment sites 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:</p> <ul style="list-style-type: none"> a) Do not involve the loss of dwellings. b) Contribute to the character and vitality of the local area. c) Are well integrated into and complement existing clusters of activity. d) Protect any neighbouring residential amenity. e) Do not adversely impact upon road safety. f) Enhance the overall development and provision of employment and self-employment space. g) Do not adversely affect the attractiveness of the local countryside. 	59	2	6
<p>NP Policy SwEE4 Proposals for hotel accommodation and visitor facilities within the defined area of Swanley Town Centre 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:</p> <ul style="list-style-type: none"> 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. 	55	5	7

PROPOSED NEIGHBOURHOOD PLAN POLICY Housing	TOTALS		
	AGREE	DISAGREE	No Response
<p>NP Policy SwH1 Development proposals of over 4 storeys should be limited to sites in Swanley Town Centre and are discouraged throughout the rest of Swanley. Such proposals should:</p> <ul style="list-style-type: none"> • Have good access to public transport. • Contribute to improving the permeability of the site and wider area, wherever possible • Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain, and 	53	5	9

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PROPOSED NEIGHBOURHOOD PLAN POLICY Housing	TOTALS		
	AGREE	DISAGREE	No Response
<p>public realm (including landscape features), particularly at street level.</p> <ul style="list-style-type: none"> • Incorporate publicly accessible amenity space and local play areas within the site area. • Where appropriate, provide additional green spaces in the form of roof gardens for residents of the development. • Have ground floor activities that provide a positive relationship to the surrounding streets. • Incorporate the highest standards of architecture and materials, including sustainable design and construction practices. • Should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation, and telecommunication interference. <p>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.</p>			
<p>NP Policy SwH2 Energy Efficient and Healthy Homes 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 Energy Performance Certificate ratings 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"> • External noise transfer from outside the building. • Cross talk between internal rooms. • Ventilation Plant noise. 	63	1	3
<p>NP Policy SwH3 Housing Space standards Homes should meet the Governments nationally described space standards (NDSS) as a minimum. Extensive tree and shrub planting shall be incorporated into all developments to provide a healthy and visually pleasing environment. A minimum of one tree per dwelling should be provided. Designs shall be inclusive for all members of society and cater for those with disabilities and the infirm wherever possible.</p> <p>Housing layouts must demonstrate how homes meet the storage requirements in the NDSS without being impacted by plant for mechanical ventilation and heating kit</p>	59	0	8
<p>NP Policy SwH4 Amenity Space for New Homes</p>	58	3	6

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PROPOSED NEIGHBOURHOOD PLAN POLICY Housing	TOTALS		
	AGREE	DISAGREE	No Response
All 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			
NP Policy SwH5 Homes for Work and study All homes should where feasible have dedicated working space with natural light	57	1	9
NP Policy SwH6 Housing Density 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	Up to 100 DPH	6	19
Rest of Swanley	50 DPH		
Edge of Swanley (sites adjacent to the Green Belt Boundary) and Swanley Village	30 DPH		

PROPOSED NEIGHBOURHOOD PLAN POLICY Sustainable development	TOTALS		
	AGREE	DISAGREE	No Response
NP Policy SwSD1 – Green Belt Developments in “Strong” and “Moderate” performing Green Belt Land as defined by Sevenoaks Council are not supported. Developments on previously developed brown field sites on Green Belt land are supported.	56	2	9
NP Policy SwSD2 – Swanley Town Centre Development proposals that result in a net loss of retail and other service-related spaces (Use class E) on sites in Swanley Town Centre (see map), other than those which are permitted development will not be supported.	54	1	12
NP Policy SwSD3 – Preventing the merging of Swanley Village with Swanley Town Development Proposals which result in the physical or visual merging of Swanley Village with Swanley Town will not be supported	54	4	9

PROPOSED NEIGHBOURHOOD PLAN POLICY Transport	TOTALS		
	AGREE	DISAGREE	No Response
NP Policy SwT1 – Planting of Trees All new developments close to main transport corridors shall incorporate extensive tree planting as part of the development.	62	0	5
NP Policy SwT2 – Road Improvements	60	0	7

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PROPOSED NEIGHBOURHOOD PLAN POLICY Transport	TOTALS		
	AGREE	DISAGREE	No Response
<p>The following road improvements indicated are supported measures to be funded in the longer term by the Community Infrastructure Levy/Planning Obligations:</p> <ul style="list-style-type: none"> a. A new all movement junction on the A20 to the west of Swanley <u>and</u> provision of an eastbound off slip access from the A20 onto the B2173. These improvements will help to alleviate congestion in the Town Centre and provide an alternative route to western Swanley and areas to the north without having to pass through the Town Centre. b. A new link road from Birchwood Road to the B2173 to avoid the narrow section at the southern end on approach to the junction with the B2173. This should improve safety at this junction and alleviate congestion. c. Improve wayfinding and signage to car parks Swanley park and other key attractions. d. All pedestrian crossings to be upgraded to meet disability requirements e. at St Mary's Road e. Upgrade the pelican crossing on the High Street f. Improve the lighting and feel of the Azalea Drive g. Improve bus stop facilities. h. Provision of Yellow Box marking at the Goldsel Road, High Street roundabout junction i. Introduce physical measure on Salisbury Avenue to prevent through movement and thus rat running from B2173 London Road j. Move No Entry signage on Nightingale Way to adjacent to Asda access to clarify that there is no vehicular access on Nightingale Way and pedestrianised area. 			
<p>NP Policy SwT3 – Cycling 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. The 7 routes identified in the SWECO Report of 2017 should be implemented to make sustainable modes feasible and possible within Swanley.</p> <p>All new developments should incorporate segregated cycle access ways and adequate storage for bicycles in accordance with Policy SwT6. A Cycle Hub at Swanley station should be provided in line with recommendations of the SWECO Report of 2017.</p>	59	2	6
<p>NP Policy SwT4 – Walking Development proposals should incorporate safe pedestrian footpaths throughout the development and link with other existing pedestrian routes where appropriate and relevant.</p>	60	0	7
<p>NP Policy SwT5 – Car and Cycle Parking Development proposals for new residential development that require their parking needs to be met on street are not appropriate in Swanley. Car and cycle parking for residential development in Swanley should as far as possible provide:</p>	59	1	7

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PROPOSED NEIGHBOURHOOD PLAN POLICY Transport	TOTALS																	
	AGREE	DISAGREE	No Response															
<p>a) Off street vehicle parking to be contiguous with and part of each property rather than as part of a shared arrangement</p> <p>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.</p> <p>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:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>Car Spaces *</th> <th>Cycle Spaces</th> </tr> </thead> <tbody> <tr> <td>1 bed house/apartment</td> <td>1.5 *</td> <td>1</td> </tr> <tr> <td>2 bed house/apartment</td> <td>2</td> <td>2</td> </tr> <tr> <td>3 bed house/apartment</td> <td>2</td> <td>2</td> </tr> <tr> <td>4+ house/apartment</td> <td>3</td> <td>2</td> </tr> </tbody> </table> <p>d) Car and Cycle spaces should be provided for visitors at a rate of 1 space per 8 homes.</p> <p>e) All car parking spaces should have access to electric vehicle charging points.</p> <p>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.</p> <p>Space dimensions should be 4.8 m x 2.4 m for cars, and 2 m x 0.75 m for cycles.</p> <p>* Off road * Rounded down.</p>		Car Spaces *	Cycle Spaces	1 bed house/apartment	1.5 *	1	2 bed house/apartment	2	2	3 bed house/apartment	2	2	4+ house/apartment	3	2			
	Car Spaces *	Cycle Spaces																
1 bed house/apartment	1.5 *	1																
2 bed house/apartment	2	2																
3 bed house/apartment	2	2																
4+ house/apartment	3	2																
<p>NP Policy SwT6 Access for Vehicles, Pedestrians and Bicycles 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>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>	61	1	5															

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PROPOSED NEIGHBOURHOOD PLAN POLICY Transport	TOTALS		
	AGREE	DISAGREE	No Response
<p>NP Policy SwT7 – Future Transport Infrastructure The proposals below are supported by the Neighbourhood Plan for further investigation and are offered as guidance to Swanley Town Council and Sevenoaks District Council for investment of the Community Infrastructure Levy.</p> <p>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>	51	2	14

As can be seen from the table there was support for all policies by those who attended events and filled in comment sheets either in person or online. However, there were some areas of disagreement and comments made on the forms indicate the main reasons. The response of STC and the Steering Group in terms of amendments to the policies to address the results of consultation are shown below.

Autumn 2021 Consultation results	
Areas of disagreement	Amendments proposed
SwC2 – loss of open space – these mainly concerned policy which related to the provision of play space which confused people because they assumed it related to provision on green space	Relocate policy related to play provision to housing section to make policy clearer
SwEE1 – Loss of Employment Uses – concern about the strength of the requirements for justifying loss of employment space	No change on the basis that this would prove difficult to justify
SwEE2 – Improving and increasing employment on existing employment sites concern about the inclusion of Swanley village within this policy	Change policy so that it relates only to improvements, not increases, in Swanley Village. Provide maps of all sites to make the policy application clearer.
SwEE4 – Support for visitor facilities – concern about the need for such facilities and their impact	Evidence suggests that it is needed and is one of the few potential areas of employment growth available that build on the green infrastructure assets of the Neighbourhood Plan area
SwH1 – Tall Buildings - Concern about the idea of tall buildings at all in Swanley	The need for the policy was based on all consultations where people felt that tall buildings were out of character in the Neighbourhood Plan area and as a result some had been agreed in the absence of planning policy to address this. It was agreed that the policy needed amendment and SDC had also raised concerns about it was worded.
SwH6 – Housing Density – concern about the impact of higher densities in the Town Centre on supporting community infrastructure and increased population	To meet housing need identified in NP consultations and by evidence increases in density are needed to protect open space and the Green Belt
SwSD1 – Green Belt – no caveat about changes	It was agreed to amend to cover protection for all designated Green Belt

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Autumn 2021 Consultation results	
Areas of disagreement	Amendments proposed
SwT5 – Car and Cycle Parking – standards should be increased for visitor parking	The proposed policy is already more generous than current Kent County Council standards and the intention of the policy was to ensure that cars could be accommodated until public transport and the transition to zero carbon was further progressed.

5. Results of Consultation with Sevenoaks District Council and Kent County Council

Sevenoaks District Council has provided updates to the Neighbourhood Plan Steering Group about the progress on their Local Plan and its developing evidence base.

They have also provided advice and practical assistance with the production of maps and provision of data for the Neighbourhood Plan area.

Kent County Council have also provided feedback to the group on Neighbourhood Plan policy development since they were drafted in 2021 shared with the public.

This process started in March 2020 when Steering Group members met with SDC Planning officers and shared initial background documents on transport, health, the Green Belt and Housing within the Neighbourhood Plan area for comment.

SDC were able to offer advice to Steering Group members on positive planning language, the use of consultation results from 2018 and 2019 and references to Local Plan evidence and policy.

On 12th October 2021 the Chair of the Steering Group again met with SDC Planning officers to outline the results of consultations and to invite them to the public events to be held on the draft NP policies and to submit their views to them too.

In the period February to April 2022 Sevenoaks District Planning Officers and Kent County Council officers provided written feedback (see Consultation evidence base) on the Neighbourhood Plan draft policies to the Steering Groups Planning Advisor via a meeting held on 15th February 2022. Almost all policies were welcomed, but points of clarification and references to evidence to support them were requested to ensure that the Neighbourhood Plan narrative to support all the policies was clear, particularly in relation to Kent County Council policies on parking and transport.

Their major concerns related to:

Policies on **Conservation and Heritage SwHC2 and 3 – SwHC2** was amended to strengthen the protection of a non-designated heritage asset and SwHC3 was deleted as it was adequately covered by advice to applicants on consideration of heritage assets when they were affected by development proposals.

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Policies on housing particularly the height of new developments covered by **Policy SwH1** and **SwH6 Housing Density**. Here the suggestion was made that the policy on tall buildings needed to be based on a character assessment of the Neighbourhood Plan area and the evidence on which the density proposals were based.

Policies on Transport, particularly where they related to Kent County Council guidance and standards covered by **Policy SwT6 on Access for vehicles, Pedestrian and Bicycles** and **Policy SwT5 on Car and Cycle parking**.

6. Conclusion

As a result of all the consultations held, the Neighbourhood Plan policies have been amended and new evidence has been collected to support the intention to provide locally distinctive policies that are clear to guide development in the future.

In addition, chapters in the plan have been reorganised and renamed and policies placed in sections which are more appropriate to their content to assist with clarity.

In particular, a character assessment has been undertaken to support policies on tall buildings in Swanley Town Centre and new maps added to assist with application on the policies on Employment.

This will form the basis for a new Regulation 14 version of the Neighbourhood Plan to reflect the feedback of local people in the Neighbourhood Plan area and statutory authorities.

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8. Appendix

Consultee Type	Body
Statutory consultee	The Environment Agency
Statutory consultee	English Heritage
Statutory consultee	Historic England
Statutory consultee	Natural England
Statutory consultee	The Mayor of London /Greater London Authority
Statutory consultee	The Civil Aviation Authority
Statutory consultee	Homes and Communities Agency
Statutory consultee	Primary Care Trust
Statutory consultee	Office of Rail Regulation
Statutory consultee	Transport for London
Statutory consultee	Integrated Transport Authority
Statutory consultee	Kent County Council Highways (as the Highways Authority)
Statutory consultee	Marine Management Organisation
General Consultation Bodies	Network Rail
General Consultation Bodies	Office of Road and Rail
General Consultation Bodies	South Eastern
General Consultation Bodies	Go Coach
General Consultation Bodies	Arriva
General Consultation Bodies	South East Local Enterprise Partnership
General Consultation Bodies	Kent Fire
General Consultation Bodies	Kent Police
General Consultation Bodies	South East Coast Ambulance Service
General Consultation Bodies	South East Water
General Consultation Bodies	Southern Water
General Consultation Bodies	Sutton and East Surrey Water
General Consultation Bodies	Thames Water
General Consultation Bodies	UKPN
General Consultation Bodies	KCC Education
General Consultation Bodies	National Grid
General Consultation Bodies	KCC Waste
General Consultation Bodies	NHS England South
General Consultation Bodies	West Kent Care Hub
General Consultation Bodies	Kent Downs AONB Unit
General Consultation Bodies	High Weald AONB Unit
General Consultation Bodies	Kent Nature Partnership

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General Consultation Bodies	Upper Medway Drainage Board
General Consultation Bodies	Strategic Planning
General Consultation Bodies	National Highways
General Consultation Bodies	Lead Local Flood Authority
General Consultation Bodies	Minerals and Waste Planning Policy
General Consultation Bodies	Development Investment (KCC)
General Consultation Bodies	Strategic Planning
General Consultation Bodies	Culture and Creative economy
General Consultation Bodies	ProW
Optional Consultation Bodies	Crockenhill Parish Council
Optional Consultation Bodies	Hextable Parish Council