

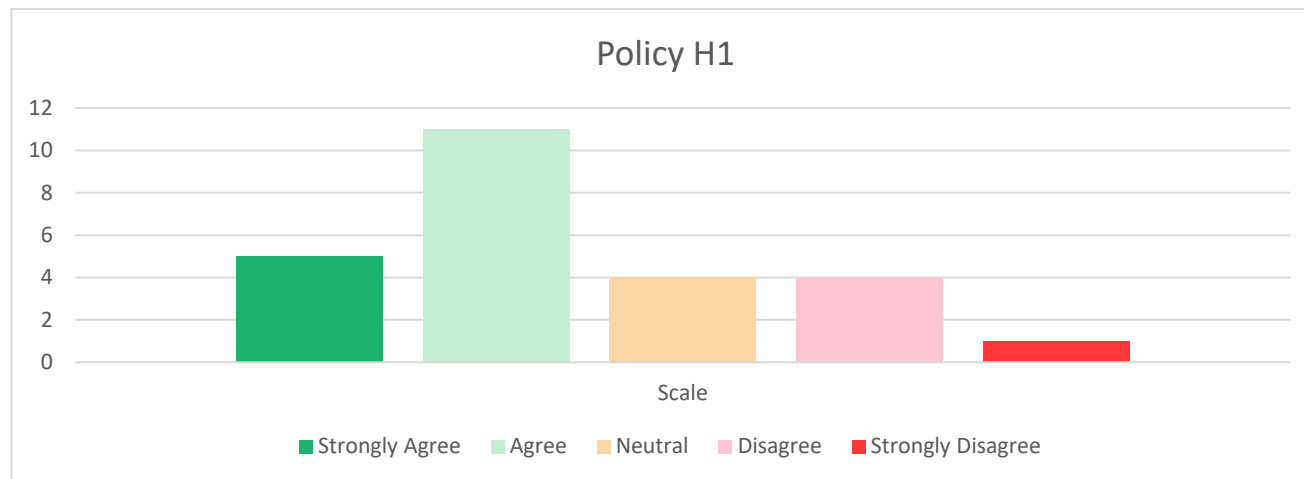
Chapter 2 – Housing Choice for All

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy H1 – Housing Mix

27 responses

Of the 25 respondents who answered the quantitative question, 64% said that they strongly agree or agree with Policy H1.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Highlights that whilst considering different housing choices, water supplies and wastewater treatment in the new housing area should be taken into consideration. An effective strategy involves active communication and cooperation among local councils, developers and water companies. Highlighting potential risks and issues related to water quality and supply in policies is vital and ensures that developers are well-informed and take necessary measures to mitigate these concerns.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Neutral	TWBC notes that the policy provides for a housing mix based on local criteria/evidence and makes provision for customised/self-build housing and does not wish to comment further on this policy.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	The Chiddingstone Housing Needs Survey indicated a need for 18 units and the parish has two affordable housing schemes underway on Rural Exception Sites. Suggestion that demand for affordable housing has been met in the parish.
Crockenhill Parish Council	Agree	Broadly supportive of commitment to deliver all new homes to meet the M4(2) criteria. Question whether the 5% target for M4(2) is sufficient, given population statistics stated in the plan.
Eynsford Parish Council	Not Answered	Support plan to “provide homes built to high sustainability standards with built-in resilience to climate change and fuel poverty” but would like to see more details regarding this, as well as changes to the planning application process to reflect this.
Hever Parish Council	Agree	Supports proposed numbers on the basis that Green belt housing development should not go ahead without additional infrastructure being in place first. Environmental impacts are a key consideration, including flood risk and waste management.
Leigh Parish Council	Neutral	No comment.
Sevenoaks Town Council	Not Answered	Highlights the importance of ensuring availability of options for downsizing. Suggestion of ‘co-housing scheme’ requires further development to include mixed communities of market and affordable homes for older people. Provides example of Rockdale in Sevenoaks.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Home Builders Federation	Not Answered	Notes the Government’s intention to require M4(2) as the mandatory standard for all new homes and that this will need to be removed, should it be implemented prior to Plan 2040 adoption, to avoid duplication. Suggestion to amend policy to reflect more recent evidence from the English Housing Survey and Council’s Household Survey which indicates needs for wheelchair accessible housing to be more likely within region of 1-3%. HBF does not consider a blanket requirement for self build homes on large housing sites to be appropriate. Do not consider the policy to be justified as no

		information is provided to show whether demand is being met. Further suggestions relating to self-build homes including suggestion to be a maximum, not a minimum and to set out that the plots will return to the applicant as market housing should they remain unsold after a specified marketing period of 6 months.
Network Rail	Not Answered	Strongly supports objectives OB6, OB9 and OB10. Emphasises the importance of new homes having multiple transport options available to them – preferably sustainable modes that can reduce pollution and congestion.
The Sevenoaks Society	Not Answered	Welcomes Policy H1.
The Shoreham Society	Agree	Encourages quality developments by smaller builders/developers and to put a smaller priority on self-build. Suggestion to provide segregated cycle paths and safe pedestrian routes within new estates, ensuring that they are built so that the streets can be immediately adopted by KCC.

General Responses

Summary

General responses support Policy H1 but suggest that the policy should include a commitment to optimise the use of brownfield sites, as well as raising queries regarding viability testing for the requirement for M4(3)b homes. The suggestion was also put forward to prioritise housing with small footprints, including en bloc accommodation of two or three storeys and provision of underground spaces. Concerns were raised that the wording of Policy H1 to deliver a variety of house sizes and types across the District does not mirror the Development Strategy, which focuses on development within or adjacent to the District's eight top-tier settlements.

Overall Summary

Summary of comments on Policy H1

Responses to Policy H1 came from a range of respondents including statutory consultees and key consultation bodies, including a number of town and parish councils, as well as from the general public. Many responses supported the objectives of Policy H1 and made reference to the M4(2) and M4(3) standards set out in the policy. Valuable suggestions were made regarding water supplies and wastewater considerations, as well as discussion surrounding the proposals for self-commissioned homes including self-build homes and co-housing.

Following analysis of the responses to Policy H1, it is important to highlight that Local Housing Needs Surveys are designed to assess the local housing need within the existing community but do not consider wider housing need (including affordable housing need) from the wider population and market trends. Therefore, it is important to note that whilst Local Housing Needs Surveys form an important part of the Plan 2040 evidence base (in particular in relation to Policy H3 and planning for Rural Exception Schemes), they should not be seen as a maximum housing need for the locality.

Additionally, it is important to highlight that in the determination of planning applications and site allocations, all policies are considered simultaneously. Therefore, whilst comments on the environment and infrastructure provision are noted, these will be dealt with alongside other policies in the Plan.

Actions for Regulation 19 (Officer Response)

Ahead of Regulation 19, further work will be carried out on co-housing and self-build and custom housebuilding, this includes confirming the Council's position in respect of self-build demand, testing whether the percentage set out in Policy H1 is appropriate, as well as exploring the potential for further detail to be included in the policy. Additionally, we will explore the percentage target for M4(2) standards and reflect upon recent evidence from the English House Survey and Council's Household Survey (particularly in relation to wheelchair accessible housing) and update the policy where required. We will also ensure that Policy H1 is in general conformity with other local plan policies.

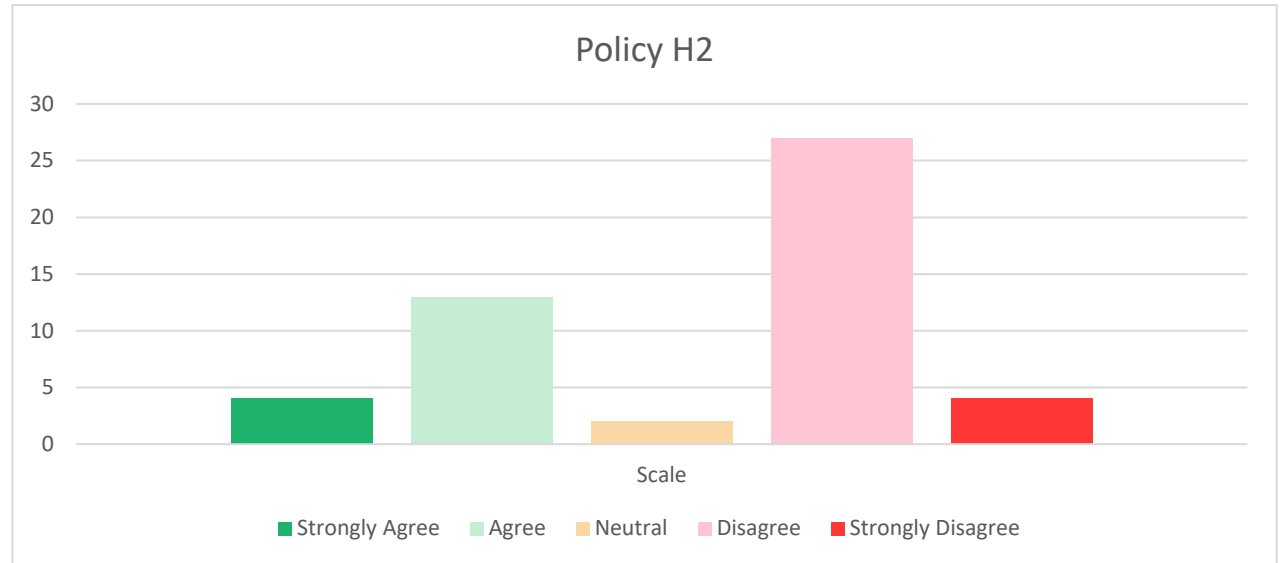
This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy H2 – Provision of Affordable Housing

54 responses

Of the 50 respondents who answered the quantitative question, 62% said that they either disagree or strongly disagree with Policy H2.

Of those who disagree with Policy H2, a large number of responses related specifically to a Local Housing Needs Survey currently being undertaken in Hartley, as part of the work on the emerging Neighbourhood Plan.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Agree	It is noted that the policy is almost identical in terms of thresholds and percentage requirements as the TWBC affordable housing policy, which is unsurprising given the similar housing needs and market contexts.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Badgers Mount Parish Council	Not Answered	Broad support for provision of affordable housing. Reservations around workability. Specific concerns around the lack of available options for people who would like to downsize in Badgers Mount.
Chiddingstone Parish Council	Agree	Suggestion that the provision of affordable housing or off-site contributions must be made on all developments. Profit margins should take into account affordable housing.

Organisation	Agree-Disagree scale	Summary of response
Crockenhill Parish Council	Agree	Broadly supportive of policy but have reservations around workability. Recognises that Sevenoaks is particularly vulnerable to the viability argument for affordable housing provision, due to high average house prices. Note that this is the most needed housing type for the District. Concerns raised regarding enforcement based on previous experience.
Dunton Green Parish Council	Not Answered	Suggestion that affordability should be measured at parish level, not ward level. Parishes in combined wards across the District, such as Riverhead and Dunton Green, may be adversely affected if the measure is not directly within the Parish. Concerns around specific local development. Encourages a means whereby affordable homes are provided in perpetuity and community housing schemes should be promoted more widely.
Eynsford Parish Council	Agree	Raises concerns regarding 'get out clauses' in Policy H2. Preference for the affordable housing percentage to be at the higher end (40%) where possible.
Farningham Parish Council	Not Answered	Concerns regarding specific site proposal at Pedham Place contradicting this policy.
Fawkham Parish Council	Not Answered	Supports the policy and is aware of limited demand for Affordable Housing in Fawkham. Highlights importance of on-site provision rather than financial contributions. Highlights Dec 2023 NPPF states that in Designated Rural Areas [DRAs] (such as Fawkham Parish) policies may set out a lower threshold of 5 units or fewer (para. 65). Encourages reconsideration of the affordable housing requirement for sites of 5 or less, and 6-9 dwellings in DRAs.
Hartley Parish Council	Not Answered	Supports policy in principle. Considers importance of developers providing a proportion of dwellings on site rather than financial contributions. Highlights that Hartley Parish Council is currently undertaking a Housing Needs Survey as part of Neighbourhood Plan preparation.
Hever Parish Council	Not Answered	Supports provision of affordable housing on the basis that additional infrastructure is provided ahead of development. Environmental impact is a key consideration, including flood risk and waste management. Development should reflect local need and include shared ownership options. Mix of housing (e.g. provision of 3 and 4 bed affordable homes) would support lower income families.

Organisation	Agree-Disagree scale	Summary of response
Kemsing Parish Council	Agree	Encourages SDC to ensure development schemes contribute to the affordable housing provision required.
Leigh Parish Council	Disagree	Considers that overall, these figures seem reasonable but concerns when applied to a small village that the provision of affordable housing is not delivered. Suggestion for a strategy that allows for small developments to have a higher percentage of affordable housing. Highlights the importance of developers profit margins taking affordable housing provision, or off-site contributions, into consideration.
Sevenoaks Town Council	Agree	Concerns regarding inclusion of allowance for developers to demonstrate that affordable homes are 'not viable'. Suggests that financial contributions in lieu of on-site affordable housing provision be ringfenced for alternative delivery of affordable and social housing.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
CPRE	Not Answered	Whilst provision of more affordable homes is welcomed, CPRE raises concerns that policy requirements are not clear enough to be easily understood. Highlights no explanation as to differing requirements in designated rural areas (DRAs) and non-DRAs. Identifies that glossary definition of previously developed land (PDL) conflicts with national policy definition. Further clarification requested regarding the caveats under the detailed table. Suggestion to cross-reference between housing policies.
Kent Downs National Landscape Unit	Not Answered	Supports the requirement for affordable housing on schemes of 6 units or more within Designated Rural Areas (which includes AONBs). Sets out preferred approach for sites located within the Kent Downs NL would be for onsite provision rather than the proposed financial contributions. If financial contributions are taken forward, Kent Downs NL consider it crucial for any contributions to be ring fenced for provision elsewhere in the respective AONB.
NHS Property Services	Not Answered	NHS Property Services request that Draft Local Plan Policy H2 support the delivery of affordable housing for key workers and local essential workers. Sets out

Organisation	Agree-Disagree scale	Summary of response
		recommendations for SDC to ensure NHS staff has access to suitable housing at an affordable price, within reasonable commuting distance of the communities they serve. Suggestion that Policy H2 should consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.
The Sevenoaks Society	Strongly Agree	Welcomes Policy H2 and particularly the provision for a viability review. Raises concerns regarding Council's recent lack of success in achieving affordable housing, in particular rented social housing, within mixed and residential developments in Sevenoaks Urban Area and therefore welcomes requirements set out in Policy H2 for viability review upon first occupation or an alternative agreed trigger point. Secondly raises concerns relating to transparency in relation to viability assessments. Suggestion to include provisions relating to openness and transparency of viability information, similar to those in the Mayor's Strategic Plan (page 13-14)
The Shoreham Society	Agree	Strongly agrees with Policy H2 with the exception of First Homes and other intermediate tenures. Suggests that the Council should plan for possible future changes in funding or regulation which will make affordable and social rented housing more freely available. Agree that the affordable housing contributions are reasonable in current policy climate.

General Responses

Summary
<p>General responses highlighted that Plan 2040 proposes allocating greenfield Green Belt sites which are less likely to suffer from viability issues, therefore having the potential to deliver affordable housing to meet policy requirements. Responses raised concerns regarding accepting financial contributions in lieu of on-site provision, as well as concerns regarding the requirement for affordable housing provision in Designated Rural Areas, with it being noted that a large percentage of the District lies within these areas. Clarification was requested as to whether the policy applies solely to C3 units, or whether it also considers C2. It was highlighted that the viability of specialist older persons housing should be regarded separately to standard housing, as well as suggesting that the reference to 'viability review' should be removed from the policy to be consistent with national policy. General responses also raised comments on specific sites.</p>

Overall Summary

Summary of comments on Policy H2

Responses to Policy H2 came from a range of respondents including statutory consultees and key consultation bodies, including many town and parish councils, as well as from the general public. Many responses supported the policy in principle, however raised concerns regarding workability, and the proposed allowance for off-site financial contributions. Responses noted that affordable housing is the most-needed housing type in the District, and that Sevenoaks District is particularly at risk for viability concerns due to the high average house prices. Responses made a range of valuable suggestions including in relation to viability concerns and accessibility, financial contributions and the consideration of ward versus parish need figures.

Recent changes to the NPPF in December 2023 were also highlighted, in particular in relation to small sites of 5 or less units in Designated Rural Areas.

Actions for Regulation 19 (Officer Response)

Ahead of Regulation 19, we will continue to analyse the responses and suggestions received and develop these policies, in collaboration with our Development Management and Housing colleagues. We will explore the possibility of affordability being measured at a parish level (rather than at a ward level) and provide further clarification throughout the policy, in particular regarding Designated Rural Areas, the national PDL definition and C2 / C3 units. Additionally, we will review the Mayor's Strategic Plan, as highlighted above, and investigate the possible inclusion of provisions relating to openness and of viability information.

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy H3 – Housing in Rural Areas

33 responses

Of the 31 respondents who answered the quantitative question, 61% said that they strongly disagree or agree with Policy H3.

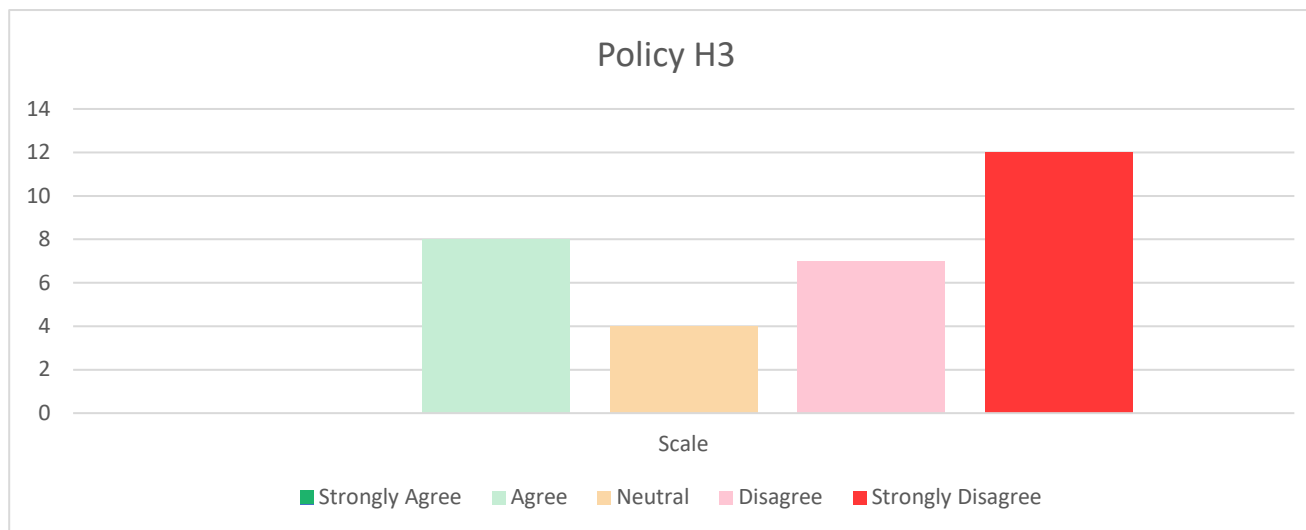
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Welcomes the inclusion of an element of open market housing to facilitate affordable housing schemes on rural exception sites, which is important to maintain viability as well as creating a housing mix.
Crockenhill Parish Council	Neutral	Encourages more emphasis on SDC working with town and parish councils, in terms of identifying areas for small-scale, appropriate development and in determining general planning applications. Queries the next step once Local Housing Needs Surveys are carried out – keen to understand and work collaboratively on next steps.
Edenbridge Town Council	Not Answered	Highlights findings from January 2022 Housing Needs Survey for Edenbridge. Discussion around specific circumstances for Affordable Housing in Edenbridge, including the new development on Four Elms Road, which will provide affordable housing.
Farningham Parish Council	Not Answered	Concerns regarding specific site proposal at Pedham Place contradicting this policy.
Fawkham Parish Council	Not Answered	Supports policy in principle but object to Policy H3 at it contains provision for market housing on unsustainable sites in areas designated as otherwise unsuitable for market housing, such as the Green Belt and has no spatial requirements. Wish to see retention

Organisation	Agree-Disagree scale	Summary of response
		of Core Strategy Policy SP4(c) and the exclusion of market housing on rural exception sites.
Hartley Parish Council	Not Answered	Object to Policy H3 as it contains provision for market housing on unsustainable sites in areas designated as otherwise unsuitable for market housing such as the Green Belt and has not spatial requirements. Would wish to see the retention of Core Strategy Policy SP4(c) and the exclusion of market housing on rural exception sites.
Leigh Parish Council	Neutral	Highlights that delivery of 100% affordable housing for local needs has been difficult. Considers there is a better approach to enable landowners to come forward with suitable sites. Provision of open market housing to facilitate a rural exceptions scheme is welcome and an important means of encouraging landowners to put sites forward.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Kent Downs National Landscape Unit	Not Answered	Concerns that proposed Policy H3 does not include any reference to such sites being used for affordable housing (although mentioned at 2.13). Kent Downs NL consider that this should be reflected in the policy wording.
NHS Property Services	Not Answered	NHS Property Services welcome the acknowledgement with regard to rural exception housing schemes that on the occasion it can be demonstrated that a wholly local needs housing scheme is not viable or deliverable, and the Council agrees, it is expected that the market housing for sale will be used, in the first instance, to meet identified needs including house for local essential workers, older people, plots for self build and co-housing.
The Shoreham Society	Agree	Agrees that modest development within existing rural settlements is reasonable, but should be carefully weighed against any potential harm to the Green Belt/National Landscapes. Opportunities for provision of affordable rented housing in villages should be encouraged. Suggests that the Council should strongly oppose standalone housing development outside of existing settlements as these are considered damaging to the Green Belt/National Landscapes and are usually car dependent.

General Responses

Summary

General responses support the policy and the delivery of affordable housing in rural areas. Comments welcome the commitment from the Council to work with landowners of rural estates to deliver rural exception housing to meet local need. Concerns were raised regarding the difficulty of meeting the Council's eligibility criteria test for new affordable housing partners. Responses also make reference to specific sites considered through the Plan 2040 process.

Overall Summary

Summary of comments on Policy H3

Responses to Policy H3 came from a range of respondents including a number of town and parish councils, key consultation bodies and general members of the public. Comments were in general support of the policy objectives, and many raised parish or site specific comments, including in relation to existing local housing needs surveys. The support for the inclusion of a small amount of market housing on rural exception sites was split as whilst many respondents support this as a more viable process for bringing affordable housing forwards in rural areas, a small number of respondents raised significant concerns regarding this approach.

It was highlighted that Policy H3 does not currently specifically mention affordable housing, aside from in the supporting text. Concerns were raised in relation to difficulty meeting the eligibility criteria tests for new affordable housing partners. Further guidance and support was also requested relating to the next steps for towns and parishes, following completion of local housing needs survey.

Additionally, it is important to highlight that in the determination of planning applications and site allocations, all policies are considered simultaneously. Therefore, whilst comments regarding the impact of housing development on the environment are noted, these will be dealt with alongside other policies in the Plan.

Actions for Regulation 19 (Officer Response)

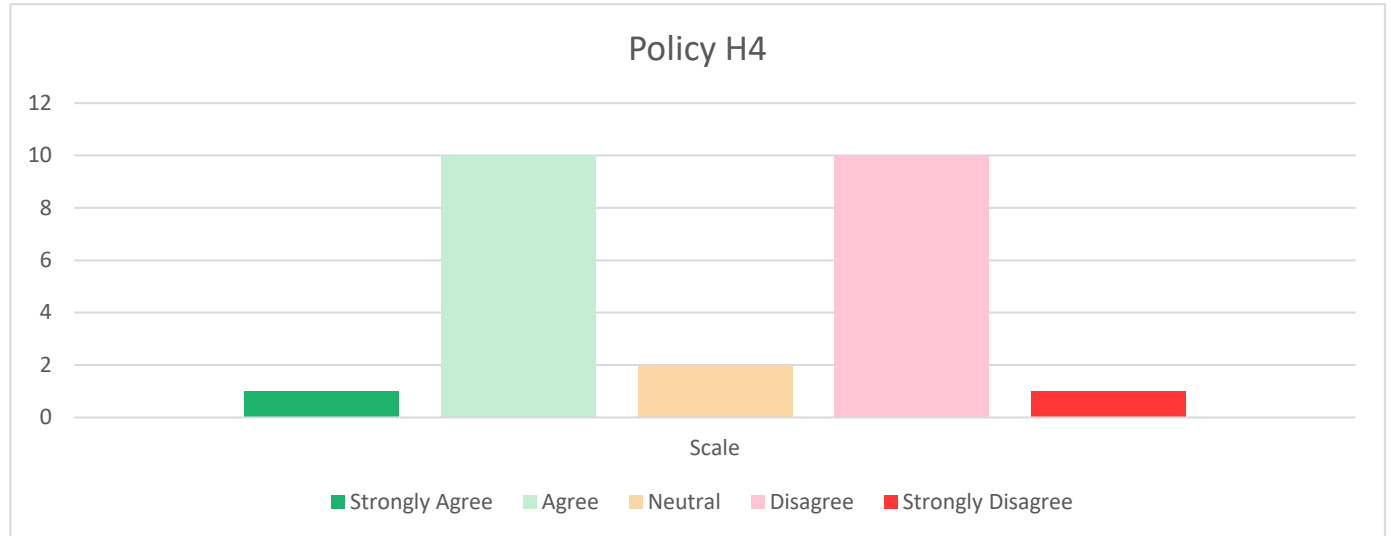
Ahead of Regulation 19, the Strategic Planning team will continue to work collaboratively with SDC housing team to review the responses to Policy H3. In particular, we will make specific reference to affordable housing in the policy, as well as contacting town and parish councils who raised queries or requested further guidance relating to Local Housing Needs Surveys.

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy H4 – Housing for Older People

27 responses

Of the 24 respondents who answered the quantitative question, the response was evenly split, with 40% answering that they strongly agree or agree with Policy H4 and another 46% stating that they disagree or strongly disagree with Policy H4. The remaining 8% were neutral.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	Welcomes the support and willingness to work with KCC on the delivery of suitable housing for older people. KCC would welcome the opportunity to look for SDC's support in securing future developer contributions via its CIL mechanism that allows appropriate adult social care infrastructure and equipment to be funded and delivered. Welcomes joint working with SDC to understand opportunities where the Local Plan to assist with recruiting difficulties into the Adult Social Care sector. Suggestion to move the delivery of adult social care infrastructure out of SDC's CIL governance.

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Suggestion that consideration should be given to any open market housing incorporated to facilitate an affordable housing scheme being for older people (either bungalows or ground floor flats). Depending on parish need, consideration should also be given to affordable housing for older people.
Crockenhill Parish Council	Agree	Broadly supportive of policy but encourages more specific building criteria. Notes that existing social housing may not be suitable for older people – e.g. no space for a double bed. Lack of storage also identified as a need for Crockenhill Parish. Preference for smaller courtyards rather than gardens, due to maintenance. Reiterates the importance of ensuring people do not have to move out of the area in order to find appropriate accommodation.
Edenbridge Town Council	Not Answered	Highlights the recent retirement community allowed on Appeal at Kent and Surrey Golf Club, Edenbridge. Highlights that existing and future provision should be taken into account.
Eynsford Parish Council	Agree	Support the policy but query why the threshold is set at 50 or more dwellings. Request to consider reducing the threshold to developments of 20 or more.
Kemsing Parish Council	Agree	Highlights that there are no specific sites or details proposed to meet this need.
Leigh Parish Council	Agree	Highlights importance of inclusion of ground floor units or bungalows for older people as part of a mixed scheme.
Sevenoaks Town Council	Agree	Highlights significant need for high quality housing for older people and refers to STC comments under Policy H1.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Home Builders Federation	Not Answered	Considers approach in final paragraph of policy H4 to be ineffective. Suggestion for the Council to allocate sites within the Local Plan for retirement housing and other specialist accommodation for older people. Policy provides no indication of how many units for older people a development would need to provide. Suggestion that a

Organisation	Agree-Disagree scale	Summary of response
		requirement to provide housing for older people is only appropriate on much larger sites where delivery could be of a sufficient scale to be attractive to a specialist provider.
The Shoreham Society	Strongly Agree	Strongly agree with policy, particularly enabling older people to vacate larger houses and to remain in their local area.

General Responses

Summary

General responses supported an individual policy for the delivery of housing for older people, however raised a variety of concerns regarding the justification of the policy and consistency with national policy. Responses noted house prices and maintenance charges in Sevenoaks District are high, making downsizing a difficult option. The importance of locating older persons housing close to key services and facilities, including public transport options was highlighted.

Overall Summary

Summary of comments on Policy H4

Responses to Policy H4 came from a range of respondents including statutory consultees and key consultation bodies, including a number of town and parish councils, as well as from the general public. Views on the policy were evenly split between agree and disagree. Of note is that all organisations (key consultation bodies and town and parish councils) who answered the quantitative question said that they strongly agree or agree. However, responses to the quantitative question from private sector organisations and the general public answered with disagree or strongly disagree, highlighting concerns regarding the justification of the policy and consistency with the NPPF.

Actions for Regulation 19 (Officer Response)

Ahead of Regulation 19, responses to Policy H4 will be further analysed and suggestions explored, including investigating strengthening the policy criteria and the possibility of altering the threshold, where appropriate. This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy H5 – Build to Rent

12 responses

Of the 11 respondents who answered the quantitative question, 55% said that they disagree with Policy H5.

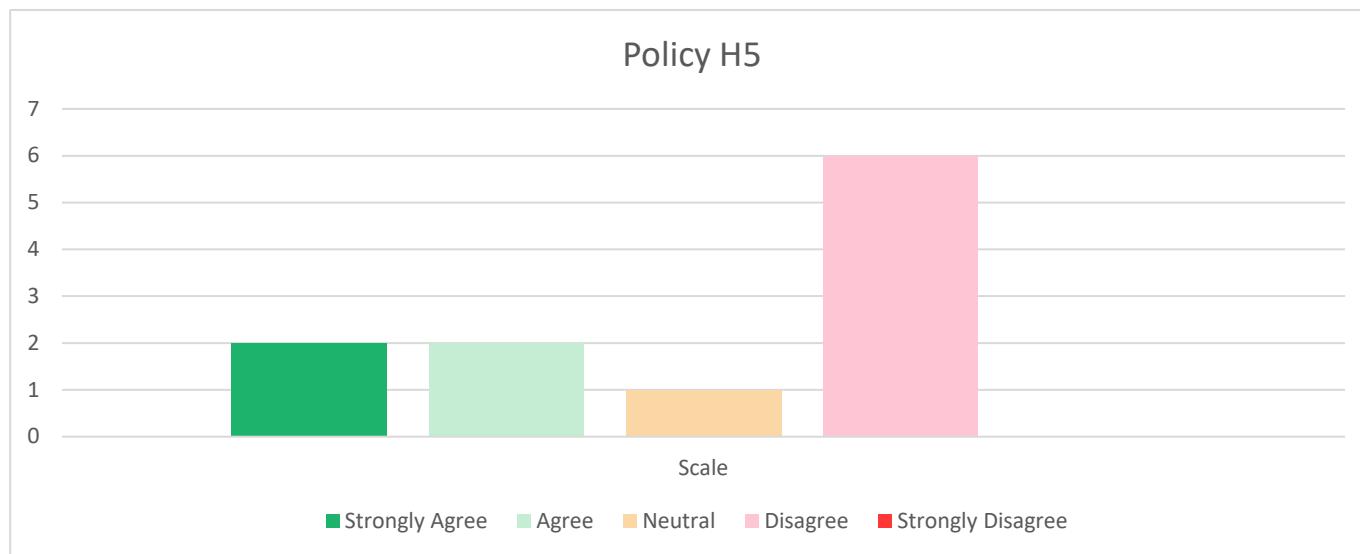
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment.
Eynsford Parish Council	Agree	Support the policy. Request to consider lowering the threshold to development of 50 units or more, due to demand for housing.
Hever Parish Council	Not Answered	Question if 20% of builds as affordable housing is enough to meet demand. Should a higher percentage be considered?

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Shoreham Society	Strongly Agree	Strongly agree with policy, particularly as it addresses a national shortage and high price of rented accommodation. Highlights that it would be positive for some social rented housing could be included in these developments.

General Responses

Summary

General responses had concerns that 20% private rented homes, capped at 80% of open market rents does not demonstrate affordability in Sevenoaks District.

Overall Summary

Summary of comments on Policy H5

Responses to Policy H5 came from a number of town and parish councils, other organisations and general members of the public. Of note, the majority of responses stating disagree came from the general public responses to the quantitative question, whereas organisations and town and parish councils agree with this policy. Qualitative responses raised concerns relating to affordability in Sevenoaks District and how this is reflected in Policy H5, as well as a small number of suggestions relating to altering the threshold to meet demand.

Actions for Regulation 19 (Officer Response)

Ahead of Regulation 19, responses to Policy H5 will be further analysed and suggestions explored, including investigating the possibility of altering the threshold, where appropriate. This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy H6 – Smaller Sites

31 responses

Of the 30 respondents who answered the quantitative question, 80% said that they either disagree or strongly disagree with Policy H6.

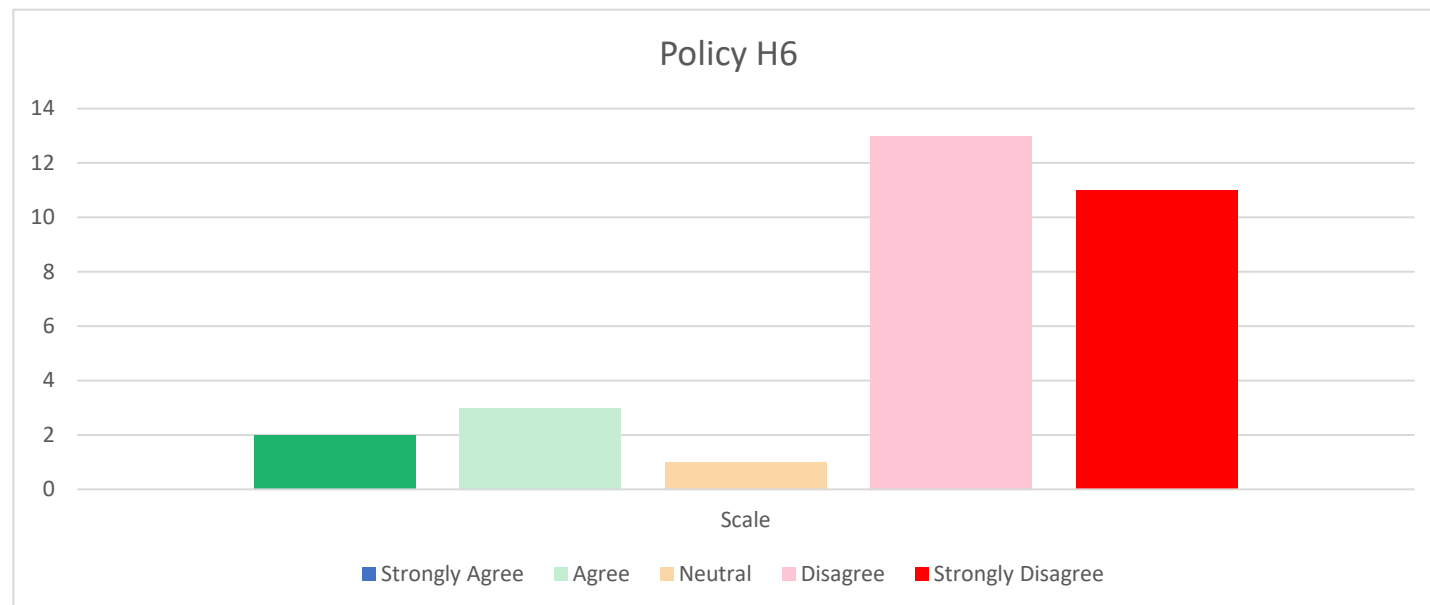
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Highlights lack of available sites within built up areas of Chiddingstone Parish.
Eynsford Parish Council	Agree	Support the policy for smaller sites. Query why smaller sites have not been included in the draft plan and calculations for meeting housing requirements.
Fawkham Parish Council	Not Answered	Considers principle of this policy acceptable but objects to current wording. Suggestion to add a further criterion which reiterates the requirements of Core Strategy Policy SP1 that sites will be required to respond to the distinctive local character of the area. Queries justification for limiting the application of the policy to sites of no larger than 1 hectare. Suggests inclusion of further wording regarding conflict with other Local and Neighbourhood Plan policies.
Hartley Parish Council	Not Answered	Considers principle of this policy acceptable but objects to current wording. Suggestion to add a further criterion which reiterates the requirements of Core Strategy Policy SP1 that sites will be required to respond to the distinctive local character of the area. Queries justification for limiting the application of the policy to sites of no larger than 1

Organisation	Agree-Disagree scale	Summary of response
		hectare. Suggests inclusion of further wording regarding conflict with other Local and Neighbourhood Plan policies.
Leigh Parish Council	Disagree	Highlights that small sites, which are of particular interest to smaller settlements, need to be able to deliver affordable housing.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Home Builders Federation	Not Answered	The policy does not address the NPPF objective of the allocation of small sites in the Local Plan or their identification in the Brownfield Register. Suggestion that the Council should not just seek to maximise delivery from the small sites that do come forward but to actively promote these through allocations. Concerns that the policy is not clear in how it will encourage small sites to come forward. Suggestion for the Council to emphasise their willingness to be flexible on small sites, and includes suggested wording.
Kent SME Developer Network	Not Answered	Supports recognition of this Policy and reference to para 69 of the NPPF. Concerns that Policy H6 does not seek to identify or allocate specific sites and therefore is ineffective. Suggests an additional policy for SME and proposed wording and draft policy is included at Appendix 2 of response.
The Shoreham Society	Strongly Agree	Agree that density should be maximised. Suggestion that the Plan should allow for the Council to use compulsory purchase orders to acquire unused or redundant sites.

General Responses

Summary
General responses to this policy queried the need for the policy to apply for developments up to 1 hectare in size, and concerns regarding the requirement of carbon and climate standards for small sites, suggesting that these should be in line with government guidance. Concerns were highlighted that the Plan does not optimise the use of previously developed land (PDL). The suggestion was made to incorporate greater

Summary

flexibility in relation to 'net zero' targets due to the viability challenges associated with smaller sites, often increased by construction costs. A number of comments related specifically to emerging Neighbourhood Plans and proposed policies.

Overall Summary

Summary of comments on Policy H6

Responses to Policy H6 were received from a number of town and parish councils, organisations and general members of the public. Qualitative responses highlighted concerns regarding the delivery of affordable housing on small sites as well as querying why Plan 2040 does not seek to allocate small sites for development. A number of responses highlighted concerns regarding conformity of small sites with other adopted local and neighbourhood plan policies, as well as concerns relating to other planning-related issues. It is important to highlight that in the determination of planning applications and site allocations, all adopted policies (both in Local and Neighbourhood Plans) are considered simultaneously. Therefore, whilst comments regarding the impact on the environment, climate standards and local character are noted and welcomed, these will be dealt with alongside other policies in the Plan.

Actions for Regulation 19 (Officer Response)

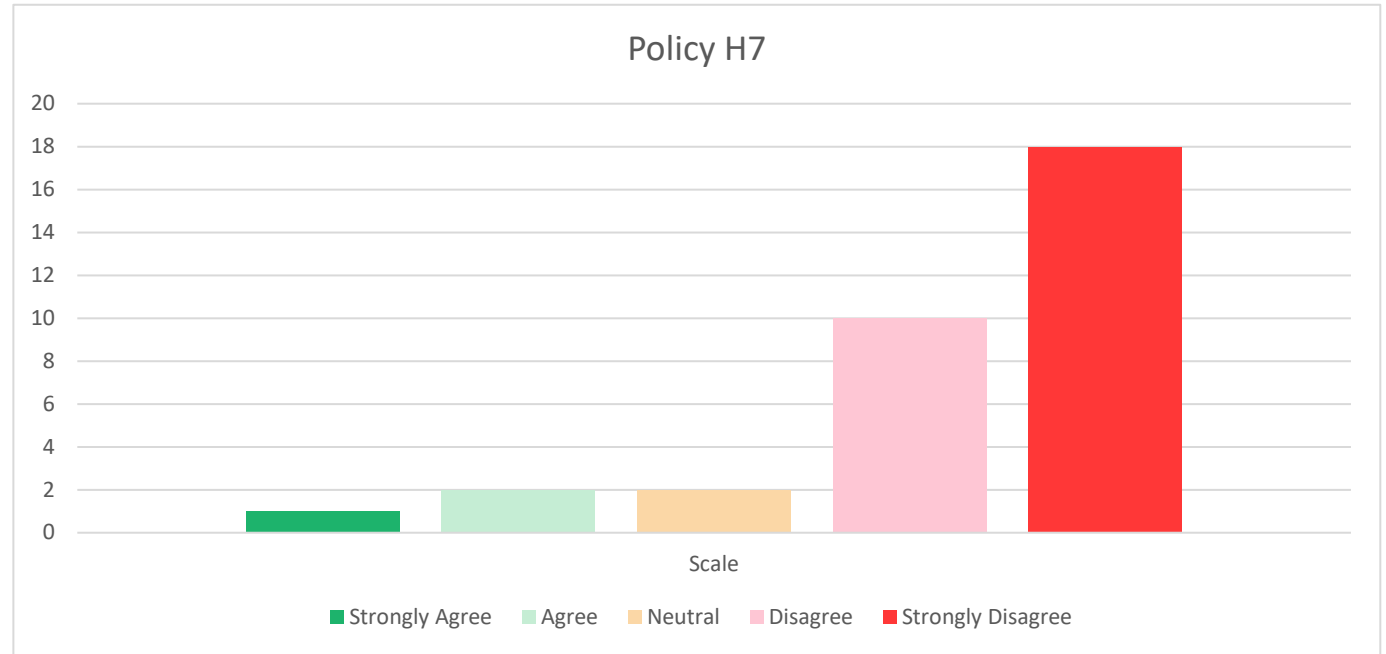
Ahead of Regulation 19, responses to Policy H6 will be further analysed and suggestions explored, including providing clarity on the reasoning for small sites not being allocated in Plan 2040. This policy will also be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy H7 – Housing Density and Intensification

37 responses

Of the 33 respondents who answered the quantitative question, 85% said that they either disagree or strongly disagree with Policy H7.

Of those who provided further comments to explain their rating, the majority of respondents raised specific concerns that the proposed ‘Edge of Settlement’ density was too high, or had concerns relating to a specific site or settlement.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	Supportive of the approach to increase the density of housing provision where these will meet housing need and lead to properly planned for provision, supported by the 6 types of areas identified by the District Wide Character Study (DWCS)

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Dartford Borough Council	Not Answered	Encourages SDC to ensure that land within existing urban areas is used very efficiently. Opportunities for development to be delivered at higher average densities must be demonstrated and secured.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment.
Edenbridge Town Council	Not Answered	Notes NPPF paragraph 129b. Highlights that consideration should be given to the local character of the area. Reiterates response to Regulation 18 Part 1 consultation, which suggests a more flexible approach to density so as not to harm the existing character of towns and villages across the District.
Fawkham Parish Council	Not Answered	Highlights importance of clarifying where policy refers to gross or net densities. Strongly object to the proposed edge of settlement density of 40-60 dwellings per hectare. Specific concerns regarding Hartley and accordance with national policy. Suggests alternative approach to Policy H7.
Hartley Parish Council	Not Answered	Highlights importance of clarifying where policy refers to gross or net densities. Strongly object to the proposed edge of settlement density of 40-60 dwellings per hectare. Specific concerns regarding Hartley and accordance with national policy. Suggests alternative approach to Policy H7.
Sevenoaks Town Council	Not Answered	Highlights importance of taking account of local character when considering appropriate densities for settlements. Important to ensure that infrastructure has capacity for higher density development. Highlights that bus frequency has changed in last 12 months and should be considered.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
CPRE	Not Answered	CPRE welcomes commitment to higher densities in highly sustainable locations, subject to there being no detrimental impact to local character or amenity. Notes paragraph 130 of the NPPF.
Network Rail	Not Answered	Suggestion that the Districts' density option of 150dph in town centre areas could be extended to transport hubs in order to optimise these sites.
The Shoreham Society	Agree	Suggests that developments should be at maximum density in all areas, in order to maximise housing delivery and minimise need for greenfield development. Highlights

Organisation	Agree-Disagree scale	Summary of response
		importance to ensure developments should respect the visual impact on the nearby Green Belt and protected landscapes, as well as historic buildings.

General Responses

Summary

The majority of general responses considered that the densities set out in Policy H7 were too high, particularly in relation to edge of settlement densities, and many comments referred to specific settlements and developments. Some responses submitted under this policy related to proposed site allocations under Policy ST2 or other policies within the Plan. Some responses agreed that higher densities in well-located sustainable locations is a sensible approach to meeting local housing need.

Overall Summary

Summary of comments on Policy H7

Responses to Policy H7 were received from a number of statutory consultees, town and parish councils and key organisations as well as general members of the public. Many responses highlighted the importance of reflecting local character in considering density. A number of suggestions were put forwards for Policy H7, including clarifying whether the policy refers to gross or net densities and the suggestion to include transport hubs in the highest density category. Site and settlement specific concerns were also raised.

Actions for Regulation 19 (Officer Response)

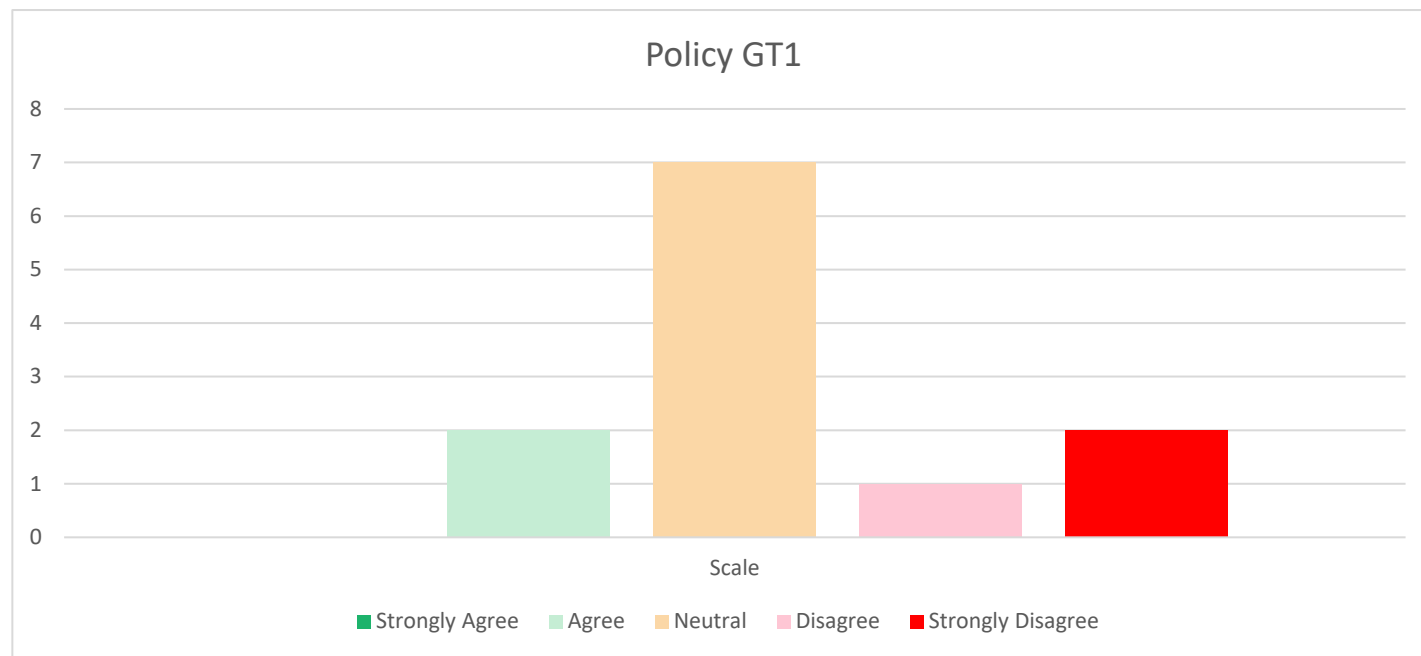
Ahead of Regulation 19, responses to Policy H7 will be further analysed and suggestions explored, including providing clarity on gross/net densities and exploring the potential to include a higher density for transport hubs. This policy will also be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy GT1 – Provision for the Gypsy and Traveller Community

17 responses

Of the 11 respondents who answered the quantitative question, 75% said that they either agree or were neutral to the proposed strategy in Policy GT1.

Three respondents stated that they disagree or strongly disagree with Policy GT1. Their qualitative responses to this Policy relate specifically to the proposed allocations for Gypsy and Traveller pitches in Edenbridge, with the main regarding a perceived overconcentration of Gypsy and Traveller sites in this location.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	From a flood risk perspective, Environment Agency supports the site allocations detailed in Policy GT1
Kent County Council	Not Answered	Highlights a typographical error in Paragraph 2.35: correct to “an area <u>not</u> likely to flood”.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
London Borough of Bromley	Not Answered	Supports stated intention to undertake additional work ahead of Regulation 19 consultation to identify further sites for allocation to meet Gypsy and Traveller need for Sevenoaks.

Organisation	Agree-Disagree scale	Summary of response
Dartford Borough Council	Not Answered	Notes that identified site allocations do not yet meet need in full. Suggestion for SDC to continue evidence gathering in order to demonstrate a sufficient supply, and should positively explore all opportunities to optimise the level of provision.
Tunbridge Wells Borough Council	Agree	Notes identified need of 43 pitches and strategy to meet this need. Support for separate Gypsy and Traveller consultation material. Welcomes criteria set out in policies GT1 and GT2 of the Plan.
Gravesham Borough Council	Not Answered	Notes that only 22 pitches have been identified to date. Requests confirmation that sufficient pitches are identified to provide an initial 5 year's supply based on the revised definition and that SDC will not be looking to Gravesham to meet any of this outstanding need.
Wealden District Council	Not Answered	Notes that residual need is expected to be met through strategic housing allocations identified within the Sevenoaks Local Plan, as well as windfall development. WDC supports SDC in meeting its identified Gypsy and Traveller accommodation needs through existing commitments and site allocations. WDC will work collaboratively with SDC on this strategic issue.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Neutral	No unauthorised plots should be allowed.
Sevenoaks Town Council	Not Answered	Highlights the importance of transit site provision and notes that policies GT1 and GT2 do not identify available sites for this.
Edenbridge Town Council	Not Answered	Opposes specific Gypsy and Traveller allocations in Edenbridge and high concentration and overprovision of Gypsy and Traveller pitches in Edenbridge. Request for both allocations to be removed from the Plan.
Hever Parish Council	Not Answered	No objection to increase number of pitches. However, highlights importance of enforcing sites to be in line with permissions.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Shoreham Society	Agree	Agree with the policy and that more sites for Gypsy and Traveller use should be provided. Highlights that sustainability may be less important, given that this community tend to use vehicles to move around. Importance of minimising impact on Green Belt, Protected Landscapes and SSSIs. Raises other concerns with policy judgements for Gypsy and Traveller applications, in particular national policy relating to 'best interests of the child'.

General Responses

Summary

General responses noted that all SDC sites are located within the Green Belt. Concerns were raised regarding the location of the proposed Gypsy and Traveller allocations, and the perceived overconcentration adjacent to Edenbridge, and the query of the number of pitch and site distribution across the District was put forward. An additional site for consideration for Gypsy and Traveller use was also submitted.

Overall Summary

Summary of comments on Policy GT1

Responses to Policy GT1 were received from a number of statutory consultees, neighbouring authorities, town and parish councils and key organisations, as well as general members of the public. Many responses acknowledged that the proposed allocations, at Regulation 18 stage, do not meet the Districts identified need in full. Responses highlighted the importance of enforcement action against unauthorised sites and sites which are not in line with planning permission and also raised the query regarding transit sites for the District. Site and settlement specific concerns were also raised in response to Policy GT1, and these will be taken into consideration alongside further consideration of site allocations.

A couple of responses highlighted the recent changes to the Planning Policy for Travellers (PPTS) in December 2023 regarding the definition of 'Gypsy and Travellers'. It should be noted that SDC has historically planned and continues to plan for the wider cultural need (rather than the

Summary of comments on Policy GT1

PPTS need) for the Gypsy and Traveller community and therefore it is considered that the update to the PPTS does not affect the Gypsy and Traveller position for Sevenoaks District.

Actions for Regulation 19 (Officer Response)

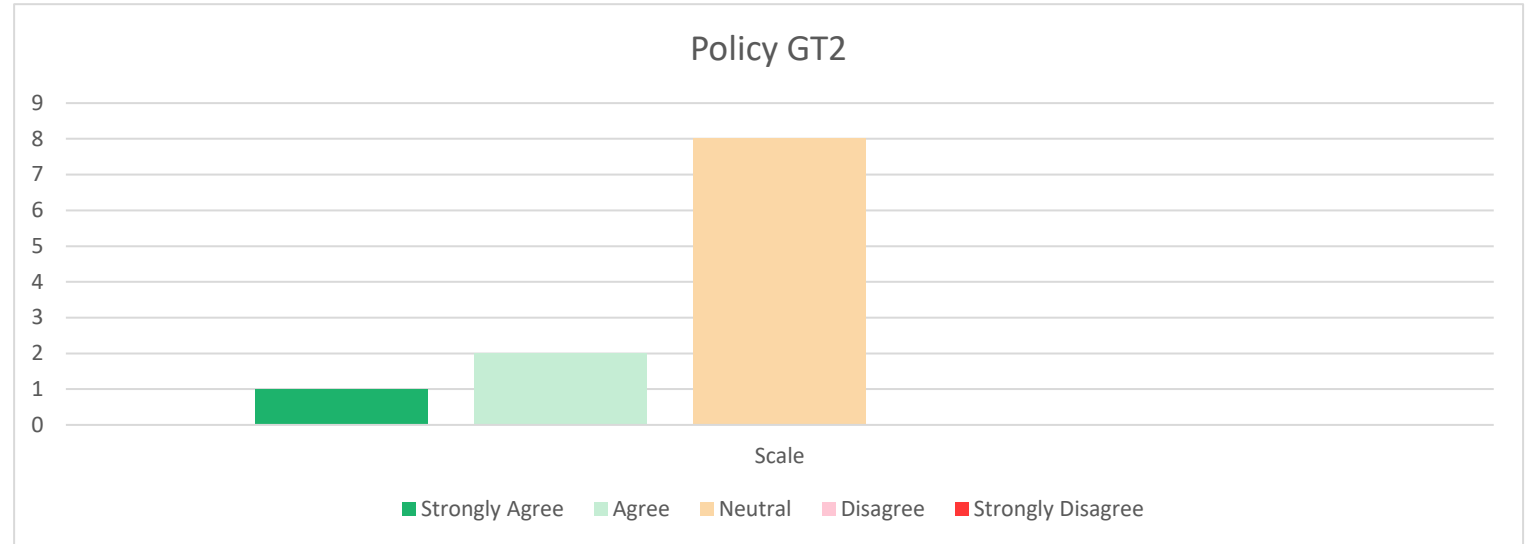
Ahead of Regulation 19 further work will need to be undertaken to identify additional sites and pitches to meet the need for Gypsy and Traveller pitches up to 2040. An updated position of need will also be provided. Site specific comments will also be analysed, including comments from statutory consultees, in order to determine site suitability and confirm proposed allocations for Gypsy and Traveller use. The additional site submitted for potential Gypsy and Traveller use will be assessed ahead of Regulation 19, and a decision taken as to whether to include this as an additional proposed allocation in Policy GT1. Additionally, a map showing the distribution of sites across the District will be provided alongside the Regulation 19 Plan and identified typographical errors will be rectified. Targeted consultation for the Gypsy and Traveller community will be repeated at Regulation 19 stage, as this has been well received across the District and resulted in increased engagement from members of the Gypsy and Traveller community.

This policy will also be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS) in December 2023.

Policy GT2 – Gypsy and Traveller Accommodation

13 responses

All 11 respondents to the quantitative question said that they either strongly agree, agree with or are neutral to Policy GT2.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Welcome Policy GT2 and particularly the statement “the site will provide an acceptable living environment for future occupants in terms of size, noise and air quality and is not located within an area likely to flood”. Recommendation to clarify the meaning of “an area likely to flood” in a footnote and/or a link to the Strategic Flood Risk Assessment (SFRA) and NPPF. Provides recommendation and suggested wording for expanding policy to include wording regarding avoidance, mitigation and compensation of impacts on habitats and biodiversity.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
London Borough of Bromley	Not Answered	Supports criteria set out in Policy GT2, which would apply to non-allocated site coming forwards through the Development Management process.

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Agree	Support for separate Gypsy and Traveller consultation material. Welcomes criteria set out in policies GT1 and GT2 of the Plan.
Wealden District Council	Not Answered	Notes that residual need is expected to be met through strategic housing allocations identified within the Sevenoaks Local Plan, as well as windfall development.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Ash-cum-Ridley Parish Council	Not Answered	Supports policy. Notes existing Gypsy and Traveller site in Ash.
Chiddingstone Parish Council	Agree	No comment.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Kent Downs National Landscape	Not Answered	Supportive of inclusion of requirements for consideration of potential impacts of Gypsy and Traveller sites within AONBs. Concerns that proposed requirements do not comply with the requirements of the NPPF or recently amended primary legislation relating to AONBs. Suggestion that gypsy sites should not be released in the AONB unless there are no other alternatives available and only when impact can be appropriately mitigated. Suggested new criterion.
The Shoreham Society	Neutral	Comments similar to policy GT1. Suggestion that key consideration is the protection of the surrounding rural environment, and that it may be reasonable to relax requirements for proximity to public transport. Suggestion that policy should encourage a reasonably high density.

General Responses

Summary

General responses suggested that the first bullet point is seemingly at odds with where the Gypsy and Traveller community prefer to live. Additionally, the importance of ensuring that the policy is enforceable was highlighted, as well as bringing attention to the importance of the consideration of the local environment and the impact on local residents.

Overall Summary

Summary of comments on Policy GT2

Responses to Policy GT2 were received from a number of statutory consultees, neighbouring authorities, town and parish councils and key organisations, as well as general members of the public. Responses highlighted that the nature of Gypsy and Traveller sites mean that they are often in rural locations within the Green Belt and a distance from key transport links, services and facilities. Responses put forwards suggestions for Policy GT2, including a recommendation to clarify criteria related to flooding, and link this to the NPPF and Strategic Flood Risk Assessment (SFRA). The recent update to primary legislation relating to National Landscapes (AONB) was also highlighted.

Actions for Regulation 19 (Officer Response)

Ahead of Regulation 19 further work will be undertaken in considering the submitted comments on Policy GT2, and in particular the suggestion from Environment Agency to strengthen the messaging around flooding, avoidance, mitigation and compensation of impacts on habitats and biodiversity. This policy will also be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS) in December 2023 as well as updates to primary legislation in relation to National Landscapes (AONB).

Overall summary of comments on Chapter 2 – Housing Choice for All

Ahead of Regulation 19, policies within Chapter 2 will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF), Planning Policy for Traveller Sites (PPTS) in December 2023 and also take account of any legislative updates.

We will work to identify further pitches, both through windfall development and potential allocations, for Gypsy and Traveller use in order to meet the identified need for the District, up to 2040, in full.

We will continue to work with the Council's Housing, Environmental Health and Design and Conservation team to reflect on responses to Chapter 2, and to make changes where appropriate and necessary.

Chapter 3 – Employment and Economy

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy EMP1 – Delivering Economic Success

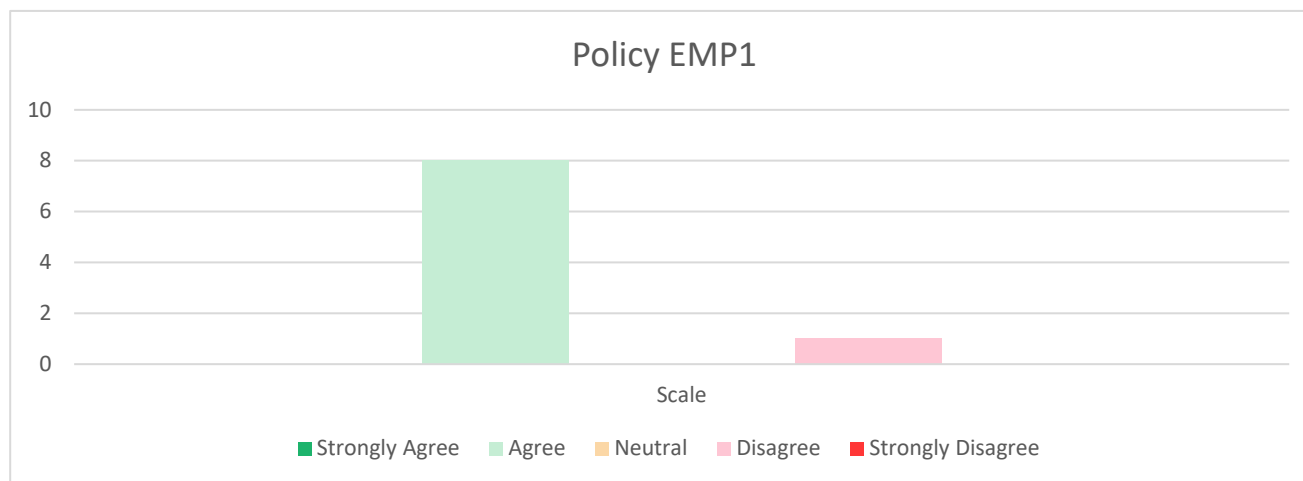
9 responses

All respondents answered the quantitative question, with 89% agreeing with Policy EMP1.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Agree	Agrees with the thrust of the policy.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Maintaining existing employment uses and strengthening the rural economy are important.
Fawkham Parish Council	Not Answered	Supports this policy, optimising employment land
Hartley Parish Council	Not Answered	Supports this policy, optimising employment land

Other consultation bodies

None

General Responses

Summary

General responses support the thrust of Policy EMP1, but concern is raised as to the conclusions of the Economic Needs Study 2022, particularly in relation to the assessment of office need compared to manufacturing and distribution.

Overall Summary

Summary of comments on Policy EMP1

Responses to Policy EMP1 come from a small range of respondents. All but 1 support the policy, but concern is raised as to the conclusions of the Economic Needs Study 2022.

Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. Queries relating to the Economic Needs Study 2022 will be investigated and conclusions updated if necessary.

Policy EMP2 – Delivering New Employment Land

16 responses

Of the 12 respondents who answered the quantitative question, 50% said that they either agree or strongly agree with Policy EMP2, 25% said that they either disagree or strongly disagree and the remaining 25% said that they are neutral on it.

Statutory Consultee responses

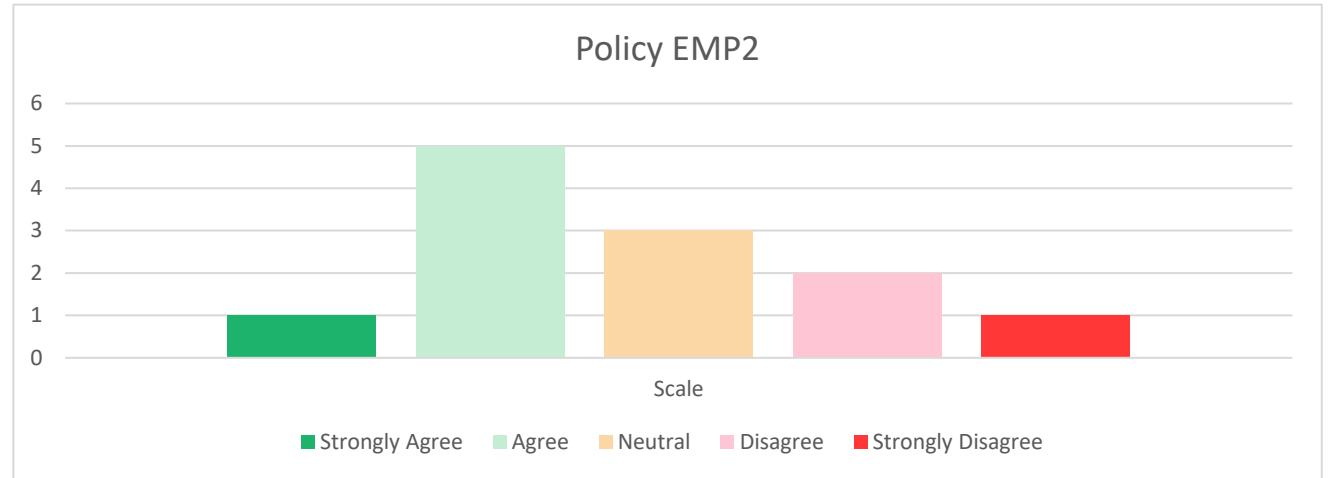
None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Neutral	Notes that all options propose to meet the identified employment needs but makes no comments on the individual sites and criteria.
Kent County Council	Not Answered	Looks forward to continued co-operation with regards to ensuring adequate access to proposed/potential sites, including from a public transport perspective.
Dartford Borough Council	Not Answered	Considers that further work is required to fully address employment needs.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Eynsford Parish Council	Neutral	Notes that the baseline sites alone meet the identified need and therefore considers that the options are not required and that any additional sites should be used for housing (where appropriate).
Chiddingstone Parish Council	Neutral	No comment.



Other consultation bodies

None

General Responses

Summary

General responses include some site-specific comments, with support for Land at Upper Hockenden Farm, Swanley and objections to Pedham Place. Others note that the baseline sites alone would meet the identified need and question the need for the additional options. Concern is raised that the Economic Needs Study 2022 underestimated need, resulting in the submission of an omission site along the A21, south of Sevenoaks Town.

Overall Summary

Summary of comments on Policy EMP2

Comments on this policy come from a small range of respondents, with the majority either supporting or being neutral to it. The findings of the Economy Needs Study 2022, and the response to it, are questioned.

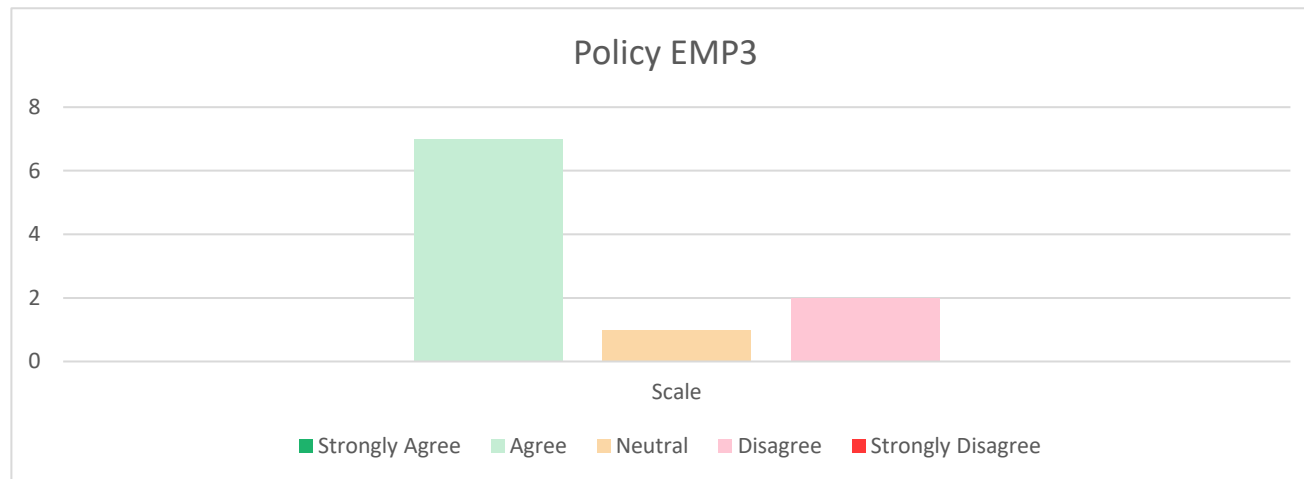
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. Queries relating to the Economic Needs Study 2022 will be investigated and its conclusions updated if necessary.

Policy EMP3 – Retaining and Optimising Existing Employment Land

11 responses

Of the 10 respondents who answered the quantitative question, 70% said that they agree with Policy EMP3.



Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Marketing to justify changes of use is sometimes poorly carried out, but if done properly, support is offered to the consideration of other uses. The principle of the co-location of uses is supported.
Leigh Parish Council	Agree	It is very important to protect the rural economy from unjustified losses.
Edenbridge Town Council	Not Answered	Disagrees with the recommendation in the Economic Needs Study 2022 to release the Warsop Estate and considers that any empty buildings should be redeveloped for commercial uses.
Hartley Parish Council	Not Answered	Recommend that policy should include recognition that remote rural sites may meet rural business needs. The Parish Council supports the presumption in favour of retaining employment use but strongly objects to Policy EMP3 and recommends it is modified to

Organisation	Agree-Disagree scale	Summary of response
		outline the presumption in favour of retaining the employment use. Reference is made to employment sites in emerging neighbourhood plans.
Fawkham Parish Council	Not Answered	Recommend that policy should include recognition that remote rural sites may meet rural business needs. The Parish Council supports the presumption in favour of retaining employment use but strongly objects to Policy EMP3 and recommends it is modified to outline the presumption in favour of retaining the employment use. Reference is made to employment sites in emerging neighbourhood plans.

Other consultation bodies

None

General Responses

Summary

Responses generally support Policy EMP3, but it is considered that existing/designated employment land needs to be more clearly defined. Consideration is given to strengthening the need to justify commercial losses and specific comments are made in relation to Edenbridge town centre, which is dealt with in Policy EDN1.

Overall Summary

Summary of comments on Policy EMP3

The thrust of this policy is supported, but consideration is given to requiring stronger justifications for changes of use and making employment designation more clearly identifiable.

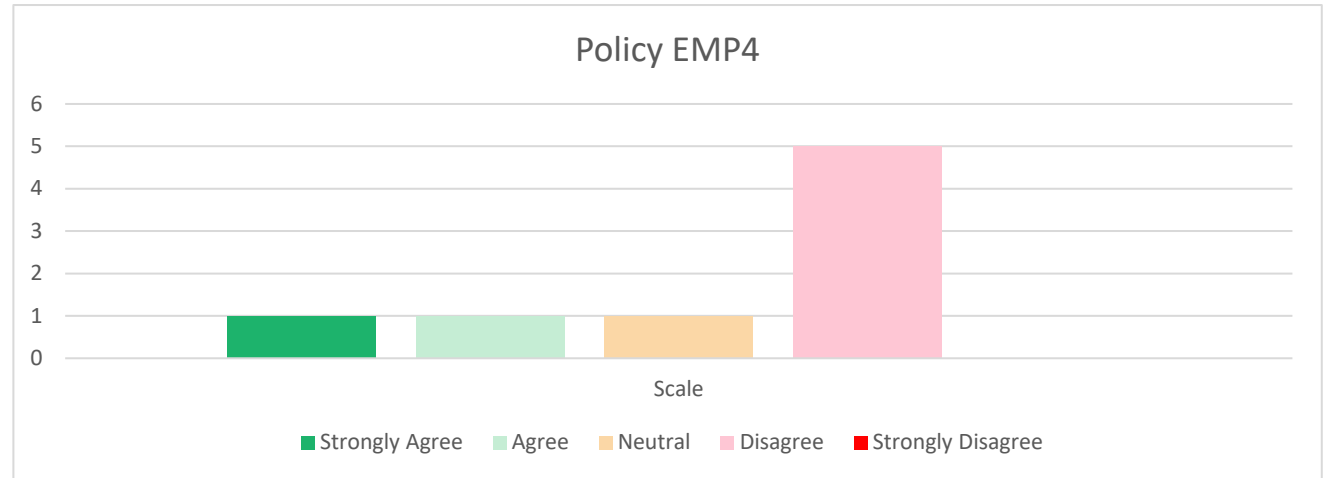
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. Suggestions for stronger protection will be considered for their compliance with the NPPF and the clearer setting out of designated employment land investigated.

Policy EMP4 – Flexible and Creative Workspace and the Co-location of Uses

9 responses

Of the 8 respondents who answered the quantitative question, 63% said that they disagree with Policy EMP4.



Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Good broadband is essential for rural areas.
Sevenoaks Town Council	Not answered	Supports the introduction of this concept given the change in working patterns and knowledge-based services in the town.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Sport England	Strongly Agree	No comments.

General Responses

Summary

Those who disagree with Policy EMP4 appear to query the concept as a whole and feel that residential and commercial uses need to be kept separate, with concern raised to impacts on residential amenity.

Overall Summary

Summary of comments on Policy EMP4

This is a newly introduced concept and is met with a mixed, cautious response.

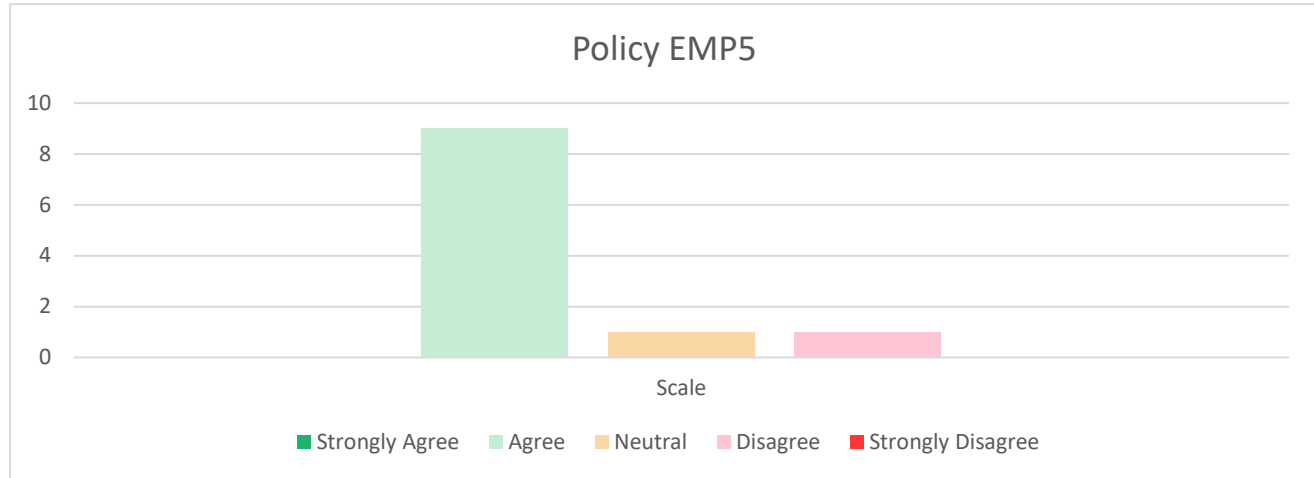
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. The caution raised to this concept is understood, and consideration will be given to making it more explicit that this will only work where there would be no harm to residential amenity. The benefits to this concept will also be expanded upon.

Policy EMP5 – The Rural Economy

12 responses

Of the 11 respondents who answered the quantitative question, 82% said that they agree with Policy EMP5.



Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Supports the thrust of the policy but raises caution to permitting new buildings in the Green Belt which may eventually end up being converted to residential dwellings in unsustainable locations. The need for new buildings in the Green Belt must be robustly evidenced.
Leigh Parish Council	Agree	Supports the policy within the limits of Green Belt policy.
Crockenhill Parish Council	Neutral	Public transport must be prioritised, particularly in villages with an ageing population.
Fawkham Parish Council	Not answered	Preference for priority to be given to business use/tourism in the conversion of rural buildings
Hartley Parish Council	Not answered	Preference for priority to be given to business use/tourism in the conversion of rural buildings

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Kent Downs National Landscape Unit	Not answered	It is important that a balance is struck between the needs of the rural economy, the need to promote sustainable patterns of development and the need to protect the character and quality of the countryside.

General Responses

Summary

General responses support the policy, but concern is raised as to its compatibility with the development proposals for Edenbridge specifically. A suggestion is made to including a new policy on agricultural land taking into account the recently updated NPPF. It is also considered that this policy should refer to tourist accommodation.

Overall Summary

Summary of comments on Policy EMP5

Overall, Policy EMP5 is supported but there is a nervousness about new development in the Green Belt and protection for agricultural land.

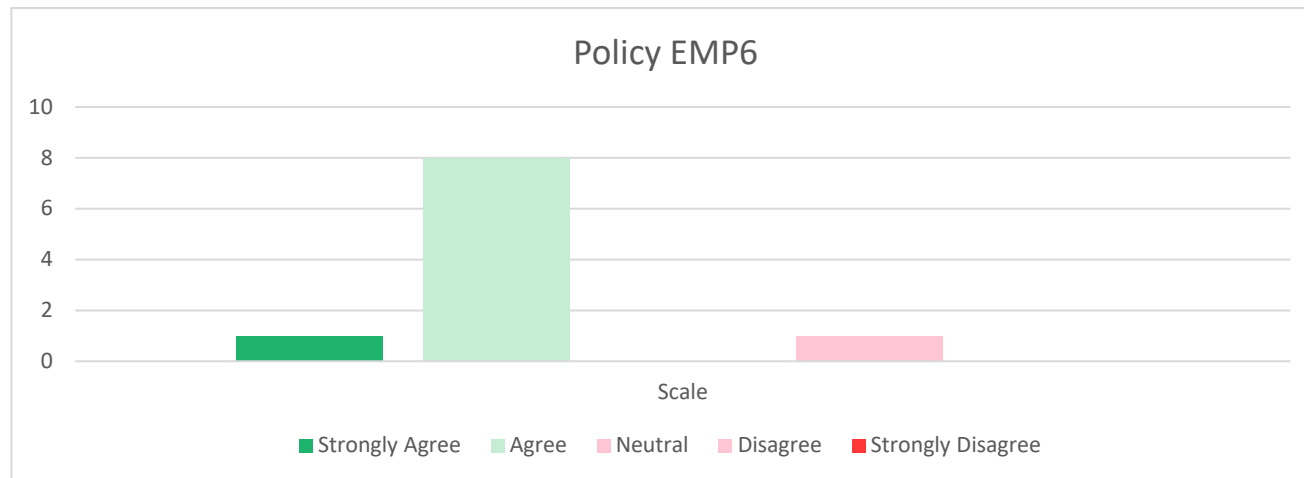
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. In particular, it will be ensured that the policy works within the limits of policies relating to the Green Belt and agricultural land.

Policy EMP6 – Tourism and the Visitor Economy

11 responses

Of the 10 respondents who answered the quantitative question, 90% said that they either agree or strongly agree with Policy EMP6.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	Supports the policy with particular reference to improving 'last mile' links, which over time will enhance the Public Right of Way network.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment.
Eynsford Parish Council	Strongly Agree	Supports the policy with the recognition that tourism brings important income to the local area.
Leigh Parish Council	Agree	Supports the policy but considers that it should include reference to the combination of factors that make up the local character of an area.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Kent Downs National Landscape Unit	Not Answered	Supports the policy except for the omission of a criterion in previous iterations of the draft plan relating to impacts upon local and landscape character and amenity.

General Responses

Summary

General responses support this policy. The need to proactively encourage more visitor accommodation in our town centres is raised, with particular reference to Edenbridge. The relationship and clarity between Policies EMP5 and EMP6 is raised for consideration, particularly in relation to visitor accommodation.

Overall Summary

Summary of comments on Policy EMP6

Overall, there is support for enhancing the tourism offer in the District, but it is considered that some further clarity is required.

Actions for Regulation 19 (Officer Response)

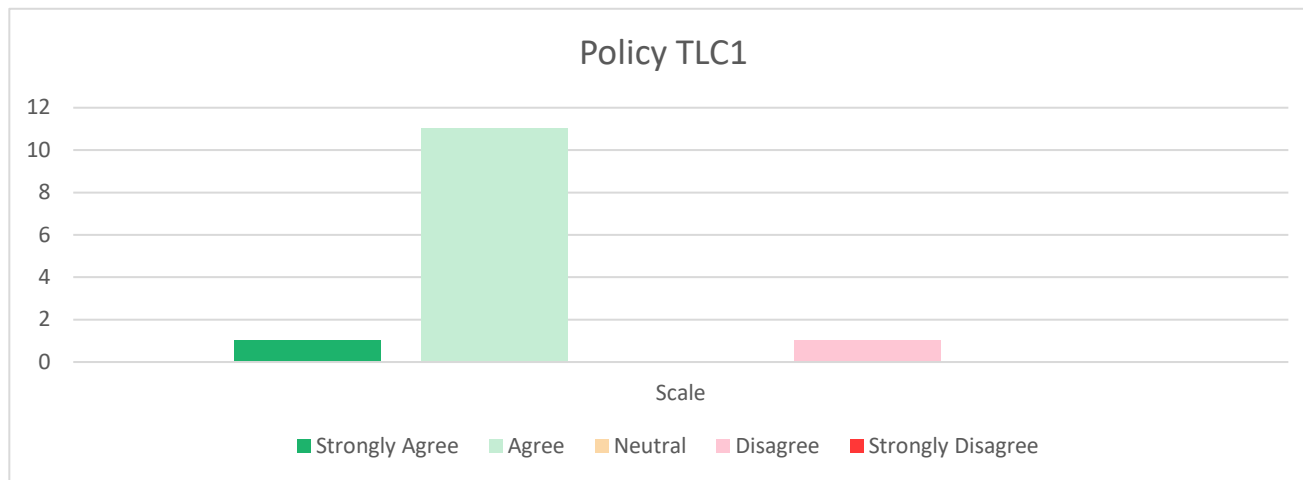
This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. The suggested need for further clarity between Policies EMP5 and EMP6 will be investigated.

Overall summary of comments on Chapter 2 – Employment and the Economy

Respondents support the principles of growing and diversifying the district's economy, but the conclusions of the Economic Needs Study 2022 may need reviewing and some further detail/clarity required across some policies, particularly with reference to development in the Green Belt and visitor accommodation.

Policy TLC1 – Town and Local Centres

Of the 13 respondents who answered the quantitative question in the survey, 12 agreed/strongly agreed with the policy.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Agree	KCC is supportive of Policy TLC1 and the promotion of walking and cycling, appreciates the various references to promoting sustainable access in town centres - the Local Plan's support for sustainable access will contribute to changing cultures and, over time, should see more people adopt these modes for local journeys
Tunbridge Wells Borough Council	Agree	TWBC agrees with the thrust of the policy and notes the reduced 500 sqm threshold in relation to the sequential test approach.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Supportive of the policy – suggestions that it could have gone further to encourage more sustainable travel to local towns (e.g. shuttle buses), retention of Post Offices is
Eynsford Parish Council	Agree	

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	considered vital and independent retail businesses should be encouraged with lower business rates.
Hartley Parish Council	Not Answered	Support the identification of Cherry Trees as a Local Centre within Hartley and the wider policy which seeks to resist the loss of shops and services where they are serving a local need

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Sport England	Agree	Supportive of town centre policy, that encourages active travel (walking, cycling and public transport). Sport England would encourage any new development to follow Theme 2 of Active Design which encourages active, high-quality places and spaces and encourage co-location of facilities which helps to promote active travel.

General Responses

Summary
Responses support the proposed policy and the loss of shops and services in all town and local centres should be resisted, where they serve a local need. Policy TLC1 should be updated to require the provision of convenience retail on strategic sites where there is a lack of existing local provision only.

Overall Summary

Summary of comments on Policy TLC1
Supportive comments, which highlight the need to retain key shops and services in town and local centres, particularly post offices, and promote active travel.

Policy SEV1 – Sevenoaks Town Centre

Of the 3 respondents who answered the quantitative question in the survey, they all agreed/strongly agreed with the policy, or were neutral.

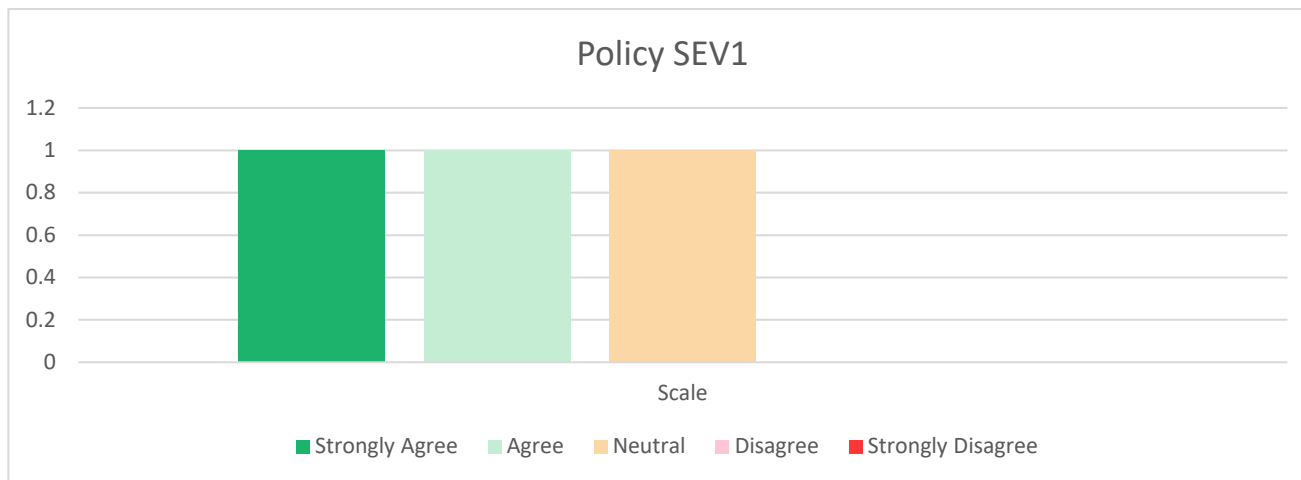
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Sevenoaks Town Council	Not Answered	<p>Sevenoaks Town Council is pleased to see the Local Plan incorporating the Sevenoaks Town Neighbourhood Plan and supporting the economic wellbeing of the town. STC notes that the Neighbourhood Plan focuses on widening the leisure offer and developing a Cultural Quarter for the town and improving active travel. The response notes that the Plan summarises the location of existing Local Centres, but should also reference new proposed Local Centres, such as the one proposed in the new neighbourhood at Sevenoaks Quarry.</p> <p>As part of the STNP implementation strategy, the Town Council will be shortly be commissioning a Masterplan for Sevenoaks, which will examine the Town Centre and the Local Centres at St John’s and Tubbs Hill. The Town Council welcomes the policy framework for Sevenoaks Town Centre, and recognises that it will develop further as the centre of gravity of the town is shifted north by the Sevenoaks Quarry development. The triangle between the High Street, the Station, and the Quarry development - together with the intermediate Local Centres - will need to be looked at in the Masterplan with regards to the creation of a new local centre, on which STC looks forward to working with the District Council.</p>

Other consultation bodies

None

General Responses

Summary

There were no further comments from the general public on Policy SEV1.

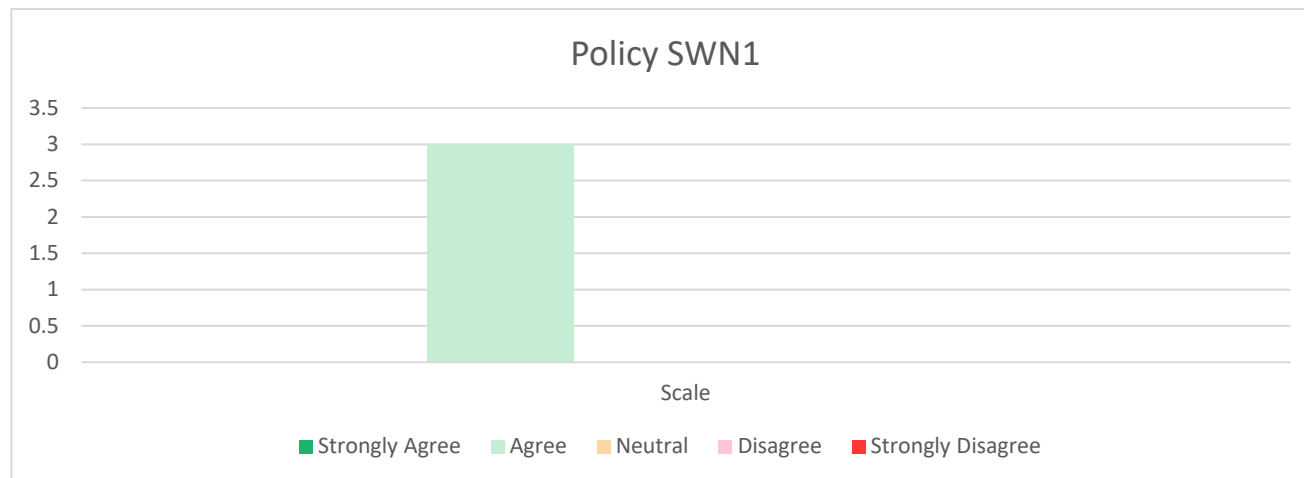
Overall Summary

Summary of comments on Policy SEV1

Sevenoaks Town Council is supportive of the proposals to promote the economic well-being of the town and incorporate the vision and objectives of the adopted Neighbourhood Plan. Reference should be made to the proposed new Local Centre which will form part of the new Sevenoaks Quarry development and how this will interact with the existing town and local centres nearby.

Policy SWN1 – Swanley Town Centre

Of the 3 respondents who answered the quantitative question in the survey, all agreed with the policy.



Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Swanley Town Council	Not Answered	STC express support for the principles of town centre regeneration and suggest the inclusion of the word 'gradual' redevelopment, to ensure the character of the town is not lost through change, supporting a growing market town rather than a high-rise suburb. Parking is also raised as a key benefit of the town and there is a concern that if parking is lost through redevelopment, this could lead to a decline in the town centre and parking issues on unrestricted local roads.

Other consultation bodies

None

General Responses

Summary

There were no further comments from the general public on Policy SWN1.

Overall Summary

Summary of comments on Policy SWN1

Swanley Town Council is supportive of the proposals to regenerate the town centre, in conjunction with the emerging proposals in the draft Neighbourhood Plan, and highlights parking, density and the pace of change in their response.

Policy EDN1 – Edenbridge Town Centre

Of the 4 respondents who answered the quantitative question in the survey, there was divergence in support/objection to the policy.

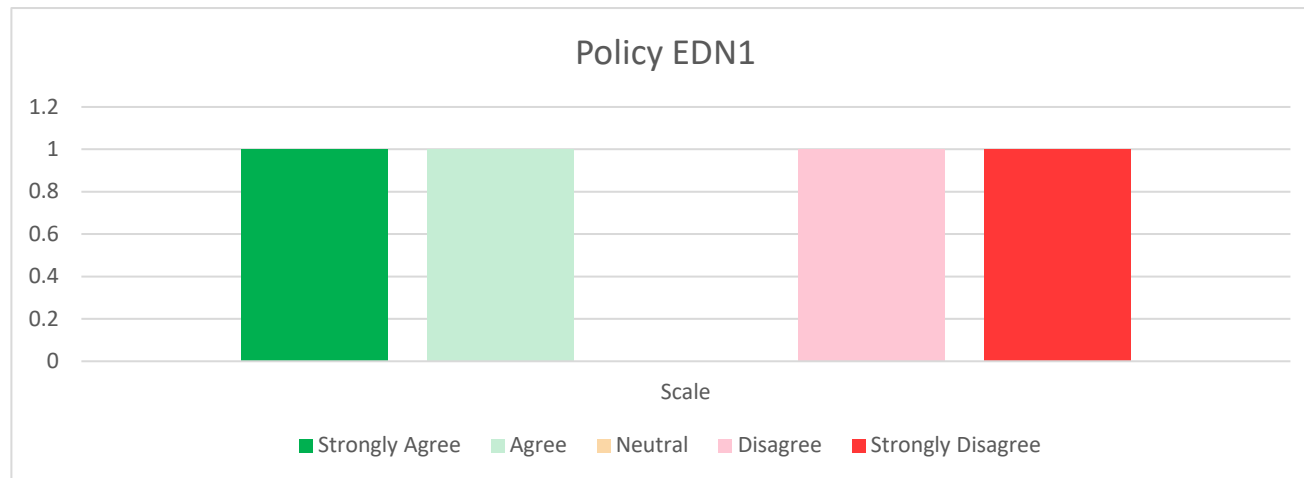
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Edenbridge Town Council	Not answered	<p>Edenbridge Town Council concerned that not all of the Town Centre strategy proposals are realistically achievable and may be too ambitious. The Town Council is very keen to see the development of the Leathermarket area and is pleased to see it included in the site allocations (ST2 MX8), but the release of the land remains uncertain. The Town Council's view is that the Plan should include a proposal for the redevelopment of the Leathermarket, but further work is needed to develop a specific proposal for the site that is deliverable and meets the needs of the town.</p> <p>Relocation of the market and pedestrianisation is not supported (and the artist's impression is misleading). Keeping car parking facilities in the town is supported. Any proposals for enhancing river connections should take account of the significant flood risk and environmental considerations.</p>
Hever Parish Council	Not answered	<p>Hever Parish Council fully supports the regeneration of Edenbridge Town Centre, for it to become a flourishing centre, in keeping and enhancing the beauty of the surrounding countryside.</p>

Other consultation bodies

None

General Responses

Summary

Generally supportive of policies to improve the town centres, particularly the Edenbridge Leathermarket and surrounding shops. Character-led development is considered important, particularly in historic settings, such as Edenbridge town centre.

Concerns regarding enhancing the river activity in an area which is noted for its increasing biodiversity projects and re-naturalising of the river meadows.

Clarity required that 'improved pedestrian access into the town centre' refers to pedestrian crossings on the bypass rather than pedestrianisation of the town centre. Local people and retailers value the ability to drive into the High Street, park and shop and this 'through traffic' is considered vitally important. Access to residential areas behind and above the shops also needs to be retained.

Edenbridge is also considered unlikely to be able to attract large-scale national retailers, but independent shops are considered important and add to the vitality of the high street.

Overall Summary

Summary of comments on Policy EDN1

General support for proposals to enhance the historic town centre and shop-fronts, transform the Leathermarket site and boost tourism and the cultural/leisure offer in the town. Further work is recommended on the Leathermarket site, to develop a specific deliverable proposal which meets the needs of the town. Relocation of the market, pedestrianisation of the centre and enhancements of the river connections are not supported.

Policy WST1 – Westerham Town Centre

Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

None

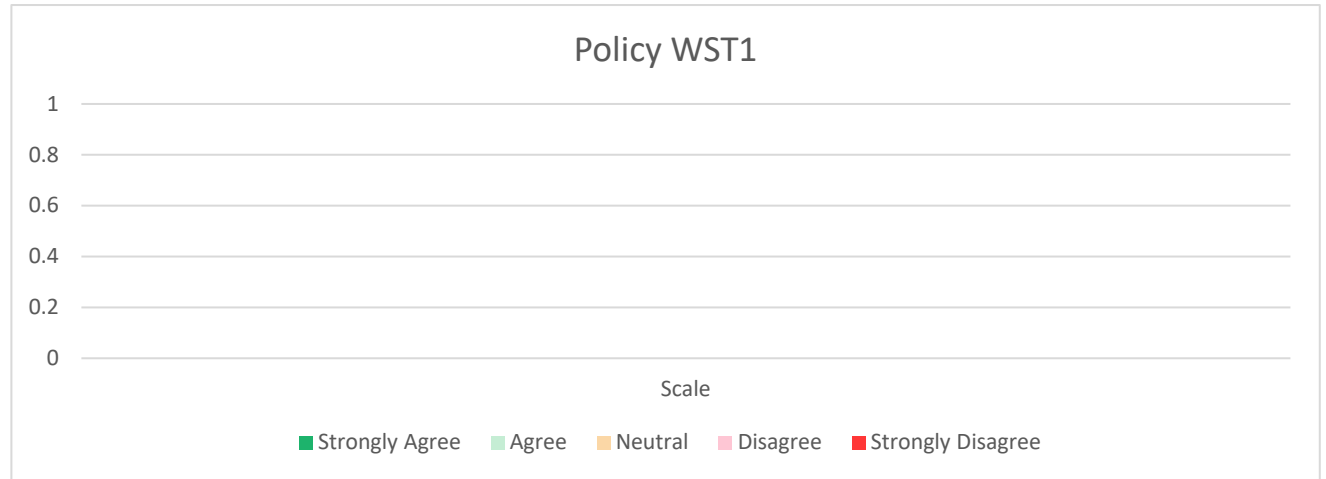
Other consultation bodies

None

General Responses

Summary

There were no further comments from the general public on Policy WST1.



Overall Summary

Summary of comments on Policy WST1

No responses – see commentary in relation to previous Regulation 18 response.

Policy NAG 1 – New Ash Green Village Centre

There was one response to the quantitative question in the survey, which agreed with the policy.

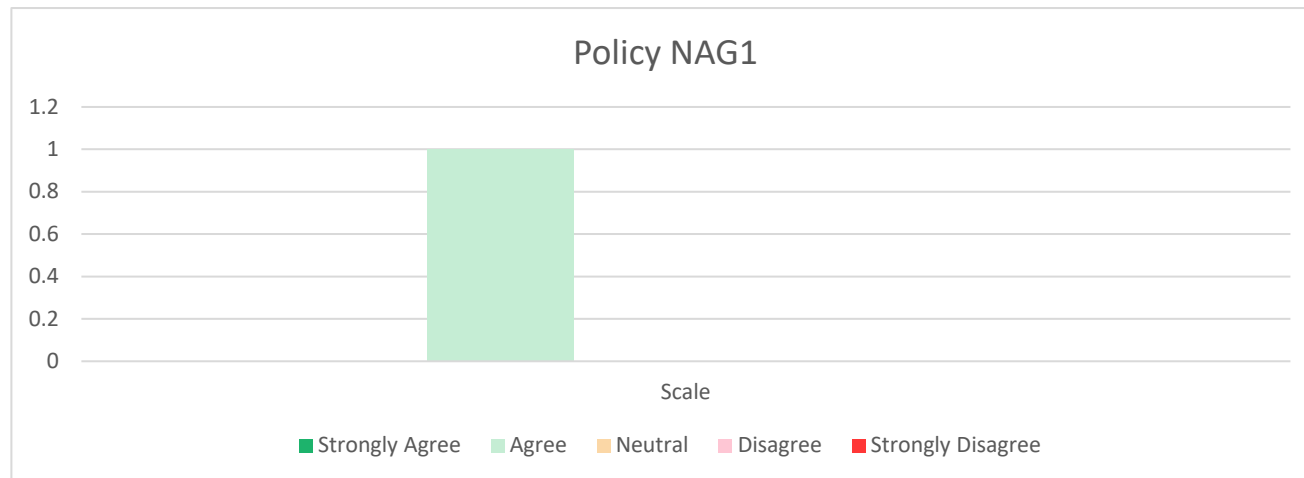
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Ash-cum-Ridley Parish Council	Agree	Agreement with the focus points is expressed, emphasising the importance of retaining adequate parking provisions. Development on the edges of the Centre and internal enhancements, aligning with the considerations of the unique history and built character of the Shopping Centre are welcomed.

Other consultation bodies

None

General Responses

Summary

General support for the proposals to enhance the village centre. Responses recognise that the centre is part of the unique nature of New Ash Green and care must be taken to preserve this in any development of the centre. Pedestrian access, a variety of shops, some offices and some residential is desirable, together with some parking. Responses notes that current upper floors are not well used. The proposal to orientate development looking outwards is supported provided delivery access is maintained.

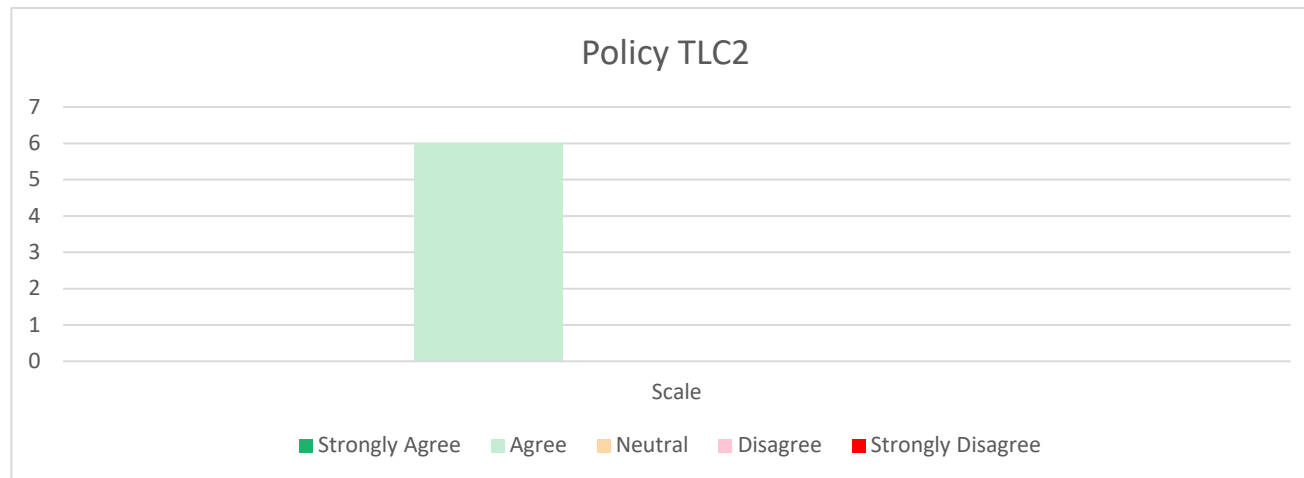
Overall Summary

Summary of comments on Policy NAG1

Support for proposals to enhance NAG village centre, including retaining adequate parking, developing edges and outward-facing buildings, residential and office space, whilst respecting the unique heritage of the SPAN village centre.

Policy TLC2 – Town Centres – Hot Food Takeaways and Evening Economy

Of the 6 respondents who answered the quantitative question in the survey, all agreed with the policy.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Agree	Support for Policy TLC2, which encourages access via sustainable modes of transport.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Sevenoaks Town Council	Agree	Responses were supportive of the policy and noted that free parking in town centres would boost the evening economy and provision should be made for moped/motorbike parking for takeaway delivery drivers. It was noted that the provision of bins does not always reduce littering.
Chiddingstone Parish Council	Agree	
Ash-cum-Ridley Parish Council	Agree	

Other consultation bodies

None

General Responses

Summary

There were no further comments from the general public on Policy TLC2.

Overall Summary

Summary of comments on Policy TLC2

General support for Policy with recommendations regarding parking.

Overall summary of comments on Chapter 3 (Employment and Economy – Town Centres)

Generally supportive comments on policies related to town centres, both the strategic policies relating to the town and local centre network and the specific policies on the five town and village centres. Comments highlight the need to retain key services and facilities within town and local centres, promote active travel, consider parking arrangements and support the development of a new network of local centres on new strategic sites, where there is a lack of existing local provision.

Detailed comments on specific proposals for the five town and village centres, particularly in relation supporting proposals in adopted and emerging Neighbourhood Plans.

Actions for Regulation 19

- Include overview of proposed new local centres in relation to strategic sites (e.g. Sevenoaks Quarry)
- Consider the inclusion of 'gradual' change in relation to Swanley town centre
- Further design work on Leathermarket proposals (Edenbridge) and replace visualisations to avoid confusion regarding pedestrianisation
- Consider references to parking, in specific town centre policies and in relation to the night-time economy.

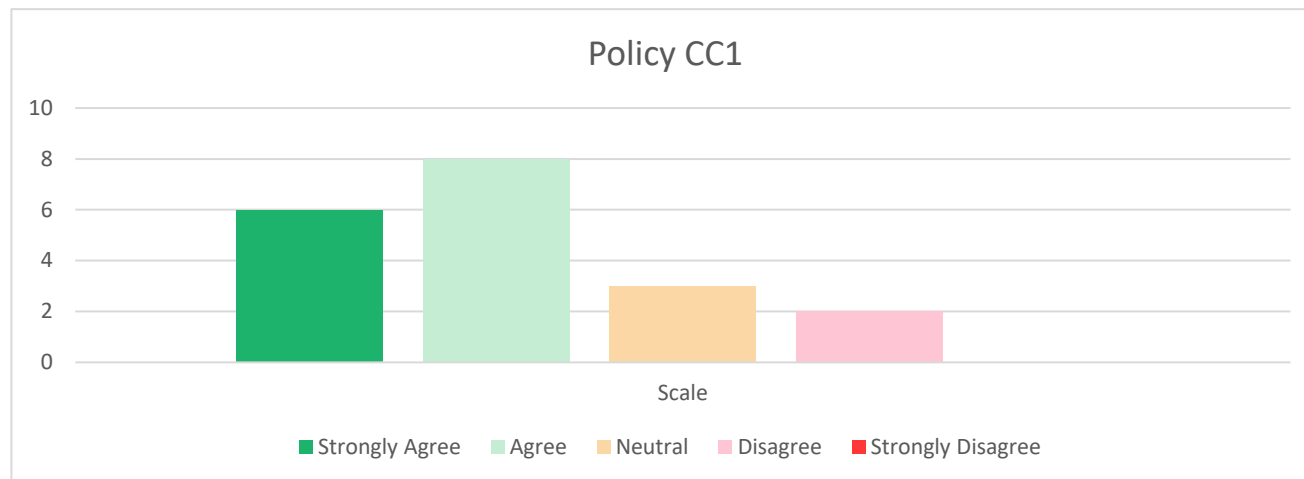
Chapter 4 – Climate Change

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy CC1 – Mitigating and Adapting to the Impacts of Climate Change

20 responses

Of the 19 respondents who answered the quantitative question, 74% said that they either agree or strongly agree with Policy CC1.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Supports the thrust of the policy and makes suggestions for its strengthening, particularly in relation to flood risk and biodiversity.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Agree	TWBC agrees with the thrust of the policy.
Kent County Council	Not Answered	Recommends further reference to the requirement for active travel options within new development.
Wealden District Council	Not Answered	Supports the approach to the issues identified.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Strongly Agree	No comment.
Eynsford Parish Council	Agree	Supports but finds it difficult to reconcile with the proposals for Green Belt development.
Sevenoaks Town Council	Not Answered	Supports but considers the chapter should include a theme on waste management.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Shoreham Society	Strongly Agree	Supports but would like to see explicit mention of increasing public transport usage and the development of bus and cycle routes.
New Ash Green Village Association Limited	Strongly Agree	No comment.
Eynsford Green Team	Neutral	Provides detailed comments as to how site MX15 would not comply with Policy CC1.
CPRE	Not Answered	Supports the intention of the policy but considers it to be too generic and vague.
SDC Property and Commercial Services	Not Answered	Concerned about the cost implications of the policy going further than the forthcoming Future Homes Standards and questions the success of measures such as BREEAM.

General Responses

Summary
<p>General responses support the thrust of Policy CC1, but some disagree that its principles can be achieved while simultaneously proposing the level of development identified within the emerging plan, particularly with relation to emissions. Others make additional suggestions relating to public transport, tree planting and solar panels. It is raised that the policy does not go far enough to support the Government's net zero aims, particularly with relation to the decarbonisation of the grid, and a site is put forward for a solar panel development. It is suggested that the council should be actively seeking to allocate such sites. It is also suggested that the policy should include flexibility for non-permanent buildings such as holiday lodges.</p>

Overall Summary

Summary of comments on Policy CC1

Responses to Policy CC1 came from a range of respondents and its principles are well supported, but concern is raised as to how it aligns with the development strategy. Suggestions for additional detail and clarity are welcomed.

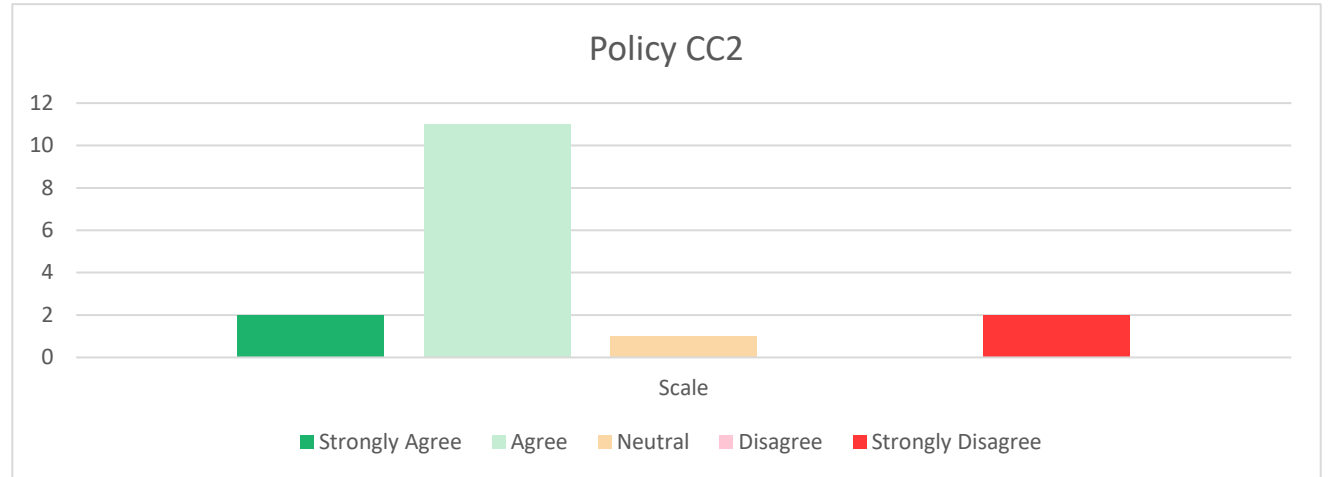
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. The implications of the Written Ministerial Statement released in December 2023 will also be reviewed. Suggestions for additional detail and clarity will be researched and included where appropriate.

Policy CC2 – Low Carbon and Climate Resilient Development

18 responses

Of the 16 respondents who answered the quantitative question, 81% said that they either agree or strongly agree with Policy CC2.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Supports the thrust of the policy but suggests reference to the waste hierarchy, with a further recommendation for a standalone policy on waste management.

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Eynsford Parish Council	Agree	Supports the principles of the policy but considers that site MX15 would not comply with it. Particularly concerned by the potential for carbon credits being used to offset the development of the site.
Chiddingstone Parish Council	Agree	Supports the policy but suggests an additional requirement for new development to include solar panels on roofs.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
CPRE	Not Answered	Supports the intention of the policy but considers it to be too generic and vague, for example in not specifying a recognised embodied carbon calculator and not mandating the use of Climate Impact Assessments.
The Sevenoaks Society	Agree	Supports the policy but suggests some clarification and amendments are made to strengthen it.
Eynsford Green Team	Agree	Supports the policy but does not consider the proposals for site MX15 comply with it, setting this out in detail against each criterion.
Kent Downs National Landscape Unit	Not Answered	Notes the reference to carbon sequestration and considers that the Unit is well placed to assist in this through nature-based solutions.
SDC Property and Commercial Services	Not Answered	Concerned about the cost implications of the policy going further than the forthcoming Future Homes Standards and questions the success of measures such as BREEAM.
Home Builders Federation	Not Answered	Raises the need for the policy as drafted to be reconsidered against the December 2023 Written Ministerial Statement and for any targets that remain to be robustly evidenced and viability tested.

General Responses

Summary
<p>General responses support the sustainability aims of Policy CC2 and make some suggestions such as the inclusion of a solar panel requirement on roofs. Concern is raised as to the achievability of this policy coupled with the level of development being identified. Developers are more cautious about the policy and consider the target related requirements should be relaxed, phased or even deleted to ensure proposals will remain viable. The implications of of the December 2023 Written Ministerial Statement are raised and it is stated that the council would need to amend its targets to be in line with this and provide the necessary evidence to support them.</p>

Overall Summary

Summary of comments on Policy CC2

The ambitions of Policy CC2 are generally well supported but with some concern about how specific sites would comply with it. The implications of the December 2023 Written Ministerial Statement are raised, along with viability concerns relating to some of the targets. Suggestions are made, and welcomed, with regards to additional themes and clarity.

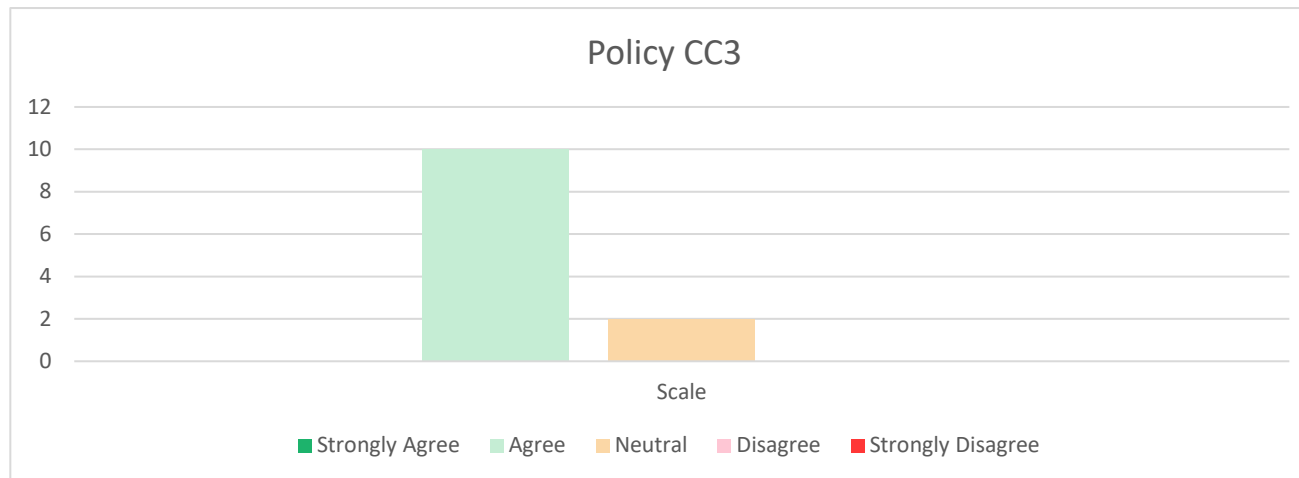
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. The implications of the Written Ministerial Statement released in December 2023 will also be reviewed. Suggestions for additional detail and clarity will be researched and included where appropriate. An updated viability assessment will be carried out to ensure all the policies in this chapter are deliverable.

Policy CC3 – Low Carbon and Renewable Energy

13 responses

Of the 12 respondents who answered the quantitative question, 83% said that they agree with Policy CC3.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Supports the thrust of the policy and makes suggestions for its strengthening, particularly in relation to biodiversity.

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Would also support solar panels on listed buildings if sympathetic.
Eynsford Parish Council	Agree	Supports the policy but does not consider that site MX15 as proposed would comply.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Eynsford Green Team	Agree	Considers that the target for 10% onsite renewable energy generation should be higher.
CPRE	Not Answered	Considers a need to include more guidance on the criteria to be considered when assessing the impacts of proposals and references Paragraph 164 of the NPPF in relation to supporting energy efficiency in existing buildings.

General Responses

Summary

General responses support the intentions of policy, but some feel it could go further particularly in terms of renewable energy generation in new development, and the development of decentralised heating networks. It is also considered that the council should be actively seeking to allocate sites for renewable energy development.

Overall Summary

Summary of comments on Policy CC3

Overall, the principles of Policy CC3 are supported, with suggestions made as to how it could go further. These are welcomed.

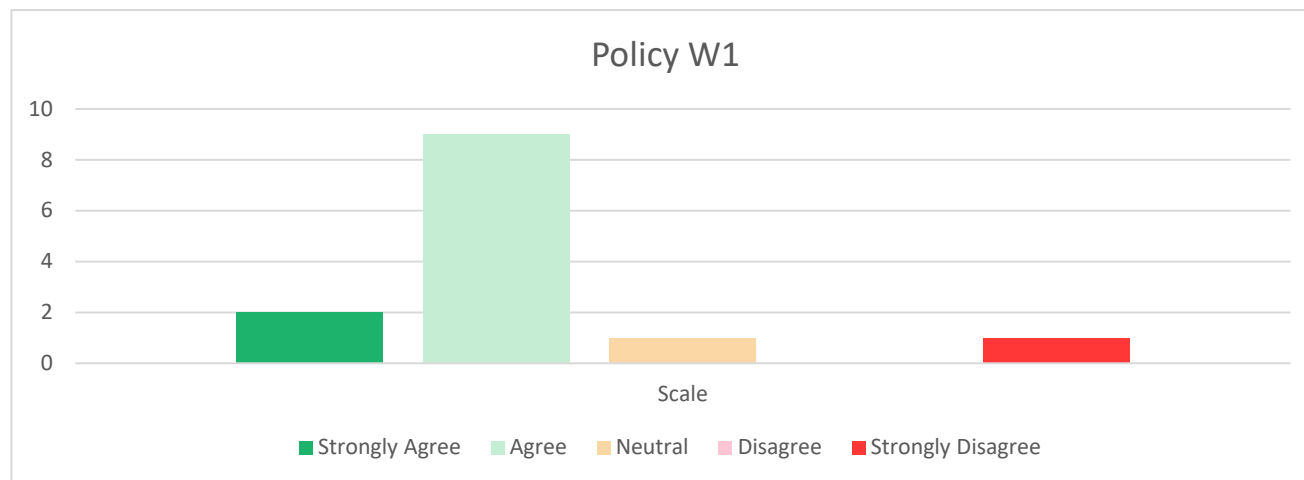
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. The implications of the Written Ministerial Statement released in December 2023 will also be reviewed. Suggestions for additional detail and clarity will be researched and included where appropriate.

Policy W1 – Flood Risk

15 responses

Of the 13 respondents who answered the quantitative question, 85% said they either agree or strongly agree with Policy W1.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Supports the policy and makes several recommendations for its improvement. These include more reference to the measures set out within the SFRA, culverts, buffer strips and Flood Zone 3b.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	Recommends alternative wording to recognise that on occasions, SuDS may be adopted by a water/sewerage company, and on rare occasions, the County Council.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment.
Eynsford Parish Council	Strongly Agree	Particularly supportive of the criterion for development not increasing flood risk elsewhere.

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	The Parish is at an increasing risk from flooding.
Sevenoaks Town Council	Not Answered	Considers that the policy needs to take account of existing drainage issues and the need to invest in SuDS outside of development boundaries.
Hever Parish Council	Not Answered	Concerned about the compatibility of the development strategy with this policy.
Edenbridge Town Council	Not Answered	Strongly supports the policy and considers it to be particularly relevant for Edenbridge.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Eynsford Green Team	Strongly Agree	Considers that site MX15 does not comply with this policy.
Thames Water	Not Answered	Supports the policy but seeks revised wording to clarify that development should not increase any form of flood risk elsewhere.

General Responses

Summary

Responses support the provisions of Policy W1, with some suggestions made for its strengthening. Concern is raised that some proposed/potential site allocations would be contrary to this policy.

Overall Summary

Summary of comments on Policy W1

Policy W1 is widely supported by Parish and Town Councils, as well as utility providers. Suggestions for amended wording and strengthening the policy are welcomed.

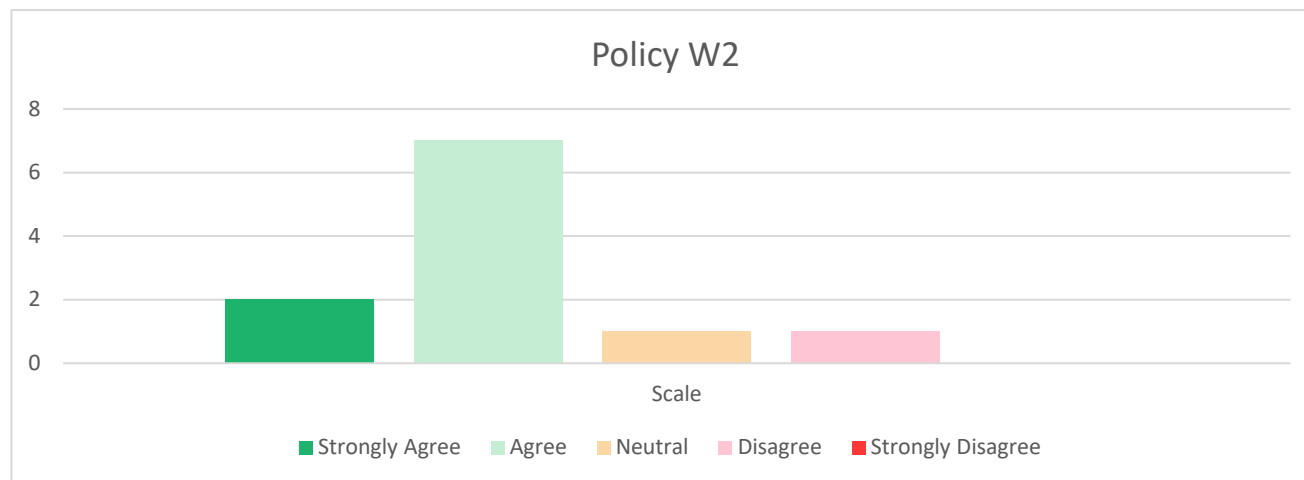
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. Suggested amendments will be considered and included where appropriate, possibly taking further advice from Kent County Council and the Environment Agency. Make it clear that site allocations will need to comply with the policy.

Policy W2 – Sustainable drainage

12 responses

Of the 11 respondents who answered the quantitative question, 82% said that they agree or strongly agree with Policy W2



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Supports the policy and provides links to further information for potential amendments to strengthen it.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	Recommends corrections to refer to the most up to date County Council policy and to ensure the policy is compatible with DEFRA's non-statutory technical guidance.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Strongly Agree	Considers that where possible, flood water should be cleaned and re-used.
Leigh Parish Council	Agree	Considers that drainage is an existing problem for the Parish and is keen to see things improve.
Kemsing Parish Council	Agree	Existing drainage systems need improving.

Organisation	Agree-Disagree scale	Summary of response
Sevenoaks Town Council	Not Answered	Supports the policy and would like to see it applied as strongly as the equivalent in the Neighbourhood Plan.
Edenbridge Town Council	Not Answered	Supports.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Eynsford Green Team	Neutral	Raises concern about the ability of site MX15 to comply with this policy.
Thames Water	Not Answered	Supports but suggests clarity in wording between the supporting text and the policy.
Upper Medway Internal Drainage Board	Not Answered	Particularly interested in development proposals for Edenbridge and sets out the scenarios in which land drainage consent will be required.

General Responses

Summary

General responses widely support Policy W2, but concern is raised as to how it can be compatible with the development strategy options.

Overall Summary

Summary of comments on Policy W2

The policy is generally supported, but concern is raised about its compatibility with the development strategy. Suggestions for some strengthening and clarity are welcomed.

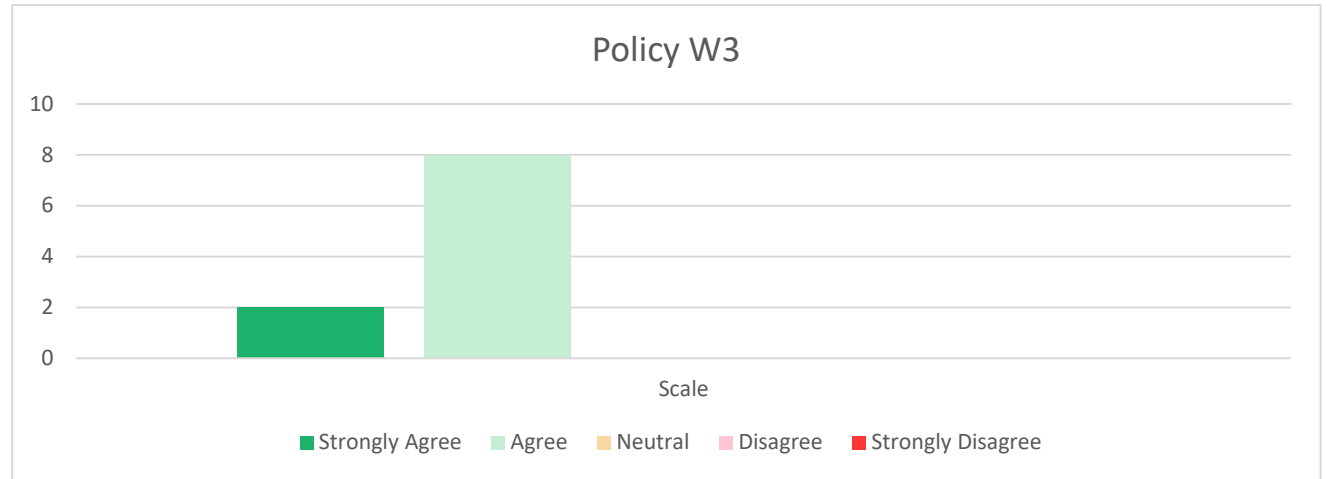
Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. Suggested amendments will be considered and included where appropriate, possibly taking further advice from Kent County Council and the Environment Agency. Make it clear that any site allocation will have to comply with these policies.

Policy W3 – Water Management, Stress and Efficiency

11 responses

Of the 10 respondents who answered the quantitative question, 100% said that they either agree or strongly agree with Policy W3.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Supports the policy, particularly the adoption of the 110 litres per person per day efficiency requirement. Recommendations are made to strengthen the reference to land contamination and impacts upon water quality.

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment.
Eynsford Parish Council	Agree	Supports but questions how it will be monitored. Also considers that site MX15 does not consider the requirements of this policy.
Hartley Parish Council	Not Answered	The parish is a Groundwater Source Protection Zone and supports the policy.
Fawkham Parish Council	Not Answered	The parish is a Groundwater Source Protection Zone and supports the policy.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Thames Water	Not Answered	Supports but suggests alternative wording to strengthen it.
The Shoreham Society	Strongly Agree	Seeks clarity on how issues would be addressed were development is unsustainable in water terms.
Eynsford Green Team	Agree	Does not consider the policy to be compatible with proposals for site MX15.

General Responses

Summary

Policy W3 is wholly supported in the general responses.

Overall Summary

Summary of comments on Policy W3

Overall, Policy W3 is well supported and suggestions for improvements are welcome. Some concern is raised with regard to specific sites in the development strategy.

Actions for Regulation 19 (Officer Response)

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023. Suggested amendments will be considered and included where appropriate, possibly taking further advice from Kent County Council and the Environment Agency. Make it clear that any site allocation will have to comply with these policies.

Overall summary of comments on Chapter 3 – Climate Change

The principles of this chapter have been greatly supported and it is a topic which all respondents clearly feel strongly about. A number of respondents feel it does not go far enough, and there a number of suggestions for strengthening the policies within it. These are welcomed and will be considered for inclusion where appropriate. It may be necessary to seek further advice from the Environment Agency and Kent County Council. There is however caution and concern raised with regards to how compatible this chapter is with the overall development strategy being proposed, particularly in relation to emissions and flooding.

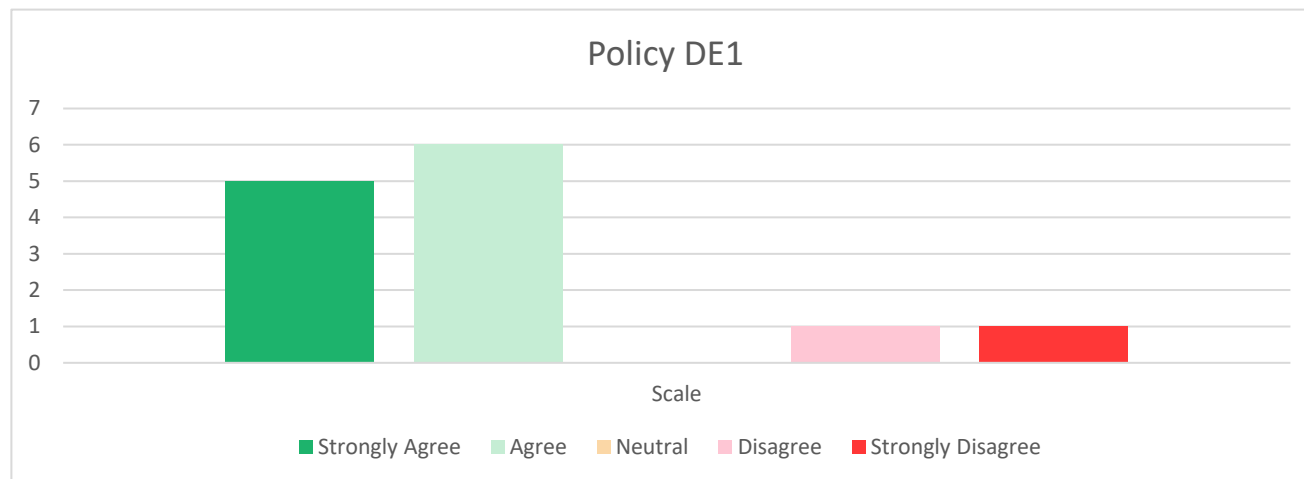
Chapter 5 – Design

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy DE1 – Design Review Panel

13 responses via scale – 85% agree or strongly agree

8 written responses



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not answered	Supportive of Design Review Panels for medium to large developments

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Design Review Panels should be optional depending upon the location, size and complexity of developments. Funding this process should not be prohibitive. Environmental requirements should be included.
Eynsford Parish Council (Green Team)	Strongly Agree	Believe the size criteria is too high. They think criteria of 20 new dwellings and non-residential/mixed use developments of more than 4,000 sqm would be much more appropriate.

Sevenoaks Town Council	Not answered	The Town Council looks forward to collaborating on the Design Review Panel, which is also required under the STNP for major planning applications or proposals on sites within sensitive locations, with engagement from the Town Council.
Fawkham Parish Council	Not answered	The Parish Council supports the use of DRP particularly for smaller sites which have significant impact on surroundings area and character and where uplifts in density are proposed.
Hartley Parish Council	Not answered	The Parish Council supports the use of DRP particularly for smaller sites which have significant impact on surroundings area and character and where uplifts in density are proposed.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
New Ash Green Village Association Limited	Strongly Agree	Especially important for design to preserve setting and special character of NAG. The system of approval for alterations to the external appearance of houses in New Ash Green which was established by Eric Lyons complements the Design Review Panel and Design Code of Policies DE1 and DE3, helping to preserve the distinct features of the village.
Sports England	Strongly Agree	Ensure developments are sustainable, encourage activity and promote health and wellbeing Encourage the use of Active Design principles as part of this panel

General Responses

Summary

Stantec on behalf of Berkeley Strategic Land Ltd : Generally supportive of policy. Suggest threshold of 50 dwellings is low and SDC should engage with DSE to check capacity for this. Highlight excessive requirements could result in delays to progress of developments.
Suggestion DRP should be used on smaller developments too.

Other responses (no organisation):

Ensure DRP includes experts
DRP should include local community too.

Overall Summary

Summary of comments on Policy DE1

Generally statutory consultees and other bodies are supportive of this policy and recognise how it supports the delivery of good design. A number of comment were raised around the size criteria of a sites subject to DRP. Planning agents/developers raise concerns that the threshold is too low, whereas town and parish response suggest the threshold is too high. Sport England have suggested that the DRP should include reference to Active Design Principles to delivery healthy and sustainable places.

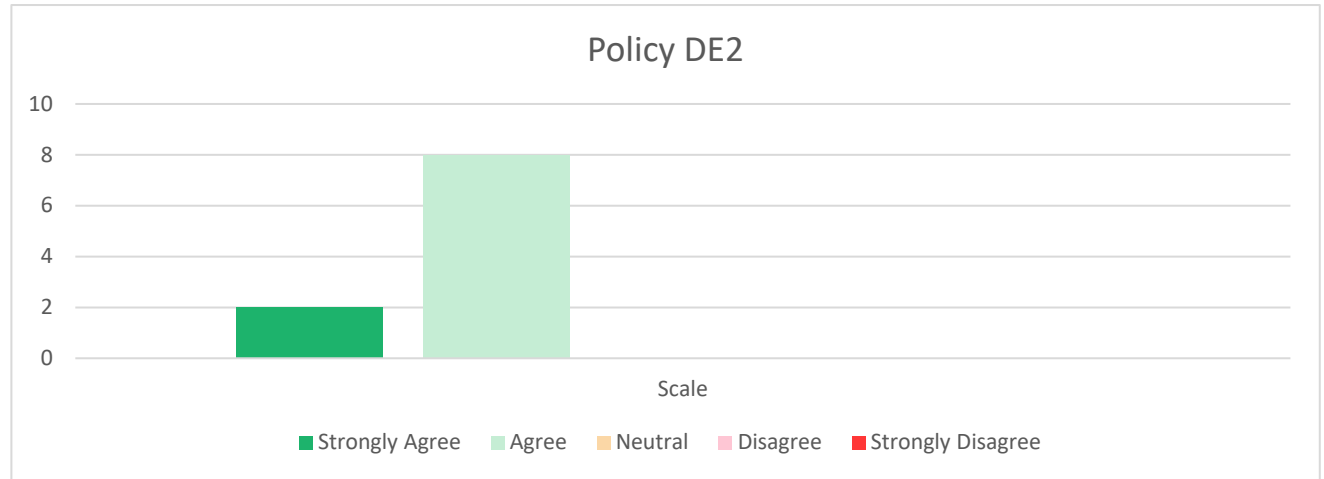
Actions for Regulation 19

Further review of threshold for DRP. Consider including Active Design Principles within DRP content.

Policy DE2 – Ensuring Design Quality

10 responses to scale – 100% agree or strongly agree.

5 written responses



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
High Weald National Landscapes	Not answered	Support for the policy. Requests specific reference to High Weald design guidance documents. We would also request the following additional text be added in to the supporting text after para 5.9: "Meanwhile the High Weald Housing Design Guide has been prepared by the High Weald Partnership to give succinct, practical and consistent advice to set clear urban design expectations for new housing development within the AONB. It aims to help to ensure higher quality and landscape-led design that reflects intrinsic High Weald character, and is embedded with a true sense of place, without stifling innovation and creativity, including responding to the historic pattern and character of settlements in the siting, form, layout, grain and massing of development, along with high quality architecture."
Kent Downs National Landscapes	Not answered	Supports the policy. Requests incorporating specific reference to Kent Downs design guidance documents

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	Welcome the inclusion of Village Design Statements and recognises the effort made by communities preparing these.
Eynsford Parish Council (Green Team)	Agree	Concern MX15, Pedham Place proposal does not meet criteria described in policy DE2.
Chiddingstone Parish Council	Strongly Agree	No comment

Organisation	Agree-Disagree scale	Summary of response
Fawkham Parish Council	Not answered	The Parish Council supports this policy. The Parish Council suggest the policy should also refer to Local Landscape Character Assessments – consistent with Policy NE1. The Parish Council highlights that the District Wide Character Study has not been updated following Reg.18 part 1 Local Plan consultation. The Parish Council have included comments on District Wide Character Study in the response and suggest that these are taken into account with an updated DWCS.
Hartley Parish Council	Not answered	The Parish Council supports this policy. In the absence of such a requirement in Policy DE3, the policy should contain a requirement to comply with the relevant Design Code for the area and/or site. In addition to the Sevenoaks Landscape Character Assessment, the Parish Council would wish to see reference to Local Landscape Character Assessments – consistent with Policy NE1

General Responses

Summary

Impartial experts should be involved in deciding whether a design reflects local character. In addition to the SDC Landscape character assessment, reference should also be made to Local Landscape character assessments and their importance in the local community

Overall Summary

Summary of comments on Policy DE2

Policy DE2 received very strong support from all types of respondents. There were suggestions to include further reference to National Landscape Design guidance. Town and parish councils support the reference to Village Design Statements.

Actions for Regulation 19

Explore inclusion of reference to other National Landscape Design Guidance within Policy.

Policy DE3 – Design Codes

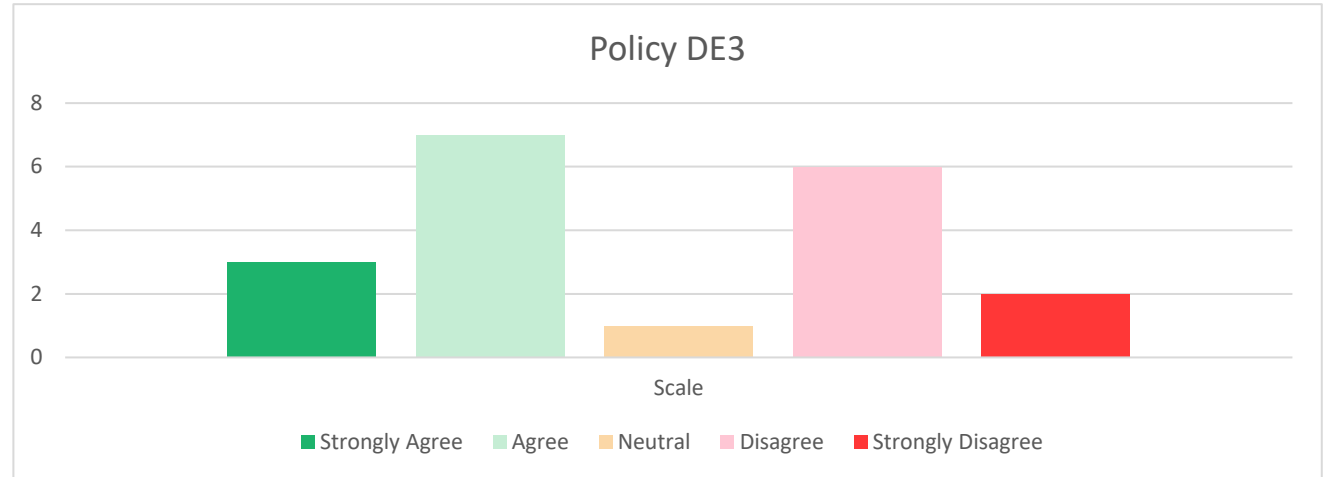
19 responses to scale – 53% agree or strongly agree, 42% disagree or strongly disagree, 5% neutral

10 written responses

Statutory Consultee responses

None.

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Not answered	Agreed this will support strategic design objectives. Consider developing a local planning tool to apply the NMDC
Kent County Council	Not answered	Reference to healthy and sustainable communities is encouraged throughout the Local Plan to support the design chapter. Encourage specific reference to designing for non-motorised access provision to ensure accessibility for all.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Disagree	Other safeguards in place without the need for Design Codes
Leigh Parish Council	Agree	No comment
Fawkham Parish Council	Not answered	The Parish Council supports how the production of design codes will require developers to engage with local communities to support planning applications. The Parish Council suggest specific reference should be made within the policy to include Parish Councils in the engagement strategy.

Organisation	Agree-Disagree scale	Summary of response
Hartley Parish Council	Not answered	The Parish Council raise the intention for the Hartley NP to contain a Design Code. They suggest the policy should refer to the need to new design codes to align with NP Design Codes. They suggest a site-specific design code may be waived provided the applicant demonstrated compliance with NP Design Code. The Parish Council suggest specific reference should be made within the policy to in include Parish Councils within the engagement strategy.

Organisation	Agree-Disagree scale	Summary of response
New Ash Green Village Association Limited	Strongly Agree	Especially important for design to preserve setting and special character of NAG. The system of approval for alterations to the external appearance of houses in New Ash Green which was established by Eric Lyons complements the Design Review Panel and Design Code of Policies DE1 and DE3, helping to preserve the distinct features of the village.

General Responses

Summary
<p>Stantec on behalf of Berkeley Homes: Asking for clarification on what an appropriate scale is and justify where Design Codes are required. Design Codes and Development Briefs potentially unintended consequences that delay the progress of development coming forward and being delivered.</p> <p>Planning agent response request that the requirement to provide Design Codes are viewed as flexible and not overly prescriptive in relation to outline planning applications.</p> <p>Other responses (no organisation): New development should support renewable energy strategies and energy efficient construction.</p> <p>Highlights demolishing buildings is unsustainable</p> <p>Reference should also be made to Design Codes in Neighbourhood Plans</p> <p>Design codes should require new buildings to be of an equal quality to existing high quality buildings in the district</p>

Overall Summary

Summary of comments on Policy DE3

Policy DE3 had less support in comparison to the other policies. The disagreement with this policy was primarily from developers/planning agents. This appears to be mostly due to a lack of clarity surrounding expectations for Design Codes. Responses from developers/planning agents request that the requirement to provide Design Codes are viewed as flexible and not overly prescriptive in relation to outline planning applications. There was generally support for Policy DE3 from neighbouring authorities. KCC recommend including reference to designing for non-motorised movement routes. General responses highlight that design issues such as climate change and sustainability can be addressed through Design Codes.

Actions for Regulation 19

Further work to define the appropriate size of development required to produce Design Code. Develop further guidance on expectation for design code production.

Overall summary of comments on Chapter 5

Majority of responses are in agreement with the policies. Policy DE3 has had least support which appears to be due to a lack of clarity surrounding expectations for Design Codes.

Developers and planning agents raise concerns about quantity of requirements and potential implications to project timelines, such as Design Codes and Character Assessments and Design Review Panel.

Other consultees have suggested additional documentation policies can reference such as National Landscape Design Guides, Active Design Principles.

Chapter 6 – Health and Wellbeing

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy HW1 – Health and Wellbeing

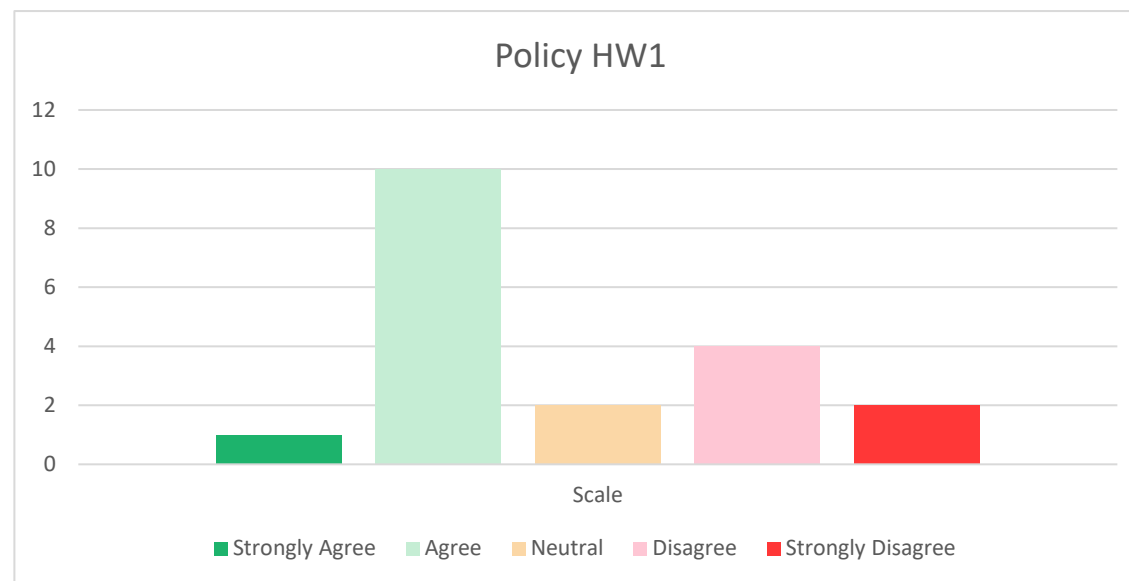
19 responses

Of the 19 respondents who answered the quantitative question, 58% said that they strongly agree or agree with Policy HW1.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Not Answered	Agrees with the approach set out under these objectives in relation to health and wellbeing.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	Agree with the policy whilst raising concerns over the traffic issues in Leigh which are considered to be dangerous for the residents in the village
Chiddingstone Parish Council	Agree	Encourage the retention and improvement of village greens and open spaces for recreation and sport as it is important physical and mental wellbeing of residents.
Eynsford Parish Council	Agree	Note and agree with the policy and objectives and consider the future for healthy communities is open spaces and active travel. Mention that green spaces in and around

Organisation	Agree-Disagree scale	Summary of response
		Eynsford are very important for their parishioners' physical and mental health and highlights importance of preserving these places.
Eynsford Parish Council (Green Team)	Not Answered	Agree with the policy however raise site specific concerns relating to MX15 Pedham Place.
Fawkham Parish Council	Not Answered	Strongly supports this policy due to it being fundamental to the creation of sustainable development. Suggests the wording "within easy access" should be more definitive by providing indicative distances. Highlights that without clear definition there is a lack of clarity for developers and potential for inconsistent interpretation over time.
Hartley Parish Council	Not Answered	Strongly supports the policy, and believes the approach included in this policy is fundamental to the creation of sustainable development and should be considered for inclusion in a Development Strategy policy, which clearly indicates the distribution of development proposed in the plan, and criteria for the consideration of other unallocated development. Also suggests the addition of precise distances defined for the wording "within easy access" so there is no misinterpretation.
Sevenoaks Town Council	Not Answered	Strongly supports this policy. Highlights the importance of cohousing, given the expected increase in average age of Sevenoaks residents, and suggests that this is recognised in Policy HW1. Concerns that the Plan does not identify means of delivering primary healthcare in Sevenoaks Town, where access to a GP is among the worst in the country.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Sport England	Strongly Agree	Support this policy. Encouraging to see that a Health Impact Assessment (HIA) is required for certain developments. Also supportive of the reference to Active Design.
Home Builders Federation	Not Answered	Agree with all major developments having to undertake a Health Impact Assessment (HIA) but consider it should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health

Organisation	Agree-Disagree scale	Summary of response
		outcomes for the area. Considered unnecessary for future development proposals that accord with this plan to undertake a separate HIA.
Network Rail	Not Answered	Considers that there should be more focus on sustainable locations with existing public transport links which can contribute to a multitude of policy objectives throughout the Plan related to Housing, Climate Change and Health and Wellbeing.
NHS Property Services	Not Answered	Supports this policy and considers it will support delivery of healthy, safe, and inclusive communities, and securement of appropriate mitigation measures.

General Responses

Summary

General responses support Policy HW1 but suggest that the policy should include a commitment to increasing bus services, as well as generating more GP services alongside new development to support the increased demand. The suggestion was also put forward for further emphasis on housing for older persons. Concerns were raised that the wording of Policy HW1 “with easy access” needs to be more definitive with defined distances to avoid misinterpretation.

Overall Summary

Summary of comments on Policy HW1

Responses to Policy HW1 came from an assortment of respondents comprising neighbouring authorities and other consultation bodies, including several town and parish councils, as well as from the general public. The majority of respondents support the objectives set out in the policy, highlighting that it is fundamental to the creation of sustainable development as well as emphasising the importance of active design. Other responses put forward valuable suggestions, such as the wording of “within easy access” becoming more definitive, as well as highlighting concerns over traffic and the necessity to improve GP services across the district.

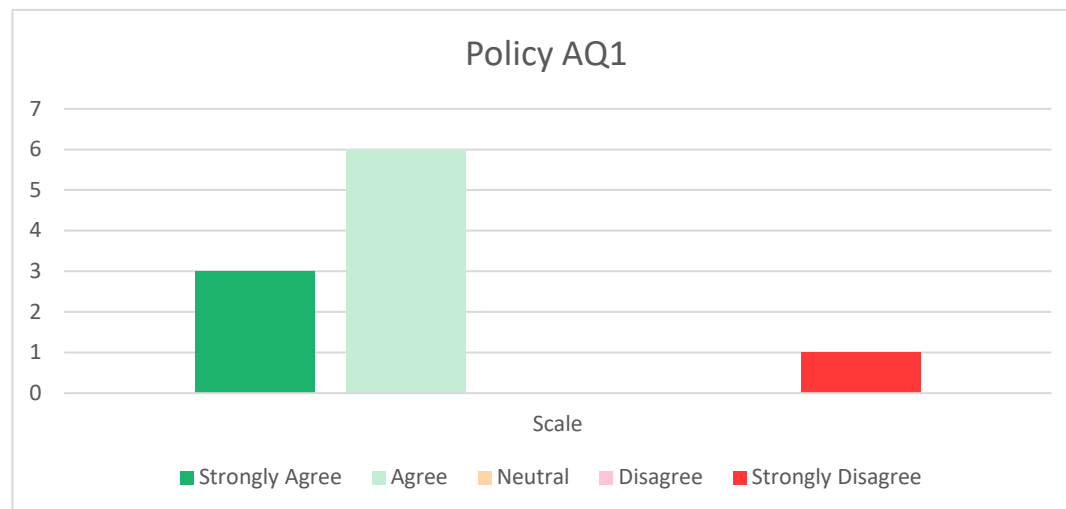
Actions for Regulation 19

Explore opportunity to set more definitive requirements, including consideration of ‘within easy access’ phrasing, to avoid misinterpretation of policy. It should be noted that all policies are considered simultaneously when determining applications and therefore, whilst comments relating to infrastructure and site specific concerns are noted, these will be addressed in other elements of Plan 2040.

Policy AQ1 – Air Quality

10 responses

Of the 10 respondents who answered the quantitative question, 90% said that they strongly agree or agree with Policy AQ1.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	Welcomes the strategic objectives set out within the health and wellbeing chapter and note that the historic environment also has a role to play in public health. Consider that the historic environment can provide individuals, as well as collectives, opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing.
Tunbridge Wells Borough Council	Not Answered	Agrees with the approach set out under these objectives in relation to health and wellbeing.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Strongly Agree	Support Policy AQ1. Raises the need for more Lorry Watch schemes, as well as essential emission testing for lorries and large vehicles.
Eynsford Parish Council	Agree	Support for Policy AQ1. Raises site specific concerns in relation to MX15 Pedham Place.

Organisation	Agree-Disagree scale	Summary of response
Eynsford Parish Council (Green Team)	Not Answered	Support for Policy AQ1. Raises site specific concerns in relation to MX15 Pedham Place. Consider that the 'reduce the impact to an acceptable level' is subjective and should be further defined in the policy.
Crockenhill Parish Council	Not Answered	Suggests that the policy should include specific targets for improving air quality across the District.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Southern Water	Not Answered	Suggest that policy wording / requirements relating to odour is added within this policy or Policy HW2. Suggested wording included: 'ensure that development would not result in unacceptable odour levels from existing sources, which cannot be adequately mitigated'.

General Responses

Summary
General responses support Policy AQ1 but suggest regular roadside air monitoring should be included in Plan 2040. Concerns are raised over the level of increased traffic that new developments would bring, further polluting the air and the consequence for residents.

Overall Summary

Summary of comments on Policy AQ1
Responses to Policy AQ1 came from a range of respondents including neighbouring authorities and other consultation bodies, including several town and parish councils, as well as from the general public. All responses bar one support the objectives set out in the policy, with various valuable suggestions put forwards, including the potential to add odour control policy requirements and increased lorry watch schemes to help better monitor air pollution. Concerns were also raised on how this policy was tested against the proposed new developments.

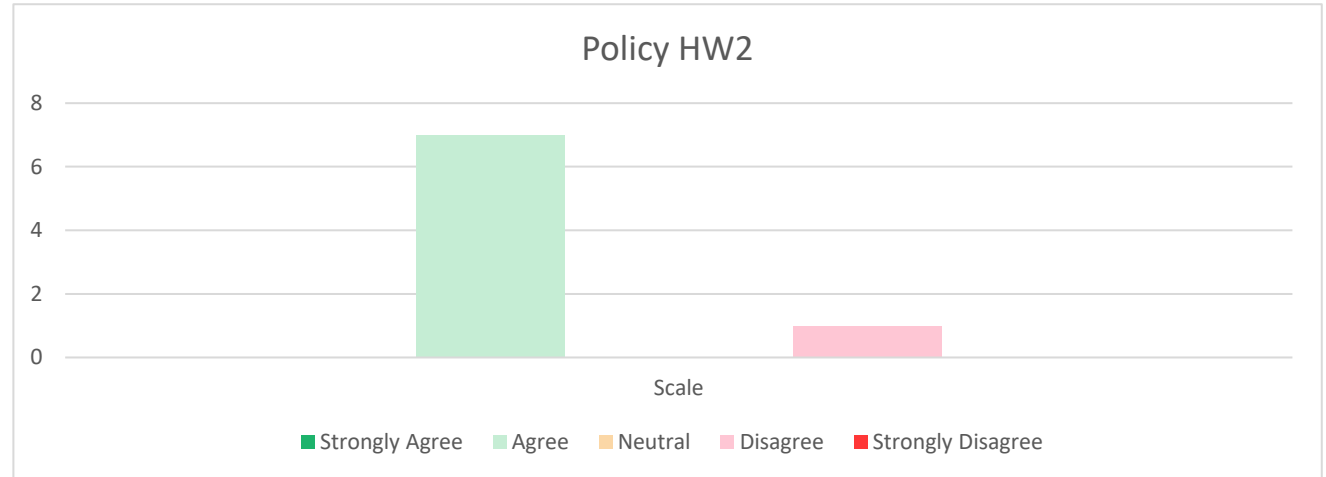
Actions for Regulation 19

Explore the possibility of introducing odour control within the policy for new developments, as well as further consultation with the SDC Environmental Health team regarding comments specific to air quality monitoring. It should be noted that all policies are considered simultaneously when determining applications and therefore, whilst comments relating to infrastructure and site-specific concerns are noted, these will be addressed in other elements of Plan 2040.

Policy HW2 – Noise

8 responses

Of the 8 respondents who answered the quantitative question, 87.5% said that they agree with Policy HW2.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	Highlights the importance of avoiding building on contaminated land as it can be detrimental for residents health and wellbeing.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Not Answered	Agrees with the approach set out under these objectives in relation to health and wellbeing.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment
Eynsford Parish Council	Agree	Support for Policy HW2. Raises site specific concerns relating to MX15 Pedham Place.

Organisation	Agree-Disagree scale	Summary of response
Swanley Town Council	Not Answered	Agree with Policy HW2. Highlights importance of considering the impact of noise on existing businesses near new development. Also highlights that it is importance that policies also protect the existing positions of businesses, to help promote the local economy and not lead to businesses having to incur additional costs for noise mitigation.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Southern Water	Disagree	Recommend that odour considerations be included within the policy.
Thames Water	Not Answered	Supports but suggests that the policy to be expanded to refer to noise, vibration, light, and odour.

General Responses

Summary
There were no further comments from the general public on Policy HW2.

Overall Summary

Summary of comments on Policy HW2
Responses to Policy HW2 came from a range of respondents including statutory consultees and key consultation bodies, including a number of town and parish councils. Most responses encouraged the objectives of Policy HW2 whilst adding suggestions on how the policy could be further strengthened, such as considering the impact of noise from new development on existing businesses nearby. It was suggested that the policy should be expand further to include odour, as well as making reference to vibration and light.

Actions for Regulation 19

Consider further expansion of the policy to include references to odour, vibration and light. Consider the impact of noise on nearby developments and how this could be mitigated through Policy. Further discussions and analysis of comments with SDCs Environmental Health team.

Chapter 7 – Historic Environment

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy HEN1 Protecting and Enhancing the Historic Environment

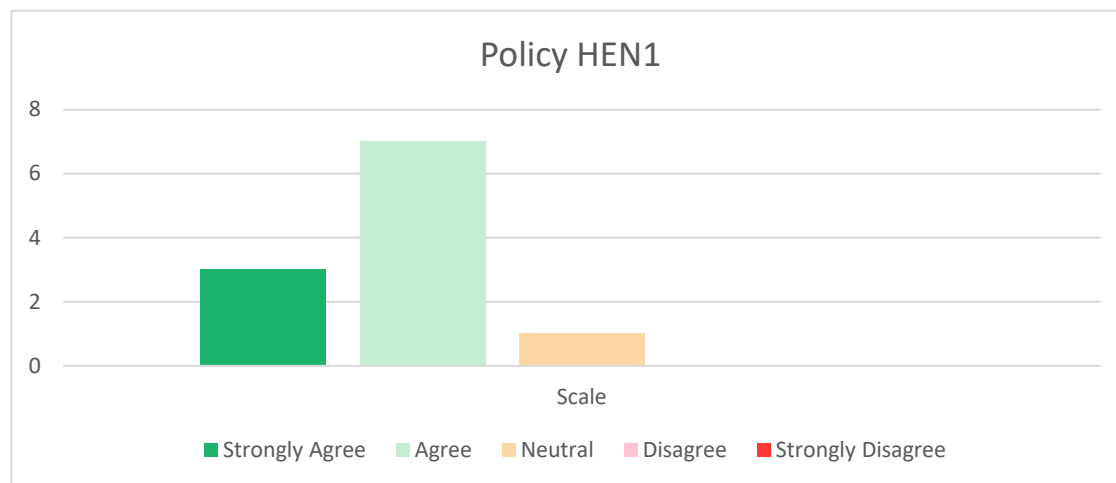
11 Responses

91% of respondents either strongly agreed or agreed with this policy.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
KCC	Not Answered	The County Council is supportive of this policy and is pleased to see the full range of heritage features included in the policy. Change in rural areas should certainly be managed sensitively. It should be noted that much of Kent has historically had a dispersed settlement pattern. The Kent Farmsteads Guidance on historic farmsteads in Kent considers how rural development proposals can be assessed on whether they are consistent with existing Character. This has been endorsed by the County Council and it is recommended that District Council considers adopting the guidance as Supplementary Planning Document.
TWBC	Agree	

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	
Leigh Parish Council	Not Answered	Welcome the policy's aim to protect and enhance this historic environment and in particular listed buildings, conservation areas and sites of significant interest.
Sevenoaks Town Council	Not Answered	Sevenoaks town contains a large number of historic assets, both Listed and locally listed that give the town its distinct historic character and need to be conserved. Development proposals affecting Listed and locally listed buildings and assets should demonstrate that their historical importance has been taken into account and preserve and enhance any new development.
Hartley Town Council	Not Answered	The Policy appears to relate to both built and natural heritage and therefore should recognise "important" hedgerows as designated heritage assets, including those which are of archaeological "importance" marking historic field boundaries in accordance with Hedgerow Regulations, 1997. The Parish Council request that Neighbourhood Plans are added to criterion d).
Fawkham Town Council	Not Answered	The Policy appears to relate to both built and natural heritage and therefore should recognise "important" hedgerows as designated heritage assets, including those which are of archaeological "importance" marking historic field boundaries in accordance with Hedgerow Regulations, 1997. The Parish Council request that Neighbourhood Plans are added to criterion d).

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
High Weald AONB	Agree	We are supportive of this policy. Within the example list of non-designated heritage assets we would like to see an additional bullet point, suggested text: "Historic public realm features which cumulatively contribute to the rural landscape character particularly within the AONBs". Suggest specific reference in Chapter 7 to the historic public realm as an important part of the historic environment, potentially after para 7.6: suggested text: "The historic public realm across the High Weald plays an important role in defining the rural landscape character of the AONB. Historic features such as locally distinctive

Organisation	Agree-Disagree scale	Summary of response
		<p>paving, railings, lamp-posts, milestones and historic fingerpost signs, along with red telephone kiosks and letterboxes, contribute positively to the character of the rural public realm.”</p> <p>We would also like to see a reference to the historic environment in the AONB included in para 7.8; suggested additional text:</p> <p>“The historic environment is also fundamental to the distinctive character, sense of place and natural beauty of AONBs, and the rich built heritage greatly informs the character of the High Weald AONB in terms of settlement pattern, building materials reflecting the underlying geology of the place, and building typologies reflecting locally distinct historic agricultural practices.”</p>

General Responses

Summary

The policy is supported.

Overall Summary

Summary of comments on Policy HEN1

Fourteen respondents answered the question. Seven provided comments. Of the responses that answered, eleven agreed or strongly agreed with the policy and one said they were neutral. Suggest adding specific reference to historic public realm features and AONB.

Policy HEN2 Sensitivity Managing Change in the Historic Environment

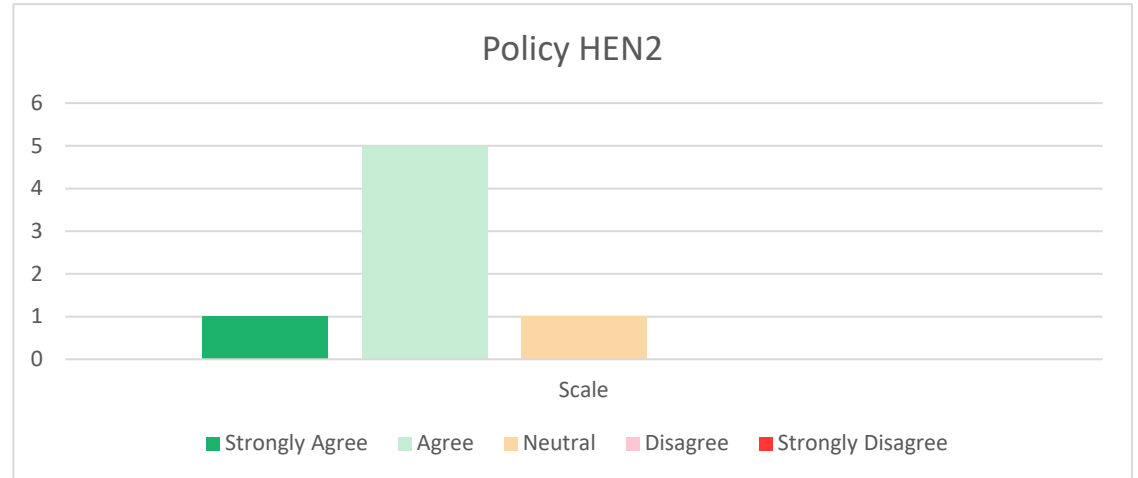
7 Responses

86% of respondents strongly agree or agree with this policy

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
KCC	Not Answered	<p>While the current text is correct, it should be noted that where the asset affected is an archaeological asset, the Heritage Statement may need to incorporate a Desk Based Assessment (DBA) or even the results of archaeological fieldwork. The County Council can advise on the need for a DBA/fieldwork on a case-by-case basis.</p> <p>Para 7.13 Incorrect. Areas of Archaeological Potential (AAP) dataset has been replaced with Archaeological Notification Areas (ANA). No reference should therefore be made to AAPs.</p> <p>The County Council would therefore recommend the following text is included within the Local Plan: Kent County Council has defined Archaeological Notification Areas to guide Sevenoaks District Council on when to consult the County Council on proposals affecting archaeological assets. These can be viewed on the Sevenoaks District Council website.</p>

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment

Fawkham Town Council	Not Answered	Support. The Parish Council support the principle of this policy which is vital for the heritage-rich Sevenoaks District.
Hartley Town Council	Not Answered	Support. The Parish Council support the principle of this policy which is vital for the heritage-rich Sevenoaks District.

Other consultation bodies

None

General Responses

Summary

The policy is supported. Heritage assets require preservation.

Summary

Summary of comments on Policy HEN2

Eight respondents answered the question. Two provided comments. Of the responses that answered, six agreed or strongly agreed with the policy and one said they were neutral. Review wording relating to archaeology.

Policy HEN3 Archaeology

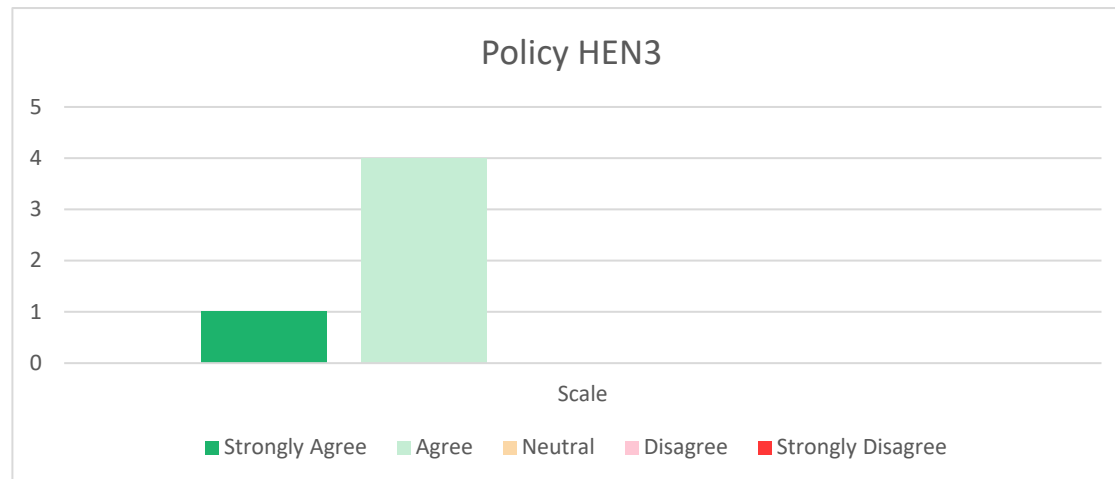
5 Responses

100% of respondents strongly agree or agree with this policy.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
KCC	Not Answered	<p>Areas of Archaeological Potential are no longer used – the following amendment is therefore recommended: “Where an application is located within, or would affect an Area of Archaeological Potential or suspected area of archaeological importance an archaeological asset, an archaeological assessment should be provided.”</p> <p>The second sentence – “Preference will be given to preservation in situ... The National Planning Policy Framework (NPPF) makes it clear that excavation and recording is not an equal alternative to preservation in-situ, it should only be carried out where preservation in-situ is not appropriate. The current text does not make that order of priority clear. The County Council would suggest the following is replaced by: Where development proposals affect non-designated heritage assets with an archaeological interest, the District Council would expect the archaeological deposits to be preserved in-situ. Where this is not possible, clear justification will be required.</p> <p>The fourth sentence is not clear what the ‘possible impact’ refers to. It could perhaps be better worded as:</p>

Organisation	Agree-Disagree scale	Summary of response
		“Developers will be required to record any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and possible impact significance and the potential impact of their proposals”.

Town and Parish Councils

Fawkham Town Council	Not Answered	Support. The Parish Council support the principle of this policy which is vital for the heritage-rich Sevenoaks District.
Hartley Town Council	Not Answered	Support. The Parish Council support the principle of this policy which is vital for the heritage-rich Sevenoaks District.

Other consultation bodies

None

General Responses

Summary

The policy is supported.

Summary

Summary of comments on Policy HEN3

Four respondents answered the question. One provided comments. All the respondents that answered the question agreed or strongly agreed with the policy. Wording needs some amendment to remove references to Areas of Archaeological Potential.

Policy HEN4 Locally Listed Buildings and Assets

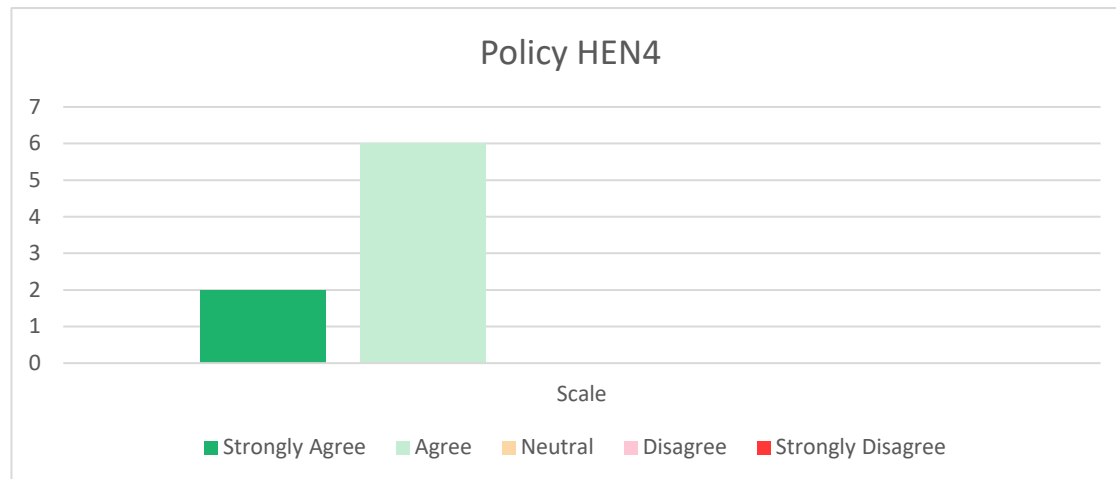
8 Response

100% of respondents strongly agree or agree with the policy.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
KCC	Not Answered	The County Council is pleased to see that the policy requires applicants to demonstrate that the significance of the assets has influenced the design of the proposals. Suggest that the Historic Environment Record be identified as the appropriate repository of information about locally listed assets

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	Locally Listed Buildings are important to the historic, local character and amenity value of the village and welcome the policy.
Hartley Parish Council	Not Answered	Strongly support. The Parish Council strongly support this policy and the expansion of the Local List beyond Sevenoaks to the wider District.
Fawkham Parish Council	Not Answered	Strongly support. The Parish Council strongly support this policy and the expansion of the Local List beyond Sevenoaks to the wider District.

Other consultation bodies

None

General Responses

Summary

The policy is supported. Locally listed assets are important to historic character and should be protected.

Summary

Summary of comments on Policy HEN4

Nine respondents answered the question. Two provided comments. Of the responses that answered, all agreed or strongly agreed with the policy.

Policy HEN5 Responding to Climate Change in the Historic Environment

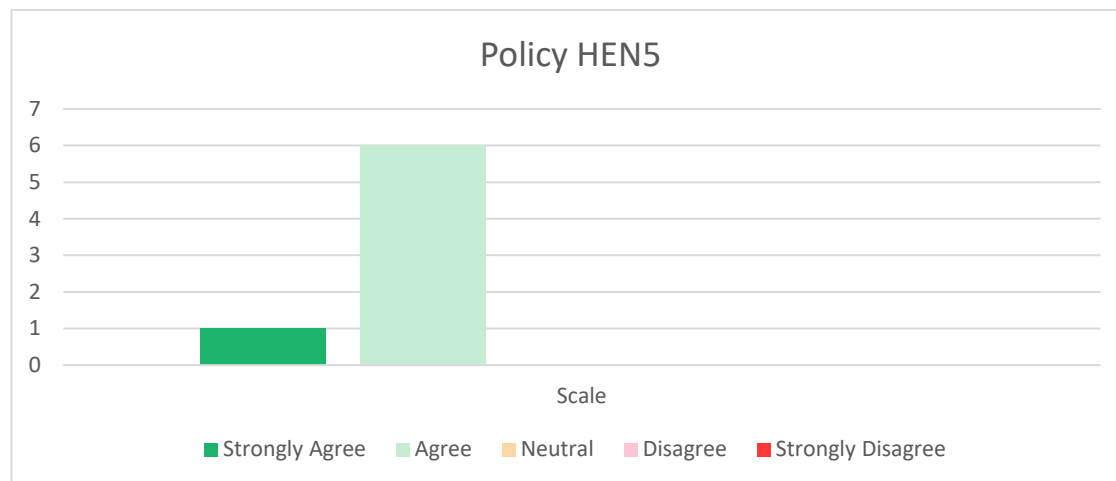
7 responses

100% of respondents strongly agree or agree with the policy.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
KCC	Not Answered	<p>Pleased to see this policy included in the draft Local Plan. Climate change will significantly impact the District's heritage and it was encouraging to see this reflected in the policy.</p> <p>The current text focuses on adapting historic buildings to make them more efficient. In addition, HE guidance demonstrates that historic structures, settlements and landscapes can in fact be more resilient in the face of climate change, and more energy efficient than more modern structures and settlements. This could usefully be highlighted in the text as an encouragement to retain old buildings where possible. ('Climate Change Adaptation Report' (Historic England, 2016) and 'There's no Place Like Old Homes: re-use and Recycle to Reduce Carbon' (Historic England 2019).</p> <p>A second issue of relevance that should be mentioned here is the role that SuDS can have on buried archaeological remains, as these are an important response to climate change. SuDS may have both direct and indirect impacts on the historic environment. When SuDS are planned, it is important that the potential impact on the historic environment is fully considered, and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record and by taking relevant expert advice. The County Council has recently produced advice for SuDS and the historic environment. It provides information about the potential impact of SuDS on the historic environment,</p>

Organisation	Agree-Disagree scale	Summary of response
		the range of mitigation measures available and how developers should proceed if their schemes are believed likely to impact on heritage assets.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Allow photovoltaic panels or tiles if sympathetic and in-keeping.
Leigh Parish Council	Agree	Need improved ways of allowing and supporting listed buildings to adapt to climate change while retaining their character.

Other consultation bodies

None

General Responses

Summary
The policy is supported. Need to allow buildings to respond to climate change, whilst retaining their character.

Summary

Summary of comments on Policy HEN5
Eight respondents answered the question. Three provided comments. Of the responses that answered, all agreed or strongly agreed with the policy.

Policy HEN6 Shop Fronts

6 Responses

100% of respondents strongly agree or agree with the policy

Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

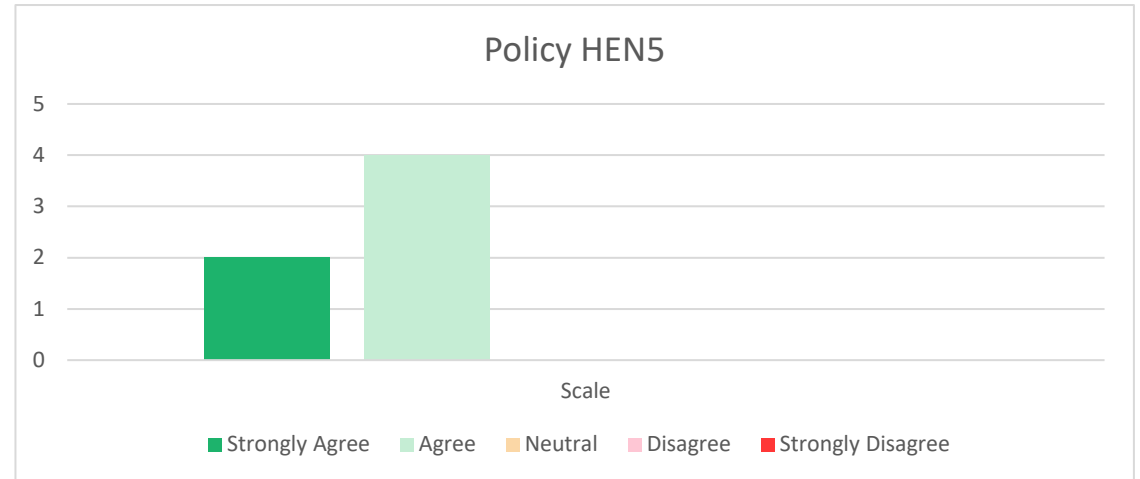
Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Historic shop fronts should be retained where possible.
Sevenoaks Town Council	Agree	Oppose internally illuminated signs in Conservation Areas, as they increase the impact of light pollution and are considered unsympathetic to the character and heritage of the area. A policy stating this was adopted by the Planning Committee on 27th June 2022.

Other consultation bodies

None

General Responses

Summary
The policy is supported.



Summary

Summary of comments on Policy HEN6

Six respondents answered the question. Two provided comments. Of the responses that answered, all agreed or strongly agreed with the policy. Historic shop fronts should be retained and shops should not have internally illuminated signs in conservation areas.

Policy HEN7 Historic Parks and Gardens

7 Responses

100% of respondents strongly agree or agree with the policy

Statutory Consultee responses

None

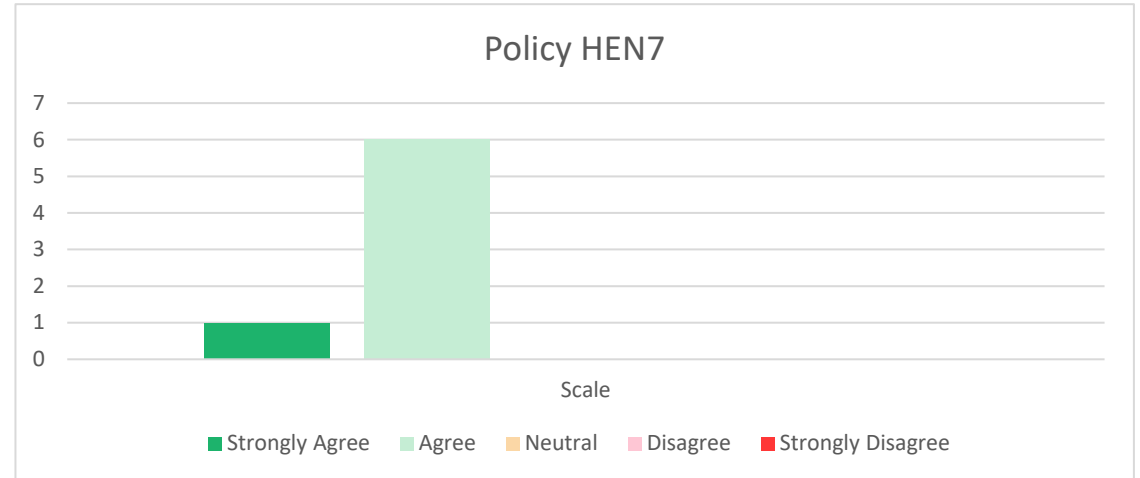
Neighbouring Authorities

None

Town and Parish Councils

None

Other consultation bodies



Organisation	Agree-Disagree scale	Summary of response
Kent Gardens Trust	Not Answered	<p>“It is suggested that the second sentence should be replaced by:-</p> <p>Some of these Historic Parks and Gardens are designated, and other are non-designated assets and were originally identified in Volume 1 of the Kent Gardens Compendium produced by Kent County Council and revised in 1996. This document was supplemented by a Review of The Kent Compendium of Historic Parks and Gardens for Sevenoaks District 2011-2013. Other Parks and Gardens are identified on the Sevenoaks Local List.</p> <p>There are likely.....”</p>
KCC	Not Answered	<p>Clause (b)</p> <p>It should be noted that there are no truly natural landscapes in Sevenoaks. The landscape that is visible today is the result of many centuries of evolution and its character is firmly rooted in the past. The Kent Historic Landscape Characterisation</p>

Organisation	Agree-Disagree scale	Summary of response
		<p>Survey (2001) (HLC) is an important resource for understanding the landscape of Kent and its development through time. The County Council emphasises that the HLC is a strategic, not local, assessment.</p> <p>It is not appropriate, therefore, to use the HLC data alone to inform specific development proposals or to identify potential development sites. To assess the historic landscape in a detailed way it is necessary to refine the existing HLC further. The County Council recommends that District Council undertakes this exercise – the County Council would welcome further engagement on this point.</p>

General Responses

Summary

The policy is supported.

Summary

Summary of comments on Policy HEN7

Eight respondents answered the question. Three provided comments. Of the responses that answered, all agreed or strongly agreed with the policy. Refer to designated and non-designated parks and gardens identified in Kent Gardens Compendium and Vol 1 Historic Parks and Gardens in Kent, which includes Emmetts, (the Compendium and Sevenoaks Local list do not).

General comment on the Historic Environment strategic objective and policies

Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Historic England	Not answered	Welcome the inclusion of policies for the Historic Environment in the Local Plan that meet the obligation for preparing the positive strategy required by the NPPF (para 20d and 196). The policies and proposals throughout all sections of the plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets, rather than relying on stand-alone policies on their own. This will be a key test of soundness and the achievement of sustainable development at examination.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council (KCC)	Not answered	<p>KCC- Recommend that the District Council develops the Heritage Strategy as recommended by the Historic Environment Review.</p> <p>Sevenoaks Museum houses many historic objects that tell the story of the development of Sevenoaks & forms part of the historic assets of the town, therefore, the County Council would expect the Museum to be referred to within the Local Plan.</p> <p>Figure 7.1: Heritage Assets and Conservation Areas: It should be noted, that in addition to the nationally and locally designated heritage assets shown, there are also numerous non-designated heritage assets in Sevenoaks.</p> <p>Strategic Objective OB16. Heritage Conservation: Paragraph 7.7 The County Council recommends replacing the word “useful” with invaluable.</p>

Town and Parish Councils

None

Other consultation bodies

None

General Responses

None

Overall Summary

Summary of comments

The policies and proposals throughout all sections of the plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets. Consider some small word changes. Fig 7.1 Add note re NDHAs, or change to 'Designated Heritage Assets'

Overall Summary for Chapter 7 – Historic Environment

Overall summary of comments on Chapter 7 – Historic Environment

There were 59 responses on the chapter in total, though many of these were from a small number of consultees. These included, Kent County Council (KCC), Parish and Town Councils, Historic England, the High Weald AONB unit, and Kent Garden Trust. The policies in this chapter were supported by all respondents that stated if they agreed or disagreed and the comments were generally very supportive. Recommendations were made for minor alterations or additions to the policies.

Actions for Regulation 19

The recommendations for minor alterations or additions to the policies will be reviewed to make any changes for the Regulation 19 policies. The policies and proposals throughout all sections of the plan will be tested against the potential effects they will have on the historic environment and the significance of heritage assets through the Sustainability Appraisal of the Plan.

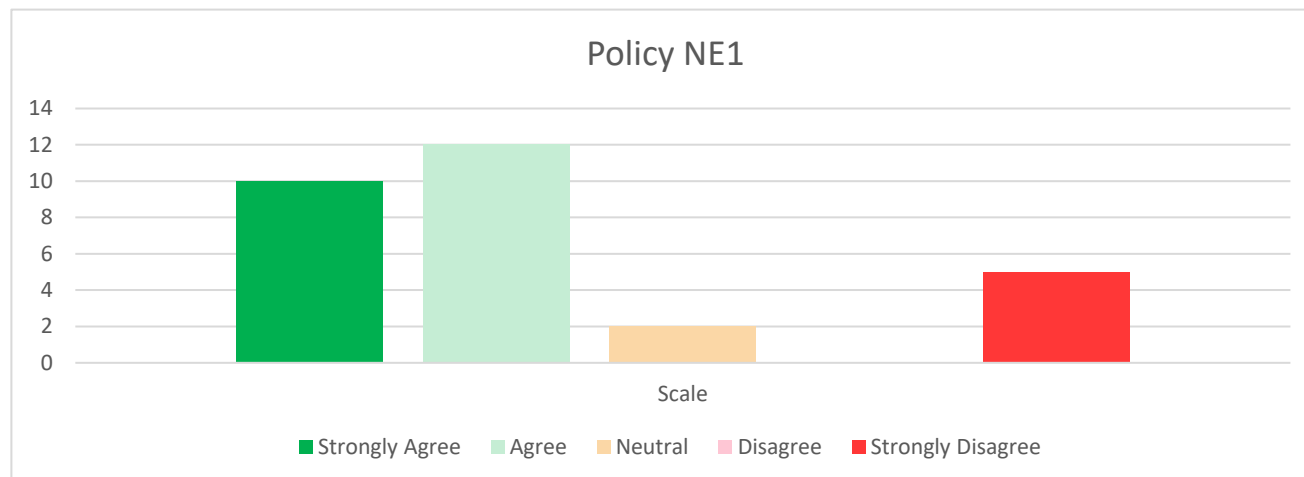
Chapter 8 – The Natural Environment

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy NE1 Landscape and Areas of Outstanding Natural Beauty

29 Responses

76% of respondents strongly agreed or agreed with this policy.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Natural England	Not Answered	<ul style="list-style-type: none"> Comments and general advice from previous consultation remain valid i.e. suggesting more detail/additional text in line with the NPPF. Comments relate to growth options. Noting option 2 as having the least impact by area and an expectation that new development would be focussed on 'adjoining opportunity site', to maximise avoidance of loss.
Environment Agency	Not Answered	<ul style="list-style-type: none"> General comments recommending updated text clarifying that figure 8.1 refers to main rivers.

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Agree	<ul style="list-style-type: none"> Highlighted new name.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Sevenoaks Town Council	Not answered.	<ul style="list-style-type: none"> • Supports the policy. • Requests policies protecting and extending hedges and wildlife porous boundaries. • Highlights importance of land outside of AONBs for wildlife and the need for policies to cover these areas.
Chiddingstone Parish Council	Strongly agree.	<ul style="list-style-type: none"> • Highlights that AONBs must be protected and enhanced.
Eynsford Parish Council	Agree	<ul style="list-style-type: none"> • Support Objective 15. • Note the distinctive character of Eynsford and Farningham and their place and setting within the AONB. • Object to impact upon this distinctive character, including skyline, views, visual amenity, tranquility and remoteness, of Pedham Place. A variety of impacts and questions raised in relation to Pedham Place e.g. traffic impacts, flooding and water supply impacts, habitat and wildlife impacts and impacts upon local businesses.
Fawkham Parish Council	Not answered	<ul style="list-style-type: none"> • Supports policy in seeking to conserve and, where possible, enhance landscape character and in providing highest level of protection to AONBs/National Landscapes. • Proposals should have regard to the Sevenoaks Landscape Character Assessment 2017 and local landscape character assessments, as these provide more detailed evidence. • Applicants should be required to demonstrate, and proposals appraised, in terms of how they make a positive contribution to objectives within the High Weald AONB Management Plan. Note that policy omits important criteria set out in the High Weald template and could be supplemented/adapted. • Strong support for it to have status of a Strategic Policy.
Hartley Parish Council	Not answered	<ul style="list-style-type: none"> • Supports policy in seeking to conserve and, where possible, enhance landscape character and in providing highest level of protection to AONBs/National Landscapes.

Organisation	Agree-Disagree scale	Summary of response
		<ul style="list-style-type: none"> Proposals should have regard to the Sevenoaks Landscape Character Assessment 2017 and local landscape character assessments, as these provide more detailed evidence. Applicants should be required to demonstrate, and proposals appraised, in terms of how they make a positive contribution to objectives within the High Weald AONB Management Plan. Note that policy omits important criteria set out in the High Weald template and could be supplemented/adapted. Strong support for it to have status of a Strategic Policy.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Woodland Trust	Strongly agree	<ul style="list-style-type: none"> Welcome references to protecting, conserving and restoring locally distinctive patterns and species and restoring native planting and natural features. Recommend prioritising native woodland from UK sourced and grown stock to address threats of pests and disease, boosting resilience and biosecurity, supporting domestic 'green economy' and reduce carbon footprint.
Kent Downs National Landscape Unit	Strongly agree.	<ul style="list-style-type: none"> Recommend amend to refer to new name.
CPRE	Not Answered	<ul style="list-style-type: none"> Highlight para 182 NPPF and section 245 of the LURA regarding placing greater emphasis on the protection of national landscapes. Note that spatial development strategy will be at odds with new statutory duty and recommend updating the policy. Welcome references to tranquillity and dark skies but request a standalone policy addressing dark skies.
High Weald National Landscape Unit	Not Answered	<ul style="list-style-type: none"> Generally supported. Amendments to wording requested include referring to development being limited in scale and extent, amendments to criteria wording and addition of 'dark skies'. Recommend that the list of enhancements be removed. Alternative wording recommended.

General Responses

Summary

- Factual errors highlighted in evidence base documents relating to landscape character, sensitivity and character study.
- Replacing something natural with man-made cannot be better.
- Strategic policy requires the use of resource utilisation factors.
- Concerns about impact of recent and future development on New Ash Green.
- Objections to proposed site allocation (HO10) due to AONB designation and presence of rare and endangered wildlife.
- Objections to development on Green Belt and AONB/National Landscapes as areas of particular importance (paragraph 11 of the NPPF).
- Objections to stand-alone settlement (MX-15) on various grounds e.g. dependency on private motor vehicles, lack of public transport, size meaning it would not be large enough to be self-supporting and destruction of a recreational facility.
- Support protection of natural landscape. Highlight areas either side of the Fawkham Valley Road as 'valued landscape' and as an area of beauty which must be protected.
- Sevenoaks seeks to protect everything but ignores it all when it comes to Pedham Place.
- Should include reference to Local Landscape Character Assessments.
- Clarity requested regarding 'exceptional circumstances', and what is meant by 'public' and 'informed'. Questions in relation to Visual Impact Assessments, their weight, how it is calculated and applied.
- Green Belt implemented for a reason and this reason has not changed. It is more important now that destruction of wildlife habitat is commonplace. People choose to live in an area of natural beauty and do not want it turned into an urban sprawl.

Overall Summary

Summary of comments on Policy NE1

The main points arising are the name change, from Area of Outstanding Natural Beauty to National Landscape, and the strengthening of the statutory duty. It is also highlighted that AONB/National Landscapes, due to their importance, should be protected and not built upon, with references to our proposed development strategy and sites located within the AONB. Some of the comments are site or area specific and as such consideration of matters raised will be through the site allocations policies. In addition, some comments relate to matters unconnected to this policy e.g. references to the Green Belt, which relate more closely to our proposed development strategy. Requests include amendment to the policy wording and the inclusion of references to Local Landscape Character Assessments, protection and extension of hedges and wildlife porous boundaries, a standalone dark skies policy and clarity in relation to Visual Impact Assessments and 'exceptional circumstances'.

Actions for Regulation 19

Consideration will be given to whether there is a need and justification for a separate policy covering dark skies, as well as to the other proposed suggestions/amendments.

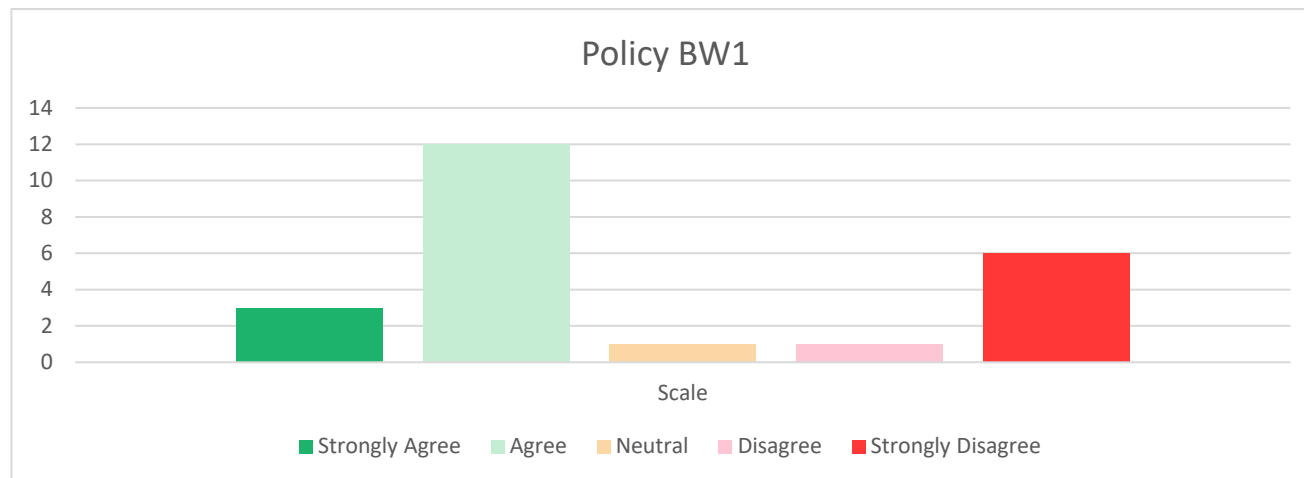
This policy will be reviewed and updated to address the change to the name of the Areas of Outstanding Natural Beauty and to address the strengthened duty.

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy BW1 – Safeguarding Places for Wildlife and Nature

23 Responses

65% of respondents strongly agreed or agreed with the policy.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not Answered	<ul style="list-style-type: none"> • Welcomes reference to public rights of way and cycle routes as part of BGI network. • Notes that planning policy is able to influence local access provision, and that the proposed requirement for planning applications to recognise, protect and enhance BGI is desirable but recommend that attention is drawn to the access element within the title.
Environment Agency	Not Answered	<ul style="list-style-type: none"> • Pleased to see term Blue Green Infrastructure used. • Recommend inclusion and promotion of river restoration.
Natural England	Not Answered	<ul style="list-style-type: none"> • Comments and general advice from previous consultation remain valid i.e. recommend further strengthening by expanding list of BGI network and including as definitive a list as possible.

Neighbouring Authorities

None.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Kemsing Parish Council	Agree	<ul style="list-style-type: none"> • Encouraging that designated sites of importance for biodiversity will be protected.
Fawkham Parish Council	Not Answered	<ul style="list-style-type: none"> • Strong support for protection of designated sites and the Blue Green Infrastructure. • No reference within policies to protected species, BAP priority species or ancient or veteran trees, which should be rectified in the Regulation 19 Local Plan. • Strong support for it to have status of a Strategic Policy.
Hartley Parish Council	Not Answered	<ul style="list-style-type: none"> • Strong support for protection of designated sites and the Blue Green Infrastructure. • No reference within policies to protected species, BAP priority species or ancient or veteran trees, which should be rectified in the Regulation 19 Local Plan. • Strong support for it to have status of a Strategic Policy.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Woodland Trust	Agree	<ul style="list-style-type: none"> • Welcome policy. Recommend adding 'woodland' to list of blue green infrastructure.

General Responses

Summary
<ul style="list-style-type: none"> • Objections raised to building on sites resulting in the destruction of more nature. • Objections to any development. • Highlights threat to wildlife and that it should be left alone. • All Green Belt should be protected. • Suggests that new houses should incorporate wildlife friendly features e.g. swift boxes.

Summary

- Concern raised about focus on sites already of wildlife value and that there should be more emphasis on increasing and extending areas of biodiversity, to improve connectivity and address the catastrophic decline in volume of wildlife.
- Policy does not go far enough to protect land such as that at Pedham Place.
- Highlights need to increase area that is returned to nature e.g. opportunities missed to create wildflower meadows or plant trees, rather than placate developers.
- Highlights the wildlife and public rights of way associated with H09/RA16 and the loss of Green Belt and need to safeguard the site per this policy.
- Highlights issues in Edenbridge relating to sewer capacity, lack of maintenance of ditches and hedges and impact of light pollution has had on wildlife and habitats. Noting need for maintenance of existing infrastructure to prevent disaster associated with further development.
- Highlights the ancient woodland and areas of good biodiversity associated with Land west of Hartley and the need for development to be carefully considered in order not to destroy habitats.
- Welcome references to swift boxes and bricks. Request clarity over whether target is mandatory and how it applies to extensions and apartments.
- Request various amendments including: setting out a preference for swift bricks; securing at least one swift brick per home but also that a more enhanced level of provision is considered; changes to the features for species listed under policy BW1 and that the protection of existing nest sites for building-dependent species such as swifts and house martins is required or their loss mitigated.
- Highlights other key red-listed species in Kent e.g.house martins and need for artificial nest sites.
- General comments include issue with duplication on contents page.

Overall Summary

Summary of comments on Policy BW1

Comments are generally supportive. Amendments suggested including providing clarity about how Public Rights of Way and cycle routes ergo access should be highlighted/made clearer as something that forms part of the Blue Green Infrastructure. Comments also include features that could be listed as forming part of the Blue Green Infrastructure e.g. woodlands. More clarity sought over references to swift boxes and how this will apply, as well as seeking higher levels of protection for swifts and other building-dependent species. General comments objecting to development and destruction of nature and site/area specific concerns.

Actions for Regulation 19

Review of Blue Green Infrastructure network features/elements, including those suggested through representations and consider how clarity could be provided in relation to the PROW features e.g. amend policy title.

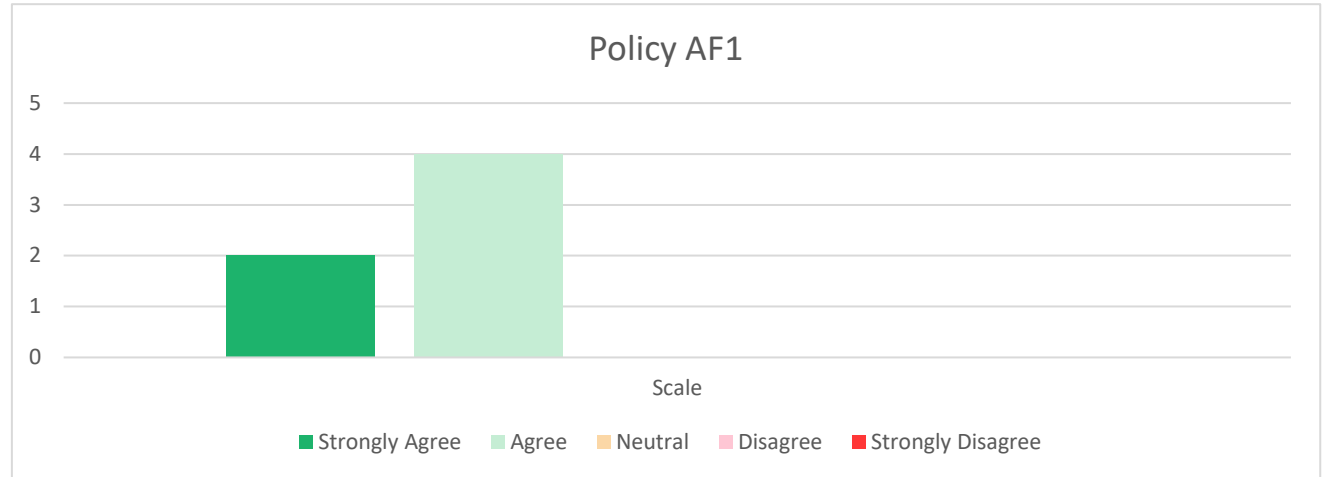
Consider changes to wording and requirements in relation to Swifts etc.

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy AF1 – Ashdown Forest

6 Responses

100% of respondents strongly agreed or agreed with this policy.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Natural England	Not Answered	<ul style="list-style-type: none"> Comments and general advice from previous consultation remain valid i.e. reference to SAMMS contributions noted but highlighted that provision of SANGs is required in relation to windfall.

Neighbouring Authorities

None.

Town and Parish Councils

None.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Woodland Trust	Strongly agree	<ul style="list-style-type: none"> Highlights that it is nationally and internationally important ancient woodland. Supports policies that protect it from overuse and other adverse impacts.

General Responses

None.

Overall Summary

Summary of comments on Policy AF1

There have been limited comments on this policy, with the only comments being supportive of policies that protect it from overuse and adverse impacts.

Actions for Regulation 19

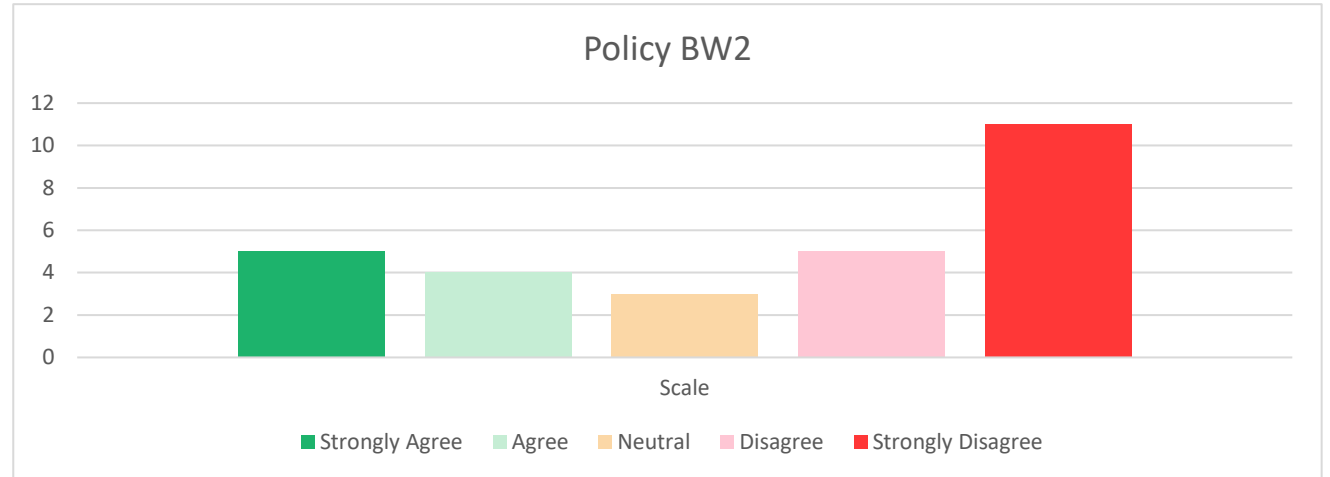
No further actions arising from the representations identified however, this policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Policy BW2 – Biodiversity in New Development

28 Responses

32% of respondents strongly agreed or agreed with this policy.

57% of respondents either strongly disagreed or disagreed with this policy.



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Environment Agency	Not Answered	<ul style="list-style-type: none"> Recommend a numerical commitment to BNG across terrestrial and aquatic habitats. Strongly urge consideration of a 20% minimum gain in every habitat type. Highlight a disconnect between commitment of 20% in the policy and section 8.37 where it states it as an aspiration. Support a robust statement. Request inclusion of the following: references to fish and eel passages; appropriate lighting design in line with best practice guidance; a pollinator strategy to support native bees and that river restoration opportunities are included as allocated sites. Highlight Darent Enhancements and aspirations to improve its viability for fish species.
Natural England	Not Answered	<ul style="list-style-type: none"> Comments and general advice from previous consultation remain valid i.e. additional text to align with the NPPF setting out how it will help support and improve biodiversity.

Neighbouring Authorities

None.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Neutral.	<ul style="list-style-type: none"> Detail problematic. The ways in which biodiversity net gain are argued are controversial and more clarity, debate and local involvement is needed to assure different environment concerns are met.
Chiddingstone Parish Council	Agree.	<ul style="list-style-type: none"> 20% is correct level and good as a baseline. Some habitats are more valuable than others and require a higher percentage net gain.
Eynesford Parish Council	Agree.	<ul style="list-style-type: none"> Partial support for ethos of the policy. Concerned there is too much emphasis on off-site gain and the ability to buy biodiversity credits. Requirements should be a lot stronger. Some of it could be classed as 'greenwashing'. Recommend the emerging 'Wilder Carbon' credits are investigated.
Fawkham Parish Council	Not Answered	<ul style="list-style-type: none"> Strong support for 20% biodiversity net gain in all proposals which are not exempted.
Hartley Parish Council	Not Answered	<ul style="list-style-type: none"> Strong support for 20% biodiversity net gain in all proposals which are not exempted.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Kent Downs National Landscape Unit	Strongly agree	<ul style="list-style-type: none"> Reflects position of the Kent Nature Partnership and the adopted AONB Third Revision Management Plan 2021-2026. Supports allocating sites specifically for BNG. Encouraging these to be within the National Landscape. Note potential to generate substantial new investment streams to achieve sustainable development and biodiversity objectives of the Management Plan.
High Weald National Landscape Unit	Not Answered	<ul style="list-style-type: none"> Request reference is made to the High Weald in relation to an understanding of its specific habitat typologies and systems.

Organisation	Agree-Disagree scale	Summary of response
Woodland Trust	Strongly agree	<ul style="list-style-type: none"> • Support 20% requirement, noting it increases the chances of achieving delivery of an average 10% across the District. • Recommends consideration of a local metric for more urban/brownfield sites e.g the London Urban Greening Factor for sites which may already have a low level of biodiversity. • Welcome off-site delivery in accordance with LNRS
Home Builders Federation	Not Answered	<ul style="list-style-type: none"> • 20% or over 10% is not justified. • Significant uncertainties as to the costs of delivering 10% gains. • Difficult to assess through whole plan viability assessment. • The Council should work with developers and stakeholders to ensure 10% can be delivered. • If maintained, will need to be robustly justified. • Welcomes use of scenario C figures (assumption all BNG is delivered off-site) within Interim Viability Assessment. However, uses 2017 costs, leaving significant uncertainty as to how much it will cost. Remains a risk as scenario C will not accurately reflect the cost. • Requirement to go beyond the statutory minimum will need to be delivered off-site, placing pressure on immature local markets for BNG credits. Lack of local credits will require delivery outside the local area or use of national credits, either increasing costs to the developer or delaying site delivery. • Recommends further sensitivity testing of higher BNG costs. • If retained, should recognise that where requirement makes the policy unviable, this will be reduced to the statutory minimum. Providing more flexibility. • Off-site delivery – requirement for it to be within the district, fails to recognise that off-site mitigation in a NCA is given the same weight in the metric and would have the same benefits. To be consistent it should give off-site delivery in the relevant NCA the same weight as for within the district itself.

General Responses

Summary
<p>Objections</p> <ul style="list-style-type: none"> • Objections raised in some quarters to 20% requirement.

Summary

- Objections raised in some quarters to any requirement exceeding 10%.
- 20% requirement threatens viability and deliverability.
- Will have a significant impact on density, raising conflict with the density aspirations. Council has utilised gross site areas for calculating yield but this does not allow for the extent of land and mitigation measures to be included to secure 20%. Needs to be fully assessed before future site assumptions progressed.
- May result in significant reductions in developable area or require off-site provision. Both expensive options that could raise viability issues.
- If strategy adopted of intensifying use of existing sites, we urge the Council to fully consider how it will provide off-site BNG mitigation as an appropriate means to facilitate maximisation of densities.
- Highlights difficulties for some sites to deliver 10% on-site e.g. smaller brownfield and regeneration.
- Highlights difficulties for sites with large quantities of biodiversity to deliver it on-site.
- Attention drawn to draft PPG which details under what circumstances a Council may seek a higher percentage net gain.
- Policy as written requires developers to deliver more than 20%.
- Recommend flexibility if 20% retained, to respond to developments where 20% would result in development being unviable.
- Highlights implications for capacity of 10% requirement.
- Should be 10% in line with national policy and guidance. Fails tests at paragraph 57 of the NPPF, not necessary to make development acceptable, should be fairly and reasonably related in scale and kind.
- Will require the Council to identify more land for development.
- Attention drawn to uncertainties around the cost of delivering net gain, which will be site-specific and dependent on base level of biodiversity on-site.
- Justification and impact of the policy must be fully evidenced.
- Should be aspirational and for developers to decide whether to go beyond the minimum requirement.
- Objections raised to off-site requirements. Recommended that it should be consistent with the metric, giving the same weight to delivery within the National Character Area as within the district, as will have the same benefits in terms of net gain.
- Recommend that SDC implement an off-site scheme within the district to which developers could contribute. Would enable contributions to be for the benefit of the district.
- Concern expressed that approach proposing delivery within or providing connections between areas of noted conservation value raises viability issues.

Support

- Support for 20% and local delivery.
- Development should be expected to retain existing biodiverse features (trees, hedges), wherever possible. Multiple benefits arise e.g. air quality, air cooling, water absorption, visual amenity.
- Developers should be obliged to see 'poor' hedgerows as an opportunity to improve biodiversity.

Summary

- Support for revising existing TPOs and more trees subject to TPO, with areas proposed for development prioritised. Attention drawn to Edenbridge, its relative lack of TPOs but also that it is characterised by its hedgerows, Oaks and Ash trees.
- BNG needs to be fully defined and implemented in accordance with Government guidelines and this should be reflected in Plan 2040. Too many biodiversity-rich areas are being lost e.g. felling of street trees and on railway land.
- Doesn't take into account ruining already biodiverse land. It goes further to say if you do develop on such land, this will be off-set somewhere else. It does not make any sense.
- Objections to proposed allocation of sites in the Green Belt, stating they do not follow this policy.
- Objections to proposed site allocations in Edenbridge and the resulting loss of long-established field ecosystems on grounds that they do not follow this policy.
- Decline of the UK's wildlife highlighted. Attention drawn to evidence contained in the State of Nature Report 2023, the fact that this decline has been going on for centuries and the global mission confirmed at COP15 to halt and reverse loss of nature by 2030 and achieve recovery by 2050.
- Highlights difficulties ensuring long-term biodiversity management and measuring 20% net gains noted.
- Highlights the district's rural nature, the need for every development to have a 20% gain or higher and that there is evidence that nature enhances mental health.

Overall Summary

Summary of comments on Policy BW2

There is a clear split between those persons and organisations who are supportive of our proposed 20% biodiversity net gain requirement and those who object to it. Concerns raised in relation to this requirement include its potential to impact upon capacity, density aspirations, deliverability and viability. Existing uncertainties around the statutory requirement, its costs and deliverability are also raised and it is recommended that our focus should be on helping developers secure the statutory requirement.

Those in favour note the decline in wildlife that's already occurred, the rural nature of the district, the loss of biodiverse areas and the evidence that nature is proven to provide a variety of benefits. Some instances of support for a higher requirement are expressed. It is also noted that long-term management and measuring of 20% net gains difficult to secure.

Actions for Regulation 19

Further work around whether or not to proceed with the 20% requirement will be undertaken, including further testing of its impact upon the viability of development through the Viability Assessment. We will also review the latest information contained within the recently published Planning Practice Guidance.

Regardless of what decision is made in relation to the 20% requirement, consideration will be given to the suggestions and recommendations made through the representations, including whether or not to include them and the most appropriate location for those amendments.

This policy will be reviewed and updated, where required and appropriate, to reflect recent changes to the National Planning Policy Framework (NPPF) in December 2023.

Overall summary of comments on Chapter 8 Natural Environment

The main area of comment has been in relation to policy BW2 and the proposed requirement for 20% biodiversity net gain, which is 10% more than that which is statutorily required. This sees a clear split in opinion, with developers primarily objecting on grounds of capacity, viability and deliverability.

Policy AF1 relating to Ashdown Forest saw very few representations aside from support for policies that protect Ashdown Forest from harmful impacts.

Policy BW1 relates to designated sites and blue green infrastructure. Comments are broadly supportive with suggestions for additional features and requirements to be added to the policy.

Policy NE1 relates to landscape and the AONB. The day prior to our consultation, a new name was introduced and these are now known as National Landscapes, to which attention was drawn, and on 26 December 2024 a new strengthened duty came into force. These are the key issues highlighted which have specific reference to this policy through responses.

Chapter 9 – Infrastructure and Community

Plan 2040 Reg. 18 Part 2 – Comment Analysis

Policy IN1 – Infrastructure Delivery

46 responses

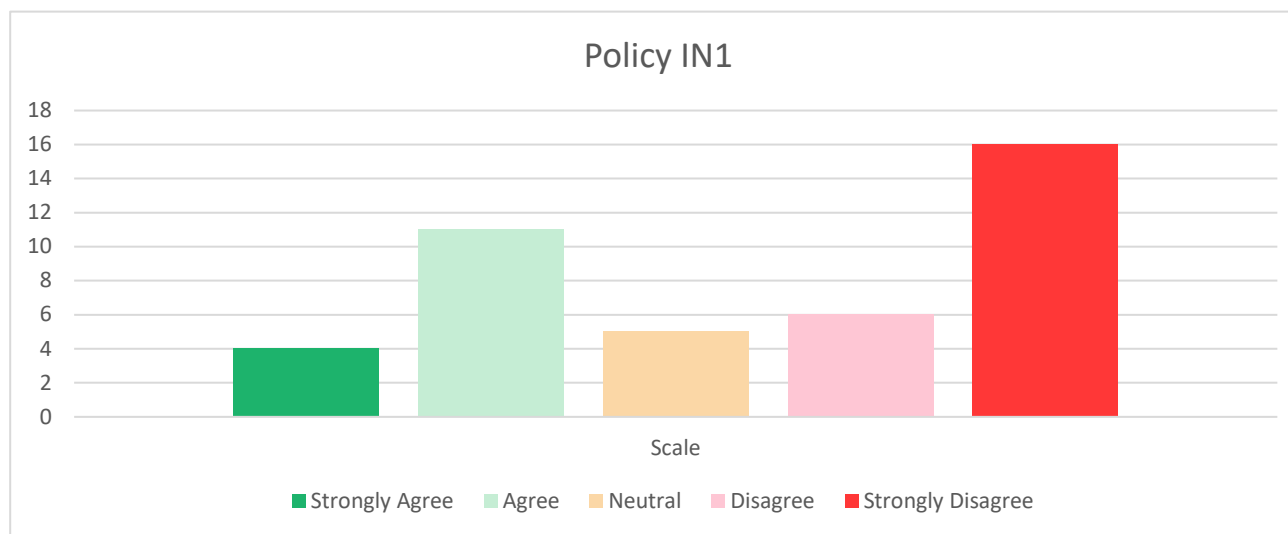
Of the 42 respondents who answered the quantitative question, 52% said that they either strongly disagree or disagree with Policy IN1.

A further 12% were neutral.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not answered	Supports the early delivery of infrastructure and welcomes continued engagement in respect of the IDP, but notes there is no mention of waste management infrastructure. Also, the policy should recognise that small scale PRoW infrastructure could be required that is not specified within the IDP e.g. removing staggered barriers. Infrastructure requirements should therefore not be limited only to those projects identified in the IDP and the policy wording should be amended accordingly.
Tandridge District Council	Not answered	The Local Plan will need to be based on a robust IDP to ensure that the right infrastructure is in place to support the proposed growth. Keen for collaboration on the provision of infrastructure for the settlements along the border (Edenbridge and Westerham), particularly in respect of road and rail.
Tunbridge Wells Borough Council	Disagree	Concerned that criterion 3 could lead to developments being allowed without the support of necessary infrastructure, creating pressure on existing infrastructure e.g. cross-boundary education.
Wealden District Council	Not answered	Supports ongoing engagement in relation to any cross boundary impacts.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	All new development must have adequate and future-proof infrastructure in place.
Edenbridge Town Council	Not answered	Supports the robust policy, particularly criterion 2. The town and parish councils should be consulted on the IDP to help ensure appropriate services and improvements. The review of the CIL charging schedule should ensure developers do not find loop holes to avoid contributions needed for infrastructure and should retain the contributions passed on to town and parish councils.
Eynsford Parish Council	Disagree	Concerned that criterion 3 would appear to permit a development without a full infrastructure contribution if perceived benefits outweigh its impacts. For example, could a developer avoid costs for flood protection / drainage infrastructure? Infrastructure costs must not be compromised if developments are to be carried out in a sustainable and sympathetic way to the environment.
Eynsford Green Team	Disagree	The exclusions in criterion 3 could be damaging to the environment if, for example, developers were able to avoid costs for flood protection / drainage infrastructure. Infrastructure costs must not be compromised if developments are to be carried out in a sustainable and sympathetic way to the environment.
Leigh Parish Council	Agree	Adequate infrastructure is essential for all new developments, both at the time of provision but also to future-proof the new development.
Sevenoaks Town Council	Not answered	The issues raised by KCC in respect of access to CIL funding must be resolved. Transport infrastructure is essential and any walking and cycling routes provided within the Sevenoaks Quarry development must link up with the LCWIP routes. New social infrastructure (education and healthcare) should be guaranteed by the mechanisms in the Local Plan. The frequent flooding in the Greatness area needs to be resolved through the delivery of utilities and hard infrastructure.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
NHS Property Services	Not answered	Supports criterion 2 and welcomes that the definition of infrastructure includes health in the supporting text. Criterion 3 should be amended to include consultation with relevant bodies (such as the NHS) where a viability argument is being pursued to argue that the full infrastructure contribution cannot be delivered. It is suggested that the following addition is made to criterion 3: "e. The relevant body or public service which would have received or benefitted from the infrastructure has been provided with an opportunity to review the viability appraisal and advise the Council on the impacts that a reduced infrastructure contribution would have on the service/s."
NHS Kent and Medway (Grimes Ltd)	Not answered	NHS Kent and Medway (with particular reference to the Dartford, Gravesham and Swanley Health and Care Partnership area) expects all new housing developments to fully fund the additional costs of providing the necessary primary care, community care and other NHS services required to ensure the health and wellbeing of the new populations (to support policy HW1 and bullet point 6 of policy T1), recognising that some or all of these requirements may be best met in facilities that are outside the immediate development area. NHS Kent and Medway expects developers to provide fully funded facilities through Section 106 agreements, or to obtain full funding for new facilities through Section 106 payments and Community Infrastructure Levy funding, where appropriate.
National Highways	Not answered	Highlighted potential impact on M25 J3, the A21 southbound off-slip with the A25 and the A21/B245 southbound off-slip, but requires completion of the transport modelling to determine the full impact of the proposed development on the strategic road network and what measures may be required to mitigate these impacts.
Network Rail	Not answered	Supports the policy but suggests some amendments: transport infrastructure should be regarded as essential infrastructure, and reference should be made to the use of grampian conditions to control the phased build out of sites to allow for necessary infrastructure to be provided.
The Sevenoaks Society	Disagree	Policy is too aspirational and fails to demonstrate that the Council and its partners will ensure the necessary infrastructure is provided to support development.

General Responses

Summary

Key points raised by respondents:

- New/improved infrastructure needs to be properly assessed and put in place before new development is permitted.
- Promised infrastructure does not always materialise.
- Current infrastructure in Sevenoaks is already at breaking point.
- The policy doesn't provide a clear plan for how existing infrastructure will meet the needs of the additional population.
- The policy contains too much flexibility for developers (criterion 3).
- Insufficient investment for new infrastructure.
- Need for additional GP surgeries, hospitals, utilities, broadband, road capacity and better public transport.
- On larger sites e.g. Pedham Place the new infrastructure should also help to improve traffic in the wider area e.g. Swanley.

Overall Summary

Summary of comments on Policy IN1 - Infrastructure Delivery

The need for new and improved infrastructure was clearly recognised by respondents, however there were mixed opinions on this policy in terms of what it should achieve. Generally it was supported by infrastructure providers subject to some minor amendments, but members of the public raised concerns that the policy is too flexible and aspirational and that the required infrastructure may not materialise.

Actions for Regulation 19

We will consider the suggested amendments made by infrastructure providers in developing the policy further, and review the level of flexibility the policy needs to provide in line with national policy and guidance.

The Infrastructure Delivery Plan (IDP) published for this consultation will be developed further in consultation with the District's infrastructure providers in the coming months, with a view to publishing a complete and robust IDP in time for the next Local Plan consultation. The IDP will set out the strategic infrastructure required, including the specific projects to be delivered to support the growth identified in the Local Plan along with expected timescales, estimated costs and funding routes.

Policy OS1 – Open Space and Recreation

16 responses

Of the 14 respondents who answered the quantitative question, 93% said that they strongly agree or agree with Policy OS1.

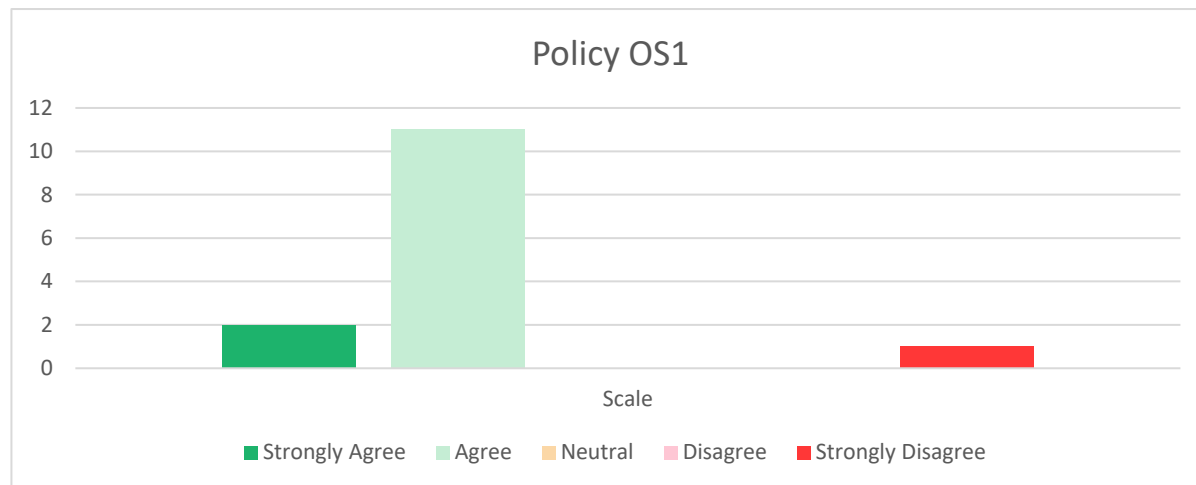
Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils



Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Not answered	Open spaces in all communities must be retained wherever possible. In villages and rural areas open spaces that contribute to the local character are very important and should be protected.
Eynsford Parish Council	Agree	Encourages the inclusion of wildlife habitats and uncut spaces wherever possible. What does 'improving the quality' mean? Suggested that criterion 3 be reworded to include the following: "Where an adequate quantity of open space exists in the local area, consideration may be given to the use of the space and improving that space. As part of the review the biodiversity of the open space must be considered. All new or improved open space must include arrangements for long term nature enhancement by way of a land management plan".
Eynsford Green Team	Agree	Some open spaces should be let for rewilding and for biodiversity. What does 'improving the quality' mean? Suggested that criterion 3 be reworded to include the following: "Where an adequate quantity of open space exists in the local area, consideration may be given to the use of the space and improving that space. As part of the review the biodiversity of the open space must be considered. All new or improved open space must include arrangements for long term nature enhancement by way of a nature management plan".

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	Existing open spaces (such as the green in Leigh) must be retained and protected for the future.
Sevenoaks Town Council	Not answered	The policy should specifically recognise the need to preserve informal green open space within the main settlements where housing density is expected to rise.
Fawkham Parish Council	Not answered	Supports the retention of designated open spaces but considers that all open spaces within the parish (as identified in the Neighbourhood Plan) should also be included. Suggested that criterion 2 be amended as follows: "All other open spaces of value to the local community, either through use or contribution to local character, <i>including those identified in Neighbourhood Plans</i> , will also be retained..." The policy should be identified as a strategic policy.
Hartley Parish Council	Not answered	Supports the retention of designated open spaces but considers that all open spaces within the parish (as identified in the Neighbourhood Plan) should also be included. Suggested that criterion 2 be amended as follows: "All other open spaces of value to the local community, either through use or contribution to local character, <i>including those identified in Neighbourhood Plans</i> , will also be retained..." The policy should be identified as a strategic policy.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Woodland Trust	Agree	Suggests that the policy could be strengthened by adding to criterion 3 that "development proposals will be required to incorporate good quality open space, including natural or wild greenspace". Recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation using Natural England's Accessible Natural Green Space Standard.

General Responses

Summary
<p>Key points raised by respondents:</p> <ul style="list-style-type: none"> We need to conserve the areas we have.

Summary

- Open spaces are needed for informal recreation, dog walking and children playing. Not all children want to play organised games.
- Open spaces should be designated in neighbourhood plans and protected in a similar way to local green spaces.
- Policy wording (criterion 2) is too restrictive and should be rephrased so as not to hinder development.
- Allotments should be retained as green spaces.

Overall Summary

Summary of comments on Policy OS1 – Open Space and Recreation

Respondents overwhelmingly supported the policy and recognised the importance of providing and retaining open space for recreation. Some good suggestions were also made including encouraging natural and wild open space, helping to enhance biodiversity, and protecting more informal green spaces.

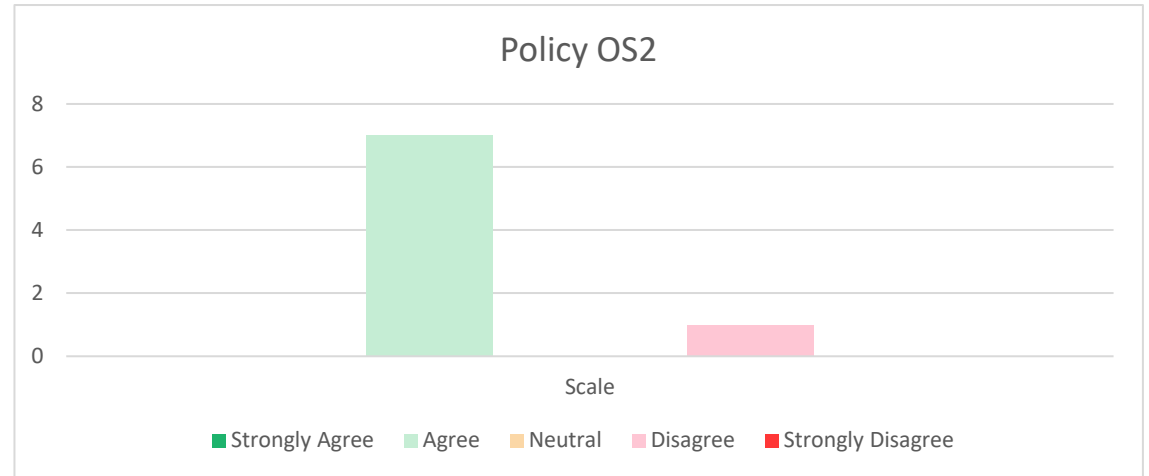
Actions for Regulation 19

The overwhelming support for this policy is noted. We will consider the suggestions made in developing the policy further, in line with national policy and guidance.

Policy OS2 – Children and Young People’s Play Space

9 responses

Of the 8 respondents who answered the quantitative question, 87.5% (all except 1) said that they agree with Policy OS2.



Statutory Consultee responses

None

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	No comment.
Ensford Parish Council	Not answered	Supports the provision of sports pitches where there is a demonstrated need and all other options have been explored. However, any associated infrastructure/buildings should be focused on local/community need.
Eynsford Green Team	Agree	It is encouraging that this policy refers to “natural play” equipment however we feel more emphasis in this policy could have been made to the natural environment for play areas by taking example of forest schools etc.

Other consultation bodies

None

General Responses

Summary

Key points raised by respondents:

- Play space requirements are too onerous for medium size developments of 11-50 units, as they will need to provide both a LAP and a LEAP which are space intensive and a significant financial cost for small to medium sized developments.
- Supports the exclusion of older persons accommodation from requiring provision of play space.

Overall Summary

Summary of comments on Policy OS2 - Children and Young People's Play Space

Respondents overwhelmingly supported the policy and recognised the importance of providing suitable play space for children and young people. Some good suggestions were also made including utilising the natural environment more through promoting forest schools. However, there was a concern raised around the deliverability of play space for medium sized developments.

Actions for Regulation 19

The overwhelming support for this policy is noted. We will consider the suggestions made in developing the policy further, in line with national policy and guidance. The policy will also be viability tested to ensure the stated requirements are viable for developers.

Policy ED1 – Education

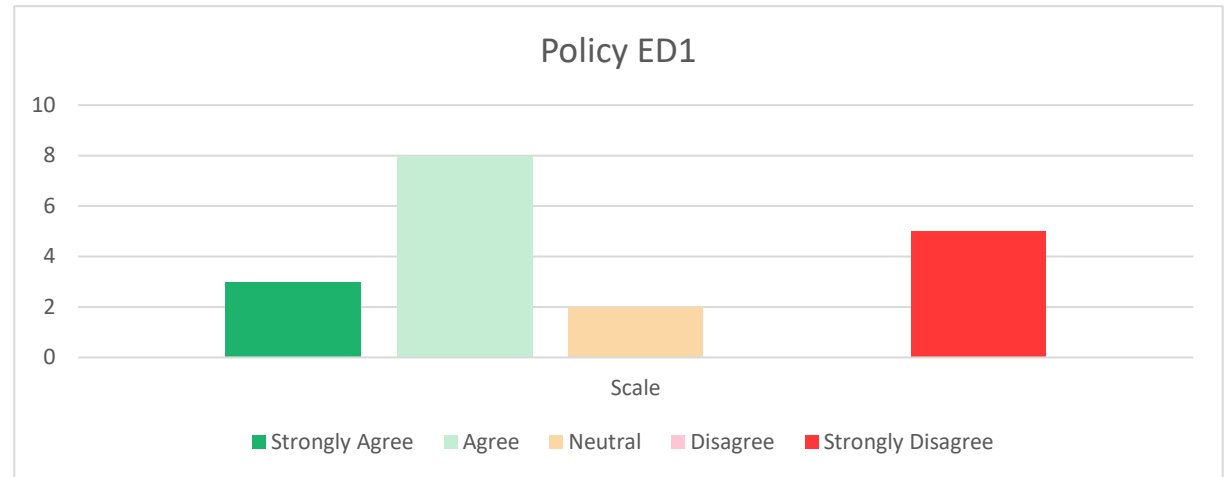
22 responses

Of the 18 respondents who answered the quantitative question, 61% said that they strongly agree or agree with Policy ED1.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not answered	Would prefer areas with clusters of development rather than disparate sites, as the former more adequately supports the future development of education infrastructure. Estimates a need for 8.5 FE of secondary education infrastructure and 260 sixth form pupils, and 10 FE of primary education across the district. Notes an error at paragraph 9.18 – 42 primary schools (not 34). Detailed comments on specific proposals: a 5-6 FE secondary school would be required if Pedham Place goes ahead, and a 5 FE secondary school would be preferred (more feasible) in Edenbridge over the 4 FE currently evidenced through planned housing numbers. New schools will have to be entirely funded by developers through developer contributions. Sufficient buildable land must be identified through scheduling with a view to such land being transferred free of charge as KCC has no funding to purchase land or fund new builds. Engagement welcomed on adult education as KCC move towards more flexible and shared accommodation going forward.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Strongly agree	For any new development it must be ensured that there is adequate primary and secondary school provision within the local area, and that there are public transport services available.
Edenbridge Town Council	Not answered	The IDP 2023 Statement identifies a requirement for the expansion of existing primary schools in/around Edenbridge and for a new 5FE secondary school, based on the existing population. Expansion of the town as indicated in policy ST2 could result in further need. The town also has limited early years provision and no provision has been identified for this.
Eynsford Parish Council	Agree	We understand that a SEN school will be built in Swanley which will fulfil a need in the district and remove the requirement for such a place at Pedham Place.
Hever Parish Council	Not answered	Supports the provision of primary and secondary school places in the area with appropriate public transport links. The provision of additional schools and education spaces is essential before further building and development occurs.
Leigh Parish Council	Agree	Prior to the approval of new development adequate consideration must be given to the provision of both primary and secondary school places. There must also be adequate public transport provision for children to get to school.

Other consultation bodies

None

General Responses

Summary
<p>Key points raised by respondents:</p> <ul style="list-style-type: none"> • Until the schools are built no further housing should be permitted. • Existing schools don't have the land to expand. • Existing schools are at capacity and under significant pressure. • SDC has no control over the education provision in the district. • Support for a new secondary school in Edenbridge. • Scepticism surrounding the deliverability of new schools. • Land should be secured until 2050 for new secondary schools. • Early years provision needs to be identified and planned for.

Overall Summary

Summary of comments on Policy ED1 - Education

This policy was generally supported with the need for sufficient education provision being clearly recognised by respondents. Crucially the policy was supported by the key infrastructure provider KCC Education, subject to a minor amendment. Some members of the public recognised that current schools are at capacity but were sceptical about the deliverability of any new school and suggested that the infrastructure should be delivered before any housing is built.

Actions for Regulation 19

The suggested amendment made by KCC Education is noted and we will update the supporting text to reflect this.

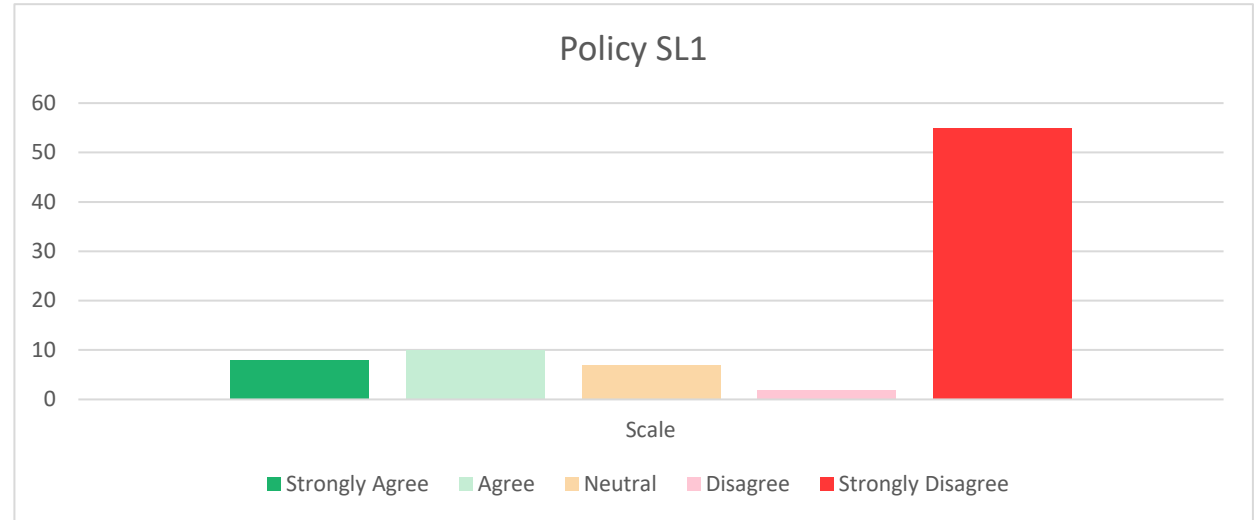
The Infrastructure Delivery Plan (IDP) will be key in evidencing deliverability of any new education provision and this will be developed further in consultation with KCC Education in the coming months, with a view to publishing a complete and robust IDP in time for the next Local Plan consultation. The IDP will set out the strategic infrastructure required, including the specific projects to be delivered to support the growth identified in the Local Plan along with expected timescales, estimated costs and funding routes.

Policy SL1 – Sports and Leisure Facilities

87 responses

Of the 82 respondents who answered the quantitative question, 67% said that they strongly disagree with Policy SL1.

Note that the vast majority of those who disagreed or strongly disagreed specifically refer to the proposal to deliver a sports stadium at Pedham Place, rather than the Sports and Leisure Facilities policy as a whole.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not answered	The reference to Sport England's Active Design Guide is welcomed. The 2018 Playing Pitch Strategy is out of date and should be refreshed.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Ash-cum-Ridley Parish Council	Not answered	Support is expressed for retaining existing sport and leisure facilities in the Parish. Concerns are raised about inadequate maintenance of the New Ash Green rugby pitches.
Chiddingstone Parish Council	Agree	Youth sport is increasing locally, with a need for youth football, rugby and cricket. This is very good news and is encouraged. Stoolball is played in this area and is not included on your list of sports. Tennis is popular in the parish.

Organisation	Agree-Disagree scale	Summary of response
Crockenhill Parish Council	Strongly disagree	We do not have the infrastructure to support large-scale sports stadiums. There is no evidence to support the claim that there is demand for a cluster of world class facilities to be built. No impact assessment has been carried out or consideration given to the amount of land that would be required. This would have a detrimental effect on the openness of the countryside, loss of Green Belt and AONB and would dwarf neighbouring settlements.
Edenbridge Town Council	Not answered	Supports this enhanced policy following the last consultation but reiterates that the Playing Strategy document mentions some of the needs, but does not identify Edenbridge. However, Edenbridge is in need of good and new facilities for example the Leisure Centre, hockey, all weather pitch, tennis, golf, concrete skate park.
Eynsford Parish Council	Strongly disagree	Given our longstanding experience with local large scale sporting facilities, Brands Hatch and the London Golf Club, we strongly question the benefits the transitory and seasonal visitors these facilities bring to the district and its economy.
Eynsford Green Team	Strongly disagree	We have not been able to see any evidence provided by the District Council to support this need. Building this complex at Pedham Place would alter the landscape of an internationally important chalk downland valley, situated in high performing Green Belt and an area of AONB. The valley is part of extensive re-wilding activity, is undertaking a UK government funded nature recovery project near to Pedham Place and is part of a wider bid to achieve UNESCO GeoPark status. The building of the complex will be at odds with this increasingly important biodiverse area. It will impact on the overall nature of the open rolling downs and damage the rural nature of the Crockenhill, Eynsford and Farningham villages. We note that one of the benefits of the Kent Downs National Landscape are the areas of darkness with limited light pollution, something that is highly beneficial to many species. Increased car traffic and air pollution will impact on local communities.
Hever Parish Council	Not answered	Supports the retention of community and leisure facilities and the need to correlate with increased demand.
Leigh Parish Council	Agree	Locally sport need is increasing e.g. youth cricket, youth football and youth rugby. The Green in Leigh and the Leigh Layabouts rugby pitch are much used by local sports teams. There is an active tennis club in Leigh. Another sport not mentioned on your list is Stoolball which is active in the parishes in the south of the district and uses the Green in Leigh.
Sevenoaks Town Council	Neutral	Agrees that existing sports and leisure facilities should be retained and improved, and notes that capacity will need to increase to reflect growth. Facilities also need to be able

Organisation	Agree-Disagree scale	Summary of response
		to evolve to meet changing needs, such as increased involvement of girls, and changes in sporting appetite, for example the growth of Padel. Sevenoaks town already has a significant unmet need for a high quality sports complex to serve successful rugby, hockey and basketball clubs. Within the town boundary, there are limitations of space availability in the provision of new pitches and facilities. STC supports the ambition of the policy to retain existing sport and leisure facilities and to ensure that new facilities are created to the highest possible standards and with care for infrastructure, accessibility and employment.
Fawkham Parish Council	Not answered	Supports the retention of the existing sport and leisure provision however concerned that criterion 3 would permit redevelopment for a wholly residential scheme. Suggests that the policy should state that on land in existing sport and leisure use, there will be a presumption in favour of retaining that use, and that a methodology/criteria should be included to indicate how non-residential uses will be assessed before considering residential use.
Hartley Parish Council	Not answered	Supports the retention of the existing sport and leisure provision however concerned that criterion 3 would permit redevelopment for a wholly residential scheme. Suggests that the policy should state that on land in existing sport and leisure use, there will be a presumption in favour of retaining that use, and that a methodology/criteria should be included to indicate how non-residential uses will be assessed before considering residential use.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Sport England	Strongly agree	Supports the protection of sports and leisure facilities through policy SL1 and reference to national policy to protect the use of sport provision. We would encourage reference to a requirement for sites to provide a Community Use Agreement to increase the availability of sport facilities to the wider community https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-use-agreements .
Kent Downs National Landscape Unit	Not answered	Criterion 1 requires proposals to be in accordance with other relevant local plan policies, which would include policy NE1 which advises that 'Major development proposals within the AONBs will only be permitted in exceptional circumstances and

Organisation	Agree-Disagree scale	Summary of response
		<p>where it is demonstrated they are in the public interest'. However, given the importance attached to the conservation and enhancement of natural beauty in AONBs in national policy, and in view of the recent amendments to the primary legislation applied to public bodies in their duties to AONBs, we consider Policy SL1 should include specific reference to any such proposals being located outside of the Kent Downs National Landscape.</p>

General Responses

Summary

Key points raised by respondents:

- Some support for the ambition to create a world class cluster of sporting facilities in the north of the district as it is recognised this will bring jobs and economic growth, attract investment to supporting industries and inspire greater levels of health and wellbeing.
- Some support for recognising the important role that high quality sports facilities play in the local economy and in attracting visitors.
- There is clear evidence that there is a shortage of sports and leisure facilities in the district.
- The policy should also allow for residential and commercial leisure use development to provide for visitors e.g. hotels and restaurants.
- Support for criterion 1 and suggestion that there should be a 'presumption in favour' of retaining such uses.
- No evidence provided to support the ambition to create a world class cluster of sporting facilities in the north of the district.
- Focus should instead be on delivering small community sport facilities throughout the district, and improving existing facilities.
- Policy is contradicting in terms of protecting sports facilities but also proposing to develop Pedham Place golf course.
- The rural area in the north of the district is not appropriate for large scale sporting facilities – the infrastructure is unsustainable.
- The cumulative impact of a rugby stadium, Brands Hatch, Millwall Football Club and London Golf Club will have a negative impact on people's health and wellbeing locally.
- It is unclear what relevance the proposed stadium and associated facilities have that identify local needs or contribute toward achieving the wellbeing of residents locally.
- Policy is not required as we have sports and leisure facilities that adequately serve the residents including the new White Oak leisure centre.
- The unspoiled Darent Valley walks currently offer the most significant sports and leisure asset in the district and should be safeguarded.
- The Sevenoaks Indoor Bowls Club must be protected under criterion 2 for its current specific use.
- The Hollybush complex must be protected under criterion 2 for hockey, tennis, indoor and outdoor bowls, play area and green space.
- Sevenoaks town is better suited to provide a major sporting stadium.

The vast majority of comments specifically refer to the proposal to deliver a sports stadium at Pedham Place, rather than the Sports and Leisure Facilities policy as a whole. Key points raised in this respect are:

- Objection to the proposal to deliver a rugby stadium at Pedham Place owing to increased traffic, poor public transport links, poor access, air, noise and light pollution, unsustainable location, lack of benefit to local residents and impact on the surrounding villages.
- The proposed stadium would be out of place in terms of scale and would change the rural character of the local area.
- The WASPS proposal lacks justification given the debt they face.
- Pedham Place golf course provides an affordable facility and should be retained for the benefit of the local community and all those that use it.
- A rugby stadium won't provide good quality local employment.
- The loss of other golf courses in the area will lead to higher demand for Pedham Place golf course, and as such should be retained.
- The O2 and Stratford stadiums are not far away and are well connected to public transport – another stadium is not needed in this location.
- The inclusion of a rugby stadium in the consultation has been confusing for residents.
- There is no justification for exceptional circumstances for the loss of Green Belt and AONB land in this location to build a rugby stadium.
- The harm to existing communities through bringing large numbers of people into the area without the infrastructure to support it will be greater than any expected benefit a rugby stadium would bring.

Overall Summary

Summary of comments on Policy SL1 – Sports and Leisure Facilities

The majority of respondents disagreed with this policy, however many of the objections were in relation to delivering a sports stadium at Pedham Place, rather than the Sports and Leisure Facilities policy as a whole. Many respondents did not support the ambition to create a world class cluster of sporting facilities in the north of the District, citing a lack of evidence, cumulative impact and the unsustainability of the rural area as their main reasons. However there was also support for the ambition, with respondents recognising the benefits including the provision of jobs, attracting investment and economic growth, and improved health and wellbeing.

The protection of existing sports and leisure facilities was generally supported, and some respondents suggested that existing facilities need to be able to expand and evolve. Sport England were supportive and encouraged the use of Community Use Agreements to increase the availability of sport facilities to the wider community.

Actions for Regulation 19

We will consider the suggested amendments made by respondents in developing the policy further, in line with national policy and guidance.

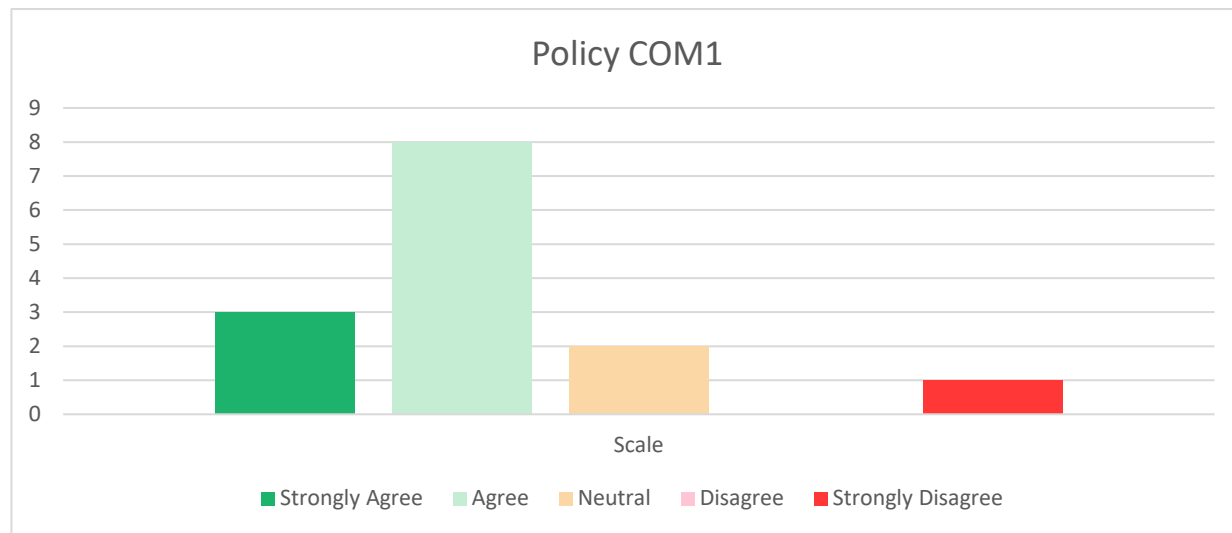
Work on a new Playing Pitch, Outdoor Sports and Leisure Facilities Strategy is progressing well and, once complete, will update the key evidence on sports and leisure facilities to a base date of 2023. The Study will take account of recent changes to White Oak Leisure Centre in Swanley and other facilities across the District. Once complete, the policy will be updated to take account of the latest assessment of quantity and quality of sports and leisure facilities within the District.

The Infrastructure Delivery Plan (IDP) published for this consultation will be developed further in consultation with the District's infrastructure providers in the coming months, with a view to publishing a complete and robust IDP in time for the next Local Plan consultation. The IDP will set out the strategic infrastructure required, including the specific projects to be delivered to support the growth identified in the Local Plan along with expected timescales, estimated costs and funding routes.

Policy COM1 – Retention of Community Uses

16 responses

Of the 14 respondents who answered the quantitative question, 79% said that they strongly agree or agree with Policy COM1.



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not answered	Libraries (Libraries, Registration and Archives) provide a significant community service and should be referenced.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	It is vital that Post Office services are retained in the local area. This is a life line for rural communities especially as high street banks have closed.
Eynsford Parish Council	Strongly agree	Supports this policy and would object to the loss of Pedham Place golf course, a popular local facility.
Hever Parish Council	Not answered	Supports the retention of community and leisure facilities and the need to correlate with increased demand.
Kemsing Parish Council	Agree	Reassuring that it is proposed that these very valuable community services and facilities will be retained.

Organisation	Agree-Disagree scale	Summary of response
Leigh Parish Council	Agree	The loss of local services and facilities must be resisted particularly in the rural areas. Post Office provision is very important in rural communities and closure of Post Office branches must be resisted.
Sevenoaks Town Council	Agree	Land east of Sevenoaks town centre is being promoted for 300 new homes with no comment on the retention of the sports, library and cultural facilities currently on the site. These facilities must be assured long term as part of a successful, vibrant town centre and community. Similarly, the Abacus Furniture warehouse forms part of a site put forward for redevelopment, a community-focused service which we hope to see retained in the town.
Fawkham Parish Council	Not answered	Supports the principle of retaining existing services. Considers that an explicit viability test should be required for all commercially provided services such as post offices, banks, public houses and surgeries in order to ensure that the potential loss of a key community facility is robustly tested.
Hartley Parish Council	Not answered	Supports the principle of retaining existing services. Considers that an explicit viability test should be required for all commercially provided services such as post offices, banks, public houses and surgeries in order to ensure that the potential loss of a key community facility is robustly tested.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
NHS Property Services	Not answered	Supports the provision of sufficient, quality community facilities, but objects to specific wording within the policy. The policy wording should be amended to be more flexible in respect of the NHS and support the principle that where the NHS can demonstrate a health facility will be changed as part of NHS estate reorganisation programmes or transformation plans, this will be sufficient for the local planning authority to accept that a facility is neither needed nor viable for its current use, and therefore that the principle of alternative uses for NHS land and property will be fully supported. It is suggested that the following additional criteria is included in the policy: "5. Where the loss of a local service or facility is part of a wider public service estate reorganisation (for example by the NHS) and the relevant body that operates it confirms the facility is no longer required thereby satisfying Part 1 Criteria b, the requirements listed under Part 2 and 3 do not apply."

General Responses

Summary

Key points raised by respondents:

- Policy should mention faith facilities like policy COM1 in the Sevenoaks Town Neighbourhood Plan, given the increasing Muslim communities in the area.
- A suitable and robust viability test on the potential loss should be adopted for key services if a change of use is being considered.

Overall Summary

Summary of comments on Policy COM1 – Retention of Community Uses

Respondents overwhelmingly supported the policy and recognised the importance of retaining local services and facilities. Some good suggestions were also made including referencing libraries, faith facilities and post offices. The NHS suggested alternative policy wording to allow more flexibility.

Actions for Regulation 19

The overwhelming support for this policy is noted. We will consider the suggestions made in developing the policy further, in line with national policy and guidance.

Policy UD1 – Utilities and Digital Infrastructure

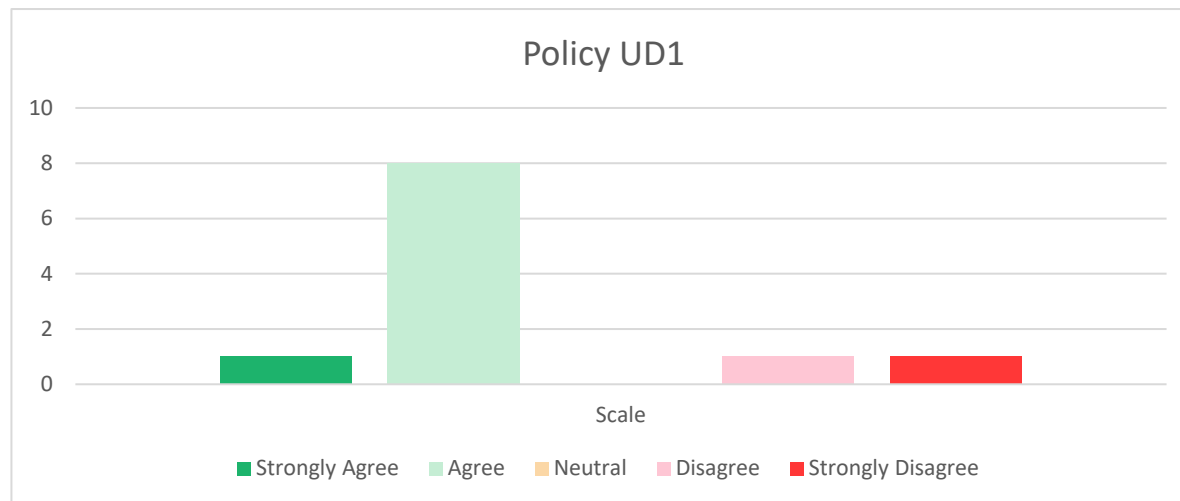
15 responses

Of the 11 respondents who answered the quantitative question, 82% said that they either strongly agree or agree with Policy UD1.

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Kent County Council	Not answered	Policy criterion 5 should update 'super fast broadband' to 'gigabit-capable broadband' (i.e. full fibre) in line with the Future Telecoms Infrastructure Review (2018). 75% of premises in Kent now have access to gigabit-capable connections.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	Infrastructure must be increased in line with development. Broadband services, electricity, water capacity must all be prioritised.
Edenbridge Town Council	Not answered	Pleased to see more strength has been added to this policy, in particular criterion 4. Southern Water has already advised that an upgrade will be needed if there are more houses in Edenbridge, and the proposals under ST2 would require significant additional water and waste water infrastructure.
Leigh Parish Council	Agree	There is real concern over drainage and highways and school and medical resources in Leigh. Drainage is a persistent problem and insufficient attention seems to be currently given to this with constant piggy-backing of building creating increasing problems with infrastructure - especially drainage.
Sevenoaks Town Council	Not answered	The Local Plan should be aiming for full fibre broadband. Gigabit capable access to all of Sevenoaks should be the Local Plan objective.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Thames Water	Not answered	Supports the requirements of the policy. In relation to criterion 4, the responsibility to deliver any network reinforcement of the water and wastewater networks lies with the statutory undertakers. However, the time taken to deliver shouldn't be underestimated and any necessary local upgrades can take 18months to 3 years to deliver from the point of certainty that development will come forward. More strategic upgrades can take 3-5 years. As such, where upgrades are needed, there may be a requirement for phasing conditions to be applied to planning permissions to require that the relevant phase of development is not occupied until any necessary network reinforcement works have been completed. It is considered that adding wording to this effect to the supporting text for the policy would be beneficial.
Home Builders Federation	Not answered	Does not consider that criterion 1 is a planning matter. The question of the supply of utilities to support development (including residential development) is a matter that is dealt with through separate statutory regimes. Plan-makers may assume that utilities will be adequate. Providers (e.g. water companies and energy companies) are governed by their own statutory regimes and are required, among other things, to ensure a supply of services adequate to meet the needs of the plan-led system. As such criterion 1 should be deleted. If the Council disagrees with this argument and is of the view that the adequacy of water services and electricity supply is in question, then that is a matter that goes to the heart of the deliverability of the Plan. Clearly, the Plan would be judged undeliverable if there is any question about the ability of allocated sites to connect to necessary services.

General Responses

Summary

Key points raised by respondents:

- Scepticism that utilities infrastructure will be delivered before housing development.
- Power cuts are experienced regularly in Edenbridge which will be made worse with additional development. As such, the electricity infrastructure in Edenbridge needs reviewing and improving.
- Support for proposed water upgrades in Edenbridge by Southern Water and SES Water.
- More detail needed on what specifically will be done to improve utilities and how it will be made carbon neutral.
- Consider whether renewable energy generation (solar and wind) can be included in new developments.

Summary

- Consider whether self-contained sewage systems for smaller sites could be developed.

Overall Summary

Summary of comments on Policy UD1 - Utilities and Digital Infrastructure

Respondents overwhelmingly supported the policy and recognised the need for prioritising utilities and digital infrastructure. Some good suggestions were also made including referencing gigabit-capable broadband and the consideration of renewable energy generation. Crucially one of the key infrastructure providers, Thames Water, supported the requirements of the policy and suggested the use of phasing conditions to ensure an infrastructure first approach. However the Home Builders Federation disagreed that criterion 1 is a planning matter.

Actions for Regulation 19

The overwhelming support for this policy is noted. We will consider the suggestions made in developing the policy further, in line with national policy and guidance.

The Infrastructure Delivery Plan (IDP) published for this consultation will be developed further in consultation with the District's infrastructure providers in the coming months, with a view to publishing a complete and robust IDP in time for the next Local Plan consultation. The IDP will set out the strategic infrastructure required, including the specific projects to be delivered to support the growth identified in the Local Plan along with expected timescales, estimated costs and funding routes.

Chapter 10 – Transport

Plan 2040 Reg. 18 Part 2 – Comment Analysis

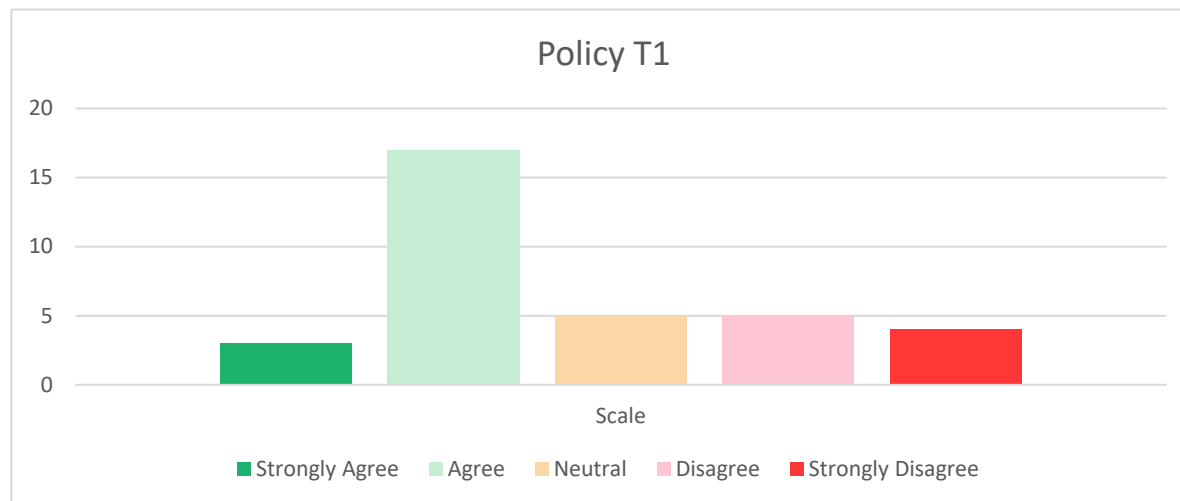
Policy T1 – Sustainable Movement Network

- 34 respondents submitted a response
- 61% (20) of respondents agreed with this policy
- 15% (5) of respondents were neutral with this policy
- 24% (9) of respondents disagreed with this policy

Statutory Consultee responses

None

Neighbouring Authorities



Organisation	Agree-Disagree scale	Summary of response
Tunbridge Wells Borough Council	Agree	<ul style="list-style-type: none"> • The reference to 'Engage with bordering local authorities to address improvements needed for cross boundary trips' is welcomed by TWBC, recognising that in some instances, there will be cross-boundary issues that will need to be addressed, requiring discussions with neighbouring authorities to address these.
Kent County Council (Public Rights of Way)	Not Answered	<ul style="list-style-type: none"> • The need for partnership working is recognised in the Local Plan, this can be further reiterated by specifically recognising the County Council in its role in respect of the PRow network. • Wheeling should be defined in the Glossary for ease of understanding. • Disabilities are broader than just mobility impairment - the Local Plan must acknowledge this and consider how development can ensure those with other disabilities are provided for so as to conveniently enjoy access within the District. • A low cost and effective way of enhancing the PRow network can include up-grading the status of footpaths to bridleways which extends lawful use by cyclists.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Kemsing Parish Council	Neutral	<ul style="list-style-type: none"> • Kemsing's A25 congestion hotspot is highlighted. • Queries on specific projects for active travel improvements and public transport provision and also locations for electric charging points.
Eynsford Parish Council	Agree	<ul style="list-style-type: none"> • Support expressed for the policy. • Noted that a majority of the district is reliant on car use and there is poor public transport in most areas. • The improvement of alternative transport, e.g., parks and ride, needs to stations needs to be considered. • Would like to see greater emphasis on improving electric car use in rural areas. and improvement of the electric car charging network.
Eynsford Green Team (a sub-committee of Eynsford Parish Council)	Agree	<ul style="list-style-type: none"> • Support expressed to reduce congestion the M25 junction 3 area congestion hot spot. • Consider that Pedham Place and the Wasps rugby stadium will increase congestion issues and so, should not be undertaken.
Chiddingstone Parish Council	Agree	<ul style="list-style-type: none"> • Bus services in rural areas need to be prioritised, in particular, school children and the elderly need bus services.
Sevenoaks Town Council	Not Answered	<ul style="list-style-type: none"> • Question how connected sustainable movement provision can be delivered if the market conditions mean that there are no buses.
Leigh Parish Council	Agree	<ul style="list-style-type: none"> • Bus services in rural areas are crucial, in particular, school children and the elderly need bus services.
Edenbridge Town Council	Not Answered	<ul style="list-style-type: none"> • Support expressed for the policy. • Highlighted that the delivery of cycling routes is difficult. • Walking routes in the town are also poor encouraging people to make short journeys by car. • Query on the consideration of road infrastructure issues served by the B2026. • The second Transport Assessment should include proposed developments in ST2.
Hever Parish Council	Not Answered	<ul style="list-style-type: none"> • Support expressed for sustainable movement and transport infrastructure to be in place to meet increased need.
Fawkham Parish Council	Not Answered	<p>Considers that the policy is insufficiently specific to guide development to sustainable locations and assist with climate change objectives and prefers the wording used in the previous version of the policy. Would support the inclusion of a policy criterion within</p>

Organisation	Agree-Disagree scale	Summary of response
		T1 and/or T2 which, for major development, requires safe and convenient access to sustainable modes of transport (footways, cycleways and a frequent public transport service).
Hartley Parish Council	Not Answered	Considers that the policy is insufficiently specific to guide development to sustainable locations and assist with climate change objectives and prefers the wording used in the previous version of the policy. Would support the inclusion of a policy criterion within T1 and/or T2 which, for major development, requires safe and convenient access to sustainable modes of transport (footways, cycleways and a frequent public transport service).

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Sport England	Strongly agree	<ul style="list-style-type: none"> Sport England support the implementation of a sustainable movement network and would encourage Active Travel England to be a stakeholder that Sevenoaks consults with to ensure the network meets the needs of community members.
The Shoreham Society	Strongly agree	<ul style="list-style-type: none"> Support expressed for the policy. Request for the plan to provide details on how this will be implemented - costs, timetable, risks.
Network Rail	Not Answered	<ul style="list-style-type: none"> Support expressed for focus on sustainable movement. Encourage the Council to engage with transport providers early in the decision-making process. Expressed interest in working with the Council to improve the public electric vehicle charging network making use of land owned by Network Rail. Support expressed for amplifying and enhancing the Sevenoaks Station Area. Noted that developer contributions should be used to mitigate any impacts on public transport development may have.

General Responses

Summary
<p>Respondents expressed concern about the impact on the road network as a result of new development and the existing difficulties on the road network. The lack of bus services in the district and limited ability to make trips across the district were highlighted. Respondents questioned the disagreement between the policy's aspirations and the reality of public transport provision and what public transport providers currently and can provide. The need for improved transport links to support new development across a range of modes including, bus services, private</p>

Summary

vehicles, bicycles, and shared transport, was raised. However, there is concern about how this will feasibly be achieved. Respondents considered that the transport network does not consider links to nearby towns in neighbouring local authorities, for example, Tunbridge Wells and East Grinstead which some residents use more regularly than services in the district.

Overall Summary

Summary of comments on Policy T1 – Sustainable Movement Network

Respondents largely supported the policy's aim for sustainable movement and better connectivity across the district. However, there was concern about the difficulties of implementing this with the existing decreased public transport service and a lack of cycling infrastructure. Respondents felt that the road network is already strained, and new development would further exacerbate this. A range of improved transport modes including, private vehicles, cycling and public transport, are needed to support new development.

Actions for Regulation 19

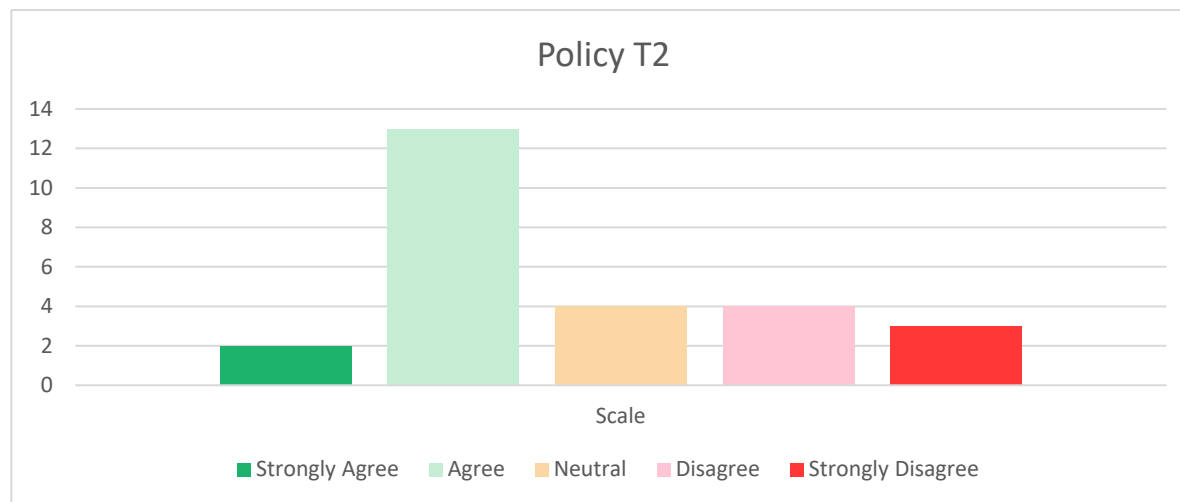
Whilst noted that public transport provision is reliant on external operators, we will continue in our capacity to support sustainable movement across our District and engage with public transport providers and Kent County Council to ensure the impact of new development and transport requirements are considered.

It is acknowledged that the rural nature of the District presents transport challenges increasing reliance on private vehicles. We are undertaking transport modelling work in conjunction with Tonbridge and Malling Borough Council to assess the impact of proposed development on key roads and junctions, including the Strategic Road Network, as managed by Highways England. The Initial Baseline Transport Assessment established the current state of congestion on the highways network, and the state of congestion in 2040 with existing growth. The Stage 2 Transport Modelling Forecast Report built on this by forecasting a single year of 2040 factoring in developments that are likely to be implemented. This work will continue to progress by using the model to test potential growth options/scenarios, to understand their impact on the road network and to consider potential mitigations.

The Infrastructure Delivery Plan is a live document and will continue to develop in conjunction with the emerging Local Plan in consultation with infrastructure providers to identify the strategic infrastructure requirements, to support planned growth. The final version of the Infrastructure Delivery Plan will contain more detailed information on projects such as time horizons and indicative costs.

Policy T2 – Sustainable Movement

- 26 respondents submitted a response
- 50% (13) of respondents agreed with this policy
- 15% (4) of respondents were neutral with this policy
- 15% (4) of respondents disagreed with this policy



Statutory Consultee responses

None

Neighbouring Authorities

Organisation	Agree-Disagree scale	Summary of response
Kent County Council (Highways and Transportation)	Not answered	<ul style="list-style-type: none"> • Proposed that the policy includes a requirement for developers to implement Travel Plans to monitor mode share and implement and promote a range of transport measures to achieve agreed targets. It is recommended that the District Council forms a support network for organisations with travel plans in the district.
Kent County Council (Public Rights of Way)	Not answered	<ul style="list-style-type: none"> • The Sustainable Movement Hierarchy is welcomed in principle. • The policy should ensure that development contributes to meaningful improvement (both on and off site) towards facilities across the District being accessible by all.

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Chiddingstone Parish Council	Agree	<ul style="list-style-type: none"> Safety for cyclists, pedestrians and horse riders on the road must be prioritised. Improved driver education possibly required. In the rural area, separate cycle routes are not possible.
Sevenoaks Town Council	Agree	<ul style="list-style-type: none"> Support expressed for facilitating sustainable movement across the district and to not be reliant on private vehicles. Recommendation to include additional provisions to encourage the use of transport rather than private vehicles - ambitious cycle route delivery, highway reconfiguration and support for 20mph limits in urban spaces. Recommendation to include e-bike sharing and rental schemes in the policy to help address the topographic challenges in Sevenoaks.
Leigh Parish Council	Agree	<ul style="list-style-type: none"> Bus services in rural areas must be retained - especially for school children and the elderly. Bus services have been deteriorating and must be prioritised.
Eynsford Green Team (a sub-committee of Eynsford Parish Council)	Agree	<ul style="list-style-type: none"> Recommendation that there should be fast EV chargers in car parks throughout the district to enable EV uptake among those without garages or driveways. Improved public transport services are supported. Buses should be planned at sensible times in the day to encourage more journeys. Walking and cycling as a priority are supported. A Darent Valley LCWIP is suggested.
Fawkham Parish Council	Strongly Disagree	<ul style="list-style-type: none"> Strongly disagree with policy wording. It is considered “wherever possible” and “when possible” is imprecise in its requirements and should be re-worded in the Regulation 19 version of the policy.
Hartley Parish Council	Not Answered	Considers that the policy is imprecise in its requirements and objects to the wording ‘wherever possible’. Considers that it needs to align more with NPPF paragraphs 114-115.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
The Shoreham Society	Strongly agree	<ul style="list-style-type: none"> Support expressed for the policy. Request for the plan to provide details on how this will be implemented - costs, timetable, risks.

General Responses

Summary

Many respondents expressed agreement in principle for the policy aims of sustainable movement but expressed concern about whether it is feasible given the topography of Sevenoaks and the lack of public transport. Respondents felt that prioritising active travel in rural locations with little provision to support this and long distances needed to travel to daily services is not realistic. The provision of car clubs was agreed in principle but there is apprehension whether they will be successful in rural locations where public transport is poor. Further to this, respondents expressed interest in improved public transport services with more regular and cheaper bus services, better active travel links to train stations and the implementation of more walking and cycling routes in the district.

Overall Summary

Summary of comments on Policy T2 - Sustainable Movement

The majority of respondents supported the principle of sustainable movement in particular, for improved bus services, better links to train stations, and the delivery of more walking and cycle routes. However, it was questioned how this could be implemented given the difficulties of Sevenoaks' topography and a lack of public transport provision. Comments for rural areas noted the difficulties and lack of bus services in rural areas, yet these are key to keeping people and places connected. Furthermore, comments for rural locations focused on the lack of existing infrastructure provision to support active travel noting the distances needed to travel to daily services are not always conducive to these modes. It is also questioned whether car clubs would work in rural locations where public transport is poor.

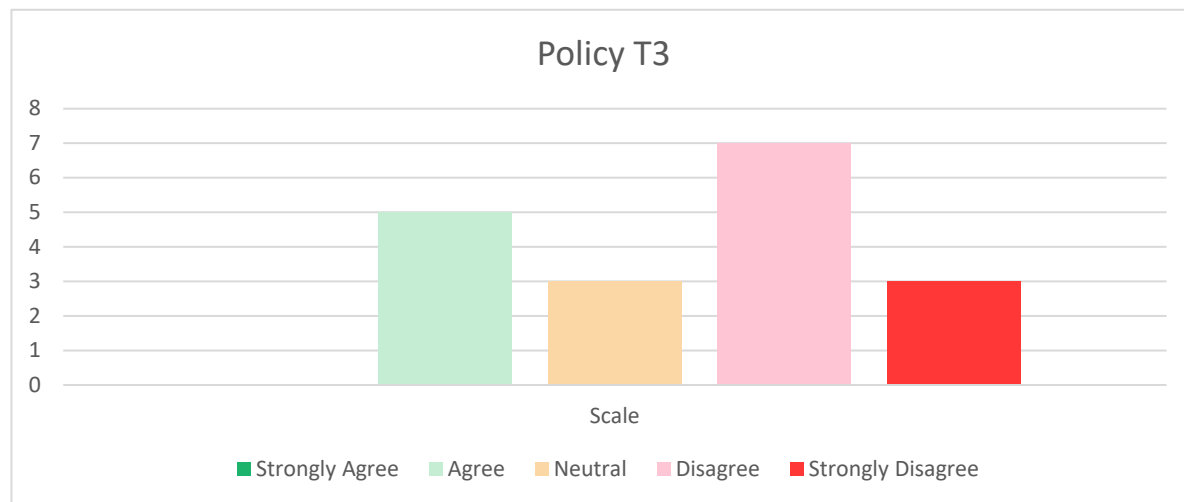
Actions for Regulation 19

We will continue to progress with active travel projects subject to funding opportunities being available. Since the Regulation 18 consultation concluded, the Swanley Town area Local Cycling and Walking Infrastructure Plan (LCWIP) was completed. LCWIPs are a strategic approach to identifying cycling and walking improvements required at the local level. Work is currently underway for feasibility studies and outline design for two routes in the Sevenoaks Urban Area LCWIP (routes 1 and 6).

In regard to the policy, the comments received will be taken into account and the policy wording will be refined to give better clarity in its requirements.

Policy T3 – Vehicle Parking

- 18 respondents submitted a response
- 28% (5) of respondents agreed with this policy
- 17% (3) of respondents were neutral with this policy
- 39% (7) of respondents disagreed with this policy



Statutory Consultee responses

Organisation	Agree-Disagree scale	Summary of response
Kent County Council (Highways and Transportation)	Not answered	The District Council should liaise with the County Council in respect of vehicle parking standards.

Neighbouring Authorities

None

Town and Parish Councils

Organisation	Agree-Disagree scale	Summary of response
Eynsford Parish Council	Agree	<ul style="list-style-type: none"> • Support expressed for the approach to vehicle parking in accordance with the sustainable movement network. However, improved public transport is required to enable the decreased use of private vehicle. • Properties in villages can have issues with roadside parking due to the property being built prior to the use and popularity of cars. • Recommendation that new developments provide residential parking within the curtilage of the property and not roadside.

Organisation	Agree-Disagree scale	Summary of response
		<ul style="list-style-type: none"> • Suggestion that all new developments are obliged to install electric car charging points.
Eynsford Green Team (a sub-committee of Eynsford Parish Council)	Agree	<ul style="list-style-type: none"> • It is considered car clubs can reduce car use, but these should be encouraged to use electric vehicles to further reduce CO2 emissions. • Properties in villages can have issues with roadside parking due to the property being built prior to the use and popularity of cars. • Recommendation that new developments provide residential parking within the curtilage of the property and not roadside. • Suggestion that all new developments are obliged to install electric car charging points.
Sevenoaks Town Council	Agree	<ul style="list-style-type: none"> • Recommendation that the policy should include promoting developments which make private vehicles less dominant in the street scene of new developments, through underground or screened parking. • New developments should also remove dominance of private vehicles in the movements around sites (through lower speed limits, shared surfaces etc.) and be designed to encourage active travel. • New developments should, wherever possible, promote car sharing, car clubs and cycle/ electric bikes schemes as alternatives or complements to private vehicle ownership. • New developments should ensure that spaces are available for the safe parking of delivery vehicles, given the shift to online shopping and home delivery.
Leigh Parish Council	Neutral	<ul style="list-style-type: none"> • All new developments need adequate parking provision to ensure a lack of parking is not an issue. • Visitors and delivery vans must also be taken into consideration.
Fawkham Parish Council	Not Answered	<ul style="list-style-type: none"> • Expressed support for compliance with KCC's existing vehicle parking standards. • Expressed support for meeting on-site parking requirements. • Noted that some rural locations with narrow lanes and a lack of off site parking may need increased level of car parking spaces than stated in KCC's parking standards.
Hartley Parish Council	Not Answered	Supports the need to meet on-site parking requirements and that in some rural locations with narrow lanes and the absence of off-site parking opportunities, either a development is unsuitable or parking requirements may need to be increased above the maxima stated.

Other consultation bodies

Organisation	Agree-Disagree scale	Summary of response
Home Builders Federation	Not answered	<ul style="list-style-type: none"> The final bullet point in the first section requires development proposals to meet minimum standards for bike parking with greater provision being required where feasible. This does not provide the necessary clarity to other the applicant or the decision maker as to what should be provided. It is also unclear as to how it would be determined whether a site could feasible deliver more. The policy as written is therefore unsound and should be amended to read "Bicycle parking meet minimum standards."
The Shoreham Society	Neutral	<ul style="list-style-type: none"> New residential development located near railway stations could be car-free with no parking spaces, except for disabled people, and residents should be ineligible for parking permits.

General Responses

Summary

Respondents felt that the reduction of car parking is not realistic as people are reliant on their private vehicles for multi-purpose trips. Further to this, public transport provision is insufficient and proximity to public transport provision does not mean an adequate service is provided limiting opportunities to use public transport. Respondents considered the existing car parking standards insufficient and encouraged additional car parking. However, support for decreased car parking was provided noting that the provision of car parking allows people to keep using private cars.

Overall Summary

Summary of comments on Policy T3- Vehicle Parking

Respondents encouraged additional parking provisions considering existing standards to be inadequate. However, support for decreased car parking was provided noting that the provision of car parking allows people to keep using private cars. It was encouraged for new developments parking to provide an adequate level of residential parking which would not exacerbate parking issues in the nearby area as well as consider the needs of visitors and delivery vans.

Actions for Regulation 19

It is appreciated that private vehicles are crucial for many residents to travel in their daily lives and adequate parking levels are required to support this. We will consider the feedback given to refine our vehicle parking policy and custom SDC standards, in consultation with KCC.

Overall Summary

Overall summary of comments on Chapter 10 - Transport

The principle of sustainable movement across the district is supported in principle but respondents queried the implementation given there is little existing infrastructure, a lack of public transport services and long distances needed to reach services. The need for improved transport links and infrastructure is considered essential to support new development. It is also crucial that improvements to the strategic road network are considered to ensure they are not exacerbated by new development. Respondents emphasised the need for an appropriate level of car parking.