

**Sevenoaks District Council and Swanley Town Council joint responses to questions 1 -3  
7 March 2024**

1. Paragraph Reference ID: 41-009-20190509 of the Planning Practice Guidance (PPG) on Neighbourhood Planning, advises that 'where a neighbourhood plan is brought forward before an up-to-date local plan is in place (i.e. Local Plan for Sevenoaks District 2040), the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local plan and the adopted development plan. Could the two Councils confirm whether or not such discussions have taken place regarding the preparation of the Local Plan for Sevenoaks District 2040 (Local Plan 2040), summarise the conclusions that were drawn, and confirm that at this stage there are no issues of concern regarding the compatibility of the Swanley Neighbourhood Plan and the Local Plan 2040?

**Response**

The Neighbourhood Plan has been under development for a number of years. As noted in the Neighbourhood Plan, work on it took place in light of the previously emerging Local Plan, which was submitted for examination in April 2019. Following Duty to Co-operate challenges at examination, it was withdrawn from examination on 15 November 2022. A new Local Development Scheme (LDS) was put in place to produce a new Local Plan and two Regulation 18 consultations have taken place (November 2022-January 2023 and November 2023-January 2024). View [the current LDS](#). It is noted that there may need to be flexibility in relation to the District Council's programme.

Sevenoaks District Council has met with and discussed it with Swanley Town Council or their representative at various points throughout this period and as part of these discussions, the District Council has ensured that the relationship between the proposed Neighbourhood Plan, Sevenoaks District Council's adopted Plan (the Core Strategy 2011 and Allocations and Development Management Plan 2015) and Sevenoaks District Council's emerging Local Plan is something that Swanley Town Council is aware of.

As is evidenced by references to it within the Neighbourhood Plan, Swanley Town Council is aware that the Neighbourhood Plan needs to be in general conformity with the strategic policies in the existing development plan and Sevenoaks District Council has confirmed which of those policies are considered to be strategic.

Moreover, references to Sevenoaks District Council's previous emerging Local Plan and first Regulation 18 consultation on the latest emerging Local Plan (Plan 2040) within the Neighbourhood Plan demonstrates an awareness of the emerging policy direction in the new Local Plan. The Neighbourhood Plan includes elements which go some way towards recognising Sevenoaks District Council's proposed strategy, for example the Green Belt policy is supportive of some Green Belt release however, this only covers sites which are in poorly performing Green Belt whereas the District Council's emerging Local Plan proposes some land/sites options which are not poorly performing. However, this is partially due to the fact that these Neighbourhood Plan policies have been developed ahead of the latest consultation on the current iteration of Sevenoaks emerging Local Plan.

It is recognised that the timing of the Neighbourhood Plan, such that it is coming forward ahead of the adoption of the new Local Plan, makes it a more complicated approach. However, neither Council wants to hinder the Neighbourhood Plan coming forward, recognising that it includes important policies which go some way towards aligning with the

emerging development strategy, particularly given that a new Local Plan is unlikely to be adopted until 2025. However, we note that there is some divergence between our emerging policies, including Sevenoaks District Council's ~~our~~ development strategy and proposed densities, which means that certain policies within the Neighbourhood Plan may become out of date upon the adoption of the Local Plan.

2. My understanding is that Local Plan 2040, which is scheduled for Examination in late 2024 (reference SDC's Local Development Scheme, July 2022), will address the District's housing and development needs, including consideration of allocating some land which is currently in the Green Belt. This consideration includes land at Pedham Place to the south-east of Swanley, which has been identified as a potential strategic development site. Could the Council confirm the current status of the land at Pedham Place and confirm whether or not the potential identification of this land for mixed development has any consequences for the submitted SNP?

## Response

Pedham Place is located within the parishes of Farningham and Eynsford but abuts Swanley parish. It comprises an area of land used as a golf course complex, with floodlit driving range, and includes an area of land used for car boot sales. It is not currently allocated for any form of development. It is located within the Green Belt and the North Downs National Landscape.

It has been previously identified as a broad location for growth in the now withdrawn Local Plan but it was not proposed for Green Belt release at that point in time. In Sevenoaks District Council's current emerging Local Plan (Plan 2040), it has been included as a potential location for a standalone settlement. In the recently concluded Regulation 18 consultation on the emerging Local Plan there were three alternative options put forward for meeting the District's identified need. Options 2 and 3 include Pedham Place as a stand-alone settlement. At this point the District Council has yet to determine which growth option will be taken forward but should it form one or part of the chosen option, the District Council's intention would be for it to be released from the Green Belt.

Pedham Place, whilst not being located within Swanley parish, is proximal to Swanley and would have implications for Swanley. Both Councils recognise that should this option be progressed, more work will need to be done in relation to various matters e.g. traffic and transport, landscape, heritage however, it is also considered that there could be potential positives arising, particularly in relation to the provision of housing, employment land and community infrastructure, including education.

As a standalone settlement, it would be expected to provide infrastructure, services and facilities to meet the needs of future residents. Uses promoted as part of it include primary care facilities, a hotel, employment and retail facilities and open space/green space and play space; much of which could benefit residents of Swanley. Being outside of Swanley parish, the policies contained within the Neighbourhood Plan would not apply in relation to Pedham Place and given its location outside of the Neighbourhood Plan area, and the fact that its status is currently a development option, it should not be considered to have a major impact on the Neighbourhood Plan proposals.

3. In the Regulation 16 response from Claremont Planning, it is suggested in paragraph 5.8 that work on the SNP should be paused pending the outcome of the emerging Local Plan 2040. How do the two Councils respond to this suggestion?

### **Response**

It is recognised that the Swanley Neighbourhood Plan is being developed within an evolving context, against the District Council's Core Strategy and Allocations and Development Management Plan, but having to be mindful of the emerging Local Plan. In relation to the emerging Local Plan, this is still at a relatively early stage but the District Council is aiming to proceed to the Regulation 19 consultation this summer, with submission taking place before the end of the year. The intention is that it will be considered under the current framework and as such its examination and adoption will need to take place by 31 December 2026. It is hoped that the District Council will have a new plan in place well before the 31 December 2026 but realistically the earliest this is likely to occur is by the end of 2025.

Both Councils have sought to work collaboratively on the Neighbourhood Plan, to ensure it is consistent with both the current and emerging Local Plan. However, the timing has meant that it has not been possible for the Neighbourhood Plan to have regard to the latest iteration of the emerging Local Plan. Both Councils are aware that a limited number of policies within the Neighbourhood Plan are likely to become out of date upon the adoption of the District Council's emerging Local Plan but we are also mindful that the emerging Local Plan is some time away from being adopted (potentially a year and a half away) and that it could potentially change quite significantly in the meantime. The District Council is conscious that considerable work has been undertaken in the preparation of the Neighbourhood Plan by the Qualifying Body over a period of approximately 5 years, against an evolving backdrop. In light of this both Councils support the Neighbourhood Plan progressing but consider that it needs to be satisfactorily future proofed. The District Council would also like to note that this is the same approach as taken with respect to the Sevenoaks Town Neighbourhood Plan, which was also developed over a number of years and against an evolving backdrop and which was successfully 'made' last year.