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Date: 26 February 2019

Dear Member

PLANNING APPLICATIONS COMMITTEE - WEDNESDAY, 6 MARCH 2019

I am now able to enclose the Appendices for next Wednesday, 6 March 2019 meeting of the Planning Applications Committee, the following Appendices which will not be printed.

Agenda Item No

F1 **Sevenoaks DC - Draft Local Plan Consultation February 2019 (Pages 3 - 212)**

F2 **Consultation on Land at Court Lodge, Pound Lane, Kingsnorth, Ashford (18/01822/AS) (Pages 213 - 252)**

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ben Watts', is written over a faint circular stamp.

Benjamin Watts
General Counsel

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**F1 SEVENOAKS DC – DRAFT LOCAL PLAN CONSULTATION RESPONSE
FEBRUARY 2019**

Kent County Council has commented on the above consultation.

The following Appendices can be found on the KCC website amongst the reports for this meeting:

Appendix 1: KCC response to Sevenoaks DC Local Plan Consultation September 2018

- (a) : Schedule of KCC's technical comments
- (b): Site specific commentary
- (c) : CYPE comments
- (d) : H and T site specific comments

Appendix 2: Schedule of KCC's response to February 2019 letter

Appendix 3: Impact Assessment of allocated sites on KCC service provision.

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1 February 2019

BY EMAIL ONLY

Dear James

Re: Sevenoaks District Council - "Proposed Submission Version" Regulation 19 Consultation December 2018

Thank you for inviting Kent County Council (KCC) to comment on the Proposed Submission Version of the Local Plan for Sevenoaks.

The County Council remains supportive of the Sevenoaks District Council's Local Plan approach, which looks at prioritising growth in existing settlements and then redeveloping previously developed land in sustainable locations. The County Council continues to recognise the challenge in meeting the identified housing need in the highly constrained District. KCC appreciates that, even with promoting high density development in such sites (where appropriate), this strategy could only deliver a proportion of the identified housing need for the District, triggering the need to assess the growth potential of Green Belt 'Exceptional Circumstances' sites.

The County Council notes that twelve 'Exceptional Circumstances' sites were included in the previous Regulation 18 consultation, which would have contributed approximately 6,800 new homes to the housing land supply, enabling the assessed local need figure to be met. However, it is recognised that whilst the sites were included in the Draft Local Plan, they were still being tested at that stage, and their inclusion in the Proposed Submission Version of the Local Plan was not guaranteed. As a result of consultation and assessment, it is acknowledged that four strategic sites are now put forward for allocation and inclusion in the Proposed Submission Version of the Local Plan.

In the context of the growth and development planned within the emerging Local Plan, the County Council will continue to examine its own priorities in respect of calls on CIL revenue and section 106 contributions, to ensure that future requirements for KCC services and infrastructure relating to highways, education facilities, adult social

care, community learning, youth service and libraries are met. Furthermore, the County Council recognises the important role of the Infrastructure Delivery Plan as an evidence base to the Local Plan and a live document throughout the Plan period, and as such, KCC will value continued engagement with Sevenoaks District Council on its formulation and updating. This collaborative relationship will be essential in identifying the timing and costs associated with the delivery of infrastructure and how it will be funded, to ensure that future development will be serviced by adequate infrastructure to meet the existing and future needs of the community that it serves.

In response to this consultation, the County Council has provided detailed, technical comments on the Proposed Submission Version of the Local Plan policies and site allocations. For ease of reference, these are set out in a comprehensive schedule accompanying this letter (Appendix 2). The County Council previously submitted a response to the Regulation 18 Draft Local Plan consultation on the 18 September 2018, providing commentary on the draft policies and the proposed site allocations (Appendix 1). The County Council requests that, where referenced, the two responses are read in conjunction to ensure all matters raised are considered, whilst avoiding unnecessary repetition in this letter and the associated appendix.

Separately, the County Council has provided an initial assessment on the identified additional strategic development sites in the Green Belt also subject to consultation. KCC would like to continue to work with the District Council to ensure that growth is properly supported by the necessary services and infrastructure.

Highways and Transportation

The County Council has been working closely with Sevenoaks District Council throughout the progression of the emerging Local Plan to help to ensure that it is supported by a robust evidence base. The County Council has provided evidence in support of the Proposed Submission Version of the Local Plan, including the Swanley Transport Study and the Sevenoaks District Transport Study. Together, these studies provide evidence that identifies the transport related issues and opportunities that are predicted to arise from the delivery of the Plan, identifying appropriate transport mitigation measures where necessary.

However, the County Council recognises that there are currently several sites that have been included within the Proposed Submission Version of the Local Plan that have only had limited assessment of the highway infrastructure and required mitigation measures. For instance, the site at Sevenoaks Quarry would generate traffic at a level that would significantly add to existing capacity issues on an already congested Bat and Ball junction, and a Transport Assessment is required to assess the impact of the development and the mitigation required. Full details are provided in appendix 2, which sets out the range of sites for which KCC has requested that Transport Assessments/Transport Statements are provided. Once this information has been received, the County Council, as Local Highway Authority, will be able to fully assess whether the impact of the development is acceptable in highway terms, and be in a position to provide more detailed commentary on the proposed site allocations.

Provision and Delivery of County Council Community Services

The County Council supports the objective of the Proposed Submission Version of the Local Plan to seek to support lively communities with well performing town and village centres that provide a range of services, facilities and infrastructure. The County Council agrees that this can be best achieved by allocating sites that support or enhance local community facilities. The County Council therefore welcomes the identification within the document of education, health and social care and community facilities as necessary infrastructure to support sustainable growth. The County Council will look to work closely with the District Council during the Examination process and throughout the Plan period to ensure that the necessary KCC services and infrastructure continue to be factored into the growth proposals of the emerging Local Plan and are delivered as necessary.

The County Council requests that where improvements are required to infrastructure as a direct result of development, such improvements are funded, where possible, either through planning obligations, legal agreements or CIL, as appropriate.

The County Council recognises that, of the proposed allocated sites put forward in the Proposed Submission Version of the Local Plan, just a few would class as strategic sites that would be capable of supporting new community infrastructure. As a result, there may be the need to identify land for the provision of any new community facilities necessary to support growth and KCC would welcome discussions with the District Council on this.

The County Council has also provided an assessment of the education requirements resulting from the proposed growth in Sevenoaks. A number of new primary schools will be required to be provided under S106 agreements, and CIL contributions may be requested towards enhancements to current educational facilities. The proposed development at Pedham Place would necessitate a new 6FE secondary school to be built within the development. An additional secondary school is also required and would ideally be located in Sevenoaks town to support the growth in the south of the District.

A full Impact Assessment of proposed allocated sites on KCC service provision is provided in Appendix 3.

Minerals and Waste

As the Minerals and Waste Planning Authority, the County Council is responsible for ensuring that mineral resources are not needlessly sterilised by other forms of development, thus ensuring that a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development. This safeguarding approach is supported by the National Planning Policy Framework (NPPF) and locally in the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). The NPPF requires that development proposals should not be permitted within mineral safeguarding areas where they might constrain potential future use of the economic

mineral resource. As such, the policies within the KMWLP aim to prevent the sterilisation of Kent's potentially economic mineral assets.

Minerals are essential to the delivery of sustainable development and mineral planning considerations are key to ensuring that there is a sufficient supply of minerals to provide the infrastructure, buildings and goods that the country needs. Mineral planning considerations are a strategic matter that cross administrative boundaries and as required by the NPPF require effective communication between local authorities.

There is a requirement to address the safeguarding of economic minerals and existing permitted waste management facilities present within the District, with particular reference to the relevant policies of the adopted KMWLP. You will be aware that in previous responses to the Sevenoaks Local Plan Issues and Options consultation and Regulation 18 consultation that the County Council drew attention to mineral and waste safeguarding matters that needed to be addressed. These matters do not appear to have been fully addressed. Separately, workshops have been hosted by the County Council for local planning authorities to discuss Mineral and Waste Safeguarding matters, to aid local understanding of this matter.

As Minerals and Waste Planning Authority, the County Council notes that a number of the proposed allocations in the consultation have mineral and waste management safeguarding implications that need to be examined before the sites are allocated. This was raised in the County Council's response to the Regulation 18 consultation and attention was drawn to the need for Mineral Assessments to inform the plan making process.

The County Council has not seen Mineral Site Assessments for any of the affected sites (the sites are listed in appendix 2). If the assessments have been undertaken, it is requested that copies are provided to the County Council. However, in the absence of Mineral Assessments for these sites, it is not possible to assess the mineral safeguarding implications or to consider whether an exemption to the safeguarding policy DM7 of the KMWLP applies and as such, the County Council currently raises a holding objection.

Sevenoaks Quarry

Notwithstanding the above, the proposed allocation ST2 – 13 (Sevenoaks Quarry) would have significant consequences for mineral planning in the County and the wider South East in the event that the site were to be developed prior to the mineral reserve being worked out. The site currently benefits from an extant planning permission for mineral extraction until 2032 (reference SE/08/675) and forms a significant part of the County Council's landbank for soft sand, which is a key indicator for the need for further soft sand releases in the County.

The County Council's current Mineral Sites Plan (currently at Regulation 19 stage) is predicated on the permitted reserve at Sevenoaks Quarry. The site is safeguarded under Policy CSM 5 of the KMWLP and is strategically important in maintaining a

steady and adequate supply of construction sand. It currently makes a significant contribution to supply not only in Kent, but also the wider South East region. Its continued and effective working is therefore crucial to the delivery of the strategy of the KMWLP, as well as the emerging Kent Mineral Sites Plan.

In the absence of evidence to demonstrate that the permitted mineral reserves can be worked prior to any housing development taking place, the County Council strongly objects to the allocation of the site. This is on the basis that it would prejudice the full and effective working of all mineral reserves and would sterilise permitted mineral resources, which would be contrary to the NPPF and to KMWLP policies. The County Council considers that in order to ensure that this policy is sound, KCC, as Mineral Planning Authority considers it necessary that provisions are incorporated into the Local Plan to require the permitted reserves to be worked in advance of housing development taking place.

There is no evidence in the Proposed Submission Version of the Local Plan that the mineral reserves are intended to be worked prior to non-mineral work taking place, although it is noted that there is some information in respect of phasing. In respect of this phasing, the Proposed Submission Version of the Local Plan indicates, within the description of the allocation, that:

“Some extraction is still taking place on the site. The Council is satisfied that there is a reasonable prospect that it will become available. As such, it is considered ‘developable’. Phase 1: years 6-10 and phase 2: 11-15, subject to confirmation of mineral extraction programme”.

The commencement of construction under this phasing plan is considered to be premature to ensure that mineral planning matters are addressed. In light of previous consultation responses, the County Council was expecting the Proposed Submission Version of the Local Plan to include evidence to demonstrate that mineral extraction could be reliably completed before non-mineral development takes place – but no such evidence appears to have been published as part of this consultation process. The Plan, as it currently stands, lacks assurance that the effective working of the mineral reserve will take place and that this important economic mineral will not be sterilised. Further evidence is requested to demonstrate that this phasing will not prejudice the permitted reserves and undermine mineral planning in the South East. The site cannot be considered as “developable” until such a time that the permitted mineral reserves have been exhausted, in order to prevent their unnecessary sterilisation. It is suggested that an approach could be to identify the site as a broad location of growth.

Furthermore, it is noted that part of the rationale for allocating the site is that the “land has been subject to previous development”. However, unlike other types of development, mineral development is a temporary land use with an approved restoration scheme. It is not a brownfield site for planning purposes, which appears to have been part of the rationale used to support allocation.

Finally, attention is drawn to the adjacent landfill activity at Greatness Quarry and the need to consider the implications of this land use activity on any future housing allocation. This would also apply for residents of phase 1, in respect of their proximity to both Sevenoaks Quarry and Greatness Quarry.

Other Mineral and Waste Safeguarding Matters

In the absence of evidence to demonstrate that mineral and waste safeguarding issues have been satisfactorily considered to address safeguarding policies (DM7 and DM8) in the adopted KMWLP, the County Council as Mineral Planning Authority raises a holding objection.

Full technical comments are set out in appendix 2.

The County Council, as Minerals and Waste Planning Authority for Kent wishes to remain involved in the plan making process for the Sevenoaks District Local Plan and would be happy to discuss the above matters. Should you require any further information regarding the above or wish to discuss it further, please contact a member of the Minerals and Waste Planning Policy Team at mwlp@kent.gov.uk or on 03000 422370.

The County Council recognises the importance of the Local Plan in identifying sites suitable for development within the Sevenoaks District to enable the delivery of new housing, employment and required infrastructure in response to local needs.

As a key infrastructure and service provider, the County Council looks forward to building upon the established and collaborative working arrangements in place between the two authorities and welcomes continued engagement with Sevenoaks District Council throughout the progression of the Local Plan to Examination. We would look to this continuing beyond adoption of the Plan to implementation; to ensure that as each of the proposed development sites are assessed and brought forward, they will deliver the necessary infrastructure to support sustainable growth.

If you require any further information or clarification on any matter raised in the County Council's response, please do not hesitate to contact me.

Yours sincerely



Barbara Cooper

Corporate Director – Growth, Environment and Transport

Encs:

Appendix 1: KCC Response to Draft Local Plan (Regulation 18) dated 18 September 2018

Appendix 2: Schedule of KCC's Technical Responses to Policies

Appendix 3: Impact Assessment of Allocated Sites on KCC Service Provision

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks draft Local Plan consultation

Page	Chapter	Policy	Respondent	Commentary
Page 18	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy 1 A Balanced Strategy for Growth in a Constrained District	Sustainable Business and Communities	As Sevenoaks is considered 'Grid Constrained', KCC recommends that in order to support sustainable development, the proposed sites should look at the feasibility of providing decentralised energy - either electric or gas. This could also be through renewables or ground source heat pumps. KCC recommends that consideration is given to whether the Local Plan could be more explicit in detailing sustainable transport options - including walking, cycling and public transport and connection to the PRow network.
Pages 25 to 30	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Public Rights of Way	It is noted that new pedestrian and cycle connections have been included for some of the sites (such as Sevenoaks Quarry). KCC requests that new walking and cycling connections, including enhancements to the existing Public Rights of Way (PRow) network, are considered within the new infrastructure provision for all the sites.
Pages 25 to 30	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Sustainable Business and Communities	KCC recommends that where new green space and community land is being developed, Sevenoaks District Council should consider how these spaces can be multifunctional, including aspects such as green gyms, biodiversity/bee pollinator, flood use (space for water), air quality mitigation. Where new community facilities are proposed, KCC recommends that consideration should be given around whether energy generation could come from renewable sources such as solar, ground source heat pumps, district heating or CHP.
Page 36 Page 11	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy 2 Housing and Mixed Use Site Allocations	Provision and Delivery of County Council Community Services	Adding up the figures shown under Policy 2 for Urban Confine, Brownfield and Exceptional Circumstance sites does not produce totals that tally with the preceding table or the housing supply distribution maps. KCC recommends SDC reviews this discrepancy. The policy does show that there would be more housing delivered under the categories of Urban Confines and Brownfield in settlements outside the main four towns of Sevenoaks, Swanley, Edenbridge and Westerham, which would appear contrary to Policy 1. KCC notes that the four main towns do have the bulk Exceptional Circumstance sites, but these seem to be predominantly focused on Swanley and Edenbridge. The lack of sites in Sevenoaks Urban Area is particularly notable in view of Policy 14 which supports town centre development. KCC notes that there are a number of sites where number of units proposed is to be confirmed creating ambiguity of the overall housing numbers. KCC recommends that an estimate could have been provided, for example based on 40dph the 12 sites could potentially deliver 236 units. The policy does seeks to make it clear, as in the supportive text, that at Edenbridge, not all of the three major Exception Sites would be included in the final draft of the Local Plan. The danger with this is that all three sites may come forward as was experienced with Swale Borough Council's approach to the allocation of land to the south and east of Faversham. At this stage KCC has had to assess the impact of the Local Plan's proposals on the worst case scenario of all three sites coming forward.
Page 36	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy 2 Housing and Mixed Use Site Allocations	Public Rights of Way	With reference to the Local Plan Appendices, KCC notes that specific design guidance has been provided for each site allocation. It is noted that guidance notes for some sites have identified existing PRow and advise that paths should be retained or diverted (e.g. HO274 - Swanley). KCC notes however that most of the guidance notes do not acknowledge the existence of recorded PRow that pass directly through the sites. They also do not highlight the existence of promoted routes that pass directly through (or adjacent to) the site allocations (e.g. North Downs Way National Trail, Darent Valley Path). KCC requests that existing PRow and promoted routes, which pass directly through a site or surround a site boundary, should be acknowledged within the guidance notes for each site. KCC recommends that guidance notes for these site allocations should state that:

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks draft Local Plan consultation

Page	Chapter	Policy	Respondent	Commentary
				<ol style="list-style-type: none"> 1. Sites protect or enhance the quality of any PRow contained within, or linking to, the site, to ensure recreational opportunities and access to the wider countryside are provided for. This includes access for walking, cycling, horse riding and the availability of open space; 2. The character and value of any quiet lanes connected to the site are not changed to a state that they become dangerous or unattractive for non motorised traffic; and 3. The sites positively add sustainable transport choices. Consideration should be given to the creation of new paths and upgrading of existing routes, to cater for pedestrians, cyclists and equestrians, especially where there are opportunities to connect with the surrounding PRow network or address safety concerns. <p>It is also noted that some of the proposed sites are located near existing 'At-Grade' railway crossings (e.g. HO127). Development of these sites may increase the number of path users across the railway crossings, introducing new safety concerns. KCC recommends therefore that impacts of development on these railway crossings will need to be assessed. KCC also recommends that consideration should be given to the provision of new railway crossing infrastructure that can mitigate the impacts of development.</p>
Page 36	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy 2 Housing and Mixed Use Site Allocations	Sustainable Business and Communities	KCC recommends that consideration is given around exceeding requirements within the Building Regulations for Energy and Water by 20% or 30% to increase the sustainability aspect of the proposed growth.
Page 44 Page 12	Chapter 2 Protecting, Conserving and Enhancing Greenbelt, Landscape and the Natural Environment	Policy 3 Landscape and AONB	Heritage and Conservation	It should be noted that much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and Kent Downs AONB have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance has been endorsed by KCC and it is recommended that SDC considers adopting the guidance as SPD, as part of the Local Plan process.
Page 51	Chapter 3 Safeguarding places for Wildlife and Nature	Policy 6 Safeguarding Places for Wildlife and Nature	SUDS	<p>The policy references "connections to offsite blue green infrastructure"; however, KCC recommends that value should also be placed on existing ditches and watercourses which may traverse any development site; therefore, it would be important to "retain the existing ... onsite ponds, ditches and watercourses and any connections to offsite blue green infrastructure"</p> <p>Further. KCC recommends that kerbs and drains may be "wildlife friendly" not just "amphibian friendly"</p>
Page 51	Chapter 3 Safeguarding places for Wildlife and Nature	Policy 6 Safeguarding Places for Wildlife and Nature	Biodiversity	<p>KCC requests that clarity is provided within the Policy to ensure that planning application requirements and considerations are made clearer.</p> <p>KCC recognises that designated sites can be impacted by construction works, therefore KCC is concerned of the lack of reference to the mitigation if a locally designated site is proposed to be lost as a result of development., KCC recommends that there should be a requirement to replace the habitat like for like or demonstrate the need for the development on the site.</p> <p>KCC recommends that the policy should state the ecological surveys are required as part of any planning application to ensure that there is no net loss of biodiversity on a site.</p>
Page	Chapter 4		Education	KCC welcomed the opportunity to attend the Duty to Cooperate meeting and looks forward to working with Sevenoaks District Council to ensure that

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks draft Local Plan consultation

Page	Chapter	Policy	Respondent	Commentary
53	Ensuring Well-Connected Communities are Supported by Appropriate Infrastructure			adequate education facilities are delivered alongside housing growth. KCC has provided a detailed commentary on the Local Plan and the proposed sites within Policy 2, Housing and Mixed Use Site Allocations, which accompanies this Technical Schedule.
Page 53	Chapter 4 Ensuring Well-Connected Communities are Supported by Appropriate Infrastructure Supporting Evidence		Public Rights of Way	KCC recommends that the County Councils Rights of Way Improvement Plan (ROWIP) is also evidenced in this policy, as it is a statutory policy document for PRow and an appendix to the Local Transport Plan (LTP) 4 for the protection and enhancement of PRow.
Page 55 Page 13	Chapter 4 Ensuring Well-Connected Communities are Supported by Appropriate Infrastructure Transport		Public Rights of Way	KCC notes that the draft Local Plan does not make reference to the PRow Network within this subsection. The PRow network is a valuable access resource that provides significant opportunities for walking and cycling in both urban and rural areas. A new paragraph should be inserted within this section to highlight the existence of the PRow network, as it is a vital component of the highways and transport network.
Page 57	Chapter 4 Ensuring Well-Connected Communities are Supported by Appropriate Infrastructure	Policy 7 Transport and Infrastructure	Provision and Delivery of County Council Community Services	<p>KCC presumes that the category of Community Facilities listed under 4.2 would cover Libraries, Community Learning & Skills (formerly Adult Education) and Youth Services, but confirmation of this would be appreciated.</p> <p>The County Council does not agree that CIL is only to be used as a “top-up” and will not be used to meet the full cost of infrastructure delivery as stated under 4.10. This precludes the funding of infrastructure that is only required as a result of the development.</p> <p>The County Council does not agree that s106 Agreements are also to be used for site-specific, on-site infrastructure improvements only as stated in 4.11. KCC considers that this may potentially rule out off-site infrastructure improvements required solely due to the impact of the development. An example could be a junction on the highway network away from development site.</p> <p>KCC considers that the combination of the statements in 4.10 and 4.11 could mean that development fails to fully fund the infrastructure improvements needed to mitigate the demand it creates contrary to the sentiment of Policy 7.</p> <p>KCC also notes that it should be for the development to mitigate its travel impacts not the Local Plan as stated in Policy 7.</p> <p>KCC welcomes the support Policy 7 gives to the provision of high quality telecommunications and broadband provision.</p>
			Public Rights of Way	The inclusion of cycle routes within this policy is welcomed by KCC; however, there is no mention of PRow. Development provides opportunities to create new links and enhance existing routes that would encourage active travel and support a modal shift in travel for short distance journeys. KCC recommends therefore that Policy 7 should include a reference to PRow as they are a vital component of the transport network, providing valuable opportunities for active travel across the district.

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks draft Local Plan consultation

Page	Chapter	Policy	Respondent	Commentary
				KCC recommends that as per National Planning Policy Framework (NPPF) Section 98, this section should include the protection and enhancement of PRoW. This will help support other policies within this document and send a clear message to developers that PRoW are a material consideration at the start of the planning process, following amendments within the Growth and Infrastructure Act 2013.
Page 57	Chapter 4 Ensuring Well-Connected Communities are Supported by Appropriate Infrastructure	Policy 7 Transport and Infrastructure	Transport Policy	<p>With regards to transport priorities in the Sevenoaks District, contributions from developments coming forward in Swanley could contribute towards the refurbishment of Swanley railway station as set out in LTP4.</p> <p>The other major project is for East facing slip roads to be built between the M26 and A21 to allow traffic 'to and from' Sevenoaks to use the M26 and therefore reduce traffic (especially freight) from the A25 which causes problems in Seal and Borough Green (TMBC). KCC understands SDC are not supportive of this scheme and looking at the proposed housing sites identified in this call for evidence, it would be unlikely that any significant contributions to this scheme could be obtained.</p> <p>The lack of overnight lorry parking facilities across Kent is a real issue. KCC have undertaken overnight lorry parking surveys that found the Sevenoaks District has on average 53 HGVs parked each night in the district of which 84% are British registered suggesting that these are domestic freight vehicles not port bound vehicles. The overnight parking hotspots in the district are mainly in laybys along the A21 and A20 as well as in the Vestry Road Industrial Estate. KCC would therefore ask that Sevenoaks District Council consider making provision for HGV layover parking within B8 (Warehouse and Distribution Centre) applications coming forward in the local plan. KCC would like to bring to the attention the recent letter written to Local Planning Authorities from Jesse Norman (Department for Transport) and Dominic Raab (former Minister for Housing) regarding the need for overnight lorry parking spaces within the planning process as well as paragraph 107 of the revised NPPF that states "<i>Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.</i>"</p>
Page 14			Sustainable Business and Communities	KCC welcomes the inclusion of electric car charging points.
Page 14			Education	<p>The local plan is comprehensive and explains the rationale behind the provision of new housing and associated infrastructure.</p> <p>Background</p> <p>The National Planning Policy Framework (NPPF) advises that local planning authorities should take a proactive, positive and collaborative approach with education authorities to ensure that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education.</p> <p>Funding for New Provision</p> <p>Kent County Council is the commissioner of school places in Kent. This bestows the duty of ensuring that there are sufficient school places at a time and location to accommodate any Kent child of school age who requires a place. New or additional school places are provided by expansions or increase in the school admission numbers, or facilitated by new build through one or a combination of these methods:</p> <ul style="list-style-type: none"> • KCC funds expansions of existing schools though Basic Need funding from the government. It should be noted that Basic Need funding is not usually enough and KCC would generally need to make use of unused CIL or section 106 from local authorities. The limit of only being able to utilise a maximum of five separate funds has been a constraint so the recent news that this may be relaxed is welcome. • The Department for Education funds a new build school through its agencies. This method is not commonly used to accommodate demand from a new housing development, unless the agency can seek section 106 or CIL. • A housing developer builds a school according to terms laid out in the section 106 agreement. This method relies on the developer working closely with KCC to maintain Government standards for school build, as described in Building Bulletin 103. The developer will sometimes have the choice to pay the section 106 tariff developer contributions, if they feel that the cost of the school build would exceed that tariff. KCC have to then find funding for any difference. • KCC manage expansions of existing schools, or entire new build schools, using section 106 or CIL funding from District or Borough Councils.

Page	Chapter	Policy	Respondent	Commentary
Page 15				<p>With the exception of the DfE funded build, these funding mechanisms have a tendency to be insufficient to complete a project without additional funding being sought. It must be stressed that there is no county council budget pot that this difference can be sought from, so KCC must seek the maximum amount of CIL or section 106 developer contributions to ensure that the end product is a quality build in accordance with Building Bulletin 103, that the school and local community can be proud of.</p> <p>Expansion Programme Once a demand has been identified, KCC initially considers whether any extant schools could be enlarged. However, the expansion programme that has been undertaken over the last eight years has resulted in there being very few schools remaining that can be expanded. Every primary and secondary school in Sevenoaks district has been considered for expansion but we are now close to the point where most schools in the district cannot be expanded any further. There remain a couple of schools that could accommodate an expansion, but these schools are the subject of a plan to accommodate existing demand and new demand created from nearly completed housing developments, such as Ryedale or the Eden Centre. It is acknowledged that there is a surplus of places across the district against existing capacity, but this would primarily be retained for general migration and changes to the demographic within existing housing stock. Therefore, to summarise, any additional demand created from new housing in Sevenoaks district can only be accommodated by creating new schools.</p> <p>Methodology for Calculating the Number of Additional Children from new Housing Development KCC uses a formula for calculating the number of primary and secondary school places that need to be provided. Nursery places are subject to a different mechanism that considers future demand from new-build plus the existing number of places that are in the immediate area. The planning calculations uses a figure called the Pupil Product Ratio (PPR) and is expressed as 0.28 for primary and 0.2 for secondary. This means that for our planning purposes, one hundred new build houses will generate 28 primary school children (at any point in time) and 20 secondary school aged children (at any point in time).</p> <p>Number of Additional Children from new build Government Delivery Expectation Taking the highest delivery aspiration of 14,000 new homes, KCC would expect to see an additional 3,920 primary aged children and 2,800 secondary aged children needing a school place, by the time that all the housing development described in this plan is completed. KCC usually measures such new demand as the number of forms of entry (FE) required to accommodate these children.</p> <p>These numbers of additional children equate to 18.6 forms of entry for primary and 18.6 forms of entry for secondary. The usual size for a new build primary school for years R to 6, is two forms of entry (school roll of 420) and the size of a new secondary school for years 7 to 11 is between six and eight forms of entry (school roll of 900-1,200). To accommodate the children from 14,000 new homes would therefore require eight new 2FE primary schools, one new 3FE primary school and three new secondary schools, one of 7FE and two schools of 6FE.</p> <p>New Housing Numbers in the SDC draft Local Plan It is understood that there is not necessarily an expectation that all the proposed developments listed in Appendix 1 – “New Housing and Mixed-Use Sites for Consultation FINAL” to be progressed. With that in mind, the tables below show the demand created from a scale of numbers of new housing from 1,000 to 14,000:</p>

Page	Chapter	Policy	Respondent	Commentary																																																																																										
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Page 18				<p>With regard to the land required, Building Bulletin 103 offers a range of site sizes that could be considered. A broad measure would be to say that for a 2FE primary school with early years facility and a specialist resource-based provision for special needs children, requires between 1.7 to 2ha of remediated, buildable land. An 8FE secondary school would require between 7 and 8 ha of remediated land.</p> <p>Relevant Observations</p> <p>Education Narrative & Dialogue</p> <p>The Local Plan documentation is very detailed. However, KCC feels that the commentary around schools provided by housing developers is incorrect, limited or absent in some areas, and too detailed in others.</p> <p>For example: the bullet points for Pedham Place indicate that a junior school will be provided. A Junior school (Key stage 2, years 3 – 7) would never be provided without a linked Infant school so the local authority must assume that the author is asking for a primary school (Key stages 1 & 2, years R – 7).</p> <p>An example where too much detail is provided is shown in Swanley where Downsvie Primary School is named as the school that would be expanded. Without ruling Downsvie out as a candidate for expansion, Kent County Council would need to consider whether this was the most viable solution, considering a list of factors, including: location, cost, proximity to demand, site size, impact on neighbouring schools, willingness of the school, highways issues, Sport England and Ofsted rating.</p> <p>KCC Education Officers and SDC Planners have recently initiated a dialogue focused on working collaboratively on the education infrastructure required as a result of the draft Local Plan and it is our intention and hope that this dialogue continues. Furthermore, KCC would be very willing to talk to any developer about school provision planning on their site, as we have begun with the developers of sites MX41 and HO371-374.</p> <p>Commitment to Fully Fund</p> <p>Kent County Council would like to see a commitment from SDC to ensure that any new build schools are fully funded, either through section 106 developer contributions or through the provision of CIL. The KCC preference would be to fund through section 106 for the more significant developments, but for smaller developments KCC would need some assurance that sufficient CIL funding was available.</p> <p>Cost of New Provision</p> <p>The draft Local Plan does not make reference to the cost of providing new provision. Every new build or built expansion will be subject to costs that are peculiar to the site. It is therefore impossible to say with any certainty how much KCC would be seeking for each new provision, until detailed feasibility studies have been completed. However, purely as a guide to SDC planners, KCC would recommend using the indicative costs listed in Table 1 below. Note that these costs are for the current year and annual inflation increases need to be borne in mind:</p> <p><i>Table 1</i></p> <table border="1"> <thead> <tr> <th>Build</th> <th>Cost Range</th> <th>Average cost</th> <th>Land Required</th> </tr> </thead> <tbody> <tr> <td>0.5FE primary School expansion</td> <td>£0.8m to £1.3m</td> <td>£1.05m</td> <td>N/A</td> </tr> <tr> <td>1FE primary school expansion</td> <td>£2m to £3.5m</td> <td>£2.75m</td> <td>0.7ha to 1.05ha</td> </tr> <tr> <td>2FE primary school expansion</td> <td>£3m to 4.5m</td> <td>£3.75m</td> <td>1.4ha to 1.8ha</td> </tr> <tr> <td>New 1FE primary school</td> <td>£5m to £6m</td> <td>£5.5m</td> <td>1.05ha</td> </tr> <tr> <td>New 2FE primary school</td> <td>£6.5m to £8m</td> <td>£7.25m</td> <td>1.7ha to 2.1ha</td> </tr> <tr> <td>1FE secondary expansion</td> <td>£4.5m to £6.5m</td> <td>£5.5m</td> <td>N/A</td> </tr> <tr> <td>2FE secondary expansion</td> <td>£6m to £8.5m</td> <td>£7.25m</td> <td>1.5ha to 2.5ha</td> </tr> <tr> <td>New 4FE secondary school</td> <td>£22m to £28m</td> <td>£26m</td> <td>4.5ha to 5ha</td> </tr> <tr> <td>New 6 FE secondary school</td> <td>£28m to £33m</td> <td>£30.5m</td> <td>6ha to 7ha</td> </tr> <tr> <td>New 8FE secondary school</td> <td>£32m to £39m</td> <td>£35.5m</td> <td>7ha to 8ha</td> </tr> </tbody> </table> <p>Education Review Groups (ERGs)</p> <p>There is no mention of the use of ERGs. An ERG is a group that meets bi-monthly or quarterly, depending the pace or state of the development. They</p>	Build	Cost Range	Average cost	Land Required	0.5FE primary School expansion	£0.8m to £1.3m	£1.05m	N/A	1FE primary school expansion	£2m to £3.5m	£2.75m	0.7ha to 1.05ha	2FE primary school expansion	£3m to 4.5m	£3.75m	1.4ha to 1.8ha	New 1FE primary school	£5m to £6m	£5.5m	1.05ha	New 2FE primary school	£6.5m to £8m	£7.25m	1.7ha to 2.1ha	1FE secondary expansion	£4.5m to £6.5m	£5.5m	N/A	2FE secondary expansion	£6m to £8.5m	£7.25m	1.5ha to 2.5ha	New 4FE secondary school	£22m to £28m	£26m	4.5ha to 5ha	New 6 FE secondary school	£28m to £33m	£30.5m	6ha to 7ha	New 8FE secondary school	£32m to £39m	£35.5m	7ha to 8ha
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Page 19				<p>normally constitute three groups, representing the developer (who normally chairs), KCC and the District Council.</p> <p>The role of the ERG is to agree small changes and issues without the need to seek a variation to the section 106. The status of the ERG and the voting protocols are agreed in the section 106. KCC would be happy to provide the examples of the relevant wording to properly constitute an ERG.</p> <p>Commissioning Primary School Places by New Development Location</p> <p>KCC uses a system of planning areas to assess primary demand across the district. A map of the KCC planning areas is at Appendix 1.</p> <p>KCC has analysed the development sites in Sevenoaks district that will generate a significant increase to primary demand. This analysis was then applied to the planning areas. The planning areas that would be impacted enough to need a built or organisational solution are shown below.</p> <p>The analysis of each planning area includes a narrative that is pertinent to fully understanding the factors and issues that KCC would need to consider when considering primary and secondary provision, including where appropriate, consideration of adjacent planning areas.</p> <p><i>(the relevant site analyses are included under policy 2)</i></p> <p>Secondary</p> <p>The forecasting and analysis of secondary provision is not done through planning areas. The forecasts are district-wide and then a ‘travel to school area’ methodology is applied to consider where new students are likely to go to school. This will factor in the three supplementary factors of faith, gender and grammar.</p> <p>Using raw figures, 14,000 new dwellings would create demand for 2800 additional places. This translates to 18.6 forms of entry for secondary. There is no surplus secondary capacity in Sevenoaks district, nor is there any capacity in neighbouring districts or boroughs.</p> <p>KCC is considering commissioning an additional 2FE of secondary for 2020, but this is to accommodate existing demand. The conclusion is that there is no surplus capacity nor are there any remaining expansion options. The only solution is new secondary schools. The question to be determined is whether Sevenoaks district would need two secondary schools or three.</p> <p><i>(the relevant site analyses are included under policy 2)</i></p> <p>Summary</p> <p>Summary points include:</p> <ul style="list-style-type: none"> • There is limited primary capacity in Kent, and what capacity exists has been identified as necessary to accommodate demand from stock housing over the next five years. • KCC has no budget to fund new schools or built expansions necessitated by new development. • KCC must seek s106 or CIL to cover the entire project costs of any new build or built expansions. • KCC would prefer that all the larger developments are managed through s106 agreements. • KCC recommend that Education Review Groups are set up for the larger developments. • With the exception of Broke Hill and Hartley there has been no discussion between any developers and KCC over either the freehold of KCC land, or the need to include additional school provision, appropriate to the size of the development. <p>Potential Costs</p> <p>The following summary of tariff-type costs is based on the KCC planning area analyses above for the proposed new dwellings described in the draft Local Plan and the average costs at table 1:</p> <table border="1" data-bbox="845 1869 1988 1908"> <thead> <tr> <th data-bbox="845 1869 1320 1908">Planning Area</th> <th data-bbox="1320 1869 1765 1908">Education Requirement</th> <th data-bbox="1765 1869 1988 1908">Est Cost £m</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Planning Area	Education Requirement	Est Cost £m			
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APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks draft Local Plan consultation

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Page 62	Chapter 5 Providing for Housing Choices	Policy 8 Market and Affordable Housing Mix	Provision and Delivery of County Council Community Services	The County Council welcomes the support provided in Policy 8 for all new housing to be to an accessible and adaptable standard and the requirement for housing developments of more than 20 units to provide 5% that are wheelchair accessible. This exceeds the level that the County Council currently requests in response to planning applications.																								
Page 68	Chapter 5 Providing for Housing Choices	Policy 9 Provision of Affordable Housing	Provision and Delivery of County Council Community Services	The County Council would query the likelihood of the target of providing 40% affordable housing being attained, given the past delivery rate of affordable housing over the last few years. The reasons for this target are fully understood, but there are concerns that development sites coming forward with a high level of affordable housing provision will be at the expense of contributions towards infrastructure improvements to mitigate the development's impact on service provision, on the grounds of viability.																								
Page 69	Chapter 5 Providing for Housing Choices	Policy 11 Provision for the Gypsy and Traveller Community	Gypsy and Traveller Unit	A total of eighteen sites are proposed across the district, which would provide a total of 90 pitches, with 50 additional pitches created. The policy states that sites should be located close to services and facilities, with access to public transport, but a number of these sites do not meet these criteria, being relatively remote.																								
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Page 71	Chapter 5 Providing for Housing Choices	Policy 12 Housing Density	Provision and Delivery of County Council Community Services	The policy identifies that recent past development has been delivered at an average density of approximately 60dph across the district and that new development will be expected to be delivered at higher densities. However, the majority of sites contained in Appendix 1 have had their capacity assessed at either 40dph or 50dph. KCC considers that this appears to suggest that the number of units for the sites identified under Policy 2 could potentially increase.									
Page 74	Chapter 6 Supporting a Vibrant and Balanced Economy	Policy 13 Supporting a Vibrant and Balanced Economy	Provision and Delivery of County Council Community Services	KCC recognises that given throughout the draft Local Plan of the number of jobs that are expected as a result of the proposed sites identified in Policy 13. However, a number of the sites identified already have existing employment use, so the overall nett gain in employment land is important if the Local Plan is to achieve its target of an additional 11.6ha of employment land. This would also need to take into account a number of the housing sites identified in Policy which currently have employment use and would be lost.									
Page 22			Highways and Transportation	<p>SITE ASSESSMENT (TRANSPORT) Please assess against indicative use proposed by promoter (A = Existing. B = Potential. C = Difficult) Sustainability Criteria I) within 800m walking distance of a bus stop or railway station providing 2 or more services per hour ii) within 800m walking distance of a convenience store, primary school and a GP surgery iii) within 30 mins public transport time of a GP, a hospital, a primary school, a secondary school, employment area and major retail centre. (A = all 3 criteria met. B= 1 or 2 criteria met. C = none of criteria met)</p> <table border="1"> <thead> <tr> <th>Site no</th> <th>Site address</th> <th></th> </tr> </thead> <tbody> <tr> <td>EM1</td> <td>Land south of High Street Brasted</td> <td> KCC Highways Comments - Need to consider trip generation from similar employment sites Transport statement required Transport Assessment Access -Existing access may need improvement depending on number of offices. Car parking to be assessed Score - B Capacity - Directly onto A25. No likely issues Score - A Sustainability -Within village centre. Bus services available. Score - A </td> </tr> <tr> <td>EM3 EM5 EM11 EM21</td> <td>Dunbrik Hub A25 Main Road Sundridge</td> <td> KCC Highways Comments - Junction with Dry Hill lane and A25 needs improving. Need to consider trip generation from similar employment sites. Transport Statement required. Transport Assessment Access - Existing accesses via Dryhill Lane and Dunbrick access road. Dryhill Lane will require widening. </td> </tr> </tbody> </table>	Site no	Site address		EM1	Land south of High Street Brasted	KCC Highways Comments - Need to consider trip generation from similar employment sites Transport statement required Transport Assessment Access -Existing access may need improvement depending on number of offices. Car parking to be assessed Score - B Capacity - Directly onto A25. No likely issues Score - A Sustainability -Within village centre. Bus services available. Score - A	EM3 EM5 EM11 EM21	Dunbrik Hub A25 Main Road Sundridge	KCC Highways Comments - Junction with Dry Hill lane and A25 needs improving. Need to consider trip generation from similar employment sites. Transport Statement required. Transport Assessment Access - Existing accesses via Dryhill Lane and Dunbrick access road. Dryhill Lane will require widening.
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				<p>Crossroads with A25 will require improvement - possible traffic signals. Score - B Capacity - Concerns regarding Dryhill Lane / A25 crossroads junction. Transport assessment required to assess capacity. Score - A Sustainability - Rural location. Infrequent bus services. Poor pedestrian / cycle facilities. No nearby train stations. Score - C</p>
			EM4	<p>Land at Pedham Place Swanley KCC Highways Comments - See MX48. Transport Statement required Transport Assessment Access -Could utilise existing roundabout (currently serving golf course) onto A20. Capacity assessment required. Score - B Capacity - A20 should have sufficient capacity. HE needs to be consulted on M25 J3 impact. Score - A Sustainability - Poor bus provision. Pedestrian / cycle provision affected by M25 J3. Swanley station remote Score - C</p>
			EM6 EM23 EM24	<p>Bartram Farm Old Otford Road Sevenoaks KCC Highways Comments Transport Assessment - Access to be improved. Transport Statement required Access -Could be accessed through existing Vestry Road industrial park. Existing Vestry Road junction onto Otford Road may require improvement. Score - B Capacity - Unlikely to create congestion issues but Bat & Ball junction would need checking. Score - A Sustainability - Infrequent bus services. Reasonable pedestrian / cycle access. Score - B</p>
			EM9	<p>The White House and land to the rear High Street Brasted KCC Highways Comments - Additional info layout and massing and car parking arrangements required. Transport Statement required. Transport Assessment Access -No existing access off High Street apparent. Would appear to require demolition of White House. Access off High Street possible. Score - B Capacity - Unlikely to cause congestion issues. Junction off High Street needs assessment. Score - A Sustainability - Village centre location. Some bus services Score - B</p>
			EM10	<p>Land west of Chaucer Industrial Park Honeypot Lane Kemsing KCC Highways Comments - New access required from existing industrial park. Transport statement required. Transport Assessment Access -New access through existing business park. Local roads unsuitable for B2 / B8. Score - B Capacity - Concerns regarding local road network - narrow winding lanes to reach A25</p>

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				<p>Score - B Sustainability -Train station nearby but with access issues. No current bus services or pedestrian / cycle facilities. Rural location much reliant on private car. Score – B</p>
				<p>EM12 Former Park and Ride Otford Road Sevenoaks</p> <p>KCC Highways Comments - Will create increase traffic movements at the Bat and Ball junction. Will require new access onto Otford Road. Pedestrian and cycle links to nearby facilities. Need to consider trip generation from similar employment sites. Transport statement required.</p> <p>Transport Assessment</p> <p>Access - Directly onto Otford Road. Improved access required (right-turn lane?). Score - B Capacity - Concerns regarding impact on Bat & Ball traffic signal junction Score - B Sustainability -Good access to Bat & Ball station. Infrequent bus services. Reasonable cycle & pedestrian facilities that may need improvement Score – B</p>
				<p>EM20 Westerham Garage and land to rea London Road Westerham</p> <p>KCC Highways Comments - Transport Statement required</p> <p>Transport Assessment</p> <p>Access - Existing access directly onto London Road. May require improvement / modification. Score - A Capacity - Unlikely congestion issues depending on quantity of development Score - A Sustainability -Poor access to public transport / cycle / pedestrian facilities. Out of town reliance on private car. Score – C</p>
				<p>EM17 Land north and east of Westerham Way (Which Way Westerham)</p> <p>KCC Highways Comments - Technical Information has been provided in respect of the allocation for 600 homes and relief road to Westerham. This indicates that the provision of the relief road and the development would reduce traffic flows along the A25 through Westerham. This would reduce congestion, queues and delays and provide opportunities for the delivery of sustainable transport measures and public realm improvements.</p> <p>Transport Assessment</p> <p>Access - Access to the development would be gained via the relief road. Score - B Capacity - Relief road would improve capacity. Score - A Sustainability - Relief Road would allow opportunities for sustainable travel and public realm improvements. Score – A</p> <p>Conclusion - Access to the development would be gained via the relief road. Relief road would improve capacity and allow opportunities for sustainable travel and public realm improvements.</p>
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Page 82 Page 26	Chapter 6 Supporting a Vibrant and Balanced Economy	Policy 14 Town and Local Centres	Provision and Delivery of County Council Community Services	<p>There is concern that, under 'Protection of Community Uses', the policy would allow that, where '<i>school and community buildings become vacant and there is no requirement for an alternative educational use for the existing community use, priority will be given to reusing the buildings or site to address local need for community facilities</i>'. This would preclude the County Council obtaining the best Capital Receipts from the disposal of its land, which on many occasions, is used to support the provision of new replacement facilities, so for this reason, the County Council would not support this part of policy 14.</p> <p>Given the draft Local Plan's broad support for development in town centres to maintain their vibrancy, is there potential for any sites to be identified for mixed-use development, particularly in Sevenoaks Town Centre, which would provide residential use above ground floor town centre uses?</p>
Page 83	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<p><i>Paragraph 7.2</i></p> <p>'Historic landscape' could be added to the ways in which the district's heritage contributes to the cultural heritage and special character of Sevenoaks (paragraph 7.2).</p> <p>The landscape that is visible today is the result of many centuries of evolution and the pattern of roads, tracks, field boundaries and hedgerows that gives the modern landscape its character is firmly rooted in the past. The Kent Historic Landscape Characterisation Survey (2001) (HLC) is an important resource for understanding the landscape of Kent and its development through time. KCC notes that the HLC is a strategic, not local, assessment. It allows us to look at the landscape of Kent and draw conclusions about the development of the landscape in different parts of the county and the county as a whole. It is not detailed enough to use at a small scale. 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. Tunbridge Wells Borough Council has recently done this for their Borough and KCC recommends that a similar approach could be taken. KCC is happy to discuss this further.</p> <p>In addition, Sevenoaks District Council is urged to consider that features within the historic landscape may also be heritage assets in their own right.</p> <p>It should also be noted that Sevenoaks contains numerous historic buildings that are not Listed (whether nationally or locally) and are not in Conservation Areas and which also contribute to the character of the area.</p>

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Page	Chapter	Policy	Respondent	Commentary
Page 83	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<p><i>Paragraph 7.4</i></p> <p>The historic environment has a significant role to play in the conservation of resources required for development and also in energy efficiency. Old buildings can often be more energy efficient than newer ones and of course have already been built. Thus, it may take less overall resource to adapt an old building than to demolish it and build a completely new one. English Heritage has produced guidance ('Climate Change and the Historic Environment', 2008) that reviews the threats to the historic environment posed by climate change. The guidance also 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.</p>
Page 83	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Sustainable Business and Communities	<p><i>Paragraph 7.4</i></p> <p>KCC considers it would be beneficial for developments over 100 residential units to have an Energy and Water Statement, which considers mitigation strategies for energy and water use to achieve above Building Standards recommendations.</p>
Page 83 Page 27	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<p><i>Paragraph 7.5</i></p> <p>Sustainable Drainage Schemes (SuDS) may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets, such as when SuDS works damage buried archaeological remains. Indirect impacts occur when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains in particular are highly vulnerable to changing moisture levels, which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>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 (HER) and by taking relevant expert advice. KCC maintains the County HER and can offer guidance on avoiding damage to the County's heritage.</p>
Page 85	Chapter 7 Ensuing New Development Respects Local Distinctiveness	Policy 15 Design Principles	Public Rights of Way	<p>KCC notes that the PRoW network is not mentioned within the draft policy text, though it is noted within Appendix 6 - Section 2. Considering the value and importance of the PRoW network, KCC requests that the PRoW network is referenced within 'Design Consideration' sections 2, 4, 5 and 6. Alternatively, reference to the protection and enhancement of PRoW should be inserted into the text underneath the table, as PRoW encompass multiple design considerations.</p> <p>Section 8 of the policy (Design and Character Guidance) should include reference to the KCC PRoW & Access 'Good Design Guide'. This is designed to aid decision-making and promote good design in public path and countryside access management. The guide applies to both urban and rural locations and is intended to complement and where appropriate, draw together relevant technical and design information, both national and local, that has already been published.</p> <p>The inclusion of PROW text within this policy should ensure that the PRoW network is considered at an early stage of the design process and successfully incorporated into future developments.</p>
Page 85	Chapter 7 Ensuing New Development Respects Local Distinctiveness	Policy 15 Design Principles		<p>KCC welcomes the use of design review as a tool for design dialogue and design quality management. To maximise the value of design review, KCC recommends that it could be used as a means to foster early engagement on design and then at key stages in the process; supporting decision making as the design develops. KCC considers the design review process could be three stage, with each stage informing the next:</p> <ol style="list-style-type: none"> 1. Strategy review - At the allocation stage, so that objectives for design quality are embedded, strategic design decisions between parcels addressed and environmental issues covered; 2. Planning review - Throughout the design and planning stages from outline to detailed application so that the design principles are agreed as early as possible and so that quality is retained through the delivery of reserved matters; and 3. Detail review – At the detail and implementation phases so that what was agreed during the planning process is delivered, rather than diluted.

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				KCC also considers that further consideration could be given on how to engage communities in the development of their settlements as early as possible so that they are involved in the design too.
Page 85	Chapter 7 Ensuing New Development Respects Local Distinctiveness	Policy 15 Design Principles	SUDS	KCC recommends that for the 'Working with site and its context' element of the policy, SDC ensures the inclusion of the following: <ul style="list-style-type: none"> i. the layout of the site should reflect the existing natural drainage catchments. ii. In an urban setting (urban extension or previously developed land) must consider the capacity of the surrounding infrastructure (i.e. drainage infrastructure)
Page 89	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<i>Paragraph 7.18</i> In addition to the benefits listed, the historic environment also contributes to social cohesion and public health. Heritage assets can act as a mechanism for bringing groups and communities together. People want to be proud of where they live and the historic environment can act as a catalyst for engendering and reawakening local pride by strengthening and celebrating the self-image of communities. The heritage of a place is an identifying link that brings people together. Heritage-led regeneration also has a role to play in helping to reduce social exclusion in modern developments. Historic buildings come in all shapes and sizes. Just as they can break up the monotonous shape of a modern development, so they can help to break up the monotony of the social structures. The historic environment also has a role to play in public health. The current and substantial pressures faced by health and social care demand a search for innovative solutions in order to continue meeting the demands of a modern population over the coming years. Besides funding, the greatest challenges to health and social care systems come from an ageing population and the prevalence of long-term and complex conditions. There is presently an ongoing shift from an acute and hospital-centred, illness-based system to a person-centric, health-based system that will rely upon individual and community assets. As such, heritage can play an important role in the contribution of the arts to person-centred, place-based care through means such as arts-on-prescription activities, cultural venues and community programmes. The historic environment, archaeology and heritage form part of our experience of being human and can provide individual, as well as collective opportunities to engage with arts and culture whilst having positive effects on our physical and mental health and wellbeing in the process.
Page 89	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<i>Paragraph 7.19</i> KCC is aware that one of the recommendations of the Historic Environment Review was that a full Heritage Strategy be developed for Sevenoaks, but KCC is not aware of how far this has progressed and it is not mentioned at all in the draft Local Plan text. It does seem sensible to prioritise areas of high vulnerability as the text suggests, but identifying such areas will be difficult until the overall assessment has been carried out as part of the Heritage Strategy.
Page 90	Chapter 7 Ensuing New Development Respects Local Distinctiveness	Policy 16 Historic Environment	Heritage and Conservation	Given that the Local Plan is intended to last for 15 to 20 years, KCC recommends that the policy needs to include an additional bullet point: <i>Recommendations of the emerging Sevenoaks Heritage Strategy</i>
Page 90	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<i>Paragraph 7.20</i> KCC considers that 'archaeological sites' should be added to the list of heritage asset types.
Page 90	Chapter 7 Ensuing New Development Respects Local		Heritage and Conservation	<i>Paragraph 7.21</i> KCC considers that 'archaeological sites' should be added within this paragraph.

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	Distinctiveness			
Page 90	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<i>Paragraph 7.22</i> KCC considers that the term 'archaeological sites' needs to be added to the list of asset types.
Page 91	Chapter 7 Ensuing New Development Respects Local Distinctiveness Archaeology		Heritage and Conservation	At present, the text only refers to Scheduled Monuments. In fact, the majority of archaeological sites in the district are not Scheduled, but nonetheless play an important role in the historic character of the district and the sense of place of local communities. KCC considers that it would be helpful to include a paragraph in this section that underlines this, as archaeology tends to be more difficult for people to appreciate than historic buildings or Conservation Areas. KCC suggests the following paragraph: <i>Most archaeological sites are not Scheduled Monuments, but nonetheless play an important role in the historic environment, contributing to a sense of place and providing people with a direct physical link to the past and bring to life stories and events occurring at an international, national, regional and local level. They are irreplaceable and development will only be allowed where their significance is conserved or enhanced.</i>
Page 91	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<i>Paragraph 7.29</i> Where alteration of a listed building is permitted, and where the works impact on the historically significant fabric, a programme of building recording should be carried out so that the historic structure before the works can be preserved by record. The report on such recording programmes should then be sent to the Kent Historic Environment Record so that it can be recorded for future generations. KCC recommends the text includes that such recording will be required or will take place.
Page 91	Chapter 7 Ensuing New Development Respects Local Distinctiveness Locally Listed Buildings		Heritage and Conservation	The Local List SPD makes it clear ('The Planning Policy context') that the creation of the local list derives from policy SP1. Policy SP1 specifically lists 'archaeological remains' among the heritage assets to be conserved by the local plan, but archaeological remains have somehow been excluded from the Local List SPD. KCC recommends this be rectified so that locally valued archaeological sites can be protected in the same way as locally valued historic buildings.
Page 92	Chapter 7 Ensuing New Development Respects Local Distinctiveness		Heritage and Conservation	<i>Paragraph 7.35</i> KCC is supportive of the commitment to reviewing Sevenoaks District's Conservation Area appraisals.
Page 93	Chapter 7 Ensuing New Development Respects Local Distinctiveness	Policy 17 Heritage Assets	Heritage and Conservation	KCC is currently working with Kent's local authorities to produce guidance for applicants on how to write heritage statements. KCC is currently looking to arrange a meeting with Sevenoaks District Council to discuss this. When the project is completed (March 2020) it will be possible to guide applicants as to whether a heritage statement is needed, whether a more substantial desk-based assessment, or whether fieldwork may be needed in advance of planning application submission. KCC recommends that the forthcoming Sevenoaks Heritage Strategy should be referred to in this section.
Page 95	Chapter 8 Health and		Public Rights of Way	KCC welcomes the acknowledgement of the Kent Active Travel Strategy. The County Council's ROWIP is not currently evidenced. The current ROWIP should be referenced as it is a strategic and statutory policy document for the protection and enhancement of PRoW.

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	Wellbeing, Air Quality and Climate Change Supporting Evidence			
Page 96	Chapter 8 Health and Wellbeing, Air Quality and Climate Change Air Quality and Climate Change		Sustainable Business and Communities	KCC recommends that the design of houses should consider passive solar, shading, orientation, natural ventilation and planting to avoid unnecessary heat gain and promote efficient energy usage.
Page 95	Chapter 8 Health and Wellbeing, Air Quality and Climate Change Health, Wellbeing and Safety		Public Rights of Way	<p>KCC notes that there is no reference to the PRoW Network. The PRoW network should be referenced within this section as it is a valuable access resource that provides significant opportunities for outdoor recreation. There is a growing body of evidence demonstrating that physical exercise in open green space can have a positive impact on mental health and wellbeing. The Local Plan should aim to increase the provision of high quality green infrastructure, creating opportunities for walking, cycling and equestrian activity.</p> <p>From a safety perspective, research shows that people are deterred from cycling along existing roads due to increasing levels of vehicular traffic. To address this issue and encourage cycling activity, especially amongst families with young children, KCC considers that there needs to be a greater provision of traffic free, off-road cycle routes across the region. The PRoW and Access Service can help to address this issue by upgrading existing PRoW and creating new off-road routes for cycling. New development should support the work of the PRoW and Access Service to enable the deliver these outcomes.</p>
Page 30	Chapter 8 Health and Wellbeing, Air Quality and Climate Change Air Quality		Public Rights of Way	High quality walking and cycling routes provide opportunities for active travel across the district. The draft Local Plan should ensure that developments incorporate convenient walking and cycling routes, which provide realistic alternatives to short car journeys. Reducing the number of short distance car journeys should help to address vehicle congestion on roads, which contribute towards air quality issues.
Page 99	Chapter 8 Health and Wellbeing, Air Quality and Climate Change	Policy 18 Health and Wellbeing, Air Quality, Climate Change and Flooding	Public Rights of Way	KCC recommends that PRoW should be referred to within this policy, as the network provides substantial opportunities for active travel and outdoor recreation, which can help to address issues associated with air quality, health and wellbeing.
Page 99-100	Chapter 8 Health and Wellbeing, Air Quality and Climate Change	Policy 18 Health and Wellbeing, Air Quality, Climate Change and Flooding	SUDS	<p>KCC recommends that under the subtitle 'Climate Change', the following addition is made: "(g) resilient drainage design which includes a climate change allowance", recognising that this is not the same as seeking a reduction in surface water runoff.</p> <p>KCC recommends that under the subtitle 'Flood Risk', KCC recommends that small sites should also be mentioned.</p> <p>KCC recommends that under the subtitle 'Sustainable Drainage'- the multi-functional aspects of SuDS should reference amenity or recreational opportunities and integration within landscape strategy where feasible.</p> <p>It is also requested that consideration is given to the following general topics, which could be incorporated into policy, as it sets direction for drainage provision in new development.</p> <p>1) Previously developed sites (brownfield development)</p>

Page	Chapter	Policy	Respondent	Commentary
Page 31				<p>Previously developed (i.e. brownfield) land usually has an existing connection to a sewer system and runoff rates from the site for any new development has in the past been based upon the capacity of the existing connection. However, when KCC reviews planning applications, consideration is required of the Non-statutory Technical Standards for Sustainable Drainage. The NSTS states that: “the peak runoff rate from the development to any drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment for that event.” KCC would recommend that policy reflects the intention to seek surface water control to greenfield runoff rates where possible and emphasizes that this may be as important with previously developed land.</p> <p>2) Delivery of multi-functional aspects of sustainable drainage measures The new NPPF paragraph 163 references that where SuDS systems are used they should “where possible, provide multifunctional benefits.” Sustainable drainage systems can comprise very many different measures and are determined by the geology, topography, layout and surrounding catchment/networks. In the first instance, the drainage system must mimic natural surface water flows and drainage flow paths to ensure that flood risk is not exacerbated on site or off site. However, for a drainage proposal to demonstrate a fully sustainable solution it must also provide additional benefits through biodiversity and amenity benefits. There are additional benefits which accrue through certain drainage proposals e.g. ground water recharge, recreation and air quality. It would be beneficial if Local Plan Policy could be clear in the expectation that all major development should provide for fully multi-functional sustainable drainage measures, which are integrated within the open space and landscape strategies of proposed development and maximise where possible other benefits including biodiversity, amenity, groundwater recharge, and recreational opportunities.</p> <p>3) Ensuring resilience in drainage infrastructure Resilience of drainage design for new development is usually provided through the inclusion of a climate change allowance. This allowance ensures that the infrastructure has capacity to accommodate surface water runoff from the proposed development over the life-time of the development. The EA published new climate change allowances in April 2017. Any planning policy should reference that drainage should account for the “latest” policy direction with respect to climate change.</p> <p>KCC would recommend that the consideration of climate change also includes consideration on development on previously developed land. In these instances, including an allowance for climate change within surface water runoff estimations can be critical given that there may be a reliance on existing drainage connections. This ensures that going forward in time, the system will have improved resilience and capacity to accommodate surface water for the life-time of the newly constructed development.</p> <p>4) Minor development and development of small sites Although the LLFA only has a duty to provide consultation on major sites, it should be noted that all development should clearly state how surface water is to be managed from the new development proposals to ensure that adequate accommodation of surface water has been provided. The new NPPF specifically states in paragraph 164 that some minor development may still be required to provide a site-specific FRA. We would recommend that the LPA considered instances where this would be applicable e.g. geographical, situational (adjacent to areas of flood risk or known drainage problems) or development specific (significant increases in impermeable area). Progressive development of small infill sites within existing urban areas may cumulatively place a significant burden on drainage infrastructure, particularly in areas served by combined sewer systems or where sewers have constrained capacity. KCC would recommend consideration of a maximum discharge rate from small sites of less than 1 ha, e.g. 2 l/s. This may therefore apply to minor development as well as major development.</p>
	Page 102	Chapter 9 Leisure and Open Space Supporting Evidence		Public Rights of Way
Page 102	Chapter 9 Leisure and Open Space		Public Rights of Way	<i>Paragraph 9.5</i> The reference to the PRow is welcomed and supported by KCC.

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Page 102	Chapter 9 Leisure and Open Space		Public Rights of Way	<p><i>Paragraph 9.6</i></p> <p>Recent studies have shown there is a correlation between areas of high deprivation that have poor access to open spaces and green infrastructure. This issue can be addressed by supporting the creation of new open spaces in areas of high deprivation. It is imperative that open spaces are easily accessible by walking, cycling or use of public transport, to avoid a dependency on private vehicle use.</p>
Page 103	Chapter 9 Leisure and Open Space	Policy 19 Open Space, Sport and Leisure	Provision and Delivery of County Council Community Services	<p>It is noted that this policy has a general presumption in favour of retaining existing sport and leisure facilities, unless they can be re-provided. However, there are sites identified within Appendix 1 where proposed mixed-use development would result in the loss of sport and leisure facilities including:</p> <ul style="list-style-type: none"> Pedham Place Golf Centre, Halstead (MX48); Broke Hill Golf Club, Halstead (MX41); and Fawkham Valley Golf Course & Football Ground, Hartley (MX52) White Oak Leisure Centre, Swanley (MX56) <p>KCC recommends consideration of the impact of the loss of these sports facilities and the potential for the re-provision within the local area.</p>
Page 32			Public Rights of Way	<p>The PRoW text within this draft policy is welcomed and supported by KCC. The inclusion of a specific PRoW reference (with a separate PRoW heading) within this policy text would support the work of the PRoW and Access Service and help secure improvements to the path network.</p> <p>KCC recommends that there should be a requirement for applicants to record the route of any PRoW affected by development, clarifying intentions for accommodating, diverting or enhancing paths. The policy should clearly state that planning applications that would adversely affect the existing PRoW network will not be permitted.</p> <p>With reference to NPPF Section 98, this policy should make reference to the North Downs Way National Trail and locally promoted routes across (e.g. Darent Valley Way). Development should provide new path links and enhance promoted routes where possible such as the creation of new paths that enable promoted routes to be re-aligned off roads.</p> <p>KCC also recommends that the Local Plan mentions that contributions may be required towards the PRoW network, including the delivery of routes both on site and off site, where appropriate.</p>
Page 116	Glossary			<p>KCC recommends that the definition of a PRoW is amended to the following: “A way over which the public have a right to pass and repass, including Public Footpaths, Public Bridleways, Restricted Byways and Byways Open to All Traffic”.</p>
Appendix 1	New Housing & Mixed-Use Sites for Consultation		Provision and Delivery of County Council Community Services	<p>KCC is not currently in a position to provide a full assessment as to the impact of the housing sites identified in Appendix 1 on KCC Service provision. Further work is being carried out grouping these sites together so that the impacts across specific areas can be assessed. In this respect that areas where development impact is expected to have the biggest effect are:</p> <ul style="list-style-type: none"> – Broke Hill Golf Club – Edenbridge – Farningham (Pedham Place Golf Centre) – Fort Halstead/Halstead/Badgers Mount (potentially in combination with Broke Hill Golf Course) – Hartley – Swanley & Hextable – North Sevenoaks (covering Sevenoaks Quarry, Otford Road and St John's area) – Westerham <p>The following specific sites are highlighted because of the potential loss of existing community facilities/infrastructure:</p>

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				<ul style="list-style-type: none"> - HO364 Edenbridge & District War Memorial Hospital - HO365 Sevenoaks Hospital - HO73 The Parish Complex, Hextable - MX29 Sevenoaks Community Centre - HO217 Sevenoaks Town Council Offices <p>In the case of the following sites, the County Council would need to complete its assessment of the impact of proposed development in the area before any agreement could be reached on the release/disposal of the sites for development: -</p> <ul style="list-style-type: none"> - HO222 Former Birchwood Primary School, Swanley - HO224 Former Furness School, Hextable - HO225 Oasis Academy, Hextable - HO226 Sevenoaks Adult Education Centre
Page 33	Appendix 6 – Proposed Design Guidance for Consultation		SUDS	<p>Proposed Design Guidance:</p> <p>Working with the site and its context:</p> <ol style="list-style-type: none"> i. It is key to know if there is any existing formal or informal drainage infrastructure that may serve a site whether greenfield or previously developed. A supplementary question may be: Is the site served by any existing drainage infrastructure e.g. natural watercourses or formal drainage systems? Has an adequate setback been provided to any watercourses? ii. It is key to identify any areas of potential flood risk that may constrain development within the site. A supplementary question may be: <i>Are there are areas of flood risk as shown on the EA mapping for fluvial or surface water within the site boundaries which may constrain the development area?</i> iii. KCC wishes to promote infiltration as the first solution to management of surface water but it is not feasible in all ground conditions. A supplementary question (for this section or the SuDS section) may be: How does the scheme take into account the underlying geology? Is infiltration viable within the site?
	Additional Comments		Minerals and Waste	<p>KCC, as the Minerals and Waste Planning Authority, is responsible for ensuring that mineral resources are not needlessly sterilised by other forms of development, to ensure that a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development. This safeguarding approach is supported by the National Planning Policy Framework (NPPF) and in the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). The NPPF requires that development proposals should not be permitted within mineral safeguarding areas where they might constrain potential future use of the economic mineral resource. As such, the policies within the KMWLP aim to prevent the sterilisation of Kent’s potentially economic mineral assets.</p> <p>As mentioned in the County Council’s response to the Sevenoaks District Local Plan “Issues and Options” Consultation in August 2017, it was noted that minerals and waste safeguarding was omitted from the consultation documents and the need for its inclusion in the Local Plan and forthcoming consultations was emphasised. There is a requirement to address the safeguarding of economic minerals and existing permitted waste management facilities present within the district, with particular reference to the relevant policies of the adopted KMWLP.</p> <p>KCC notes that the draft Local Plan does not make reference to either minerals or waste safeguarding, nor does it refer to the relevant policies of the adopted KMWLP, in which the criteria and objectives for their safeguarding are outlined. The County council would request that evidence is provided to demonstrate that mineral and waste safeguarding issues have been satisfactorily considered.</p> <p><u>Mineral Safeguarding</u></p> <p>KCC has undertaken a comparison exercise with the proposed sites of the draft Local Plan, Policy 2 – Housing and Mixed Use Site Allocations and the Minerals Safeguarding Areas (MSA) Policies Maps of Policy CSM 5 Land-Won Mineral Safeguarding of the KMWLP. KCC notes that the following proposed</p>

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				<p>sites coincide with safeguarded economic minerals:</p> <ul style="list-style-type: none"> • HO4 – River Terrace Deposits • MX54B – River Terrace Deposits • HO102 – Sub-Alluvial River Terrace Deposits • HO189, HO190, HO223, MX25 and MX26 – River Terrace Deposits • HO336 – River Terrace Deposits • HO342 – Limestone Hythe Formation (Kentish Ragstone) • HO354 – River Terrace Deposits • HO374 – Silica Sand/Construction Sand – Sandstone: Folkestone Formation • HO373 – Silica Sand/Construction Sand – Sandstone: Folkestone Formation • HO371 – Silica Sand/Construction Sand – Sandstone: Folkestone Formation • MX43 – Silica Sand/Construction Sand – Sandstone: Folkestone Formation • MX54a – River Terrace Deposits • MX54b – River Terrace Deposits • EM11 – Sub-Alluvial River Terrace Deposits, River Terrace Deposits and Silica Sand/Construction Sand – Sandstone: Folkestone Formation • EM3 – Sub-Alluvial River Terrace Deposits and Silica Sand/Construction Sand – Sandstone: Folkestone Formation • EM5 – River Terrace Deposits and Silica Sand/Construction Sand – Sandstone: Folkestone Formation • EM21 – River Terrace Deposits and Silica Sand/Construction Sand – Sandstone: Folkestone Formation • EM23 and EM24 – Sub-Alluvial River Terrace Deposits • EM20 – Silica Sand/Construction Sand – Sandstone: Folkestone Formation • GT20 – River Terrace Deposits <p>Where a proposed site is coincident with an MSA, a Minerals Assessment is required to assess the mineral quality and quantity. The Mineral Assessment should provide a recommendation from a reputable mineral industry and should refer to the relevant policies of the adopted KWMLP, specifically DM 7 Safeguarding Mineral Resources where exemption criteria to the presumption to safeguard are outlined. Further guidance on mineral safeguarding and Minerals Assessments can be found in our Safeguarding Supplementary Planning Document: https://www.kent.gov.uk/data/assets/pdf_file/0019/69310/Supplementary-Planning-Documents-SPD-on-Minerals-and-Waste-Safeguarding.pdf.</p> <p>Please note that this document is in the process of being amended to give further clarity on how minerals and waste safeguarding matters should be addressed during the Local Plan process. The core principles will not change.</p> <p><u>Waste Management Facility Safeguarding</u></p> <p>The draft Local Plan does not make reference to permitted and safeguarded waste management facilities that occur within the Sevenoaks District. KCC wishes to draw attention to the need for the draft Local Plan to take into account that existing permitted waste management facilities are safeguarded and any proposed development within 250m of these facilities should take into account Policy CSW16 Safeguarding of Existing Waste Management Facilities. The criteria outlining exemptions from the presumption to safeguarding are set out in Policy DM8 Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the KWMLP. KCC requires the continued lawful future operation of waste management facilities and for this to be recognised in the Local Plan. The following proposed sites appear to be within 250m of safeguarded existing and permitted waste management facilities:</p> <ul style="list-style-type: none"> • EM3, EM11 and EM5 – Dunbrick Waste Station, Waste Recycling Group PLC (Country Style), Sunridge • GT4 – Knockhalt Station Goods Yard, Halstead • EM4 and EX48 – Swanley Household Waste Recycling Centre, Swanley • EM24 and MX43 – Greatness Landfill Site

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				<p>The Minerals and Waste Planning Authority for Kent wishes to remain involved in the process of the Sevenoaks District Local Plan and would be happy to consider any further site assessment(s) to address the mineral and waste considerations identified above. Should you require any further information regarding the above or wish to discuss it further, please contact a member of the Minerals and Waste Planning Policy Team at mwlp@kent.gov.uk or on 03000 422370.</p>
<p>Page 35</p>	<p>Additional Comments</p>		<p>Waste Management</p>	<p>Waste Management</p> <p>KCC Waste Management operates a network of eighteen Household Recycling Centres (HWRCs) and six co-located Waste Transfer Stations (WTSs) and demand on these sites is at unprecedented levels. As a result of additional demand generated by housing growth, this could result in a requirement to build more, larger sites or invest in the maintenance or repair of existing HWRCs and WTSs.</p> <p>At the Dunbrik HWRC and WTS we are expecting an increase in waste throughput, especially through the Waste Transfer Station as a result of significant housing development resulting in an increase in kerbside collections. The site already has challenges in terms of demand, especially in relation to access to the site. Similarly, the Swanley Household Waste Recycling Centre will also be under pressure due to housing growth.</p> <p>Waste Management completed an infrastructure review in 2017, to understand the impacts of the predicted population growth, up to 2030, on its network of Household Waste Recycling Centres (HWRCs) and Waste Transfer Stations (WTSs).</p> <p>This took it account of projected population growth for each district and modelled which HWRC residents are most likely to use based on their location. It also accounted for which WTS kerbside collected waste would need to be delivered into.</p> <p>There are two HWRCs in the District. Swanley HWRC and Sevenoaks (Dunbrik) HWRC.</p> <p>The review showed that Swanley HWRC will be over capacity by 2025, Sevenoaks HWRC will be over capacity by 2030.</p> <p>The Swanley HWRC needs significant investment in order to remain fit for purpose moving forward. The infrastructure is dated with disposal points being accessed via steps. Opportunities for expansion are being explored, which will allow for faster turnaround times for customer entering and leaving the site.</p> <p>Co-located at the Sevenoaks (Dunbrik) is a WTS (where all of Sevenoaks District kerbside collected waste is delivered). The Dunbrik HWRC and WTS is on a site leased to KCC. KCC are considering proposals from the leaseholder to rebuild and reconfigure the WTS which will improve access and improve traffic flow.</p> <p>All of the settlements proposed by the district in the Information Pack are within 30 minutes (off-peak) drive of both HWRCs, and currently there are no options of alternative or additional sites to lease, and KCC does not have access to the Capital funding needed to increase HWRC or WTS capacity within the District to meet the needs of its projected population growth.</p> <p>The challenge that KCC has as the Waste Disposal Authority is the ability to secure developer contribution funding i.e. S106 and CIL, to invest into the development of Waste Infrastructure because of increased housing growth and therefore demand on the service provided.</p> <p>Moving forwards, KCC must work closely with the District as the Waste Collection Authority, to carefully plan where they should take kerbside collected waste to in order maximise rounds and minimise costs for both parties.</p> <p>In addition, it should be considered that KCC does not have the infrastructure in place to support the planned increase in population across the district, whilst still maintaining a positive level of service</p>

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KCC's comments relating to Chapter 1 - A Balanced Strategy for Growth in a Constrained District – policy 2 “Housing and Mixed Use Site Allocations”

Key

UC - Urban Confines - where sites are located in existing settlements
BF - Brownfield - where sites are previously developed or 'brownfield' land
EC - Exceptional Circumstances - 'Exceptional Circumstances' sites (to be tested)

The table below provides comments for each site, listed under policy 2.

NB The following assessment criteria used for the Highways and Transportation and Heritage and Conservation site assessments are as follows:

Highways and Transportation

All Call-for Sites Submissions and Other New Sites (with results of Preliminary Assessment)

SITE ASSESSMENT (TRANSPORT)

Assessed against indicative use proposed by promoter
(A = Existing. B = Potential. C = Difficult)

Sustainability Criteria

- i) within 800m walking distance of a bus stop or railway station providing 2 or more services per hour
 - ii) within 800m walking distance of a convenience store, primary school and a GP surgery
 - iii) within 30 mins public transport time of a GP, a hospital, a primary school, a secondary school, employment area and major retail centre.
- (A = all 3 criteria met. B= 1 or 2 criteria met. C = none of criteria met)

Heritage and Conservation

The initial archaeological appraisal of options carried out for the housing and mixed use sites within this table has been undertaken primarily from readily available resources held by the Kent County Council Historic Environment Record. It is not a detailed appraisal but merely provides a broad initial view on the sensitivity of the archaeological resource and the way in which this should be approached for each of the options. The sensitivity of particular sites may change following more detailed appraisal and in light of new information. The process of assessment will be reviewed and refined as the Local Development Framework process continues. A crude 5 point scale has been used to rank the options with regard to archaeology. This is:

- 1 - Development of this site (or part of) should be avoided
- 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.
- 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.
- 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.
- 5 - No known archaeological potential on the site or part of it.

Note that for each described site several 'Scales' may be noted reflecting the varying potential across the site. For consideration of the site as a whole the lowest numerical 'Scale', i.e. that with the highest archaeological sensitivity, should be used.

Provision of Community Services

There are a number of proposed large sites where land should be acquired to support the provision of additional infrastructure for KCC Service delivery to meet the need generated by development. This land should be acquired through s106 Agreements.

Ref	Settlement/ Site	No. of units	Site type	Respondent	Comment
Sevenoaks Urban Area					
				Education - Secondary	The town of Sevenoaks will likely need a new 6FE secondary school if the numbers of dwellings recorded in the draft Local Plan are built in the district. It could be built anywhere in or outside the town, but KCC is conscious of the Green Belt issues. Nevertheless, with the amount of housing development being proposed in this Draft Local Plan, without a new 6FE school, KCC would have difficulty supporting housing development in the Sevenoaks, Halstead and Dunton Green areas.
HO5	5 Crownfields, Sevenoaks	14	UC	Highways and Transportation	<p>KCC Highways Comments - Gradient of site makes the site difficult. Development of this scale would not be likely to lead to any significant impact on capacity. Access - visibility appears to cross third party land</p> <p>Transport Assessment</p> <p>Access - Existing access but visibility issues Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity to local facilities. Score - A</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Broad potential for as yet unknown remains with some potential for post medieval activity, subject to query on "historic landfill".</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO217	Sevenoaks Town Council Offices, Bradbourne Vale Road, Sevenoaks	16	UC	Highways and Transportation	<p>KCC Highways Comments - Utilise existing access</p> <p>Transport Assessment</p> <p>Access - Utilise existing access onto Bradbourne Vale Road Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity to local facilities. Pedestrian, cycling routes and bus stops on Bradbourne Vale Road. Score - A</p>
				Education - Primary	<p>Sevenoaks Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX43 600 dwellings MX50 240 dwellings HO365 73 dwellings HO226 30 dwellings MX29 25 dwellings HO381 16 dwellings HO217 16 dwellings</p>

				<p>HO349 10 dwellings HO86 9 dwellings HO44 14 dwellings HO47 13 dwellings HO382 25 dwellings MX49 30 dwellings</p> <p>Up to 1101 new dwellings would generate 308 primary pupils. This equates to 1.5FE of primary provision.</p> <p>Sevenoaks Planning Area covers the town of Sevenoaks, Riverhead, Dunton Green, Chevening and extends as far south as Sevenoaks Weald.</p> <p>There is currently a small surplus of capacity in Sevenoaks Planning Area but this fluctuates and cannot be applied into the planning process. The PPR from the Sevenoaks town sites, especially MX43, would require additional provision of 1FE.</p> <p>The primary schools in Sevenoaks have all been assessed for viability for expansion over the last seven years. With the exception of Dunton Green PS, it is unlikely that any other expansions will be possible due to site constraints.</p> <p>Dunton Green could be expanded, although currently the PPR that was expected from Ryedale (circa 450) dwellings has yet to materialise. It may be that an expansion of Dunton Green could accommodate the local PPR from Ryedale and the local PPR from MX50. However, it would then be unlikely to be able to provide any capacity that could be utilised by MX24, HO328, HO368, HO138, HO307, HO49 or MX41 which means that these developments will need new provision.</p> <p>KCC would prefer, due to the size of the MX43 North Sevenoaks development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX43 North Sevenoaks development, as has become practice in other developments of this or similar size.</p>	
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Former sand quarry identifiable on 1st Ed OS map. Some potential for post medieval industrial remains.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>	
HO226	Sevenoaks Adult Education Centre, Bradbourne Road, Sevenoaks	30	UC	Highways and Transportation	<p>KCC Highways Comments - Use of existing access.</p> <p>Transport Assessment</p> <p>Access - Use of existing access on Bradbourne Road. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity to local facilities Score - A</p>
			Education Primary	-	<p>Sevenoaks Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX43 600 dwellings MX50 240 dwellings HO365 73 dwellings HO226 30 dwellings MX29 25 dwellings HO381 16 dwellings HO217 16 dwellings HO349 10 dwellings</p>

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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology and some interest in main building identifiable as <i>Maywood</i> on 2nd Ed OS map.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>	
HO349	Godfreys, Otford Road, Sevenoaks	10	UC	Highways and Transportation	<p>KCC Highways Comments - Improvements to existent access required.</p> <p>Transport Assessment</p> <p>Access - Some improvements to existing access required. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity to local facilities Score - A</p>
			Education Primary	-	<p>Sevenoaks Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX43 600 dwellings MX50 240 dwellings HO365 73 dwellings HO226 30 dwellings MX29 25 dwellings HO381 16 dwellings HO217 16 dwellings</p>

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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for prehistoric in view of location within a river valley and a Neolithic chipping floor recorded to the west.</p> <p><i>Some formal archaeological work may be required subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>	
HO365	Sevenoaks Hospital, Hospital Road, Sevenoaks	73	UC	Highways and Transportation	<p>Documents required - Transport Statement</p> <p>KCC Highways Comments - Existing access, but improvements will be required. Transport Statement will be required to assess capacity and junctions.</p> <p>Transport Assessment</p> <p>Access - Some improvements to access required. Score - B</p> <p>Capacity - Existing use as a hospital but Transport Statement will be required to assess capacity. Score - B</p> <p>Sustainability - Within close proximity to local facilities. Score - A</p>
			Education Primary	-	<p>Sevenoaks Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX43 600 dwellings MX50 240 dwellings</p>

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				Heritage and Conservation	<p>Preliminary Heritage Assessment - There is potential for post medieval or earlier remains associated with the development of settlement and trade focused around the Bat & Ball junction. This seems to have been a multi-routeway junction and there are indications of activity from 19th century with potential for earlier remains. Both the north site and the southern one contain buildings of 19th century date but most of these have been demolished or merged in to more modern buildings. Remains may survive below ground. There are some designated cottages to the south of the northern block, 128 -134 St John's Hill. The northern site now contains the locally important building of the Sevenoaks Cottage Hospital.</p> <p><i>In view of the locally important Sevenoaks Cottage Hospital, a predetermination historic building assessment and Heritage Statement need to be undertaken with a supporting Statement of significance.</i></p> <p><i>Formal historic building and archaeological work will be required, subject to details.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>
HO381	15 Botolphs Road, Sevenoaks	St 16	UC	Highways and Transportation	<p>KCC Highways Comments - Improvements to existing access required.</p> <p>Transport Assessment</p> <p>Access - Access would require improvements and widening. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity to local facilities.</p>

					Score – A																										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for as yet unknown archaeology.</p> <p><i>Programme of formal archaeological works may be required subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>																										
HO382	Archery and Far End, Chipstead Lane, Chipstead, Sevenoaks	25	UC	Highways and Transportation	<p>KCC Highways Comments - Concerns regarding number of vehicles for 25 dwellings utilising a small access currently utilised by approximately 5 dwellings. Access would require alterations in line with Kent Design Guide for Minor Access Ways.</p> <p>Transport Assessment</p> <p>Access - Use of existing access. Carriageway is approximately 4.1 metres in width. There should be sufficient space for 2 cars to pass each other at least every 40m. These spaces should be intervisible. The access would require widening at junction with Chiptead Lane to allow two cars to</p>																										

				<p>pass. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score – A Sustainability - The sites is located to the north of Sevenoaks town centre. Walking distance approximately 2 miles to Sevenoaks railway station. Pedestrian and cycle ways available. Score – A</p>																										
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains associated with River Terrace Gravel deposits and Alluvium. Some quarrying indicated on 4th Ed OS map.</p> <p><i>Formal archaeological works may be required subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>																										

MX29	Sevenoaks Community Centre, Otford Road, Sevenoaks	25 homes plus Community Employment	UC	Highways and Transportation	<p>KCC Highways Comments - Development of this scale would not be likely to lead to any significant impact on capacity. Use of existing access.</p> <p>Transport Assessment</p> <p>Access - Existing access off Cramptons Road. Score - A Capacity - No issues likely Score - A Sustainability - Close to Bat & Ball Station. Bus services available. Reasonable pedestrian / cycle facilities. Score - A</p>																										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for post medieval archaeological remains associated with varied use of the site since the mid-19th century. Buildings seem to range from farm outbuildings, terrace of dwellings and industrial buildings.</p> <p><i>Formal archaeological works may be required subject to details.</i></p>																										

					Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.																										
HO86	Chaucers of Sevenoaks, London Road, Dunton Green	9	BF	Highways and Transportation	<p>KCC Highways Comments - No particular concerns subject to level of development proposed.</p> <p>Transport Assessment</p> <p>Access - Existing access onto London Road. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Pedestrian and cycle routes available from site to local centre Dunton Green. Bus stops within close proximity of the site. Score - B</p>																										
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				Heritage and Conservation	Preliminary Heritage Assessment - Potential for remains associated with post medieval activity around Great Dunton Farm and along major routeway of London Road.																										

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MX43	Sevenoaks Quarry, Bat and Ball Road, Sevenoaks	600 Community Leisure Open space	BF/EC	Highways and Transportation	<p>Documents included 02/08/18 - Sevenoaks Quarry Northern Sevenoaks Extension Report - 28 March 2018 Documents Required - Transport Assessment was received 10/08/18 - to be reviewed.</p> <p>KCC Highways Comments - 800 homes. The development of this area has the advantage of being brownfield land and whilst pedestrian and cycle links could be provided into Sevenoaks and public transport provision is available at Bat and Ball and Dunton Green there are concerns regarding sustainability and congestion. The land is some distance from Sevenoaks Centre (some 3km) and this is likely to lead to additional congestion. The existing junction of the A225 and A25 at Bat and Ball junction is notoriously busy and already suffers from congestion, queues and delays. New road links and or improvements to key junctions are not obvious. Further comments cannot be made until Transport Assessment provided - David Tucker Associates to produce. Bat & Ball junction traffic signals and Greatness Lane / Seal Road junction particularly.</p> <p>Transport Assessment</p> <p>Access - Existing roads may be suitable provided traffic generation is well spread. However local junctions may require attention or difficult to improve. Several existing access points available. Score - A Capacity - Full TA required to assess. Score - C Sustainability - Primary schools 2km away. Other facilities within 800m. Score - B</p> <p>Conclusion - Await full TA before full assessment can be made</p>																										
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				SUDS	<p>It is assumed that this site would contribute to a tributary of the River Darent given underlying geology for portions of the site; therefore any connection below the railway will need confirmation/investigation.</p> <p>Water quality will need protection with incorporation of a lake system.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Multi period archaeology has been located within this site as part of formal archaeological works for the quarry.</p> <p><i>Formal archaeological works required, subject to details of extent and depth of extraction</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
MX49	Land west of Chevening Road, Chipstead	30 plus Community Open space	EC	Highways and Transportation	<p>Documents included 02/08/18 - MX49 Documents Required - Transport Statement</p> <p>KCC Highways Comments - Pre-application advice provided on masterplan for circa 30 dwellings, with recreation ground and public car park for 30 cars. Off site highway works - pedestrian crossing. Please see separate tab for full response.</p> <p>Transport Assessment</p> <p>Access - New access proposed to the north of the existing access. Providing access for dwellings and 30 space community car park. Visibility issues due to retained hedge. Request for 43mx2mx0.6m. Score - B</p> <p>Capacity - Development of this scale would not be likely to lead to any significant impact on capacity. Score - A</p> <p>Sustainability - The site is located within close proximity to Chipstead centre, and local buses Score - B</p> <p>A new zebra crossing is proposed to the north of the site, with pedestrian linkages from the community car park, and a footway through the congre green from the pedestrian footway at the site access. A pedestrian refuge point is proposed on the crossing at the point closest to the site. This is to enhanced visibility for pedestrians in light of the retained hedge along the Chevening Road boundary. The pedestrian crossing would be acceptable principle. The details would need to be determined with KCC Agreements Team through a Section 278 Agreement.</p> <p>A streetlight is proposed at the crossing, which will need agreement with KCC Streetlighting. The closest streetlight is outside Boot Lodge, opposite northern boundary of the site. Therefore, it may be considered appropriate to introduce an additional streetlight, especially given the introduction of and pedestrian crossing.</p> <p>Conclusion</p>

				<p>In principle, the proposal for a mixed-use scheme of residential dwellings, community green and community car park would be acceptable in terms of capacity. The number of residential dwellings proposed would not be likely to lead to any significant impact on the local and strategic network. The community car park would meet a need of providing car parking for parents, thus providing some relief to the congestion of Chevening Road during peak hours.</p> <p>The main concern remains the visibility from the proposed access. As noted above, it is suggested that the hedge is reduced to 0.6 metres in height if possible. The visibility could be conditioned as part of any planning approval.</p>																										
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			SUDS	<p>Though the site is not within an area of flood risk it is traversed by a possible overland flow path. There are no surface water sewers within the vicinity. The underlying geology is unlikely to be feasible for infiltration. It is assumed that surface water will be discharged to the ordinary watercourse on the southern boundary.</p> <p>Space for attenuation of surface water will need to be included within the layout. This may impact number of dwellings to be delivered and needs due consideration.</p>																										

					The overland flow path will need to be assessed and avoided if needed. (Note we normally recommend that housing is located outside of medium to high areas at risk of surface water flooding, but this instance may be associated with ground levels alone.)																										
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains due to location close to River Terrace Gravels and for post medieval to modern remains associated with the late 19th century or earlier Froghole Farm. There is some potential for as yet unknown archaeology.</p> <p><i>Formal programme of archaeological works required subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																										
MX50	Land rear of the Village Hall, London Road, Dunton Green	240 plus Community Infrastructure	EC	Highways and Transportation	<p>Documents included 02/08/18</p> <p>Documents Required - Transport Assessment</p> <p>KCC Highways Comments - New access on to London Road. Emergency access required? Capacity assessment to be submitted. Appendix 2 Access Strategy not shown.</p> <p>Transport Assessment</p> <p>Access - Access directly onto A224 London Road. Junction type needing assessment (possible mini-roundabout). Emergency access reqd. - possible combined with cycle / pedestrian access off London Road further south.</p> <p>Score - B</p> <p>Capacity - Unlikely to cause capacity problems on network given only 250 houses.</p> <p>Score - A</p> <p>Sustainability - Capacity of Dunton Green Primary School. All criteria met.</p> <p>Score - A</p> <p>Conclusion -Await TA for further assessment</p>																										
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				SUDS	<p>There are no surface water sewers within the vicinity. The underlying geology is unlikely to be feasible for infiltration. It is assumed that surface water flows easterly to be discharged through a possible culvert below the railway embankment.</p> <p>The capacity and condition of the existing culvert will need further investigation.</p> <p>Space for attenuation of surface water will need to be included within the layout; though this may already have been addressed through the parameter plan provided. It is important that SuDS are integrated into any landscape proposal.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains especially Iron Age archaeology. Some potential for multi period activity.</p> <p><i>Formal programme of archaeological works required subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
Swanley					
				Education Secondary	<p>Swanley, Hextable & Hartley</p> <p>A new 8FE secondary school will be needed for the students generated by the housing developments being proposed in the northern half of the district.</p> <p>Due to the distances involved, it would be sensible to site the new school in the Pedham Place development as it lies half way between Hartley and Swanley/Hextable as well as good transport links from the A20.</p> <p>With the amount of housing development being proposed in this Draft Local Plan, without a new 8FE school, KCC would have difficulty supporting housing development in the Swanley, Hextable, Pedham Place and Hartley areas.</p>
HO197	Land rear of West View Road, Swanley	25	UC	Highways and Transportation	<p>KCC Highways Comments - New access required.</p> <p>Transport Assessment</p> <p>Access - Existing "track" unsuitable width. Needs widening. Score - C Capacity - West View Road suitable for likely generation. Score - A Sustainability - Facilities / public transport available nearby. Score - A</p>
				Education Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p>

				<p>HO106 9 dwellings HO212 19 dwellings HO224 124 dwellings HO225 127 dwellings HO58 16 dwellings HO73 15 dwellings (est from DPH) HO10 12 dwellings (est from DPH) HO197 25 dwellings HO198 22 dwellings HO202 7 dwellings HO222 26 dwellings HO274 24 dwellings HO298 13 dwellings (est from DPH) HO357 12 dwellings (est from DPH) HO4 71 dwellings MX32 5 dwellings MX54a/b450 750 dwellings MX56 80 dwellings MX9 16 dwellings HO124 47 dwellings (est from DPH) HO97 30 dwellings (est from DPH)</p> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>	
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains based on proximity of Mesolithic and Neolithic findspots to north west and site is within a narrow valley with Head and River Terrace Gravels.</p> <p><i>Formal programme of archaeological works required, subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p>	
HO198	The Woodlands, Hilda May Avenue, Swanley	22	UC	Highways and Transportation	<p>KCC Highways Comments - Existing access may need widening</p> <p>Transport Assessment</p> <p>Access - Existing access but may be too narrow for 22 houses. Score - B</p>

				<p>Capacity - Low traffic generation unlikely to cause problems Score - A Sustainability - Facilities within walking distance Score - A</p>																																										
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for archaeology associated with the later 19th century phase of White Oak School and Kettlewell Convalescent Home.</p> <p>Predetermination <i>Heritage Statement and Archaeological, Historic building and Historic landscape assessment needed to support any</i></p>																																										

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HO202	Land adjacent to 23 Russett Way, Swanley	7	UC	Highways and Transportation	<p>KCC Highways Comments - Direct access to Russett Way</p> <p>Transport Assessment</p> <p>Access - Direct frontage to suitable road Score - A Capacity - V low traffic generation. No problem Score - A Sustainability - Some facilities nearby Score - B</p>																																										
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HO274	Land between 16 and 32 Alder Way, Swanley	24	UC	Highways and Transportation	<p>KCC Highways Comments - Retain or divert public right of way</p> <p>Transport Assessment</p> <p>Access - New access off Alder way possible Score - B Capacity - Traffic generation unlikely to create congestion issues. Score - A Sustainability - Primary school within 500m. Bus services nearby. Otherwise Swanley centre Score - B</p>																																										
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MX56	White Oak Leisure Centre, Hilda May Avenue, Swanley (as part of a leisure centre replacement programme)	80 Leisure	UC	Highways and Transportation	<p>KCC Highways Comments - Transport Statement required. Emergency access required</p> <p>Transport Assessment</p> <p>Access - Existing access but may need improvement. Junction of Hilda May Avenue with London Road would need assessing. Score - B</p> <p>Capacity - Should be acceptable although Hida May Avenue / London Road junction capacity would need assessing. Score - A</p> <p>Sustainability -Bus services available nearby. Good pedestrian /cycle access to town centre. Swanley station within 1 km. Score - A</p>																																										
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Site contains designated heritage asset The Manor House. Potential for remains associated with post medieval to modern farm complex identifiable as North Ash on 1st Ed OS map. Main house is an early 19th century Grade II listed building and it was surrounded by outbuildings, formal gardens and historic landscape. North Ash farm is identified as being of historic interest in Historic Farmstead Survey (HE).</p> <p><i>Heritage Statement, including a historic building, historic landscape and archaeological assessments required to inform any application.</i></p> <p><i>Formal historic building, historic landscape and archaeological works required, subject to details.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>																					
HO4	Harringtons Nursery, Highlands Hill, Swanley	71	BF	Highways and Transportation	<p>KCC Highways Comments - Will create increase traffic movements at the five wents junction. At over 50 units a secondary emergency access would be required. Transport Statement required.</p> <p>Transport Assessment</p> <p>Access - Existing access available but may require improvement Score - A Capacity - Transport Statement needs to assess Five Wents junction Score - A Sustainability - Some local facilities but reliant on car Score - B</p>																				
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains in view of location on River Terrace Gravels and within a valley system. Stray metal finds to the south might indicate prehistoric and Roman activity. Some horticultural heritage interest given the presence of greenhouses on 4th Ed OS map</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO10	Old Forge Yard, Swanley Village Road, Swanley	TBC*	BF	Highways and Transportation	<p>KCC Highways Comments - New access required</p> <p>Transport Assessment</p> <p>Access - Hotham Close possible? Off School lane Score – C Capacity - Low traffic generation Score - A Sustainability - Primary school. Otherwise Swanley town centre Score – B</p>
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Broad potential for post medieval remains associated with Red Lion PH, identifiable on 1st Ed OS, and nearby settlement activity.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval</p>
HO222	Former Birchwood Primary School, Russett Way, Swanley	26	BF	<p>Highways and Transportation</p> <p>KCC Highways Comments - Existing access off Russett Way and / or new access off Leydenhatch Lane</p> <p>Transport Assessment</p> <p>Access - Suitable accesses. 2 access would distribute traffic Score - A Capacity - No likely issues Score - A Sustainability - Primary school & GP > 800m Score - B</p>

				Education Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO106 9 dwellings HO212 19 dwellings HO224 124 dwellings HO225 127 dwellings HO58 16 dwellings HO73 15 dwellings (est from DPH) HO10 12 dwellings (est from DPH) HO197 25 dwellings HO198 22 dwellings HO202 7 dwellings HO222 26 dwellings HO274 24 dwellings HO298 13 dwellings (est from DPH) HO357 12 dwellings (est from DPH) HO4 71 dwellings MX32 5 dwellings MX54a/b450 750 dwellings MX56 80 dwellings MX9 16 dwellings HO124 47 dwellings (est from DPH) HO97 30 dwellings (est from DPH)</p> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for as yet unidentified archaeology</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO298	Land rear of Cedar Lodge, Wood Street, Swanley Village	TBC*	BF	Highways and Transportation	<p>KCC Highways Comments - Button Street narrow and might need improvement. Junction with Wood Street may require visibility improvements which could require additional land</p> <p>Transport Assessment</p> <p>Access - New access off Button Street. Visibility issues.</p>

				<p>Score - B Capacity - Local roads narrow with poor visibility Score - B Sustainability - Poor access to facilities. Score – C</p>																																										
			Education Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr><td>HO106</td><td>9 dwellings</td></tr> <tr><td>HO212</td><td>19 dwellings</td></tr> <tr><td>HO224</td><td>124 dwellings</td></tr> <tr><td>HO225</td><td>127 dwellings</td></tr> <tr><td>HO58</td><td>16 dwellings</td></tr> <tr><td>HO73</td><td>15 dwellings (est from DPH)</td></tr> <tr><td>HO10</td><td>12 dwellings (est from DPH)</td></tr> <tr><td>HO197</td><td>25 dwellings</td></tr> <tr><td>HO198</td><td>22 dwellings</td></tr> <tr><td>HO202</td><td>7 dwellings</td></tr> <tr><td>HO222</td><td>26 dwellings</td></tr> <tr><td>HO274</td><td>24 dwellings</td></tr> <tr><td>HO298</td><td>13 dwellings (est from DPH)</td></tr> <tr><td>HO357</td><td>12 dwellings (est from DPH)</td></tr> <tr><td>HO4</td><td>71 dwellings</td></tr> <tr><td>MX32</td><td>5 dwellings</td></tr> <tr><td>MX54a/b450</td><td>750 dwellings</td></tr> <tr><td>MX56</td><td>80 dwellings</td></tr> <tr><td>MX9</td><td>16 dwellings</td></tr> <tr><td>HO124</td><td>47 dwellings (est from DPH)</td></tr> <tr><td>HO97</td><td>30 dwellings (est from DPH)</td></tr> </table> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>	HO106	9 dwellings	HO212	19 dwellings	HO224	124 dwellings	HO225	127 dwellings	HO58	16 dwellings	HO73	15 dwellings (est from DPH)	HO10	12 dwellings (est from DPH)	HO197	25 dwellings	HO198	22 dwellings	HO202	7 dwellings	HO222	26 dwellings	HO274	24 dwellings	HO298	13 dwellings (est from DPH)	HO357	12 dwellings (est from DPH)	HO4	71 dwellings	MX32	5 dwellings	MX54a/b450	750 dwellings	MX56	80 dwellings	MX9	16 dwellings	HO124	47 dwellings (est from DPH)	HO97	30 dwellings (est from DPH)
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for prehistoric remains based on site's location within a valley.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>																																										

HO357	Swanley Village Nursery, Swanley Village Road, Swanley Village	TBC*	BF	Highways and Transportation	<p>KCC Highways Comments - Swanley Village Road narrow with poor forward visibility. Existing access would need improvement, especially visibility.</p> <p>Transport Assessment</p> <p>Access - Existing access would need improvement Score - B Capacity - Swanley Village Road narrow with poor forward visibility. Traffic generation low however. Score - B Sustainability - Within 800m of primary school but otherwise poor accessibility Score - B</p>																																										
				Education - Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table data-bbox="1003 688 1537 1348"> <tr><td>HO106</td><td>9 dwellings</td></tr> <tr><td>HO212</td><td>19 dwellings</td></tr> <tr><td>HO224</td><td>124 dwellings</td></tr> <tr><td>HO225</td><td>127 dwellings</td></tr> <tr><td>HO58</td><td>16 dwellings</td></tr> <tr><td>HO73</td><td>15 dwellings (est from DPH)</td></tr> <tr><td>HO10</td><td>12 dwellings (est from DPH)</td></tr> <tr><td>HO197</td><td>25 dwellings</td></tr> <tr><td>HO198</td><td>22 dwellings</td></tr> <tr><td>HO202</td><td>7 dwellings</td></tr> <tr><td>HO222</td><td>26 dwellings</td></tr> <tr><td>HO274</td><td>24 dwellings</td></tr> <tr><td>HO298</td><td>13 dwellings (est from DPH)</td></tr> <tr><td>HO357</td><td>12 dwellings (est from DPH)</td></tr> <tr><td>HO4</td><td>71 dwellings</td></tr> <tr><td>MX32</td><td>5 dwellings</td></tr> <tr><td>MX54a/b450</td><td>750 dwellings</td></tr> <tr><td>MX56</td><td>80 dwellings</td></tr> <tr><td>MX9</td><td>16 dwellings</td></tr> <tr><td>HO124</td><td>47 dwellings (est from DPH)</td></tr> <tr><td>HO97</td><td>30 dwellings (est from DPH)</td></tr> </table> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p>	HO106	9 dwellings	HO212	19 dwellings	HO224	124 dwellings	HO225	127 dwellings	HO58	16 dwellings	HO73	15 dwellings (est from DPH)	HO10	12 dwellings (est from DPH)	HO197	25 dwellings	HO198	22 dwellings	HO202	7 dwellings	HO222	26 dwellings	HO274	24 dwellings	HO298	13 dwellings (est from DPH)	HO357	12 dwellings (est from DPH)	HO4	71 dwellings	MX32	5 dwellings	MX54a/b450	750 dwellings	MX56	80 dwellings	MX9	16 dwellings	HO124	47 dwellings (est from DPH)	HO97	30 dwellings (est from DPH)
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for post medieval and later remains associated with The Old Place, a 19th century establishment and the nearby horticultural complex. Potential horticultural outbuildings identifiable on the 3rd Ed OS map on the site.</p> <p><i>Some historic building and archaeological work may be required subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																																										
MX9	Upper Hockenden Farm, Hockenden Lane, Swanley	16 Employment	BF	Highways and Transportation	<p>KCC Highways Comments - None</p> <p>Transport Assessment</p> <p>Access - Existing access off Hockenden Lane requires improvement / improved visibility. Existing junction of Hockenden Lane with London Road probably adequate for number of units proposed Score - B</p> <p>Capacity - Junction of Hockenden Lane / London Road needs checking. Score - B</p> <p>Sustainability - Edge of town with some bus services into town / Bromley. Pedestrian / cycle access along Hockenden Lane needs improvement. Score - B</p>																																										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for post medieval remains associated with the development of Upper Hockenden farm, a historic farm complex identified in the Historic Farmstead Survey (HE). The complex did contain main farmhouse and several outbuildings which may still survive. Part of the complex to the north included some hop pickers' huts.</p> <p><i>Heritage Statement and historic building assessment required to support any application.</i></p> <p><i>Formal programme of historic building, historic landscape and archaeological works may be required subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																																
MX32	Pembroke Business Centre and Pembroke House, College Road, Swanley	5 Employment	BF	Highways and Transportation	<p>KCC Highways Comments - None</p> <p>Transport Assessment</p> <p>Access -Existing access may require minor improvement / visibility improvements. Score - A Capacity - No issues depending on intensity of employment use Score - A Sustainability -Poor sustainably transport locally Score - C</p>																																
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for historic remains associated with Hextable College of Horticulture. Site may contain remains of greenhouses and Pembroke House associated with early 20th century extension of college.</p> <p><i>Heritage Statement, including historic buildings assessment, required to inform any application.</i></p> <p><i>Formal programme of historic building, historic landscape and archaeological works may be required subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
MX48	Land at Pedham Place	2500 plus Employment Retail Infrastructure Leisure Open space	EC	Highways and Transportation	<p>Documents included 02/08/18 -Pedham Place Swanley - Location Plan , Pedham Place proposals Documents Required - Transport Assessment Modelling required.</p> <p>KCC Highways Comments - A development of this scale requires a transport assessment to assess the impact of the development on the existing highway, access arrangements, public transport facilities and measures to encourage and promote cycling and walking. The site is located close to the strategic highway network and therefore Highways England should be consulted. Accessibility between the site and Swanley Centre is likely to be a problem especially for walking and cycling.</p> <p>Transport Assessment</p> <p>Access - Transport Assessment required to inform of access arrangements Score - B Capacity - Close to strategic highway but a development of this scale requires a transport Assessment and modelling to identify where mitigating measures are required. Score - B Sustainability - Access to Swanley Centre and rail difficult for pedestrians and cyclists. Score - C</p>

					<p>Conclusion - Transport Assessment required to inform of access arrangements. Close to strategic highway but a development of this scale requires a transport Assessment and modelling to identify where mitigating measures are required. Access to Swanley Centre and rail difficult for pedestrians and cyclists.</p>																						
				Education Primary	<p>Sevenoaks Rural North Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr><td>MX48</td><td>2500 dwellings</td></tr> <tr><td>HO315</td><td>55 dwellings</td></tr> <tr><td>HO326</td><td>35 dwellings</td></tr> <tr><td>HO127</td><td>9 dwellings</td></tr> <tr><td>HO346</td><td>42 dwellings</td></tr> <tr><td>HO354</td><td>4 dwellings (est from DPH)</td></tr> <tr><td>HO129</td><td>18 dwellings (est from DPH)</td></tr> <tr><td>HO272</td><td>16 dwellings</td></tr> <tr><td>HO35</td><td>25 dwellings</td></tr> <tr><td>HO77</td><td>41 dwellings</td></tr> <tr><td>HO78</td><td>10 dwellings</td></tr> </table> <p>Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.</p> <p>The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.</p> <p>KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.</p>	MX48	2500 dwellings	HO315	55 dwellings	HO326	35 dwellings	HO127	9 dwellings	HO346	42 dwellings	HO354	4 dwellings (est from DPH)	HO129	18 dwellings (est from DPH)	HO272	16 dwellings	HO35	25 dwellings	HO77	41 dwellings	HO78	10 dwellings
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				SUDS	<p>From a desk review, it is not clear where the discharge destination for any surface water generated from the development would be directed. There are no surface water sewers within the vicinity.</p> <p>Though the underlying geology is suitable for infiltration, the landfilling activities may limit areas where infiltration is permissible (in general infiltration is not permitted in areas of made ground).</p> <p>It will be extremely important to obtain ground investigation early in the development planning to inform masterplanning on this site</p>																						
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Multi period archaeology has been located within this site as part of formal archaeological works for the quarry.</p> <p><i>Formal archaeological works required, subject to details of extent and depth of extraction</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																						
MX54a	Land between Beechenlea Lane and the railway line,	400 (already included in MX54b) Community Infrastructure	EC	Highways and Transportation	<p>Documents included 02/08/18 - Land East of Swanley Option 1 , SK1-15 Land East of Swanley Option 2 , SK1-16 Land East of Swanley Option 3 , SK1-17 Land East of Swanley Option 4 , SK1-18 Land East of Swanley Option 4a , SK1-19 Land East of Swanley Option 4b , SK1-20 Land East of Swanley Option 5 , SK1-23 Land East of Swanley revision A</p> <p>Documents Required - Transport Assessment Modelling required.</p>																						

	Swanley	Open space		<p>KCC Highways Comments - Options for the Cooper Estates Strategic Land to the west of Beechenlea Lane. I have looked at the proposals shown in Options 1 and 2 and have made the following comments:</p> <p>In both Options there is only one access and this is from Highlands Hill to the north. This is a problem as a development of over 300 homes requires at least two points of access. This is accordance with Kent Design. KCC Highways would be likely to raise objection to a development of over 300 homes served from a single access.</p> <p>New Barn Road and Leyden Hatch Lane are constrained in terms of width and not suited to any significant intensification of traffic.</p> <p>Traffic will therefore be distributed via the B258 Swanley Lane. This will lead to additional congestion and delays in Swanley Centre and contributions and mitigating measures will be required together with improvements to the Swanley Lane B258/Highlands Hill junction.</p> <p>The proposed road bridge over the railway line will require agreement with Network Rail. The bridge once completed would be owned and maintained by KCC Highways and a commuted sum would be required for the future maintenance of the bridge. The bridge would be designed to Eurocode loading standards with safety barriers provided a minimum of 30m in advance of the parapet.</p> <p>The Park and Ride site shows a new access off Beechenlea Lane, however the pinch point to the south of the access is not suitable for the intensification of use by buses and cars to access the site. Also a park and ride site at this location will only be viable if a fast and frequent bus service is provided with journey time improvements when compared to car journeys. Pricing should also be considered as presently the parking in Swanley town centre is readily available for no or low cost.</p> <p>A new access is shown to the east of the site from Beechenlea Lane south of the railway bridge. Beechenlea Lane is narrow and not suited to any significant intensification of traffic flows and the railway bridge is weak with a weight limit.</p> <p><u>Transport Assessment</u></p> <p>Access - Options 1 to 4 Score - C Capacity - Options 1 to 4 Score - C Sustainability - Options 1 to 4 Score - B</p>																																				
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains in view of location within a valley system and presence of River Terrace Gravels on site. Mesolithic and Neolithic flint findspots are close to or within the site as well as findspots of Bronze Age and Roman date.</p> <p><i>Heritage Statement required to support any application.</i> <i>Formal archaeological works, including geoarchaeological work, required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
MX54b	Land between Beechenlea Lane and Highlands Hill, Swanley	750 Community Infrastructure Open space	EC Highways and Transportation	<p>Documents included 02/08/18 - MW54a & MX54b Documents Required - Transport Assessment Modelling required.</p> <p>KCC Highways Comments - Options for the Cooper Estates Strategic Land to the west of Beechenlea Lane. I have looked at the proposals shown in Options 1 and 2 and have made the following comments:</p> <p>In both Options there is only one access and this is from Highlands Hill to the north. This is a problem as a development of over 300 homes requires at least two points of access. This is accordance with Kent Design. KCC Highways would be likely to raise objection to a development of over 300 homes served from a single access.</p> <p>New Barn Road and Leyden Hatch Lane are constrained in terms of width and not suited to any significant intensification of traffic.</p> <p>Traffic will therefore be distributed via the B258 Swanley Lane. This will lead to additional congestion and delays in Swanley Centre and</p>

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Edenbridge					
				Education Secondary	<p>- Many people from Edenbridge have wanted a secondary school since the closure of Eden Valley School in 2002. KCC offers no opposition to this aspiration, but any new school must be viable. The existing secondary demand, added to the additional demand created if ALL the Edenbridge sites are developed would still only create about 4FE. This is because many Edenbridge students would still prefer to attend Grammar or faith schools in Tonbridge or Tunbridge Wells.</p> <p>A point of support would be available if the school was located in the north of the town, so making it more accessible for students from Westerham.</p> <p>A 4FE secondary school in Edenbridge could be vulnerable financially, but if such a school can be proven to be part of the whole secondary solution for Sevenoaks, KCC would of course, give it serious consideration.</p>
HO210	Open space at Stangrove Estate, Crouch House Road, Edenbridge	15	UC	Highways	<p>KCC Highways Comments - Very few properties within the Stangrove Estate benefit from off street parking. Parking can be haphazard causing a hazard to other highway users, including pedestrians. Parcel 1 - Open space bound by railway line to the north and Cedar Drive to the south. Parcel 2 - Open space between Cedar Drive and existing residential dwellings. Parcel 3 - Open space bound by Park Avenue to the south and east. Parcel 4 - Existing local corner shop. Parcel 5 - Open space bound by Park View Close to the south and playground to the north. Parcel 6 - Open space bound by Park Grove to the east and Chestnut Grove to the north.</p> <p>Transport Assessment</p> <p>Access - Stangrove Estate is a very tightly bound estate with very little off street parking. Access to properties would likely to lead to conflicts</p>

					<p>within the estate. On street parking would not be supported due to the already congested nature of the estate. Score - C Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - A Close proximity to Edenbridge and Edenbridge Town railway station. Score - A</p>														
				Education Primary	<p>- Edenbridge Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr> <td>HO189, HO190, HO223, MX25 & MX26</td> <td>515 dwellings</td> </tr> <tr> <td>MX10</td> <td>450 dwellings</td> </tr> <tr> <td>MX51</td> <td>250 dwellings</td> </tr> <tr> <td>HO210</td> <td>15 dwellings</td> </tr> <tr> <td>HO364</td> <td>31 dwellings (est based on DPH)</td> </tr> <tr> <td>HO379</td> <td>5 dwellings</td> </tr> <tr> <td>MX44</td> <td>80 dwellings</td> </tr> </table> <p>Up to 1346 new dwellings would generate 377 primary pupils. This equates to 1.8 FE of primary provision.</p> <p>There is currently sufficient capacity at Edenbridge Primary School to accommodate about 100-150 additional primary pupils across all seven-year groups. If all options are progressed, an additional 1FE would be required.</p> <p>Edenbridge Primary School was enlarged two years ago and cannot be enlarged again. The two other primary schools in the planning area (Four Elms PS and Hever CE PS) have small sites and do not lend themselves to enlargement. If the demand increases beyond that forecast, Edenbridge Town will need a new 1FE Primary school built in or near the town.</p> <p>KCC would prefer, due to the size of any combination of HO189, HO190, HO223, MX25, MX26, MX10 or MX51 development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the Edenbridge developments, as has become practice in other developments of this or similar size.</p>	HO189, HO190, HO223, MX25 & MX26	515 dwellings	MX10	450 dwellings	MX51	250 dwellings	HO210	15 dwellings	HO364	31 dwellings (est based on DPH)	HO379	5 dwellings	MX44	80 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>														
HO364	Edenbridge & District War Memorial Hospital, Mill Hill, Edenbridge	TBC*	UC	Highways	<p>KCC Highways Comments - Existing parking available to the rear of the site. Bus stop on site.</p> <p>Transport Assessment</p> <p>Access - Utilise existing access from Mill Hill. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - A Site is located due south of Edenbridge town centre. Walking distance to centre and train stations. Bus stops on Mill Hill and current bus stop on site. Score - A</p>														
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for Roman remains associated with use of routeway on the alignment of Mill Hill and roman coin found to the north. Potential for post medieval and later remains associated with Blossoms Farm, identified on Historic Farmstead Survey (HE) and Blossoms Park. War Memorial Hospital identifiable on 4th Ed OS map.</p> <p>Heritage Statement, including a historic building assessment, required to support any application.</p> <p><i>Formal historic building, historic landscape and archaeological work may be required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO379	Kent & Surrey Driving Range, Crouch House Road, Edenbridge	5	BF	Highways	<p>KCC Highways Comments - New access required onto Crouch House Road.</p> <p>Transport Assessment</p> <p>Access - New access will be required onto Crouch House Road. Visibility may be constrained by exiting hedges / trees and railway bridge. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Site is located to the western edge of Edenbridge settlement boundary. Bus stops located immediately adjacent to the site on Crouch House Road. Score - A</p>
				Education Primary	<p>Edenbridge Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO189, HO190, HO223, MX25 & MX26 515 dwellings MX10 450 dwellings MX51 250 dwellings HO210 15 dwellings HO364 31 dwellings (est based on DPH) HO379 5 dwellings</p>

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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for as yet unknown archaeology.</p> <p><i>Programme of formal archaeological works may be required subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO189	Land south of Skinners Lane, Edenbridge	265	EC	Highways and Transportation	<p>Documents included 02/08/18 -FN46 WSP Transport Technical Note Edenbridge</p> <p>Documents Required - Transport Assessment with Travel Plans for each of the proposed uses.</p> <p>KCC Highways Comments - HO189 & HO190 - Approximately 265 dwellings. Pedestrian Home Zones. New 'T' Junction onto Four Elms Road, new vehicular access to some housing via new roundabout onto Four Elms Road, further north. Pedestrian and cycle connectivity.</p> <p>Transport Assessment</p> <p>Access - Main residential accessed via new priority controlled T-junction off B2027 Four Elms Road. Visibility splays 2.4mx120m. Medical Centre / school and residential accessed via new four arm roundabout junction with Wayside Drive.</p> <p>Score - B</p> <p>Capacity - Circa 300 dwellings, plus 600-900 pupil secondary school, plus medical centre. Trip rates have been assessed, including scheme for 300 dwellings at St John Way / Enterprise Way (14/03783/OUT). AM & PM peaks. Surveys undertaken at four junctions - Four Elms Road / Wayside Drive, Station Road / Four Elms Road, Station Road / St Johns Way / Commerce Way, Station Road / Enterprise Way</p> <p>Score - B</p> <p>Sustainability - Within close proximity to Edenbridge town centre.</p> <p>Score - A</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - General potential for prehistoric and roman, especially with Roman Road being on an alignment of a Roman routeway. A post medieval agricultural building is identifiable towards the southern land parcels.</p> <p><i>Formal programme of archaeological works required, subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO190	Land north of Skinners Lane, Edenbridge	50	EC	Highways and Transportation	<p>Documents included 02/08/18 -FN46 WSP Transport Technical Note Edenbridge Documents Required - Transport Assessment with Travel Plans for each of the proposed uses.</p> <p>KCC Highways Comments - HO189 & HO190 - Approximately 265 dwellings. Pedestrian Home Zones. New 'T' Junction onto Four Elms Road, new vehicular access to some housing via new roundabout onto Four Elms Road, further north. Pedestrian and cycle connectivity.</p> <p>Transport Assessment</p> <p>Access - Main residential accessed via new priority controlled T-junction off B2027 Four Elms Road. Visibility splays 2.4mx120m. Medical Centre / school and residential accessed via new four arm roundabout junction with Wayside Drive.</p> <p>Score - B</p> <p>Capacity - Circa 300 dwellings, plus 600-900 pupil secondary school, plus medical centre. Trip rates have been assessed, including scheme for 300 dwellings at St John Way / Enterprise Way (14/03783/OUT). AM & PM peaks. Surveys undertaken at four junctions - Four Elms Road / Wayside Drive, Station Road / Four Elms Road, Station Road / St Johns Way / Commerce Way, Station Road / Enterprise Way</p> <p>Score - B</p> <p>Sustainability - Within close proximity to Edenbridge town centre.</p> <p>Score - A</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>
				Education	- Edenbridge Planning Area

				Primary	<p><i>Development sites that impact on this planning area:</i></p> <p>HO189, HO190, HO223, MX25 & MX26 515 dwellings MX10 450 dwellings MX51 250 dwellings HO210 15 dwellings HO364 31 dwellings (est based on DPH) HO379 5 dwellings MX44 80 dwellings</p> <p>Up to 1346 new dwellings would generate 377 primary pupils. This equates to 1.8 FE of primary provision.</p> <p>There is currently sufficient capacity at Edenbridge Primary School to accommodate about 100-150 additional primary pupils across all seven-year groups. If all options are progressed, an additional 1FE would be required.</p> <p>Edenbridge Primary School was enlarged two years ago and cannot be enlarged again. The two other primary schools in the planning area (Four Elms PS and Hever CE PS) have small sites and do not lend themselves to enlargement. If the demand increases beyond that forecast, Edenbridge Town will need a new 1FE Primary school built in or near the town.</p> <p>KCC would prefer, due to the size of any combination of HO189, HO190, HO223, MX25, MX26, MX10 or MX51 development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the Edenbridge developments, as has become practice in other developments of this or similar size.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - General potential for prehistoric and roman, especially with Roman Road being on an alignment of a Roman routeway. A post medieval agricultural building is identifiable towards the southern land parcels.</p> <p><i>Formal programme of archaeological works required, subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO223	Land east of Bray Road, Edenbridge	200	EC	Highways and Transportation	<p>Documents included 02/08/18 -FN46 WSP Transport Technical Note Edenbridge Documents Required - Transport Assessment with Travel Plans for each of the proposed uses.</p> <p>KCC Highways Comments - HO223 - Promoted by KCC for residential</p> <p>Transport Assessment</p> <p>Access - Main residential accessed via new priority controlled T-junction off B2027 Four Elms Road. Visibility splays 2.4mx120m. Medical Centre / school and residential accessed via new four arm roundabout junction with Wayside Drive.</p> <p>Score - B</p> <p>Capacity - Circa 300 dwellings, plus 600-900 pupil secondary school, plus medical centre. Trip rates have been assessed, including scheme for 300 dwellings at St John Way / Enterprise Way (14/03783/OUT). AM & PM peaks. Surveys undertaken at four junctions - Four Elms Road / Wayside Drive, Station Road / Four Elms Road, Station Road / St Johns Way / Commerce Way, Station Road / Enterprise Way</p> <p>Score - B</p> <p>Sustainability - Within close proximity to Edenbridge town centre.</p> <p>Score - A</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>

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MX25	Land east of Four Elms Road and north of Skinners Lane, Edenbridge	Health hub	EC	Highways and Transportation	<p>Documents included 02/08/18 -FN46 WSP Transport Technical Note Edenbridge</p> <p>Documents Required - Transport Assessment with Travel Plans for each of the proposed uses.</p> <p>KCC Highways Comments - MX25 - Medical hub incl GP surgery, dental practice, hospital services facilities</p> <p>Transport Assessment</p> <p>Access - Main residential accessed via new priority controlled T-junction off B2027 Four Elms Road. Visibility splays 2.4mx120m. Medical Centre / school and residential accessed via new four arm roundabout junction with Wayside Drive.</p> <p>Score - B</p> <p>Capacity - Circa 300 dwellings, plus 600-900 pupil secondary school, plus medical centre. Trip rates have been assessed, including scheme for 300 dwellings at St John Way / Enterprise Way (14/03783/OUT). AM & PM peaks. Surveys undertaken at four junctions - Four Elms Road / Wayside Drive, Station Road / Four Elms Road, Station Road / St Johns Way / Commerrce Way, Station Road / Enterprise Way</p> <p>Score - B</p> <p>Sustainability - Within close proximity to Edenbridge town centre.</p> <p>Score - A</p>

				<p>Access - Main residential accessed via new priority-controlled T-junction off B2027 Four Elms Road. Visibility splays 2.4mx120m. Medical Centre / school and residential accessed via new four arm roundabout junction with Wayside Drive.</p> <p>Score - B</p> <p>Capacity - Circa 300 dwellings, plus 600-900 pupil secondary school, plus medical centre. Trip rates have been assessed, including scheme for 300 dwellings at St John Way / Enterprise Way (14/03783/OUT). AM & PM peaks. Surveys undertaken at four junctions - Four Elms Road / Wayside Drive, Station Road / Four Elms Road, Station Road / St Johns Way / Commmerce Way, Station Road / Enterprise Way</p> <p>Score - B</p> <p>Sustainability - Within close proximity to Edenbridge town centre.</p> <p>Score - A</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>														
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			SUDS	<p>There is a surface water overland flow path which traverses the site. Given the underlying geology, any surface water generated by the development will need to be attenuated within the site.</p> <p>The overland flow path will need to be assessed and avoided if needed.</p> <p>Space for attenuation of surface water will need to be included within the layout; though this has been considered to some degree in the parameter plan submitted. It is important that SuDS are integrated into the existing drainage network and within any landscape proposal.</p>														

				Heritage and Conservation	<p>Preliminary Heritage Assessment - General potential for prehistoric and roman, especially with Roman Road being on an alignment of a Roman routeway. A post medieval agricultural building is identifiable towards the southern land parcels.</p> <p><i>Formal programme of archaeological works required, subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>														
MX10	Land at Breezehurst Farm, Crouch House Road, Edenbridge	450 Employment Health hub Secondary school	EC	Highways and Transportation	<p>Documents included 02/08/18 -MX10 Documents Required - Transport Assessment</p> <p>KCC Highways Comments - Proposed medical centre to the north of Breezehurst Farm with access approximately 40 metres from where road bend to Little Browns Lane. Potential visibility issues. Second access to the south of mobile home site. Full TA required to enable full assessment.</p> <p>Transport Assessment</p> <p>Access - Two proposed accesses, one to the north of Breezehurst Farm and one to the south of St Brelade's Court mobile homes site. Score - A</p> <p>Capacity - Full TA required to enable capacity to be fully established. Large site constrained by railway line to the north and south. Adjoins already consented application 14/03783/OUT for 300 dwellings which will need to be fully included in capacity assessment. Junction capacity at Enterprise Way / Station Road and St Johns Way / Station Road. Score - B</p> <p>Sustainability - Access to Edenbridge through permitted scheme via Enterprise Way. Two railway stations within walking distance. Score - A</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>														
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				SUDS	<p>The site is traversed by an area of fluvial flood risk and some associated extent of surface water overland flow paths.</p> <p>The areas of flood risk will need to be assessed and avoided. SuDS features should not be located within any area of flood risk. Space for attenuation of surface water will need to be included within the layout.</p>														
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for as yet unknown archaeological remains.</p> <p><i>Formal programme of archaeological remains may be required, subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>														
MX44	Land west of Romani Way, Edenbridge	80 G&T pitches Employment	EC	Highways and Transportation	<p>Documents included 02/08/18 -MX44 only Call for Sites information</p> <p>Documents Required - Transport Statement</p> <p>KCC Highways Comments - Full Transport Statement required before full assessment can be made.</p> <p>Transport Assessment</p> <p>Access - New access could be made off Hever Road</p> <p>Score - B</p> <p>Capacity - Full Transport Statement required. Site located on eastern edge of Edenbridge. Potential capacity on Hever Road. Junction capacity at Hever Road / High Street / Mill Hill may need to be assessed.</p> <p>Score - B</p> <p>Sustainability - Located on the eastern edge of Edenbridge. Pedestrian links limited and would need improving.</p> <p>Score - B</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>														
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				SUDS	<p>From a desk review, it is not clear where the discharge destination for any surface water generated from the development would be directed. There are no surface water sewers within the vicinity.</p> <p>Given the underlying geology, any surface water generated by the development will need to be attenuated within the site. There do not appear to be any ordinary watercourses which would convey surface water from the site.</p> <p>We have concerns as to the discharge destination from this site. This will require assessment. An infrastructure upgrade in sewers in the vicinity of the site may be required.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Multi period archaeology has been located within this site as part of formal archaeological works for the quarry.</p> <p><i>Formal archaeological works required, subject to details of extent and depth of extraction</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
MX51	Land south west of Crouch House Road, Edenbridge	250 Health hub Secondary school	EC	Highways and Transportation	<p>Documents included 02/08/18 -MX51 Documents Required - Transport Assessment</p> <p>KCC Highways Comments - Approximately 250 dwellings, new access required, plus secondary / emergency access. Full Transport Assessment required to assess the impact of proposed junctions</p> <p><u>Transport Assessment</u></p> <p>Access - Two potential access outlined off Crouch House Road. Score - B Capacity - Full TA required to enable capacity to be fully established. Score - B Sustainability - Site is approximately 500 metres due west of Edenbridge High Street. However, Walking access via Crouch House Road, and Stangrove Road. Bus stops located on Crouch House Road. Score - A</p> <p>Conclusion - Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations-providing links between Uckfield/London and Redhill and Tonbridge.</p>

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				SUDS	<p>From a desk review, it is not clear where the discharge destination for any surface water generated from the development would be directed. There are no surface water sewers along Crouch House Road, though a surface water sewer is located in Pine Grove. It appears that the site topography would direct surface water naturally towards the east, towards Crouch House Road rather than to the west where the concept plan locates ponds.</p> <p>Given the underlying geology, any surface water generated by the development will need to be attenuated within the site. There do not appear to be any ordinary watercourses which would convey surface water from the site.</p> <p>KCC has major concerns as to the discharge destination from this site. A major infrastructure upgrade in sewers in the vicinity of the site may be required.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains with proximity of River Terrace Gravels and for Roman remains with a roman road considered to follow the alignment of the High Street and a Roman coin located within the site. The site contains a possible post medieval to modern farm outbuilding or barn identified on the Historic Farmstead survey (HE). Potential for as yet unknown multi-period remains.</p> <p>Some potential for post medieval or earlier land and water management with historic field boundaries and water management systems.</p> <p>Heritage Statement and Archaeological Deskbased Assessment and Historic Landscape Assessment required to support any application.</p> <p>Formal programme of archaeological works required subject to details.</p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
Westerham					
HO46	Land	10	UC	Highways and	KCC Highways Comments - Access to be improved

	between Granville Road and Farleycroft, Westerham			Transportation	<p><u>Transport Assessment</u></p> <p>Access - Existing access may need widening / pedestrian facility. Score - B Capacity - No issues Score - A Sustainability -Within walking distance of town centre / buses etc. Score – A</p>										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for prehistoric remains gives proximity of Iron Age findspot.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval</p>										
HO327	Crockham Hill House, Main Road, Crockham Hill	5	BF	Highways and Transportation	<p>KCC Highways Comments - Direct access off Main Road. Improved junction may be required</p> <p><u>Transport Assessment</u></p> <p>Access - Existing access? - no details available Score - A Capacity - No issues given low number Score - A Sustainability -Few facilities nearby other than primary school Score – B</p>										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for roman remains associated with Roman road following the alignment of Main Road. Crockham Hill House is identifiable on the 1st Ed OS map with associated formal gardens. It is not a designated heritage asset but is a building of local heritage interest.</p> <p><i>Heritage Statement, including a historic building assessment, needed to support any application. Some formal historic building, historic landscape and archaeological works may be required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>										
HO371	Land south of Farley Lane, Westerham	9	EC	Highways and Transportation	<p>Documents included 02/08/18 -HO371 / HO372 / HO373 / HO374</p> <p>Documents Required - Transport Technical Note received and considered.</p> <p>KCC Highways Comments - Technical Information has been provided in respect of the allocation for 600 homes and relief road to Westerham. This indicates that the provision of the relief road and the development would reduce traffic flows along the A25 through Westerham. This would reduce congestion, queues and delays and provide opportunities for the delivery of sustainable transport measures and public realm improvements.</p> <p>Transport Assessment</p> <p>Access - Access to the development would be gained via the relief road.</p> <p>Score - B</p> <p>Capacity - Relief road would improve capacity.</p> <p>Score - A</p> <p>Sustainability - Relief Road would allow opportunities for sustainable travel and public realm improvements.</p> <p>Score - A</p> <p>Conclusion - Access to the development would be gained via the relief road. Relief road would improve capacity and allow opportunities for sustainable travel and public realm improvements.</p>										
				Education Primary	<p>Westerham</p> <p><i>Development sites that impact on this planning area:</i></p> <table border="0"> <tr> <td>HO371, HO372, 373 & HO 374</td> <td>600 dwellings</td> </tr> <tr> <td>HO327</td> <td>5 dwellings</td> </tr> <tr> <td>HO46</td> <td>10 dwellings</td> </tr> <tr> <td>HO336</td> <td>6 dwellings (est from DPH)</td> </tr> <tr> <td>HO342</td> <td>14 dwellings</td> </tr> </table> <p>Up to 635 new dwellings would generate 177 primary pupils. This equates to 0.9FE of primary provision.</p> <p>With sufficient funding, KCC believe that this demand could be accommodated within existing schools, probably by way of an expansion if deemed necessary at the time of these developments coming to fruition.</p>	HO371, HO372, 373 & HO 374	600 dwellings	HO327	5 dwellings	HO46	10 dwellings	HO336	6 dwellings (est from DPH)	HO342	14 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment –Low archaeological potential for as yet unknown remains.</p> <p><i>Formal archaeological works may be required, subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>										

HO372	Land north of Farley Lane, Westerham	59	EC	Highways and Transportation	<p>Documents included 02/08/18 -HO371 / HO372 / HO373 / HO374</p> <p>Documents Required - Transport Assessment</p> <p>KCC Highways Comments - Technical Information has been provided in respect of the allocation for 600 homes and relief road to Westerham. This indicates that the provision of the relief road and the development would reduce traffic flows along the A25 through Westerham. This would reduce congestion, queues and delays and provide opportunities for the delivery of sustainable transport measures and public realm improvements.</p> <p>Transport Assessment</p> <p>Access - Access to the development would be gained via the relief road.</p> <p>Score - B</p> <p>Capacity - Relief road would improve capacity.</p> <p>Score - A</p> <p>Sustainability - Relief Road would allow opportunities for sustainable travel and public realm improvements.</p> <p>Score - A</p> <p>Conclusion - Access to the development would be gained via the relief road. Relief road would improve capacity and allow opportunities for sustainable travel and public realm improvements.</p>										
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				SUDS	<p>The submission for the proposed development recognises the local flooding and drainage issues within the locality and offers inclusion of a strategic provision for the area within the development proposal.</p> <p>The different sites have different underlying geology and infiltration potential. It is assumed that attenuation will be a significant requirement across the sites but this may be included with the strategic provision offered for consideration.</p> <p>Assessment will be required on a strategic level given the spread of the site. Space for attenuation of surface water will need to be included within the layout.</p>										
				Heritage and Conservation	<p>Preliminary Heritage Assessment –: Low potential for remains associated with Green Croft farm identifiable on 2nd Ed OS map;</p> <p><i>Formal archaeological works may be required, subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>										
HO373	Land east of	166	EC	Highways and	Documents included 02/08/18 -HO371 / HO372 / HO373 / HO374										

	Croydon Road, Westerham			Transportation	<p>Documents Required - Transport Assessment</p> <p>KCC Highways Comments - Technical Information has been provided in respect of the allocation for 600 homes and relief road to Westerham. This indicates that the provision of the relief road and the development would reduce traffic flows along the A25 through Westerham. This would reduce congestion, queues and delays and provide opportunities for the delivery of sustainable transport measures and public realm improvements.</p> <p>Transport Assessment</p> <p>Access - Access to the development would be gained via the relief road. Score - B Capacity - Relief road would improve capacity. Score - A Sustainability - Relief Road would allow opportunities for sustainable travel and public realm improvements. Score - A</p> <p>Conclusion - Access to the development would be gained via the relief road. Relief road would improve capacity and allow opportunities for sustainable travel and public realm improvements.</p>										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - potential for as yet unknown multi-period archaeological remains and for remains associated with outbuilding identifiable on 1st Ed OS map: <i>Formal historic building and archaeological works may be required, subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>										
HO374	Land south of Madan Road, Westerham	366	EC	Highways and Transportation	<p>Documents included 02/08/18 -HO371 / HO372 / HO373 / HO374</p> <p>Documents Required - Transport Assessment</p>										

				<p>KCC Highways Comments - Technical Information has been provided in respect of the allocation for 600 homes and relief road to Westerham. This indicates that the provision of the relief road and the development would reduce traffic flows along the A25 through Westerham. This would reduce congestion, queues and delays and provide opportunities for the delivery of sustainable transport measures and public realm improvements.</p> <p>Transport Assessment</p> <p>Access - Access to the development would be gained via the relief road. Score - B Capacity - Relief road would improve capacity. Score - A Sustainability - Relief Road would allow opportunities for sustainable travel and public realm improvements. Score - A</p> <p>Conclusion - Access to the development would be gained via the relief road. Relief road would improve capacity and allow opportunities for sustainable travel and public realm improvements.</p>										
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - potential for as yet unknown multi-period archaeological remains and for remains associated with the Westerham Valley Branch Railway. This local railway was opened in 1881 and closed in 1961. It is a locally important heritage asset and any remains and its alignment should preferably be preserved in situ.</p> <p>Predetermination Deskbased Assessment required and specialist historic landscape and heritage asset assessment of the Westerham Valley Branch Railway. Heritage Enhancement measures for the railway are recommended</p> <p><i>A programme of historic landscape and archaeological works required as well as heritage enhancement measures for the Westerham Valley Branch Railway.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible</p>										

New Ash Green					
HO384	The Forge, Ash Road, Ash	14	UC	Highways	<p>Documents required - Transport Statement</p> <p>KCC Highways comments - The site is accessed via Ash Road which loops around a small area of green space. The existing access could be utilised for future development, avoiding the main Ash Road. Walking distance to New Ash Green village centre, with local bus stops.</p> <p>Transport Assessment</p> <p>Access - Use of existing access Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - The site is within the southern boundary of New Ash Green village. There is no train station. Bus stops are available on Chapel Wood Road & North Ash Road Score - B</p>
				Education Primary	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>MX52 & MX53800 dwellings</i> <i>H051 13 dwellings</i> <i>HO165 31 dwellings</i> <i>HO378 32 dwellings</i> <i>HO353 10 dwellings</i> <i>HO384 14 dwellings</i> <i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
				Heritage and	Preliminary Heritage Assessment - Potential for post medieval remains associated with settlement and smithy.

				Conservation	<p><i>Formal archaeological works may be required subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
MX55	The Manor House, North Ash Road, New Ash Green	TBC* Employment	UC	Highways and Transportation	<p>KCC Highways Comments - Transport Statement required</p> <p>Transport Assessment</p> <p>Access - Existing access off North Ash Road. Improvement to bellmouth and visibility required. Score - B Capacity - No issues likely Score - A Sustainability - Good sustainably transport options available. Nearby school, health centre, local shops. Score - A</p>
				Education - Primary	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>MX52 & MX53 800 dwellings</i></p> <p><i>H051 13 dwellings</i></p> <p><i>H0165 31 dwellings</i></p> <p><i>H0378 32 dwellings</i></p> <p><i>H0353 10 dwellings</i></p> <p><i>H0384 14 dwellings</i></p> <p><i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Site contains designated heritage asset The Manor House. Potential for remains associated with post medieval to modern farm complex identifiable as North Ash on 1st Ed OS map. Main house is an early 19th century Grade II listed building and it</p>

					<p>was surrounded by outbuildings, formal gardens and historic landscape. North Ash farm is identified as being of historic interest in Historic Farmstead Survey (HE).</p> <p><i>Heritage Statement, including a historic building, historic landscape and archaeological assessments required to inform any application.</i></p> <p><i>Formal historic building, historic landscape and archaeological works required, subject to details.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>
Oxford					
HO102	Oxford Builders Merchants, High Street, Oxford	TBC*	UC	Highways	<p>KCC Highways Comments - Access onto High Street could be utilised</p> <p>Transport Assessment</p> <p>Access - Existing access could be utilised Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity of local facilities and High Street. Score - A</p>
				Education Primary -	<p>Sevenoaks East</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO104 15 dwellings HO133 20 dwellings HO340 20 dwellings (est from DPH) HO102 19 dwellings (est from DPH, incl in this planning area for adjacency)</p> <p>Up to 74 new dwellings, generating 20 pupils which could be accommodated in existing provision.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential associated with Oxford Little Park, a medieval and post medieval deer park, and with the later Broughton Farm. Oxford contains evidence of prehistoric and later settlement and there is potential for associated archaeology to survive on site.</p> <p><i>Heritage Statement required to support any application. Formal archaeological works probably required subject to details.</i></p> <p>Scale 3- Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
Hartley					
HO353	Land south of Orchard House, Ash Road, Hartley	10	BF	Highways	<p>KCC Highways Comments - Improvements to access required.</p> <p>Transport Assessment</p> <p>Access - Existing access which could be improved. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Some local facilities available in Hartley Score - A</p>
				Education Primary -	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p>

					<p><i>MX52 & MX53</i> 800 dwellings <i>H051</i> 13 dwellings <i>HO165</i> 31 dwellings <i>HO378</i> 32 dwellings <i>HO353</i> 10 dwellings <i>HO384</i> 14 dwellings <i>MX55</i> 42 dwellings (est based on DPH)</p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for post medieval remains associated with historic farm complex of Hartley House.</p> <p>Some formal archaeological work may be required subject to details.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval</p>
MX52	Land at Corinthians Sports Club, Valley Road, Fawkham/Hartley	570 Employment Health Education Sports	EC	Highways and Transportation	<p>Documents included 02/08/18 -MW52 & MX53 Documents Required - Transport Assessment required</p> <p>KCC Highways Comments - DHA Planning Consultants. Transport route studies required on the road network leading to the Strategic road network and local rural roads.</p> <p>Transport Assessment</p> <p>Access - A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Valley Road. A development of more than 300 homes requires two accesses.</p> <p>Score - B</p> <p>Capacity - A Transport Assessment would assess the impact of the development and areas where mitigating measures are required. The scope of the TA should include route assessments on the existing highway network which would be used to access the strategic highway, Ebbsfleet,</p>

				<p>Bluewater. Capacity assessments will be required at key junctions.</p> <p>Score - C</p> <p>Sustainability - Connections to Longfield and it's station could be provided for buses, cycling and walking.</p> <p>Score - B</p> <p>Conclusion - A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Fawkham road and Valley Road. A development of more than 300 homes requires two accesses. A Transport Assessment would assess the impact of the development and areas where mitigating measures are required. The scope of the TA should include route assessments on the existing highway network which would be used to access the strategic highway, Ebbsfleet, Bluewater. Capacity assessments will be required at key junctions. Connections to Longfield and its station could be provided for buses, cycling and walking.</p>
			Education Primary	<p>- Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>MX52 & MX53 800 dwellings</i></p> <p><i>H051 13 dwellings</i></p> <p><i>HO165 31 dwellings</i></p> <p><i>HO378 32 dwellings</i></p> <p><i>HO353 10 dwellings</i></p> <p><i>HO384 14 dwellings</i></p> <p><i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
			Heritage and Conservation	<p>Preliminary Heritage Assessment - this housing allocation site lies adjacent to the site of Pennis Farmhouse, which is considered to be on the site of a 16th century or earlier residence, possible medieval hall house. Both Pennis Farmhouse and the later Pennis House are designated heritage assets, Grade II. There are also some Grade II listed gate and railings. This is clearly a multi-period high status residence with associated outbuildings and historic landscape.</p> <p>There is also potential for significant remains associated with prehistoric activity, including burial remains, in view of ring ditch just south of Pennis House complex.</p>

					<p>There are significant heritage assets to consider and there may be constraints on developing parts of this site. Equally there may be heritage opportunities providing benefits to a suitable development scheme.</p> <p>Pre-allocation Historic Building Assessment, Historic Landscape Assessment and Archaeological Deskbased Assessment required in view of potential for sensitive prehistoric remains and with regard to the designated heritage assets of Pennis Farmhouse and Pennis House.</p> <p>Pre-determination archaeological deskbased Assessment, historic landscape assessment and assessment of setting of Pennis House and Pennis Farmhouse..</p> <p>Formal programme of heritage works required and should include heritage enhancement measures.</p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>
MX53	Land between Parkfield and Fawkham Road, Fawkham/Hartley	230 Infrastructure Country park	EC	Highways and Transportation	<p>Documents included 02/08/18 -MW52 & MX53 Documents Required - Transport Assessment required</p> <p>KCC Highways Comments - DHA Planning Consultants. Transport route studies required on the road network leading to the Strategic road network and local rural roads.</p> <p>Transport Assessment</p> <p>Access - A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Fawkham Road. A development of up to 300 homes could be accessed from a single point of access with an additional emergency access provided and a looped arrangement in the development.</p> <p>Score - B</p> <p>Capacity - A Transport Assessment would assess the impact of the development and areas where mitigating measures are required. The scope of the TA should include route assessments on the existing highway network which would be used to access the strategic highway, Ebbsfleet, Bluewater. Capacity assessments will be required at key junctions.</p> <p>Score - C</p> <p>Sustainability - Connections to Longfield and its station could be provided for buses, cycling and walking.</p> <p>Score – B</p> <p>Conclusion - A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Fawkham road and Valley Road. A development of more than 300 homes requires two accesses. A Transport Assessment would assess the impact of the development and areas where mitigating measures are required. The scope of the TA should include route assessments on the existing highway network which would be used to access the strategic highway, Ebbsfleet, Bluewater. Capacity assessments will be required at key junctions. Connections to Longfield and its station could be provided for buses, cycling and walking.</p>
				Education Primary -	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX52 & MX53 800 dwellings H051 13 dwellings H0165 31 dwellings H0378 32 dwellings H0353 10 dwellings H0384 14 dwellings</p>

				<p><i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
			Heritage and Conservation	<p>Preliminary Heritage Assessment – This site is adjacent to the designated heritage asset of St Marys Church, a Grade I listed heritage asset. St Mary's Church is considered to date from 11th century with several phases of rebuild. The proposed housing site also is adjacent to the site of a medieval manor of Fawkham Castle. The castle and church would have been a focus for medieval settlement and trade and there may be extensive remains in the surrounding area. There is high potential for remains associated with the castle and with the medieval settlement activity to survive within the proposed housing site. There is also potential for prehistoric remains due to proximity valley system to west. Iron Age remains have been located towards the southern end of the site and further prehistoric remains may survive on site.</p> <p>Impact on St Mary's Church, Fawkham Castle and any associated medieval remains and their setting and associated historic landscape is a major factor to consider for MX53. Remains associated with the medieval settlement may be of significance and be a constraint on development. Impact on the setting of St Mary's Church and the site of the castle would need to inform any design for new development nearby if the scheme progressed.</p> <p><i>Pre-allocation heritage assessment needed in view of possible heritage constraints to developing part of the site.</i></p> <p><i>Predetermination heritage assessment required, including Archaeological Deskbased Assessment, Historic Landscape Assessment and Assessment of setting of Church and castle complex.</i> <i>Results of early heritage assessments should be used to inform any design and layout to ensure there is no detrimental impact on the heritage assets identified, especially St Mary's Church and Fawkham Castle</i></p> <p><i>Formal programme of heritage works required and should include heritage enhancement measures.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>
			Country Parks & Countryside Partnerships	<p>KCC recommends that the site promoter would need to demonstrate a need, the habitat and landscape benefits and the management and sustainability of a new park. KCC is currently not seeking new sites for ownership and recommends that a new park could be partly managed through a local partnership which would need to be funded, or self-funding.</p>

Other settlements				
				Education Secondary – If the three schools described for Sevenoaks, Swanley, Hextable & Hartley and Edenbridge were to be created, then they would likely be sufficient to accommodate any additional secondary demand. However, this is dependent on the forecasts showing manageable numbers of demand over the next five to fifteen years from stock housing and from newly built housing, outside the proposals described in the draft Local Plan.
HO150	Chelsfield Depot, Shacklands Road, Badgers Mount	194	BF	Highways and Transportation Documents required - Transport Assessment KCC Highways Comments - Transport Assessment required. Secondary / emergency access will need to be provided. Site is close to A224 Orpington Bypass to provide access to the strategic highway network. Transport Assessment Access - Use of existing access on Shacklands Road. Secondary / emergency access will be required. Score - A Capacity - No significant capacity issues expected however a Transport Assessment would be required. Score - A Sustainability - The site is not within the confines of a defined settlement boundary. Pedestrian and cycle links to provide access to Badger Mount and Knockholt train station. Score – B
				Heritage and Conservation Preliminary Heritage Assessment - Former site of WWII Ammunitions Store. Site has been cleared but any remnants of the WWII activity would be of historic interest <i>Heritage Statement required to support any application, including assessment of impact on setting and character of Terrys Lodge.. Formal programme of archaeological works required, subject to details..</i> Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval
HO328	Land west of the roundabout, London Road, Badgers Mount	21	BF	Highways KCC Highways Comments - Existing access onto London Road. Transport Assessment Access - Existing access onto London Road approximately 40 metres from the roundabout. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Existing footpath, cycleway and bus stops along London Road. Site is located to the south of the settlement of Badgers Mount. Score – B
				Education Primary - Sevenoaks Northern Villages <i>Development sites that impact on this planning area:</i> MX41 800 dwellings MX24 300 dwellings HO328 21 dwellings HO368 66 dwellings HO138 13 dwellings HO307 50 dwellings HO49 27 dwellings Up to 1277 new dwellings would generate 358 primary pupils. This equates to 1.7FE of primary provision.

				<p>The two significant developments in this area are the Broke Hill development north of Halstead, and the Fort Halstead development which lies south of Halstead. The issue for KCC is that the small primary school in Halstead cannot really be expanded on its current site. To move the school to Broke Hill means that the residents in Fort Halstead would have much further to travel.</p> <p>As has been mentioned above, KCC believe that the developments in Dunton Green will fill an expanded 2FE Dunton Green Primary School, leaving no capacity for residents from the Sevenoaks Northern Villages planning area. KCC request dialogue with SDC planners over resolution of this issue.</p> <p>KCC would prefer, due to the size of the MX41 Broke Hill development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX41 Broke Hill development, as has become practice in other developments of this or similar size. KCC has already had several very helpful meetings with the Broke Hill developers and it is hoped that these will continue in the form of more formal ERG meetings, to include SDC.</p>														
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Some potential for remains associated with <i>Colegate</i>, a 16th century establishment with house and formal grounds. House is identifiable on 1st Ed OS map and was associated with Colgate family.</p> <p><i>Some formal archaeological work may be required subject to details.</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>														
HO368	Calcutta Club and Polhill Business Centre, London Road, Badgers Mount	66	BF	<p>Documents required - Transport Statement</p> <p>KCC Highways comments - Existing access from London Road can be utilised. Secondary / emergency access will be required.</p> <p>Transport Assessment</p> <p>Access - Use of existing access. Good visibility. Secondary / emergency access will be required. Score – A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score – A Sustainability - Site is not within a defined settlement boundary. Pedestrian footpaths along London Road to provide access to Badgers Mount and Knockholt railway station. Score - C</p>														
			Education Primary	<p>Sevenoaks Northern Villages</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr> <td>MX41</td> <td>800 dwellings</td> </tr> <tr> <td>MX24</td> <td>300 dwellings</td> </tr> <tr> <td>HO328</td> <td>21 dwellings</td> </tr> <tr> <td>HO368</td> <td>66 dwellings</td> </tr> <tr> <td>HO138</td> <td>13 dwellings</td> </tr> <tr> <td>HO307</td> <td>50 dwellings</td> </tr> <tr> <td>HO49</td> <td>27 dwellings</td> </tr> </table> <p>Up to 1277 new dwellings would generate 358 primary pupils. This equates to 1.7FE of primary provision.</p> <p>The two significant developments in this area are the Broke Hill development north of Halstead, and the Fort Halstead development which lies south of Halstead. The issue for KCC is that the small primary school in Halstead cannot really be expanded on its current site. To move the school to Broke Hill means that the residents in Fort Halstead would have much further to travel.</p> <p>As has been mentioned above, KCC believe that the developments in Dunton Green will fill an expanded 2FE Dunton Green Primary School,</p>	MX41	800 dwellings	MX24	300 dwellings	HO328	21 dwellings	HO368	66 dwellings	HO138	13 dwellings	HO307	50 dwellings	HO49	27 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for multi-period remains associated with use of ancient trackway, Pilgrims Way, running to the south east of site. There are buildings identifiable on the 3rd Ed OS map forming a complex called The Retreat. This seem to include greenhouses. Some of these buildings no longer survive above ground but remains may survive below ground.</p> <p><i>A Heritage Statement would be required to support any application.</i></p> <p><i>Formal historic building and archaeological works may be required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO109	Highways Depot, Tonbridge Road, Chiddingstone Causeway	8	BF	Highways	<p>KCC Highways Comments - Site bound to the south by railway line, cricket ground to the west, and residential to the east.</p> <p>Transport Assessment</p> <p>Access - Use of existing access from B2027 Tonbridge Road. Score – A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score – A Sustainability - Footpaths available on opposite side of Tonbridge Road to access point. Within close proximity to Penshurst railway station. Score – A</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for archaeology associated with post medieval settlement and agricultural activity close to Penshurst Station. Adjacent cottages identifiable on 1st OS map.</p> <p><i>Formal archaeological works may be required subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO97	Middle Farm Nursery, Cray Road, Crockenhill	TBC*	BF	Highways	<p>KCC Highways Comments - Existing access from Cray Road. Visibility may be an issue due to hedges and trees.</p> <p>Transport Assessment</p> <p>Access - Use of existing access. Some improvements to visibility required. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Close proximity to Crockehill village centre and local services. Score - B</p>
				Education Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>HO1069 dwellings</i></p>

				<p>HO212 19 dwellings HO224 124 dwellings HO225 127 dwellings HO58 16 dwellings HO73 15 dwellings (est from DPH) HO10 12 dwellings (est from DPH) HO19725 dwellings HO19822 dwellings HO202 7 dwellings HO22226 dwellings HO27424 dwellings HO298 13 dwellings (est from DPH) HO357 12 dwellings (est from DPH) HO4 71 dwellings MX32 5 dwellings MX54a/b450 / 750 dwellings MX56 80 dwellings MX9 16 dwellings HO12447 dwellings (est from DPH) HO97 30 dwellings (est from DPH)</p> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for prehistoric and later archaeology.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO124	Wested Farm, Eynsford Road, Crockenhill	TBC*	BF	<p>Highways</p> <p>KCC Highways Comments - Use of existing access but concerns regarding sustainability due to remote location.</p> <p>Transport Assessment</p> <p>Access - Use of existing access to Wested Farm Score – A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Not within a defined settlement. No pedestrian links on Eynesford Road Score – C</p>

			Education Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO1069 dwellings HO212 19 dwellings HO224 124 dwellings HO225 127 dwellings HO58 16 dwellings HO73 15 dwellings (est from DPH) HO10 12 dwellings (est from DPH) HO197 25 dwellings HO198 22 dwellings HO202 7 dwellings HO222 26 dwellings HO274 24 dwellings HO298 13 dwellings (est from DPH) HO357 12 dwellings (est from DPH) HO4 71 dwellings MX32 5 dwellings MX54a/b 450 / 750 dwellings MX56 80 dwellings MX9 16 dwellings HO124 47 dwellings (est from DPH) HO97 30 dwellings (est from DPH)</p> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains associated with possible ring ditch to the west. Wested is a historic farm complex considered to date from at least 17th century and may be of earlier origins. Many of the buildings are identifiable on the 1st Ed OS map and the barn is a Grade II listed building.</p> <p>Designated heritage asset and the locally highlighted buildings are not within site itself but there may be an impact on their setting and character.</p> <p><i>Heritage Statement required to support any application. Formal programme of archaeological works required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p>

HO315	Gorse Hill Nursery, Gorse Hill, Farningham	55	BF		<p>Documents required - Transport Statement</p> <p>KCC Highways Comments - Some vehicle parking on the southern part of the access strip to the nursery</p> <p>Transport Assessment</p> <p>Access - Existing access could be utilised via a dedicated a service road from Gorse Hill. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Site is located approximately 1 mile north of the local centre of West Kingsdown. Local bus stops on Gorse Hill / London Road. Score - B</p>																						
				Education Primary	<p>Sevenoaks Rural North Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr><td>MX48</td><td>2500 dwellings</td></tr> <tr><td>HO315</td><td>55 dwellings</td></tr> <tr><td>HO326</td><td>35 dwellings</td></tr> <tr><td>HO127</td><td>9 dwellings</td></tr> <tr><td>HO346</td><td>42 dwellings</td></tr> <tr><td>HO354</td><td>4 dwellings (est from DPH)</td></tr> <tr><td>HO129</td><td>18 dwellings (est from DPH)</td></tr> <tr><td>HO272</td><td>16 dwellings</td></tr> <tr><td>HO35</td><td>25 dwellings</td></tr> <tr><td>HO77</td><td>41 dwellings</td></tr> <tr><td>HO78</td><td>10 dwellings</td></tr> </table> <p>Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.</p> <p>The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.</p> <p>KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.</p>	MX48	2500 dwellings	HO315	55 dwellings	HO326	35 dwellings	HO127	9 dwellings	HO346	42 dwellings	HO354	4 dwellings (est from DPH)	HO129	18 dwellings (est from DPH)	HO272	16 dwellings	HO35	25 dwellings	HO77	41 dwellings	HO78	10 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for multi-period archaeology due to number of cropmarks nearby, including enclosures and possible ring ditches to south. Prehistoric, Roman and Medieval findspots identified in neighbouring fields.</p> <p><i>Heritage Statement needed to support any application. Some formal archaeological work may be required, subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																						
HO326	Maplescombe Farm, Maplescomb	35	BF		<p>KCC Highways Comments - Maplescombe Lane is a narrow lane. The road widens immediately opposite the site, which appears to be utilised for informal parking.</p>																						

	e Lane, Farningham			<p>Transport Assessment</p> <p>Access - Existing access to be utilised. Score - A Capacity - Maplecombe Lane is a narrow country lane with limited capacity to accommodate a large number of additional dwellings and associated vehicles. Score - B Sustainability - The site is not located within a settlement. Concerns regarding accessibility for pedestrians, cyclists and other modes of sustainable transport. Score - C</p>																						
			Education - Primary	<p>Sevenoaks Rural North Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr><td>MX48</td><td>2500 dwellings</td></tr> <tr><td>HO315</td><td>55 dwellings</td></tr> <tr><td>HO326</td><td>35 dwellings</td></tr> <tr><td>HO127</td><td>9 dwellings</td></tr> <tr><td>HO346</td><td>42 dwellings</td></tr> <tr><td>HO354</td><td>4 dwellings (est from DPH)</td></tr> <tr><td>HO129</td><td>18 dwellings (est from DPH)</td></tr> <tr><td>HO272</td><td>16 dwellings</td></tr> <tr><td>HO35</td><td>25 dwellings</td></tr> <tr><td>HO77</td><td>41 dwellings</td></tr> <tr><td>HO78</td><td>10 dwellings</td></tr> </table> <p>Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.</p> <p>The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.</p> <p>KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.</p>	MX48	2500 dwellings	HO315	55 dwellings	HO326	35 dwellings	HO127	9 dwellings	HO346	42 dwellings	HO354	4 dwellings (est from DPH)	HO129	18 dwellings (est from DPH)	HO272	16 dwellings	HO35	25 dwellings	HO77	41 dwellings	HO78	10 dwellings
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains due to location with a valley system. Maplescombe is an 18th century farm complex and includes a Grade II listed farm house. Associated farm outbuildings may extend into the application site.</p> <p><i>Some formal archaeological work may be required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval</p>																						
HO51	Eureka Naturist Club, Manor Lane, Fawkham	13	BF	<p>KCC Highways comments - No particular concerns subject to level of development proposed. Access would need to be improved.</p> <p>Transport Assessment</p> <p>Access - Existing access could be utilised but would need to be improved, Manor Lane is a narrow country lane. Score - B</p>																						

				<p>Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Remote location. Score - C</p>
			Education Primary	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>MX52 & MX53 800 dwellings</i> <i>H051 13 dwellings</i> <i>HO165 31 dwellings</i> <i>HO378 32 dwellings</i> <i>HO353 10 dwellings</i> <i>HO384 14 dwellings</i> <i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO165	Fawkham Business Park, Fawkham Road, Fawkham	31	BF	<p>KCC Highways Comments - No particular concerns subject to level of development proposed.</p> <p>Transport Assessment</p> <p>Access - Existing access could be utilised from Fawkham Road Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Site is located to the western edge of Longfield settlement boundary.</p>

					Score – A
				Education Primary	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>MX52 & MX53800 dwellings</i></p> <p><i>H051 13 dwellings</i></p> <p><i>HO165 31 dwellings</i></p> <p><i>HO378 32 dwellings</i></p> <p><i>HO353 10 dwellings</i></p> <p><i>HO384 14 dwellings</i></p> <p><i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady’s and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for Roman archaeology associated with features found on site itself. There is some potential for prehistoric as well based on the proximity of a cropmark enclosure possibly of prehistoric date.</p> <p><i>Heritage Statement required to support any application. Formal programme of archaeological works required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO378	Grange Park Farm, Manor Lane, Fawkham	32	BF	Highways	<p>KCC Highways Comments - Access to be improved, potential visibility issues.</p> <p>Transport Assessment</p> <p>Access - Existing access from Manor Lane at North Lodge. Visibility may be an issue due to curve of road and established hedges and trees. Vehicles entering and exiting the access southwards may be problematic due to the sharp alignment of the road to the access.</p> <p>Score - B</p> <p>Capacity - A development of this scale would not be likely to lead to any significant impact on capacity.</p> <p>Score - A</p>

					<p>Sustainability - Remote location. Score – C</p>
				Education Primary	<p>Hartley & New Ash Green Planning Area & Part of Sevenoaks Rural North Planning Area (Considered together because of adjacency)</p> <p><i>Development sites that impact on this planning area:</i></p> <p><i>MX52 & MX53800 dwellings</i> <i>H051 13 dwellings</i> <i>HO165 31 dwellings</i> <i>HO378 32 dwellings</i> <i>HO353 10 dwellings</i> <i>HO384 14 dwellings</i> <i>MX55 42 dwellings (est based on DPH)</i></p> <p>Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.</p> <p>There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.</p> <p>There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.</p> <p>KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.</p> <p>KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.</p> <p>KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low potential for as yet unknown archaeology.</p> <p><i>Programme of formal archaeological works may be required subject to details</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO49	Highfield Farm and Knocka Villa, Crow Drive, Halstead	27	BF	Highways	<p>KCC Highways Comments - No particular concerns subject to level of development proposed. Rural location.</p> <p><u>Transport Assessment</u></p> <p>Access - Existing access onto Crow Drive. Good visibility. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Bus stops available on PollHill. Fairly remote location from defined settlements.</p>

					Score – C														
				Education Primary	<p>Sevenoaks Northern Villages</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr> <td>MX41</td> <td>800 dwellings</td> </tr> <tr> <td>MX24</td> <td>300 dwellings</td> </tr> <tr> <td>HO328</td> <td>21 dwellings</td> </tr> <tr> <td>HO368</td> <td>66 dwellings</td> </tr> <tr> <td>HO138</td> <td>13 dwellings</td> </tr> <tr> <td>HO307</td> <td>50 dwellings</td> </tr> <tr> <td>HO49</td> <td>27 dwellings</td> </tr> </table> <p>Up to 1277 new dwellings would generate 358 primary pupils. This equates to 1.7FE of primary provision.</p> <p>The two significant developments in this area are the Broke Hill development north of Halstead, and the Fort Halstead development which lies south of Halstead. The issue for KCC is that the small primary school in Halstead cannot really be expanded on its current site. To move the school to Broke Hill means that the residents in Fort Halstead would have much further to travel.</p> <p>As has been mentioned above, KCC believe that the developments in Dunton Green will fill an expanded 2FE Dunton Green Primary School, leaving no capacity for residents from the Sevenoaks Northern Villages planning area. KCC request dialogue with SDC planners over resolution of this issue.</p> <p>KCC would prefer, due to the size of the MX41 Broke Hill development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX41 Broke Hill development, as has become practice in other developments of this or similar size. KCC has already had several very helpful meetings with the Broke Hill developers and it is hoped that these will continue in the form of more formal ERG meetings, to include SDC.</p>	MX41	800 dwellings	MX24	300 dwellings	HO328	21 dwellings	HO368	66 dwellings	HO138	13 dwellings	HO307	50 dwellings	HO49	27 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for remains associated with the use of an ancient routeway following alignment of Crow Drive. Roman coin PAS find to west may suggest Roman activity.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>														
HO138	Deer Leap Stud Farm, Knockholt Road, Halstead	13	BF		<p>KCC Highways Comments - No particular concerns subject to level of development proposed.</p> <p>Transport Assessment</p> <p>Access - Existing access onto Knockholt Road.</p> <p>Score - A</p> <p>Capacity - A development of this scale would not be likely to lead to any significant impact on capacity.</p> <p>Score - A</p> <p>Sustainability - Site is located to the south western boundary of Halstead. Some bus stops located within close proximity of the site on Knockholt Road</p> <p>Score – A</p>														
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				Heritage and Conservation	Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology
HO307	Oak Tree Farm, London Road, Halstead	50	BF	Highways	<p>Documents required - Transport Statement</p> <p>KCC Highways comments - Access improvements required. Rural location.</p> <p>Transport Assessment</p> <p>Access - Existing access onto A224 London Road. Access route is appears less than 4 metres in width. There should be sufficient space for 2 cars to pass each other at least every 40m. These spaces should be intervisible. Score - B</p> <p>Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A</p> <p>Sustainability - Remote location. Score - C</p>
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for remains of post medieval or earlier date associated with land boundaries identifiable on 1st Ed OS map. Oak Tree Farm outbuildings identified in Farmstead Survey (HE)</p> <p>Some formal archaeological work may be required, subject to details</p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>														
MX24	Fort Halstead, Crow Drive, Halstead	300 (in addition to 450 granted planning permission) Employment	BF	Highways and Transportation	<p>KCC Highways Comments - Current pre-application and extant permission. Transport Assessment required. Restriction on employment uses e.g. no B8</p> <p>Transport Assessment</p> <p>Access - Extant permission provides access via Crow Drive to A224 Pollhill. Proposed roundabout needing re-assessment. Secondary access (via Star Hill?) required.</p> <p>Score - B</p> <p>Capacity - Pollhill junction to be assessed together with restricted traffic to Star Hill Road - junction assessment. Other junctions on A224 require assessment</p> <p>Score - B</p> <p>Sustainability - Poor sustainable transport location. Additional bus services to Knockholt Station and primary schools required. Enhanced bus services required to Sevenoaks / Orpington. Improvement to cycle routes to station / villages.</p> <p>Score - B</p>														
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Site contains scheduled monument of Fort Halstead and several designated historic buildings. Site particularly sensitive and important for its military heritage.</p> <p>Detailed heritage assessments have been recommended and some preliminary historic buildings assessments completed. Historic landscape and archaeological assessments outstanding.</p> <p><i>Formal archaeological, historic landscape and historic buildings works required.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>										
MX41	Land at Broke Hill Golf Course, Sevenoaks Road, Halstead	800 Employment Retail Community Leisure Open space	EC	Highways and Transportation	<p>Documents included 02/08/18 -MX41 http://simplesend.it/d/f732fca01e18487e919f607b146f3cf0b277a7c69e5148</p> <p>Documents Required - Transport Assessment received 08/08/18</p> <p>KCC Highways Comments - Transport Assessment has been scoped with KCC and has been received and considered.</p> <p>Transport Assessment Access - Two accesses onto London Road and this accords with Kent Design. Emergency / cycling / walking access can be provided to connect rural roads. Score - B Capacity - A capacity assessment has been completed. Additional information is required to address outstanding concerns relating to the traffic impact along Wheatsheaf Hill and at the Hewitts roundabout. Score - B Sustainability - The site is close to the Knockholt station and a development of this scale would be expected to deliver public transport improvements and walking and cycling opportunities. Score - B Conclusion - Two accesses onto London Road and this accords with Kent Design. Emergency/cycling Walking access can be provided to connect rural roads. A capacity assessment has been completed. Additional information is required to address outstanding concerns relating to the traffic impact along Wheatsheaf Hill and at the Hewitts roundabout. The site is close to the Knockholt station and a development of this scale would be expected to deliver public transport improvements and walking and cycling opportunities.</p>										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for remains associated with <i>Broke Farm</i>, a post medieval or earlier farm complex. The 1st Ed OS map indicates a substantial complex including main house, outbuildings, driveways, formal gardens, parkland and orchards. There are also two small holdings identifiable on 1st Ed OS map, including <i>Cadlocks</i>, which may be associated with <i>Broke Farm</i></p> <p><i>Deskbased Archaeological Assessment, Historic Landscape Assessment and Archaeological Impact Assessment required to support any application.</i></p> <p><i>Formal programme of archaeological works will be required subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO73	The Parish Complex, College Road, Hextable	TBC*	UC	Highways	<p>KCC Highways Comments - Vehicle access through College Road . Crawfords. Pedestrian access via Crowfords</p> <p>Transport Assessment</p> <p>Access - Existing access that would need improvement Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - B Sustainability - Walking distance to facilities and local buses Score - A</p>
				Education Primary	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO106 9 dwellings HO212 19 dwellings HO224 124 dwellings HO225 127 dwellings HO58 16 dwellings HO73 15 dwellings (est from DPH) HO10 12 dwellings (est from DPH) HO197 25 dwellings HO198 22 dwellings</p>

					<p>HO202 7 dwellings HO222 26 dwellings HO274 24 dwellings HO298 13 dwellings (est from DPH) HO357 12 dwellings (est from DPH) HO4 71 dwellings MX32 5 dwellings MX54a/b450 750 dwellings MX56 80 dwellings MX9 16 dwellings HO124 47 dwellings (est from DPH) HO97 30 dwellings (est from DPH)</p> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - May contain designated heritage asset of Gate and gate piers, wall and railings to Hextable House, 18th century: Grade II.</p> <p>Potential for sensitive and important heritage associated with Swanley Horticultural College which developed around Hextable House of late 19th century date. Locally important gardens are situated adjacent to western boundary but 1st Ed OS map indicates presence of original house buildings on site with later OS maps showing later development as a college.</p> <p><i>Pre-allocation heritage assessment recommended</i></p> <p><i>Pre-determination Heritage Statement/Deskbased Archaeological, Historic Building and Historic Landscape Assessment required. Pre-determination Statement of Significance on listed gate and wall required to inform decisions regarding potential impact of scheme on designated gate, gate piers, railings and wall. Designated heritage asset should not be detrimentally affected. Formal programme of historic building, archaeological and heritage interpretation works required. Method statement on preservation and protection of designated heritage asset.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>
HO224	Former Furness School, Rowhill Road, Hextable	124	UC	Highways	<p>Documents required - Transport Assessment</p> <p>KCC Highways Comments - Secondary / emergency access required.</p> <p><u>Transport Assessment</u></p> <p>Access - Secondary access required. Primary access off Dartford Road (B258) preferred, secondary / emergency access off Row Hill Road.</p>

				<p>Score - B Capacity - Transport Assessment required to assess the impact on the wider network. Score - A Sustainability - Within close proximity to local facilities and bus stops. Score – A</p>																																										
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for heritage related to the original use of this land as a “home for orphans” identifiable on the 2nd Ed OS map. It later developed in the 20th century to a “Home for Little Boys” and was believed to contain a WWII air raid shelter.</p> <p>Predetermination heritage statement required focussing on historic built environment and archaeology. Formal historic building, historic</p>																																										

					<p>landscape and archaeological works required, subject to details.</p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																																										
HO58	Land west of College Cottages, College Road, Hextable	16	BF	Highways	<p>KCC Highways Comments - New access to be provided through adjacent site HO73 from College Road or Crawfords.</p> <p>Transport Assessment</p> <p>Access - New access required through adjacent site. Footway connection required.</p> <p>Score - B</p> <p>Capacity - A development of this scale would not be likely to lead to any significant impact on capacity.</p> <p>Score - A</p> <p>Sustainability - Footway connection required along College Road</p> <p>Score - B</p>																																										
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HO106	College Road Nurseries, College Road, Hextable	9	BF	Highways	<p>KCC Highways Comments - Will require new access onto College Road. Potential visibility issues at access. Concerns regarding accessibility for pedestrians, cyclists and other modes of sustainable transport.</p> <p>Transport Assessment</p> <p>Access - New access will be required onto College Road. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - B Sustainability score - B</p>																																										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for heritage associated with Swanley Horticultural College which developed around Hextable House of late 19th century date. Locally important gardens are situated adjacent to western boundary but 2nd Ed OS map indicates presence of College buildings.</p> <p><i>Pre-allocation heritage assessment recommended</i></p> <p><i>Predetermination Heritage Statement/Deskbased Archaeological, Historic Building and Historic Landscape Assessment required to support any application. Formal programme of historic building, archaeological and heritage interpretation works required.</i></p> <p>Scale 2 - Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>																						
HO212	Egerton Nursery, Egerton Avenue, Hextable	19	BF	Highways	<p>KCC Highways Comments - New access is required off Egerton Avenue</p> <p>Transport Assessment</p> <p>Access - New access required off Egerton Avenue Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within walking distance of local facilities and local buses Score - A</p>																						
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric archaeology due to presence of River Terrace Gravels, which have potential to contain flint artefacts.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>	
HO225	Oasis Academy, Egerton Avenue, Hextable	127	BF	Highways	<p>Documents required - Transport Assessment</p> <p>KCC Highways Comments - Transport Assessment required, capacity of surrounding roads and junctions would need to be assessed as part of TA.</p> <p>Transport Assessment</p> <p>Access - Existing access on Egernton Avenue. May need some improvement. Score - A Capacity - Capacity of nearby junctions needs to be assessed as part of TA. Score - B Sustainability - Within walking distance of local facilities and local buses Score - A</p>
			Education Primary	-	<p>Swanley Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO106 9 dwellings</p>

				<p>HO212 19 dwellings HO224 124 dwellings HO225 127 dwellings HO58 16 dwellings HO73 15 dwellings (est from DPH) HO10 12 dwellings (est from DPH) HO197 25 dwellings HO198 22 dwellings HO202 7 dwellings HO222 26 dwellings HO274 24 dwellings HO298 13 dwellings (est from DPH) HO357 12 dwellings (est from DPH) HO4 71 dwellings MX32 5 dwellings MX54a/b450 750 dwellings MX56 80 dwellings MX9 16 dwellings HO124 47 dwellings (est from DPH) HO97 30 dwellings (est from DPH)</p> <p>Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.</p> <p>There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.</p> <p>Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.</p> <p>KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.</p> <p>KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.</p> <p>The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.</p>
				<p>Heritage and Conservation</p> <p>Preliminary Heritage Assessment - Low archaeological potential for as yet unidentified archaeology.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO354	Holmesdale Works, Holmesdale Road, South Darenth	TBC*	UC	<p>Highways</p> <p>KCC Highways Comments - Access off Holmesdale Road could be utilised.</p> <p>Transport Assessment</p> <p>Access - Existing access could be utilised with some improvement required. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Some services within walking distance. Score - B</p>

				Education Primary	<p>- Sevenoaks Rural North Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr><td>MX48</td><td>2500 dwellings</td></tr> <tr><td>HO315</td><td>55 dwellings</td></tr> <tr><td>HO326</td><td>35 dwellings</td></tr> <tr><td>HO127</td><td>9 dwellings</td></tr> <tr><td>HO346</td><td>42 dwellings</td></tr> <tr><td>HO354</td><td>4 dwellings (est from DPH)</td></tr> <tr><td>HO129</td><td>18 dwellings (est from DPH)</td></tr> <tr><td>HO272</td><td>16 dwellings</td></tr> <tr><td>HO35</td><td>25 dwellings</td></tr> <tr><td>HO77</td><td>41 dwellings</td></tr> <tr><td>HO78</td><td>10 dwellings</td></tr> </table> <p>Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.</p> <p>The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.</p> <p>KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.</p>	MX48	2500 dwellings	HO315	55 dwellings	HO326	35 dwellings	HO127	9 dwellings	HO346	42 dwellings	HO354	4 dwellings (est from DPH)	HO129	18 dwellings (est from DPH)	HO272	16 dwellings	HO35	25 dwellings	HO77	41 dwellings	HO78	10 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for prehistoric remains due to location on Taplow Gravels. Also potential for post medieval industrial heritage remains. Buildings are identifiable on 1st Ed OS map and current buildings may date from the 19th century or earlier.</p> <p><i>Heritage Statement, including a geoarchaeological assessment and historic building assessment, required to support any application.</i></p> <p><i>Some historic building and archaeological work may be required subject to details</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																						
HO127	Gills Farm, Gills Road, South Darenth	9	BF	Highways	<p>KCC Highways Comments - Former farm use, single track narrow lane for access with poor visibility.</p> <p>Transport Assessment</p> <p>Access - Poor visibility at narrow access lane. Score - B Capacity - Single track lane. Former farm use. Score - B Sustainability - No services nearby Score - C</p>																						
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for remains associated with post medieval farming activity. Some of Gill's Farms buildings identifiable on 1st Ed OS map.</p> <p><i>Heritage Statement required to support any application. Formal programme of archaeological works required, subject to details.</i></p> <p>Scale 3- Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO346	Land at Oakview Stud Farm, Lombard Street, Horton Kirby	42	BF	Highways	<p>KCC Highways Comments - Some improvements to access required.</p> <p>Transport Assessment</p> <p>Access - Existing access to the north west of the site, off Lombard Street. Some modifications and improvements required. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Some services within walking distance. Approx 500m to local school. Score - B</p>
				Education Primary	<p>Sevenoaks Rural North Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX48 2500 dwellings HO315 55 dwellings HO326 35 dwellings HO127 9 dwellings HO346 42 dwellings HO354 4 dwellings (est from DPH)</p>

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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for remains associated with multi-period findspots in the surrounding area and with Reynolds Place, a post medieval farm complex noted on the Historic Farmstead Survey (HE).</p> <p><i>Some formal archaeological work may be required subject to details.</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO340	Land east of Whitebeam Close and south of Pilgrim Way Cottages, Kemsing	TBC*	UC	Highways	<p>KCC Highways Comments - Whitebeam Close is a private street. Unadopted highway.</p> <p>Transport Assessment</p> <p>Access - Whitebeam Close is currently unadopted highway. Visibility constraints at the junction with Pilgrims Way. Score - C Capacity - Pilgrims Way is a very narrow highway, where there may be constraints with increased traffic. Score - B Sustainability - Within close proximity to local facilities. Pedestrian footpath to the east of site which could be utilised but improvements would be required. Score - B</p>
				Education Primary	<p>Sevenoaks East</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO104 15 dwellings HO133 20 dwellings HO340 20 dwellings (est from DPH) HO102 19 dwellings (est from DPH, incl in this planning area for adjacency)</p> <p>Up to 74 new dwellings, generating 20 pupils which could be accommodated in existing provision.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for multi period remains associated with use of Pilgrims Way, an ancient trackway. Roman, Early Medieval and Medieval remains recorded in the area.</p> <p><i>Some formal archaeological work may be required subject to details</i></p>

					Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval
HO104	Baldwins Yard, Noahs Ark, Kemsing	15	BF	Highways	<p>KCC Highways Comments - Existing access could be utilised</p> <p>Transport Assessment</p> <p>Access - Existing access could be utilised. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Kemsing village is 1km to the north of the site. Score - C</p>
				Education Primary	<p>Sevenoaks East</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO104 15 dwellings HO133 20 dwellings HO340 20 dwellings (est from DPH) HO102 19 dwellings (est from DPH, incl in this planning area for adjacency)</p> <p>Up to 74 new dwellings, generating 20 pupils which could be accommodated in existing provision.</p>
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Archaeological potential for remains associated with prehistoric activity due to river valley to the south. Potential for post medieval remains associated with Noah's Ark, 17th century cottage pair. Noah's Ark is Grade II listed building.</p> <p><i>Heritage Statement required to support any application, including consideration of impact on the designated Noah's Ark.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>
HO133	Land south of West End, Kemsing	20	BF	Highways	<p>KCC Highways Comments - Current access will require some improvements.</p> <p>Transport Assessment</p> <p>Access - Current access is a farm track which will require improvements Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Within close proximity to local facilities. Bus stops on West End. Score - A</p>
				Education Primary	<p>Sevenoaks East</p> <p><i>Development sites that impact on this planning area:</i></p> <p>HO104 15 dwellings HO133 20 dwellings HO340 20 dwellings (est from DPH) HO102 19 dwellings (est from DPH, incl in this planning area for adjacency)</p> <p>Up to 74 new dwellings, generating 20 pupils which could be accommodated in existing provision.</p>

				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for remains associated with prehistoric activity in view of the proximity of a spring. There are in addition probable early medieval burials to the north and Roman remains to the west. Associated remains may extend into the proposed HO138site.</p> <p><i>Heritage Statement required to support any application, including assessment of impact on setting and character of Terrys Lodge.. Formal programme of archaeological works required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																										
HO44	51-59 Mount Pleasant Road and land to the rear, Sevenoaks Weald	14	UC	Highways	<p>KCC Highways Comments - Narrow access could lead to capacity issues.</p> <p>Transport Assessment</p> <p>Access - Access appears difficult and poorly aligned road. Score - C Capacity - Narrow access road could lead to highway safety issues with increased capacity Score - C Sustainability - Not accessible or close to facilities Score - C</p>																										
				Education - Primary	<p>Sevenoaks Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr><td>MX43</td><td>600 dwellings</td></tr> <tr><td>MX50</td><td>240 dwellings</td></tr> <tr><td>HO365</td><td>73 dwellings</td></tr> <tr><td>HO226</td><td>30 dwellings</td></tr> <tr><td>MX29</td><td>25 dwellings</td></tr> <tr><td>HO381</td><td>16 dwellings</td></tr> <tr><td>HO217</td><td>16 dwellings</td></tr> <tr><td>HO349</td><td>10 dwellings</td></tr> <tr><td>HO86</td><td>9 dwellings</td></tr> <tr><td>HO44</td><td>14 dwellings</td></tr> <tr><td>HO47</td><td>13 dwellings</td></tr> <tr><td>HO382</td><td>25 dwellings</td></tr> <tr><td>MX49</td><td>30 dwellings</td></tr> </table> <p>Up to 1101 new dwellings would generate 308 primary pupils. This equates to 1.5FE of primary provision.</p> <p>Sevenoaks Planning Area covers the town of Sevenoaks, Riverhead, Dunton Green, Chevening and extends as far south as Sevenoaks Weald.</p> <p>There is currently a small surplus of capacity in Sevenoaks Planning Area but this fluctuates and cannot be applied into the planning process. The PPR from the Sevenoaks town sites, especially MX43, would require additional provision of 1FE.</p> <p>The primary schools in Sevenoaks have all been assessed for viability for expansion over the last seven years. With the exception of Dunton Green PS, it is unlikely that any other expansions will be possible due to site constraints.</p> <p>Dunton Green could be expanded, although currently the PPR that was expected from Ryedale (circa 450) dwellings has yet to materialise. It may be that an expansion of Dunton Green could accommodate the local PPR from Ryedale and the local PPR from MX50. However, it would then be unlikely to be able to provide any capacity that could be utilised by MX24, HO328, HO368, HO138, HO307, HO49 or MX41 which means that these developments will need new provision.</p> <p>KCC would prefer, due to the size of the MX43 North Sevenoaks development, the education provision be managed through section 106, rather than through CIL.</p>	MX43	600 dwellings	MX50	240 dwellings	HO365	73 dwellings	HO226	30 dwellings	MX29	25 dwellings	HO381	16 dwellings	HO217	16 dwellings	HO349	10 dwellings	HO86	9 dwellings	HO44	14 dwellings	HO47	13 dwellings	HO382	25 dwellings	MX49	30 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>																										
HO47	1-6 Gilchrist Cottages and land to the rear, Mount Pleasant Road, Sevenoaks Weald	13	UC	Highways	<p>KCC Highways Comments - New access to be provided.</p> <p>Transport Assessment</p> <p>Access - New access required off adjacent roads. Score - B Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Not accessible or close to facilities Score - C</p>																										
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>										
HO336	Car park east of Sundridge House, Main Road, Sundridge	TBC*	BF	Highways	<p>KCC Highways Comments - Existing access with possible visibility improvements.</p> <p>Transport Assessment</p> <p>Access - The existing access could be used. Score - A Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Few facilities within walking distance. Score - B</p>										
				Education Primary -	<p>Westerham</p> <p><i>Development sites that impact on this planning area:</i></p> <table> <tr> <td>HO371, HO372, 372 & HO 374</td> <td>600 dwellings</td> </tr> <tr> <td>HO327</td> <td>5 dwellings</td> </tr> <tr> <td>HO46</td> <td>10 dwellings</td> </tr> <tr> <td>HO336</td> <td>6 dwellings (est from DPH)</td> </tr> <tr> <td>HO342</td> <td>14 dwellings</td> </tr> </table> <p>Up to 635 new dwellings would generate 177 primary pupils. This equates to 0.9FE of primary provision.</p> <p>With sufficient funding, KCC believe that this demand could be accommodated within existing schools, probably by way of an expansion if deemed necessary at the time of these developments coming to fruition.</p>	HO371, HO372, 372 & HO 374	600 dwellings	HO327	5 dwellings	HO46	10 dwellings	HO336	6 dwellings (est from DPH)	HO342	14 dwellings
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for post medieval remains associated with use of Lamb Inn, identifiable on 1st Ed OS map.</p> <p><i>Some formal archaeological work may be required subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>										
HO342	Meadow Cottage, Goathurst Common, Ide Hill	14	BF	Highways	<p>KCC Highways Comments - New access would be required. Visibility issues would need to be addressed.</p> <p>Transport Assessment</p> <p>Access - New access would be required. Visibility issues at junction with Wheatsheaf Hill (B2042). Score - C Capacity - A development of this scale would not be likely to lead to any significant impact on capacity. Score - A Sustainability - Not accessible or close to facilities Score - C</p>										
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			Heritage and Conservation	<p>Preliminary Heritage Assessment - Broad potential for prehistoric and post medieval remains.</p> <p><i>Some formal archaeological work may be required subject to details.</i></p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>
HO35	JD Hotchkiss Ltd, London Road, West Kingsdown	25	UC	<p>Highways and Transportation</p> <p>KCC Highways Comments - Direct access off A20. Junction may require amendment</p> <p>Transport Assessment</p> <p>Access - Existing access Score - A Capacity - No issues Score - A Sustainability -Some local facilities nearby. Bus services. Score – B</p>
			Education - Primary	<p>Sevenoaks Rural North Planning Area</p> <p><i>Development sites that impact on this planning area:</i></p> <p>MX48 2500 dwellings HO315 55 dwellings HO326 35 dwellings HO127 9 dwellings HO346 42 dwellings HO354 4 dwellings (est from DPH) HO129 18 dwellings (est from DPH) HO272 16 dwellings HO35 25 dwellings HO77 41 dwellings HO78 10 dwellings</p> <p>Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.</p> <p>The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.</p> <p>KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.</p>

					KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.																						
				Heritage and Conservation	<p>Preliminary Heritage Assessment - Site situated on part of site of Hever Place, a post medieval farm complex identifiable on 1st Ed OS map and noted in Farmstead Survey (HE).</p> <p><i>Heritage Statement required to support any application. Formal programme of archaeological works required.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																						
HO78	Florence Farm Mobile Home Park, Main Road, West Kingsdown	10	UC	Highways and Transportation	<p>KCC Highways Comments - Access to be improved</p> <p>Transport Assessment</p> <p>Access - Existing access requiring widening / junction improvement. Directly off A20</p> <p>Score - B</p> <p>Capacity - No issues</p> <p>Score - A</p> <p>Sustainability - Some local facilities. Bus service</p> <p>Score - B</p>																						
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				Heritage and Conservation	Preliminary Heritage Assessment - Low archaeological potential for as yet unknown archaeology.																						

				Conservation	Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.																						
HO272	Rajdani, London Road, West Kingsdown	16	UC	Highways and Transportation	<p>KCC Highways Comments - Direct access off A20. Junction may require amendment</p> <p>Transport Assessment</p> <p>Access - Existing access Score - A Capacity - No issues Score - A Sustainability - Some local facilities. Primary school > 800m Score - B</p>																						
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Low archaeological potential for as yet unidentified archaeology.</p> <p>Scale 4 - Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p>																						
HO77	Millview Park and Foxlands, London Road, West Kingsdown	41	BF	Highways and Transportation	<p>KCC Highways Comments - Direct access off A20. Junction may require amendment</p> <p>Transport Assessment</p> <p>Access - Existing access Score - A</p>																						

					<p>Capacity - No issues Score - A Sustainability -Some local facilities nearby. Bus services. Score – B</p>																						
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				Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for post medieval remains associated with farmstead complex to west identifiable on 2nd Ed OS map.</p> <p><i>Formal programme of archaeological works probably required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>																						
HO129	Terrys Lodge Farm, Terrys Lodge Road, Wrotham	TBC*	BF	Highways	<p>KCC Highways comments - Remote rural location with access to A20 nearby.</p> <p>Transport Assessment</p> <p>Access - Existing access would require some improvement. Score - A Capacity - Narrow road but could accommodate low generation. Score - A Sustainability - No facilities nearby Score – C</p>																						
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			Primary	<p><i>Development sites that impact on this planning area:</i></p> <p>MX48 2500 dwellings HO315 55 dwellings HO326 35 dwellings HO127 9 dwellings HO346 42 dwellings HO354 4 dwellings (est from DPH) HO129 18 dwellings (est from DPH) HO272 16 dwellings HO35 25 dwellings HO77 41 dwellings HO78 10 dwellings</p> <p>Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.</p> <p>The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.</p> <p>KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.</p> <p>KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.</p>
			Heritage and Conservation	<p>Preliminary Heritage Assessment - Potential for remains associated with post medieval farming activity. Some of Terry's Lodge Farm buildings identifiable on 1st Ed OS map. The main farmhouse is a designated heritage asset (Grade II) and is of early 18th century date.</p> <p><i>Heritage Statement required to support any application, including assessment of impact on setting and character of Terrys Lodge.. Formal programme of archaeological works required, subject to details.</i></p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p>

KCC Children, Young People and Education Comment on the draft Local Plan for Sevenoaks District.

Thank you for the opportunity to comment on the draft Local Plan for Sevenoaks District. The local plan is comprehensive and explains the rationale behind the provision of new housing and associated infrastructure.

Background

The National Planning Policy Framework (NPPF) advises that local planning authorities should take a proactive, positive and collaborative approach with education authorities to ensure that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education.

Funding for New Provision

Kent County Council is the commissioner of school places in Kent. This bestows the duty of ensuring that there are sufficient school places at a time and location to accommodate any Kent child of school age who requires a place. New or additional school places are provided by expansions or increase in the school admission numbers, or facilitated by new build through one or a combination of these methods:

- KCC funds expansions of existing schools through Basic Need funding from the government. It should be noted that Basic Need funding is not usually enough and KCC would generally need to make use of unused CIL or section 106 from local authorities. The limit of only being able to utilise a maximum of five separate funds has been a constraint so the recent news that this may be relaxed is welcome.
- The Department for Education funds a new build school through its agencies. This method is not commonly used to accommodate demand from a new housing development, unless the agency can seek section 106 or CIL.
- A housing developer builds a school according to terms laid out in the section 106 agreement. This method relies on the developer working closely with KCC to maintain Government standards for school build, as described in Building Bulletin 103. The developer will sometimes have the choice to pay the section 106 tariff developer contributions, if they feel that the cost of the school build would exceed that tariff. KCC have to then find funding for any difference.
- KCC manage expansions of existing schools, or entire new build schools, using section 106 or CIL funding from District or Borough Councils.

With the exception of the DfE funded build, these funding mechanisms have a tendency to be insufficient to complete a project without additional funding being sought. It must be stressed that there is no county council budget pot that this difference can be sought from, so KCC must seek the maximum amount of CIL or section 106 developer contributions to ensure that the end product is a quality build in accordance with Building Bulletin 103, that the school and local community can be proud of.

Expansion Programme

Once a demand has been identified, KCC initially consider whether any extant schools could be enlarged. However, the expansion programme that has been undertaken over the last eight years has resulted in there being very few schools remaining that can be expanded. Every primary and secondary school in Sevenoaks district has been considered for expansion but we are now close to the point where most schools in the district cannot be expanded any further. There remain a couple of schools that could accommodate an expansion, but these schools are the subject of a plan to accommodate existing demand and new demand created from nearly completed housing developments, such as Ryedale or the Eden Centre.

It is acknowledged that there is a surplus of places across the district against existing capacity, but this would primarily be retained for general migration and changes to the demographic within existing housing stock.

Therefore, to summarise, any additional demand created from new housing in Sevenoaks district can only be accommodated by creating new schools.

Methodology for Calculating the Number of Additional Children from new Housing Development

KCC uses a formula for calculating the number of primary and secondary school places that need to be provided. Nursery places are subject to a different mechanism that considers future demand from new-build plus the existing number of places that are in the immediate area.

The planning calculations uses a figure called the Pupil Product Ratio (PPR) and is expressed as 0.28 for primary and 0.2 for secondary. This means that for our planning purposes, one hundred new build houses will generate 28 primary school children (at any point in time) and 20 secondary school aged children (at any point in time).

Number of Additional Children from new build

Government Delivery Expectation

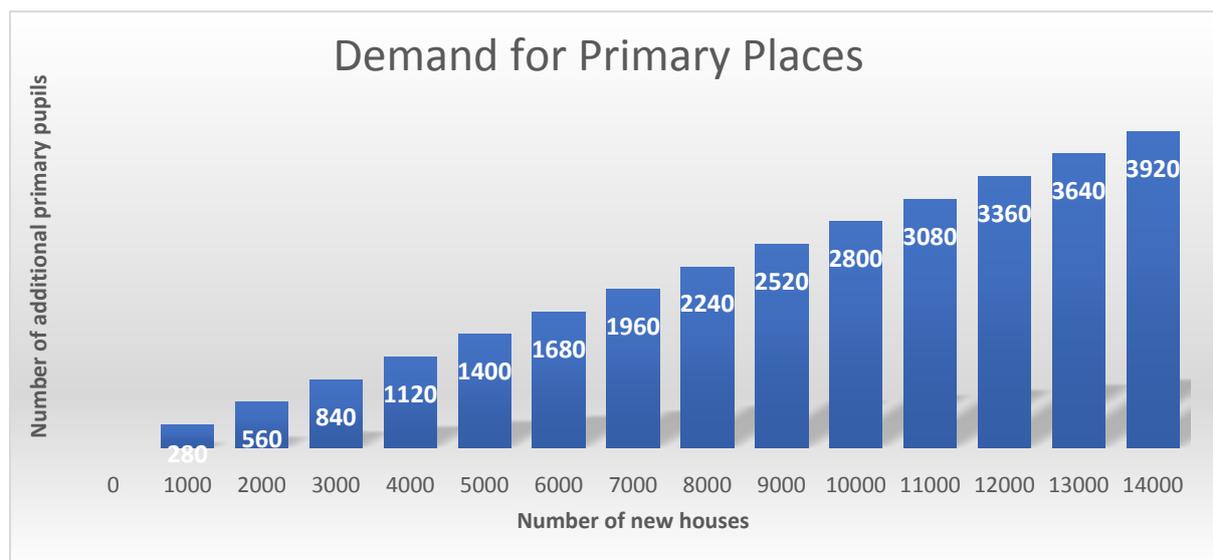
Taking the highest delivery aspiration of 14,000 new homes, we would expect to see an additional 3,920 primary aged children and 2,800 secondary aged children

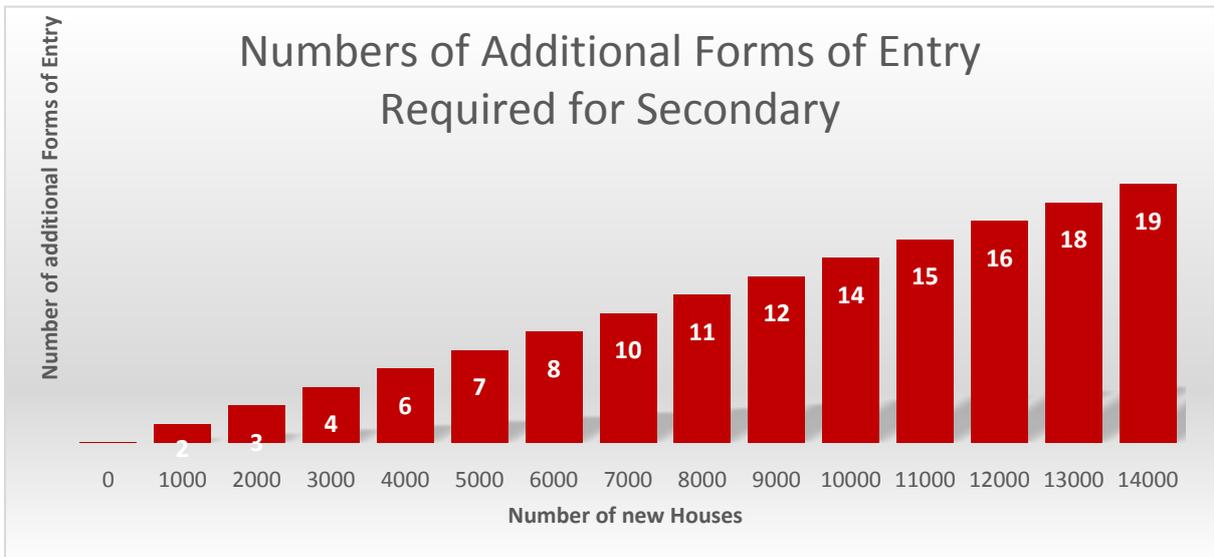
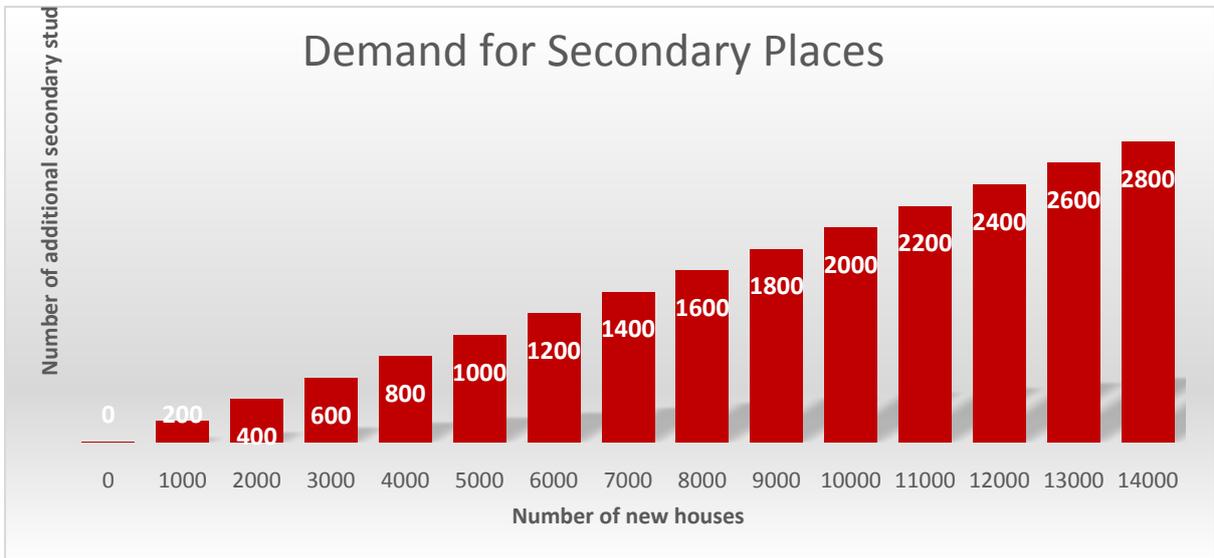
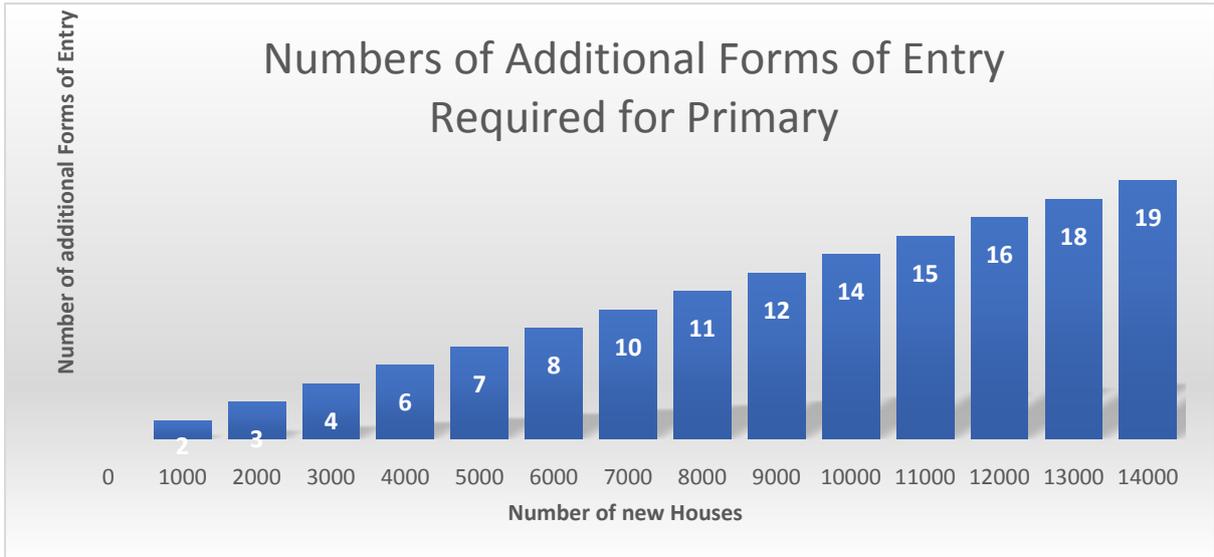
needing a school place, by the time that all the housing development described in this plan is completed. KCC usually measures such new demand as the number of forms of entry (FE) required to accommodate these children.

These numbers of additional children equate to 18.6 forms of entry for primary and 18.6 forms of entry for secondary. The usual size for a new build primary school for years R to 6, is two forms of entry (school roll of 420) and the size of a new secondary school for years 7 to 11 is between six and eight forms of entry (school roll of 900-1,200). To accommodate the children from 14,000 new homes would therefore require eight new 2FE primary schools, one new 3FE primary school and three new secondary schools, one of 7FE and two schools of 6FE.

New Housing Numbers in the SDC draft Local Plan

It is understood that there is not necessarily an expectation that all the proposed developments listed in Appendix 1 – “New Housing and Mixed-Use Sites for Consultation FINAL” to be progressed. With that in mind, the tables below show the demand created from a scale of numbers of new housing from 1,000 to 14,000:





The 2FE and 3FE primary schools and 6-8FE secondary school size is not absolute and where appropriate, KCC would certainly consider larger school sizes. Smaller schools are less likely to be considered, because the smaller the school, the greater the risk of the school being financially viable. It should be remembered that one of the reasons for the closure of Eden Valley School in Edenbridge was the size of the school roll and the impact on school budgets.

It is worth explaining that Pupil Product Ratios do not always materialise and generally in Kent, actual numbers of pupils per 100 dwellings is higher than the Pupil Product Rate (PPR) that was used to calculate the developer contributions or CIL. Kent County Council is currently reviewing the formula in light of a number of recent developments that have generated more than the expected number of school age children. This would have the effect of increasing the numbers of forecasted children, with a corresponding increase in the number of primary and secondary schools needed, beyond that described above.

Type of Dwellings

Following on from an explanation of PPR, KCC would point out that the types and size of homes will also affect demand.

For example, a hundred dwellings with a high percentage of one or two bedrooms flats would likely generate fewer pupils/ students than a hundred 3, 4 or 5 bed roomed homes.

KCC would therefore seek early sight of any masterplans to enable robust planning for education.

Location of New Provision

An additional factor is proximity. Where feasible, KCC would recommend that primary school aged children do not travel more than two miles to their primary schools. The distance for secondary is less of a constraint, although it would not be ideal for secondary students to be travelling long distances to and from school.

In the tables above, KCC has compared the pupil product estimated from the number of new dwellings described in each housing development. However, this is on a district wide basis. Closer analysis on a more local level needs to look at demand and existing capacity. For example, the Pedham Place development is forecast to accommodate 2500 new dwellings. This equates to between 3 or 4 FE of primary. There is no school nearby, nor are there any obvious other sites that could house a primary school. The outcome of this is that all the required additional new provision must be located on the development site.

It is therefore essential that the District Council is committed to identifying and scheduling land for the provision of new schools, during the process of identifying land for housing. This is in accordance with the government planning policy objectives as set out in paragraph 72 of the NPPF, which says that when new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. This consultation response is intended to illustrate that KCC believe that the demand is such in Sevenoaks district that sites must be identified.

With regard to the land required, Building Bulletin 103 offers a range of site sizes that could be considered. A broad measure would be to say that for a 2FE primary school with early years facility and a specialist resource-based provision for special needs children, requires between 1.7 to 2ha of remediated, buildable land. An 8FE secondary school would require between 7 and 8 ha of remediated land.

Relevant Observations

Education Narrative & Dialogue

The local plan documentation is very detailed. However, KCC feels that the commentary around schools provided by housing developers is incorrect, limited or absent in some areas, and too detailed in others.

For example: the bullet points for Pedham Place indicate that a junior school will be provided. A Junior school (Key stage 2, years 3 – 7) would never be provided without a linked Infant school so the local authority must assume that the author is asking for a primary school (Key stages 1 & 2, years R – 7).

An example where too much detail is provided is shown in Swanley where Downsview Primary School is named as the school that would be expanded. Without ruling Downsview out as a candidate for expansion, Kent County Council would need to consider whether this was the most viable solution, considering a list of factors, including: location, cost, proximity to demand, site size, impact on neighbouring schools, willingness of the school, highways issues, Sport England and Ofsted rating.

KCC Education Officers and SDC Planners have recently initiated a dialogue focused on working collaboratively on the education infrastructure required as a result of the draft Local Plan and it is our intention and hope that this dialogue continues. Furthermore, KCC would be very willing to talk to any developer about school provision planning on their site, as we have begun with the developers of sites MX41 and HO371-374.

Commitment to Fully Fund

Kent County Council would like to see a commitment from SDC to ensure that any new build schools are fully funded, either through section 106 developer contributions or through the provision of CIL. The KCC preference would be to fund through section 106 for the more significant developments, but for smaller developments KCC would need some assurance that sufficient CIL funding was available.

Cost of New Provision

The draft Local Plan does not make reference to the cost of providing new provision. Every new build or built expansion will be subject to costs that are peculiar to the site. It is therefore impossible to say with any certainty how much KCC would be seeking for each new provision, until detailed feasibility studies have been completed.

However, purely as a guide to SDC planners, KCC would recommend using the indicative costs listed in Table 1 below. Note that these costs are for the current year and annual inflation increases need to be borne in mind:

Table 1

<i>Build</i>	<i>Cost Range</i>	<i>Average cost</i>	<i>Land Required</i>
0.5FE primary School expansion	£0.8m to £1.3m	£1.05m	N/A
1FE primary school expansion	£2m to £3.5m	£2.75m	0.7ha to 1.05ha
2FE primary school expansion	£3m to 4.5m	£3.75m	1.4ha to 1.8ha
New 1FE primary school	£5m to £6m	£5.5m	1.05ha
New 2FE primary school	£6.5m to £8m	£7.25m	1.7ha to 2.1ha
1FE secondary expansion	£4.5m to £6.5m	£5.5m	N/A
2FE secondary expansion	£6m to £8.5m	£7.25m	1.5ha to 2.5ha
New 4FE secondary school	£22m to £28m	£26m	4.5ha to 5ha
New 6 FE secondary school	£28m to £33m	£30.5m	6ha to 7ha
New 8FE secondary school	£32m to £39m	£35.5m	7ha to 8ha

Education Review Groups (ERGs)

There is no mention of the use of ERGs. An ERG is a group that meets bi-monthly or quarterly, depending the pace or state of the development. They normally constitute three groups, representing the developer (who normally chairs), KCC and the District Council.

The role of the ERG is to agree small changes and issues without the need to seek a variation to the section 106. The status of the ERG and the voting protocols are agreed in the section 106. KCC would be happy to provide the examples of the relevant wording to properly constitute an ERG.

Commissioning Primary School Places by New Development Location

KCC uses a system of planning areas to assess primary demand across the district. A map of the KCC planning areas is at Appendix 1.

KCC has analysed the development sites in Sevenoaks district that will generate a significant increase to primary demand. This analysis was then applied to the planning areas. The planning areas that would be impacted enough to need a built or organisational solution are shown below.

The analysis of each planning area includes a narrative that is pertinent to fully understanding the factors and issues that KCC would need to consider when considering primary and secondary provision, including where appropriate, consideration of adjacent planning areas.

Edenbridge Planning Area

Development sites that impact on this planning area:

HO189, HO190, HO223, MX25 & MX26	515 dwellings
MX10	450 dwellings
MX51	250 dwellings
HO210	15 dwellings
HO364	31 dwellings (est based on DPH)
HO379	5 dwellings
MX44	80 dwellings

Up to 1346 new dwellings would generate 377 primary pupils. This equates to 1.8 FE of primary provision.

There is currently sufficient capacity at Edenbridge Primary School to accommodate about 100-150 additional primary pupils across all seven-year groups. If all options are progressed, an additional 1FE would be required.

Edenbridge Primary School was enlarged two years ago and cannot be enlarged again. The two other primary schools in the planning area (Four Elms PS and Hever CE PS) have small sites and do not lend themselves to enlargement. If the demand increases beyond that forecast, Edenbridge Town will need a new 1FE Primary school built in or near the town.

KCC would prefer, due to the size of any combination of HO189, HO190, HO223, MX25, MX26, MX10 or MX51 development, the education provision be managed through s106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the Edenbridge developments, as has become practice in other developments of this or similar size.

Hartley & New Ash Green Planning Area
Part of Sevenoaks Rural North Planning Area
(Considered together because of adjacency)

Development sites that impact on this planning area:

MX52 & MX53	800 dwellings
H051	13 dwellings
HO165	31 dwellings
HO378	32 dwellings
HO353	10 dwellings
HO384	14 dwellings
MX55	42 dwellings (est based on DPH)

Up to 942 new dwellings would generate 264 primary pupils. This equates to 1.2FE.

There are three schools in the Hartley & New Ash Green planning area. Hartley Academy, Our Lady's and New Ash Green Primary School. There is one primary school in the impacted part of Sevenoaks Rural North planning area, Fawkham CE PS.

There is a small amount of capacity in these four schools, but not enough to accommodate 264 new pupils. This additional demand would require new provision, of between 1 and 1.5 FE.

KCC notes the proposal put forward by the Leigh Academies Trust that describes a plan to relocate Milestone Academy and Hartley Primary Academy onto a single site. The future use or disposal of any KCC freehold land that is released after a relocation, would remain a KCC decision and there is no guarantee that any realised funds would be diverted to support this proposal. It has to be remembered that the current status quo of primary provision and extant housing is balanced and sustainable, so any additional demand created must come with developer funding to provide additional school places. Nevertheless, KCC would be willing to enter discussions around this issue.

KCC notes that the building condition of Hartley Primary Academy and Milestone Academy are being mentioned as supporting factors to the proposal to build a new facility that would accommodate both schools. KCC would remind SDC that the condition and maintenance of these two Academy buildings is the responsibility of the Trust, not KCC.

KCC would prefer, due to the size of the MX52 & MX53 Corinthians and Banckside development, the education provision be managed through s106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX52 & MX53 Corinthians and Banckside development, as has become practice in other developments of this or similar size.

Sevenoaks Planning Area

Development sites that impact on this planning area:

MX43	600 dwellings
MX50	240 dwellings
HO365	73 dwellings
HO226	30 dwellings
MX29	25 dwellings
HO381	16 dwellings
HO217	16 dwellings
HO349	10 dwellings
HO86	9 dwellings
HO44	14 dwellings
HO47	13 dwellings
HO382	25 dwellings
MX49	30 dwellings

Up to 1101 new dwellings would generate 308 primary pupils. This equates to 1.5FE of primary provision.

Sevenoaks Planning Area covers the town of Sevenoaks, Riverhead, Dunton Green, Chevening and extends as far south as Sevenoaks Weald.

There is currently a small surplus of capacity in Sevenoaks Planning Area but this fluctuates and cannot be applied into the planning process. The PPR from the Sevenoaks town sites, especially MX43, would require additional provision of 1FE.

The primary schools in Sevenoaks have all been assessed for viability for expansion over the last seven years. With the exception of Dunton Green PS, it is unlikely that any other expansions will be possible due to site constraints.

Dunton Green could be expanded, although currently the PPR that was expected from Ryedale (circa 450) dwellings has yet to materialise. It may be that an expansion of Dunton Green could accommodate the local PPR from Ryedale and the local PPR from MX50. However, it would then be unlikely to be able to provide any capacity that could be utilised by MX24, HO328, HO368, HO138, HO307, HO49 or MX41 which means that these developments will need new provision.

KCC would prefer, due to the size of the MX43 North Sevenoaks development, the education provision be managed through section 106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX43 North Sevenoaks development, as has become practice in other developments of this or similar size.

Swanley Planning Area

Development sites that impact on this planning area:

HO106	9 dwellings
HO212	19 dwellings
HO224	124 dwellings
HO225	127 dwellings
HO58	16 dwellings
HO73	15 dwellings (est from DPH)
HO10	12 dwellings (est from DPH)
HO197	25 dwellings
HO198	22 dwellings
HO202	7 dwellings
HO222	26 dwellings
HO274	24 dwellings
HO298	13 dwellings (est from DPH)
HO357	12 dwellings (est from DPH)
HO4	71 dwellings
MX32	5 dwellings
MX54a/b	450 / 750 dwellings
MX56	80 dwellings
MX9	16 dwellings
HO124	47 dwellings (est from DPH)

HO97 30 dwellings (est from DPH)

Up to 1450 new dwellings would generate 406 primary pupils. 406 pupil product is nearly a full 2FE primary school.

There is currently some capacity in three of the primary schools in Swanley & Hextable. However, forecasts indicate that this capacity will be largely filled over the next few years. The pupil product from these developments must be accommodated in new provision.

Downsview has been mentioned by the developer as the school that could be expanded. The location of much of the new housing would suggest that Downsview is the best option. However, the demand might better be met with a new 2FE primary school. KCC would be happy to talk to the developer and SDC about options for the Swanley Planning Area.

KCC would prefer, due to the size of the MX54 Beechenlea development, the education provision be managed through section 106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX54 Beechenlea development, as has become practice in other developments of this or similar size.

KCC has no plans to move or relocate Broomhill Bank North Special School from Rowhill Road, Hextable. KCC retains the freehold.

The disposition of the unoccupied Oasis Hextable school site is not yet determined. KCC retains the freehold.

Sevenoaks Rural North Planning Area

Development sites that impact on this planning area:

MX48	2500 dwellings
HO315	55 dwellings
HO326	35 dwellings
HO127	9 dwellings
HO346	42 dwellings
HO354	4 dwellings (est from DPH)
HO129	18 dwellings (est from DPH)
HO272	16 dwellings
HO35	25 dwellings

HO77	41 dwellings
HO78	10 dwellings

Up to 2755 new dwellings would generate 771 primary pupils. 771 pupils constitute 3.6 FE of primary provision.

The planning area is dominated by the Pedham Place development and its 2500 new dwellings. KCC notes the developer is offering to site a new junior school. A junior school offers places to Years 3 to Year 6. It is suggested that the developer means a primary school which offers Reception Year to Year 6. 2500 dwellings would suggest 700 primary pupils which would translate into just over 3 FE of primary provision required. KCC preference would be for two new 2FE Primary Schools to accommodate Pedham Place and the demand from the remaining developments.

KCC would prefer, due to the size of the MX48 Pedham Place development, the education provision be managed through s106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX48 Pedham Place development, as has become practice in other developments of this or similar size.

Sevenoaks Northern Villages

Development sites that impact on this planning area:

MX41	800 dwellings
MX24	300 dwellings
HO328	21 dwellings
HO368	66 dwellings
HO138	13 dwellings
HO307	50 dwellings
HO49	27 dwellings

Up to 1277 new dwellings would generate 358 primary pupils. This equates to 1.7FE of primary provision.

The two significant developments in this area are the Broke Hill development north of Halstead, and the Fort Halstead development which lies south of Halstead. The issue for KCC is that the small primary school in Halstead cannot really be expanded on its current site. To move the school to Broke Hill means that the residents in Fort Halstead would have much further to travel.

As has been mentioned above, KCC believe that the developments in Dunton Green will fill an expanded 2FE Dunton Green Primary School, leaving no capacity for residents from the Sevenoaks Northern Villages planning area. KCC request dialogue with SDC planners over resolution of this issue.

KCC would prefer, due to the size of the MX41 Broke Hill development, the education provision be managed through section 106, rather than through CIL.

KCC would recommend the establishment of an Education Review Group for the MX41 Broke Hill development, as has become practice in other developments of this or similar size. KCC has already had several very helpful meetings with the Broke Hill developers and it is hoped that these will continue in the form of more formal ERG meetings, to include SDC.

Westerham

Development sites that impact on this planning area:

HO371, HO372, 372 & HO 374	600 dwellings
HO327	5 dwellings
HO46	10 dwellings
HO336	6 dwellings (est from DPH)
HO342	14 dwellings

Up to 635 new dwellings would generate 177 primary pupils. This equates to 0.9FE of primary provision.

With sufficient funding, KCC believe that this demand could be accommodated within existing schools, probably by way of an expansion if deemed necessary at the time of these developments coming to fruition.

Sevenoaks East

Development sites that impact on this planning area:

HO104	15 dwellings
HO133	20 dwellings
HO340	20 dwellings (est from DPH)
HO102	19 dwellings (est from DPH, incl in this planning area for adjacency)

Up to 74 new dwellings, generating 20 pupils which could be accommodated in existing provision.

Secondary

The forecasting and analysis of secondary provision is not done through planning areas. The forecasts are district-wide and then a 'travel to school area' methodology is applied to consider where new students are likely to go to school. This will factor in the three supplementary factors of faith, gender and grammar.

Using raw figures, 14,000 new dwellings would create demand for 2800 additional places. This translates to 18.6 forms of entry for secondary. There is no surplus secondary capacity in Sevenoaks district, nor is there any capacity in neighbouring districts or boroughs.

KCC is considering commissioning an additional 2FE of secondary for 2020, but this is to accommodate existing demand. The conclusion is that there is no surplus capacity nor are there any remaining expansion options. The only solution is new secondary schools. The question to be determined is whether Sevenoaks district would need two secondary schools or three.

Edenbridge

Many people from Edenbridge have wanted a secondary school since the closure of Eden Valley School in 2002. KCC offers no opposition to this aspiration, but any new school must be viable. The existing secondary demand, added to the additional demand created if ALL the Edenbridge sites are developed would still only create about 4FE. This is because many Edenbridge students would still prefer to attend Grammar or faith schools in Tonbridge or Tunbridge Wells.

A point of support would be available if the school was located in the north of the town, so making it more accessible for students from Westerham.

A 4FE secondary school in Edenbridge could be vulnerable financially, but if such a school can be proven to be part of the whole secondary solution for Sevenoaks, KCC would of course, give it serious consideration.

Sevenoaks

The town of Sevenoaks will likely need a new 6FE secondary school if the numbers of dwellings recorded in the draft Local Plan are built in the district. It could be built anywhere in or outside the town, but KCC are conscious of the green belt issues.

Nevertheless, with the amount of housing development being proposed in this draft Local Plan, without a new 6FE school, KCC would have difficulty supporting housing development in the Sevenoaks, Halstead and Dunton Green areas.

Swanley, Hextable & Hartley

A new 8FE secondary school will be needed for the students generated by the housing developments being proposed in the northern half of the district.

Due to the distances involved, it would be sensible to site the new school in the Pedham Place development as it lies half way between Hartley and Swanley/Hextable as well as good transport links from the A20.

With the amount of housing development being proposed in this draft Local Plan, without a new 8FE school, KCC would have difficulty supporting housing development in the Swanley, Hextable, Pedham Place and Hartley areas.

Other Areas

If the three schools described above were to be created, then they would likely be sufficient to accommodate any additional secondary demand. However, this is dependent on the forecasts showing manageable numbers of demand over the next five to fifteen years from stock housing and from newly built housing, outside the proposals described in the draft Local Plan.

Summary

Summary points include:

- There is limited primary capacity in Kent, and what capacity exists has been identified as necessary to accommodate demand from stock housing over the next five years.
- KCC has no budget to fund new schools or built expansions necessitated by new development.
- KCC must seek s106 or CIL to cover the entire project costs of any new build or built expansions.
- KCC would prefer that all the larger developments are managed through s106 agreements.
- KCC recommend that Education Review Groups are set up for the larger developments.

- With the exception of Broke Hill and Hartley there has been no discussion between any developers and KCC over either the freehold of KCC land, or the need to include additional school provision, appropriate to the size of the development.

Potential Costs

The following summary of tariff-type costs is based on the KCC planning area analyses above for the proposed new dwellings described in the draft Local Plan and the average costs at table 1:

<i>Planning Area</i>	<i>Education Requirement</i>	<i>Est Cost £m</i>
Edenbridge	1FE New primary school	5.5
	4FE New secondary school	26
Hartley & New Ash Green & Part of Sevenoaks Rural North	2FE primary expansion	3.75
Sevenoaks	2FE New primary school	7.25
	6FE New secondary school	30.5
Swanley	2FE primary expansion	3.75
Sevenoaks Rural North	2FE New primary school	7.25
	2FE New primary school	7.25
	8FE New secondary school	35.5
Sevenoaks Northern Villages	2FE New Primary school	7.25
Westerham	1FE primary expansion	2.75
	<i>tot</i>	136.75

These costs would reduce significantly if any developer opts in a s106 agreement to undertake to build any new provisions themselves.

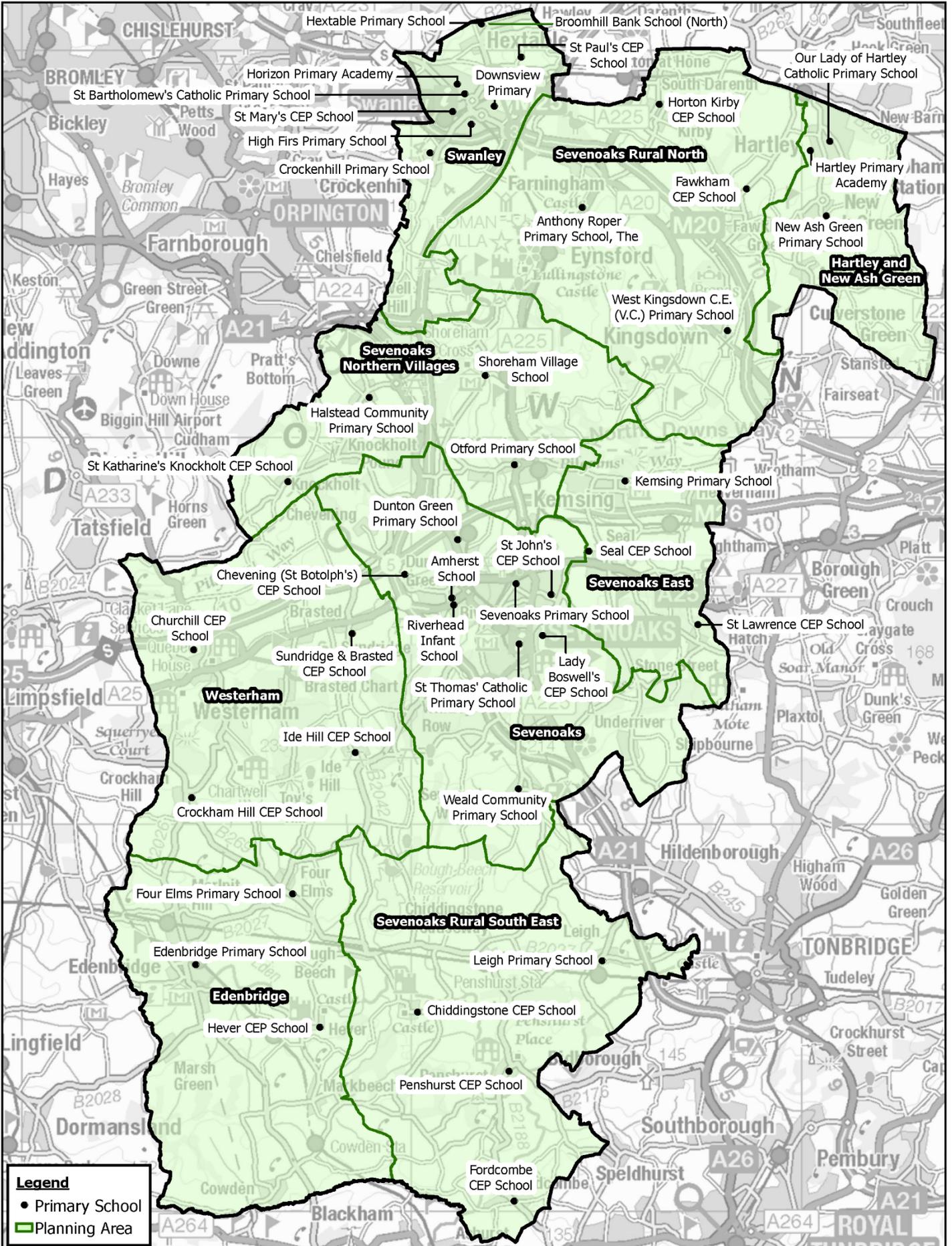
Ian Watts

Area Education Officer for Dartford, Gravesham & Sevenoaks

Tel: 03000 414302

Email: ian.watts@kent.gov.uk

Sevenoaks District Primary Planning Areas



	Site Reference
Sevenoaks	MX43
	MX49
	MX50
Swanley	MX54a
	MX54b
	MX48

Edenbridge	MX25
	MX26
	HO189
	HO190
	HO223
	MX51
	MX10
	MX44
Westerham	HO371
	HO372
	HO373
	HO374
	EM17

Fawkham/Hartley	MX52
Halstead/Pratts Bottom	MX53
	MX41

Site Address	Site Capacity
Sevenoaks Quarry, Bat and Ball Road, Sevenoaks	600
Land west of Chevening Road, Chipstead	30
Land rear of the Village Hall, London Road, Dunton Green	240
Land between Beechenlea Lane and the railway line, Swanley	400
Land between Beechenlea Lane and Highlands Hill, Swanley	750
Land at Pedham Place (wider), Swanley	2500

Land east of Four Elms Road and north of Skinners Lane, Edenbridge	
Land south of the railway line, Four Elms Road, Edenbridge	
Land south of Skinners Lane, Edenbridge	265
Land north of Skinners Lane, Edenbridge	50
Land east of Bray Road, Edenbridge	200
Land south west of Crouch House Road, Edenbridge	250
Land at Breezehurst Farm, Crouch House Road, Edenbridge	450
Land west of Romani Way, Edenbridge	80
Land south of Farley Lane, Westerham	9
Land north of Farley Lane, Westerham	59
Land east of Croydon Road, Westerham	166
Land south of Madan Road, Westerham	366
Land south of Beggars Lane, Westerham	B1-B8

Land at Corinthians Sports Club, Valley Road, Fawkham	570
Land between Parkfield and Fawkham Road, Fawkham	230
Land at Broke Hill Golf Course, Sevenoaks Road, Halstead	800

Documents included 02/08/18

Sevenoaks Quarry Northern Sevenoaks Extension Report - 28 March 2018

MX49

MX50

Land East of Swanley Option 1 , SK1-15 Land East of Swanley Option 2 , SK1-16
Land East of Swanley Option 3 , SK1-17 Land East of Swanley Option 4 , SK1-18
Land East of Swanley Option 4a , SK1-19 Land East of Swanley Option 4b , SK1-20
Land East of Swanley Option 5 , SK1-23 Land East of Swanley revision A

MW54a & MX54b

Pedham Place Swanley - Location Plan , Pedham Place proposals

MX48

FN46 WSP Transport Technical Note Edenbridge

MX51

MX10

MX44 only Call for Sites information

HO371 / HO372 / HO373 / HO374

MW52 & MX53

MW52 & MX53

MX41

<http://simplesend.it/d/f732fca01e18487e919f607b146f3cf0b277a7c69e5148>

Documents Required
Transport Assessment was received 10/08/18 - to be reviewed.
Transport Statement
Transport Assessment
Transport Assessment Modelling required.
Transport Assessment Modelling required.

Transport Assessment with Travel Plans for each of the proposed uses.
Transport Assessment
Transport Assessment
Transport Statement
Transport Technical Note received and considered.
Transport Assessment
Transport Assessment
Transport Assessment
Transport Assessment

Transport Assessment required

Transport Assessment required

Transport Assessment received
08/08/18

KCC Highways Comments

800 homes. The development of this area has the advantage of being brownfield land and whilst pedestrian and cycle links could be provided into Sevenoaks and public transport provision is available at Bat and Ball and Dunton Green there are concerns regarding sustainability and congestion. The land is some distance from Sevenoaks Centre (some 3km) and this is likely to lead to additional congestion. The existing junction of the A225 and A25 at Bat and Ball junction is notoriously busy and already suffers from congestion, queues and delays. New road links and or improvements to key junctions are not obvious. Further comments cannot be made until Transport Assessment provided - David Tucker Associates to produce. Bat & Ball junction traffic signals and Greatness Lane / Seal Road junction particularly.

Pre-application advice provided on masterplan for circa 30 dwellings, with recreation ground and public car park for 30 cars. Off site highway works - pedestrian crossing. Please see separate tab for full response.

New access on to London Road. Emergency access required? Capacity assessment to be submitted. Appendix 2 Access Strategy not shown.

See separate tab

A development of this scale requires a transport assessment to assess the impact of the development on the existing highway, access arrangements, public transport facilities and measures to encourage and promote cycling and walking. The site is located close to the strategic highway network and therefore Highways England should be consulted. Accessibility between the site and Swanley Centre is likely to be a problem especially for walking and cycling.

MX25 - Medical hub incl GP surgery, dental practice, hospital services facilities
MX26 - Community facilities, secondary school 4-6 form entry (600-900 pupils)
HO189 & HO190 - Approximately 265 dwellings. Pedestrian Home Zones. New 'T' Junction onto Four Elms Road, new vehicular access to some housing via new roundabout onto Four Elms Road, further north. Pedestrian and cycle connectivity.
HO223 - Promoted by KCC for residential
Approximately 250 dwellings, new access required, plus secondary / emergency access. Full Transport Assessment required to assess the impact of proposed junctions
Proposed medical centre to the north of Breezhurst Farm with access approximately 40 metres from where road bend to Little Browns Lane. Potential visibility issues. Second access to the south of mobile home site. Full TA required to enable full assessment.
Full Transport Statement required before full assessment can be made.
Technical Information has been provided in respect of the allocation for 600 homes and relief road to Westerham. This indicates that the provision of the relief road and the development would reduce traffic flows along the A25 through Westerham. This would reduce congestion, queues and delays and provide opportunities for the delivery of sustainable transport measures and public realm improvements.

DHA Planning Consultants. Transport route studies required on the road network leading to the Strategic road network and local rural roads.

Transport Assessment has been scoped with KCC and has been received and considered.

Access	Score A, B or C
Existing roads may be suitable provided traffic generation is well spread. However local junctions may require attention or difficult to improve. Several existing access points available.	A
New access proposed to the north of the existing access. Providing access for dwellings and 30 space community car park. Visibility issues due to retained hedge. Request for 43mx2mx0.6m.	B
Access directly onto A224 London Road. Junction type needing assessment (possible mini-roundabout). Emergency access reqd. - possible combined with cycle / pedestrian	B
Options 1 to 4	C
Option 5	B
Transport Assessment required to inform of access arrangements	B

Main residential accessed via new priority controlled T-junction off B2027 Four Elms Road. Visibility splays 2.4mx120m. Medical Centre / school and residential accessed via new four arm roundabout junction with Wayside Drive.	B
Two potential access outlinsed off Crouch House Road.	B
Two proposed accesses, one to the north of Breezehurst Farm and one to the south of St Brelade's Court mobile homes site.	A
New access could be made off Hever Road	B
Access to the development would be gained via the relief road.	B

<p>A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Valley Road. A development of more than 300 homes requires two accesses.</p>	<p>B</p>
<p>A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Fawkham Road. A development of up to 300 homes could be accessed from a single point of access with an additional emergency access provided and a looped arrangement in the development.</p>	<p>B</p>
<p>Two accesses onto London Road and this accords with Kent Design. Emergency / cycling / walking access can be provided to connect rural roads.</p>	<p>B</p>

Transport Asses	
Capacity	Score A, B or C
Full TA required to assess.	C
Development of this scale would not be likely to lead to any significant impact on capacity.	A
Unlikely to cause capacity problems on network given only 250 houses.	A
Options 1 to 4	C
Option 5	B
Close to strategic highway but a development of this scale requires a transport Assessment and modelling to identify where mitigating measures are required.	B

<p>Circa 300 dwellings, plus 600-900 pupil secondary school, plus medical centre. Trip rates have been assessed, including scheme for 300 dwellings at St John Way / Enterprise Way (14/03783/OUT). AM & PM peaks. Surveys undertaken at four junctions - Four Elms Road / Wayside Drive, Station Road / Four Elms Road, Station Road / St Johns Way / Commmerce Way, Station Road / Enterprise Way</p>	B
<p>Full TA required to enable capacity to be fully established.</p>	B
<p>Full TA required to enable capacity to be fully established. Large site constrained by railway line to the north and south. Adjoins already consented application 14/03783/OUT for 300 dwellings which will need to be fully included in capacity assessment. Junction capacity at Enterprise Way / Station Road and St Johns Way / Station Road.</p>	B
<p>Full Transport Statement required. Site located on eastern edge of Edenbridge. Potential capacity on Hever Road. Junction capacity at Hever Road / High Street / Mill Hill may need to be assessed.</p>	B
<p>Relief road would improve capacity.</p>	A

<p>A Transport Assessment would assess the impact of the development and areas where mitigating measures are required. The scope of the TA should include route assessments on the existing highway network which would be used to access the strategic highway, Ebbsfleet, Bluewater. Capacity assessments will be required at key junctions.</p>	<p>C</p>
<p>As above</p>	<p>C</p>
<p>A capacity assessment has been completed. Additional information is required to address outstanding concerns relating to the traffic impact along Wheatsheaf Hill and at the Hewitts roundabout.</p>	<p>B</p>

sment	
Sustainability	Score A, B or C
Primary schools 2km away. Other facilities within 800m.	B
The site is located withing cose proximity to Chipsetad centre, and local buses	B
? Capacity of Dunton Green Primary School. All criteria met.	A
Options 1 to 4	B
Option 5	B
Access to Swanley Centre and rail difficult for pedestrians and cyclists.	C

Within close proximity to Edenbridge town centre.	A
Site is approximately 500 metres due west of Edenbridge High Street. However, Walking access via Crouch House Road, and Stangrove Road. Bus stops located on Crouch House Road.	A
Access to Edenbridge through permitted scheme via Enterprise Way. Two railway stations within walking distance.	A
Located on the eastern edge of Edenbridge. Pedestrian links limited and would need improving.	B
Relief Road would allow opportunities for sustainable travel and public realm improvements.	A

Connections to Longfield and it's station could be provided for buses, cycling and walking.	B
As above	B
The site is close to the Knockholt station and a development of this scale would be expected to deliver public transport improvements and walking and cycling opportunities.	B

Conclusion	
Await full TA before full assessment can be made	
Await TA for further assessment	
Transport Assessment required to inform of access arrangements. Close to strategic highway but a development of this scale requires a transport Assessment and modelling to identify where mitigating measures are required. Access to Swanley Centre and rail difficult for pedestrians and cyclists.	

<p>Edenbridge is located in a rural area without the benefit of high quality principle roads. It is accessed via B roads to the north and to the east and a 'c class' road (Lingfield Road) to the west. These roads are single carriageway with constraints along their routes including villages, bends and narrowings. There are no obvious improvements to bring these routes up to a principal route status. Development which leads to any significant increase in traffic movements is likely to lead to traffic issues along these routes. Edenbridge does however benefit from 2 rail stations- providing links between Uckfield/London and Redhill and Tonbridge.</p>	
<p>Access to the development would be gained via the relief road. Relief road would improve capacity and allow opportunities for sustainable travel and public realm improvements.</p>	

<p>A development of this scale would require a Transport Assessment to inform of the access arrangements. Access should be taken from Ash Road this being more suitable than Fawkham road and Valley Road. A development of more than 300 homes requires two accesses. A Transport Assessment would assess the impact of the development and areas where mitigating measures are required. The scope of the TA should include</p>	
<p>As above</p>	
<p>Two accesses onto London Road and this accords with Kent Design. Emergency/cycling Walking access can be provided to connect rural roads. A capacity assessment has been completed. Additional information is required to address outstanding concerns relating to the traffic impact along Wheatsheaf Hill and at the Hewitts roundabout. The site is close to the Knockholt station and a development of this scale would be expected to deliver public transport improvements and walking and cycling opportunities.</p>	

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Growth, Environment & Transport

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Phone: 03000 415981
Ask for: Barbara Cooper
Email: Barbara.Cooper@kent.gov.uk

14 September 2018

BY EMAIL ONLY

Dear Hannah,

Re: Sevenoaks District Council - "Draft Local Plan" Consultation July 2018

Thank you for inviting Kent County Council (KCC) to comment on the draft Local Plan for Sevenoaks.

The County Council acknowledges the huge challenge in meeting the identified housing need in a highly constrained district and is supportive of the Draft Local Plan approach, which seeks to meet all the housing need within the Sevenoaks boundary.

The County Council supports the Draft Local Plan's preferred option for growth, which looks, first of all, at prioritising growth in existing settlements and redeveloping previously developed land in sustainable locations. KCC appreciates that, even with promoting high density development in such sites, where appropriate, this will only be able to deliver a proportion of the identified housing need for the district.

In looking to provide sufficient sites to meet the housing need, the County Council supports the Draft Local Plan's approach to then look at sites in the Green Belt, provided that this is done in exceptional circumstances, where appropriate and necessary social and community infrastructure is proposed in addition to the housing, and provided that such infrastructure would help address an evidenced infrastructure deficiency in the area. KCC notes that these sites would accommodate a significant proportion of the identified housing need, comprehensively delivering c. 6,800 homes, and that the sites are still being tested by Sevenoaks District Council for suitability, with no guarantee that they will be included in the final draft Local Plan.

The County Council is working closely with the District Council on assessing all the potential sites, and particularly welcomed the opportunity to discuss the Draft Local Plan at a constructive Duty to Cooperate meeting on 1 August 2018. The

inclusion of all the sites put forward by the County Council during the Call for Sites in 2015, is also welcomed.

KCC requests continued engagement as further information for each of the sites emerges, to ensure that each development will fund the infrastructure improvements needed to meet the demand that it creates. There is likely to be particular impact on KCC infrastructure and services as a result of development at Broke Hill Golf Club, Edenbridge, Farningham (Pedham Place Golf Centre), Fort Halstead/Halstead/Badgers Mount (potentially in combination with Broke Hill Golf Course), Hartley, Swanley & Hextable, North Sevenoaks (covering Sevenoaks Quarry, Otford Road and St John's area) and Westerham.

In considering the highways and transportation implications, KCC will continue to work closely with Sevenoaks District Council as the preparation of evidence continues. Only a few sites have, so far, demonstrated that they are able to adequately mitigate their impact and therefore further work has been requested. KCC notes that site promoters have been asked to submit transport assessments/transport statements where their development is of a significant scale and is likely to have a significant impact. As this information is received, the County Council will continue to review and provide comments. Additionally, the County Council has jointly commissioned Sweco to prepare a district-wide transport assessment to consider the impact of the Local Plan development strategy and to identify where mitigating measures will be required. This information is currently being prepared and should be available in November.

KCC recognises that the selection process for proposed sites within this consultation is ongoing - this uncertainty creates a challenge in providing a comprehensive infrastructure requirement breakdown at this stage as the exact need for the range of service and infrastructure requirements will be determined by which of the site options come forward in a given area. As an example, in Edenbridge, determining whether additional primary and secondary education provision can be accommodated within existing capacity or whether new school places will be required will depend upon which of the three large sites and the smaller sites are put forward in the Local Plan.

Accordingly, continued engagement will be vital as you progress the Draft Local Plan and Infrastructure Delivery Plan over the next few months, and the County Council looks forward to helping shape the growth strategy to ensure that the right infrastructure is identified for each site, alongside the mechanisms for its delivery.

KCC provides detailed environmental and technical comments on the Draft Local Plan policies and potential site allocations. For ease of reference, these are set out in comprehensive schedules accompanying this letter.

The County Council recognises the importance of the Local Plan in identifying sites suitable for development within the district, in enabling the delivery of new housing, employment and required infrastructure in response to local needs. The County Council looks forward to continuing the established and collaborative working arrangements in place between the two authorities. The County Council

will continue to welcome this positive engagement as assessment of the development sites progress; and more generally in the overall preparation and progression of the Local Plan.

If you require any further information or clarification on any matter raised in KCC's response, please do not hesitate to contact me.

Yours sincerely,



Barbara Cooper
Corporate Director – Growth, Environment and Transport

Encs:

Appendix 1: Schedule of KCC's Technical Responses to Policies

Appendix 2: Appendix 2 KCC Site Specific Commentary for Policy 2

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Pg	Chapter	Policy	Respondent	Commentary
Sevenoaks District Council Local Plan - Proposed Submission Version				
13	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Provision and Delivery of County Council Community Services	<i>What is the District Like?</i> The Local Plan states that there are four state secondary schools within the District (this includes the satellite of Weald of Kent Grammar). This satellite school is assessed as part of the secondary school capacity for the Tonbridge and Malling Borough. The Local Plan also notes that many secondary school pupils travel outside the district for education. KCC is concerned with the sustainability of this approach as secondary schools in neighbouring districts come under increasing pressure from growth in their districts.
20	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy ST1 A Balanced Strategy for Growth in a Constrained District	Provision and Delivery of County Council Community Services	
21	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Provision and Delivery of County Council Community Services	<i>Paragraph 1.4</i> Within the table setting out the District Council's priorities for the four main towns, KCC recommends that there is mention of the need to provide a new secondary school.
26-30 Page 181	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Highways and Transportation	<i>ST2-13 Sevenoaks Quarry</i> The requirement for improvements to Bat and Ball junction have been identified in the Draft Plan at page 26 ST2-13, however the infrastructure improvements required to mitigate the impacts of the development have not been identified or assessed in terms of safety, capacity and deliverability. The traffic generated by the development is at a level that would significantly add to existing capacity issues resulting in further delays and queuing on the existing highway network which already is congested at the Bat and Ball junction and further afield. A Transport Assessment is required to assess the impact of the development and mitigation required. This should also include evidence of how safe and suitable access to the site can be achieved, and what opportunities for sustainable transport modes can be taken up. Accessibility and sustainability- The site lies some 3km north of Sevenoaks and therefore any development of this site would require regular and frequent bus services, cycle routes and footways to allow connection with Sevenoaks Town. A footbridge on Watercress Drive allows pedestrian access to the retail and industrial area to the west of the rail line but this is remote and unlit. The route for mobility impaired pedestrians and cyclists is difficult. This should be addressed. The site is convenient for Bat and Ball train station however access for the mobility impaired may not be available to both platforms. Cycle and pedestrian access to the schools and local facilities should be considered in a Transport Assessment. Access- Vehicular access is proposed via Bat and Ball Road. Developments over 300 homes require two points of access which do not appear to be provided. Visibility at the junction of Bat and Ball Road and the A225 Otford Road is restricted due to the road alignment and therefore speed surveys and visibility measurements are required. A number of units (approximately 150) would be accessed from Farm Road as a cul-de-sac. A looped access arrangement and an emergency access should be provided. Alternatively, a link between the two sites could be considered. Access to Childbridge Lane should be provided for emergencies/cycling and pedestrians. Also access to Seal primary school from the development should be considered. Access to Farm Road is gained via Greatness Lane and Mill Lane from the A25. These roads are residential streets which are restricted in width due to on-street parking. A traffic calming scheme with some parking restrictions is recommended to mitigate the impact of the additional traffic on these residential streets. Visibility onto the A25 from these residential streets is a concern and evidence of the vision splays should be provided. Improvements are required to the junction of A25/Greatness Lane with consideration given to easing the radius on the west side of the junction and relocating the loading bay. Details are required of the crash history and this should include a plot of the crashes together with details for the latest 3-year period. Traffic Impact- A Transport Assessment should include details of the phasing of the development and how it fits with the completion of the quarrying and restoration works. A25/A225 Previous assessment of the Bat and Ball junction indicates that mitigating measures will be required. Drawings are required of the options to improve capacity together with safety audit and capacity assessments for 2035. In addition to A25 Seal Road/A225 Otford Road (Bat and Ball junction), capacity assessments are also required at the following junctions for 2035: <ul style="list-style-type: none"> • A225/Bat and Ball Road • A25/Greatness Lane • A25/Mill Lane

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks Proposed Submission Version consultation and Additional Consultations

Pg	Chapter	Policy	Respondent	Commentary									
				<ul style="list-style-type: none"> A225/Bat and Ball Road A25/London Road A25/A224 Amherst Hill <p><i>ST2-33 Land off Four Elms Road and ST2-34 land east of Bray Road</i></p> <p>A Transport Assessment is required to assess the cumulative impact of this development and the site between Hartfield Road and Hever Road with mitigating measures identified. This assessment should include evidence of how safe and suitable access to the site can be achieved, and what opportunities for sustainable transport modes can be taken up.</p> <p><i>ST2-28 Land at Pedham Place, Swanley, Farningham, Eynsford</i></p> <p>Considerable new infrastructure would be required to accompany a development of this scale. There are concerns over the sustainability of the site as access to Swanley will be difficult across M25 Junction 3. In order for this development to be accessible by modes other than the private car, significant improvements will be required to the pedestrian and cycle facilities to link the site with Swanley Town Centre. Additionally, capacity improvements will be required at M25 Junction 3 and Highways England will also be likely to have concerns. The highway network through Swanley already experiences congestion and delays and the recent Swanley Transport Study has identified measures and opportunities to help to alleviate these problems whilst improving accessibility for other modes of transport. The development of the Pedham Place site would be expected to contribute towards these measures.</p> <p>A development of this scale will have far reaching impacts which have yet to be assessed. A Transport Assessment is required which assesses the impact of this development on the highway network and identifies and models the mitigating measures required.</p>									
26-30	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Public Rights of Way and Access Service	KCC recommends that as there are recorded PRow that pass directly through the identified strategic sites, then 'new pedestrian and cycle connections within and beyond the site' should be noted for all the sites, not just the 'Sevenoaks Quarry'. It is also requested that enhancements to the existing PRow network are considered for each site, in preparation for the expected increase in use of the existing paths as a result of the proposed developments.									
Page 292	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy ST1 A balanced strategy for growth	Minerals and Waste	Please see comments set out under "General Comment on Sevenoaks District Council Local Plan - Proposed Submission Version" – (below paragraph 107), on page 16.									
30	Chapter 1 A Balanced Strategy for Growth in a Constrained District		Provision and Delivery of County Council Community Services	KCC notes that Pedham Place has been identified as a "Broad Location for Growth" in accordance with National Planning Policy Framework (NPPF) but its release from the Green Belt will only be considered in the next review of the Local Plan in five years' time. Whilst the site has been included as an allocation under Policy ST2 it cannot, at this stage, be considered as there is no certainty that the site will come forward. Any infrastructure assessment of this site carried out by the County Council will, therefore, be considered separately and in addition to the other housing sites allocated under Policy ST2.									
33	Chapter 1 A Balanced Strategy for Growth in a Constrained District	Policy ST2 Housing and Mixed Use Site Allocations	Highways and Transportation	<p>KCC Highways has previously provided comments relating to the sites included in the Reg 18 consultation. An updated version of these comments relating to the sites going forward in the Regulation 19 consultation are as follows:</p> <table border="1"> <thead> <tr> <th>Ref.</th> <th>Settlement /Site</th> <th>No of units</th> </tr> </thead> <tbody> <tr> <td>1</td> <td><i>Delivery and Post Office / BT Exchange, South Park, Sevenoaks</i> Transport Assessment required. Sustainable location – facilities and train station within walking distance. Junction assessments required at London Road / High Street and Granville Road / London Road as a minimum.</td> <td>100</td> </tr> <tr> <td>2</td> <td><i>5 Crownfields, Sevenoaks</i></td> <td>20</td> </tr> </tbody> </table>	Ref.	Settlement /Site	No of units	1	<i>Delivery and Post Office / BT Exchange, South Park, Sevenoaks</i> Transport Assessment required. Sustainable location – facilities and train station within walking distance. Junction assessments required at London Road / High Street and Granville Road / London Road as a minimum.	100	2	<i>5 Crownfields, Sevenoaks</i>	20
Ref.	Settlement /Site	No of units											
1	<i>Delivery and Post Office / BT Exchange, South Park, Sevenoaks</i> Transport Assessment required. Sustainable location – facilities and train station within walking distance. Junction assessments required at London Road / High Street and Granville Road / London Road as a minimum.	100											
2	<i>5 Crownfields, Sevenoaks</i>	20											

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks Proposed Submission Version consultation and Additional Consultations

Pg	Chapter	Policy	Respondent	Commentary	
				Gradient of site makes the site difficult. Development of this scale would not be likely to lead to any significant impact on capacity. Access - visibility appears to cross third party land. Existing access onto Crownfields could be utilised. Within walking distance to local facilities and services.	
				3 <i>15 St Botolphs Road, Sevenoaks</i> Improvements to existing access required.	12
				4 <i>School House, Oak Lane and Hopgarden Lane, Sevenoaks</i> Transport Statement required with evidence that safe and suitable access can be achieved with adequate visibility, with pedestrian links provided.	56
				5 <i>Johnsons, Oak Lane and Hopgarden Lane, Sevenoaks</i> Transport Statement required with evidence that safe and suitable access can be achieved with adequate visibility, with pedestrian links provided.	54
				6 <i>Sevenoaks Hospital</i> Existing access, but improvements will be required. Transport Statement will be required to assess capacity and junctions.	73
				7 <i>Sevenoaks Community Centre</i> Transport Statement required. Use of existing access off Cramptons Road. Contribution may be required towards improvements to Bat and Ball junction and cycle network.	75
				8 <i>Cramptons Road Water Works, Sevenoaks</i> Transport Assessment required. Contribution towards improvements to highway network, including Bat & Ball junction and cycle network between Otford and Sevenoaks.	126
				9 <i>Sevenoaks Gasholders, Cramptons Road, Sevenoaks</i> Transport Assessment required. Contribution towards improvements to highway network, including Bat & Ball junction and cycle network between Otford and Sevenoaks.	98
				10 <i>Sevenoaks Town Council Offices, Bradbourne Vale Road, Sevenoaks</i> Utilise existing access onto Bradbourne Vale Road. A development of this scale would not be likely to lead to any significant impact on capacity. Within close proximity to local facilities.	32
				11 <i>Sevenoaks Adult Education Centre, Bradbourne Road, Sevenoaks</i> Utilise existing access on Bradbourne Road. A development of this scale would not be likely to lead to any significant impact on capacity. Within close proximity to local facilities	30
				13 <i>Sevenoaks Quarry, Bat and Ball Road, Sevenoaks</i> Comments included under Chapter 1.	600
				15 <i>Chaucers of Sevenoaks, London Road, Dunton Green</i> Existing access onto London Road. A development of this scale would not be likely to lead to any significant impact on capacity. Pedestrian and cycle routes available from the site to local centre Dunton Green.	11
				16 <i>Swanley Centre, Nightingale Way, Swanley</i> This is a town centre development in a sustainable location. Improvements are required to the accessibility of the site for pedestrians and public transport users and as the development will lead to some additional traffic, mitigating measures are required to help ease congestion. This should include the following: <ol style="list-style-type: none"> 1. Existing controlled crossing on High Street to be upgraded to a puffin to allow improved management of pedestrians crossing and increased capacity; 2. Direction signing of the car park; 3. Interactive signs on 3 approaches – Swanley Lane, High Street and A20. S106 funding required for: <ol style="list-style-type: none"> 1. Amendments to Controlled Parking Zones £5000 or amount to be agreed with local planning authority; 2. Bus service ½ hourly loop of Swanley to be provided on market days during phase 1 construction period and to continue until 3 years after 	250

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks Proposed Submission Version consultation and Additional Consultations

Pg	Chapter	Policy	Respondent	Commentary	
				<p>full occupation. Developer to meet the cost and revenue received to be used to fund continuation of the service after the 3 years;</p> <ol style="list-style-type: none"> 3. Sustainable Transport fund of £250k for footway works and/or extended bus service to provide for bus service 6 days per week; 4. Car club membership for residential units for 3 years from occupation; 5. Travel plan required – to be uploaded onto Jambusters website with annual monitoring for period of 5 years from full occupation; 6. Parking management plan - to include restriction of parking in the bays between blocks 1 and 2 in order that this area is free for market day van parking from 0700 hrs; 7. Construction management plan; and 8. Deliveries to be restricted between 0800 to 0930 and 1630 to 1800. 	
				<p>17 <i>Bevan Place, Swanley</i> Transport Assessment required. Appropriate contribution towards Swanley Transport Study schemes / measures.</p>	100
				<p>18 <i>Bus Garage and Kingdom Hall, London Road, Swanley</i> Transport Statement required. Appropriate contribution towards Swanley Transport Study schemes / measures.</p>	74
				<p>19 <i>The Woodlands, Hilda May Avenue, Swanley</i> Existing access may require widening. Facilities within walking distance. Appropriate contribution towards Swanley Transport Study schemes / measures.</p>	66
				<p>20 <i>White Oak Leisure Centre, Hilda May Avenue (as part of a leisure centre replacement programme)</i> Transport Statement required. Emergency access required. Existing access may require improvements, Junction capacity assessment of Hilda May Avenue and London Road required. Appropriate contribution towards Swanley Transport Study schemes / measures.</p>	80
				<p>21 <i>Land between 16 and 32 Alder Way, Swanley</i> New access of Alder Way possible. Retention or diversion of Public Right of Way required. Traffic generation unlikely to create congestion issues.</p>	20
				<p>22 <i>Former Birchwood Primary School, Russett Way, Swanley</i> Existing access off Russett Way and/or new access off Leydenhatch Lane. Suitable accesses, two accesses would distribute traffic.</p>	39
				<p>23 <i>Upper Hockenden Farm, Hockenden Lane, Swanley</i> Existing access off Hockenden Lane requires improvement / improved visibility. Existing junction of Hockenden Lane with London Road probably adequate for number of units proposed. Capacity assessment required at junction of Hockenden Lane / London Road.</p>	25
				<p>24 <i>Harringtons Nursery, Highlands Hill, Swanley</i> Transport Statement required. Over 50 units, a secondary / emergency access required. Existing access available but improvement required. Will create increased traffic movements at the Five Wents junction – capacity assessment required. Appropriate contribution towards Swanley Transport Study schemes / measures.</p>	71
				<p>25 <i>Swanley Village Nursery, Swanley Village Road, Swanley Village</i></p>	6

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks Proposed Submission Version consultation and Additional Consultations

Pg	Chapter	Policy	Respondent	Commentary	
				Swanley Village Road narrow with poor forward visibility. Existing access would need improvement, especially visibility.	
				26 <i>Land rear of Cedar Lodge, Wood Street, Swanley Village</i> Button Street narrow and might need improvement. Junction with Wood Street may require visibility improvements which could require additional land.	6
				27 <i>Land south of Wood Street, Swanley Village</i> Footway connections required on Wood Street.	10
				28 <i>Land at Pedham Place</i> Comments included under Chapter 1.	2500
				29 <i>Station Approach, Edenbridge</i> Improved junction arrangement where Station Approach meets the private access road to the site.	30
				30 <i>Open Space at Stangrove Estate House Road, Edenbridge</i> Very few properties within the Stangrove Estate benefit from off street parking. Parking can be haphazard causing a hazard to other highway users, including pedestrians. Parcel 1 - Open space bound by railway line to the north and Cedar Drive to the south. Parcel 2 - Open space between Cedar Drive and existing residential dwellings. Parcel 3 - Open space bound by Park Avenue to the south and east. Parcel 4 - Existing local corner shop. Parcel 5 - Open space bound by Park View Close to the south and playground to the north. Parcel 6 - Open space bound by Park Grove to the east and Chestnut Grove to the north. Stangrove Estate is a very tightly bound estate with very little off street parking. Access to properties would likely to lead to conflicts within the estate. On street parking would not be supported due to the already congested nature of the estate.	15
				31 <i>Kent & Surry Driving Range, Crouch House Road, Edenbridge</i> New access required onto Crouch House Road. Visibility may be constrained by existing hedges / trees and railway bridge. Site is located to the western edge of Edenbridge settlement boundary. Bus stops located immediately adjacent to the site on Crouch House Road.	7
				32 <i>Edenbridge & District War Memorial Hospital, Mill Hill, Edenbridge</i> Existing parking available to the rear of the site. Bus stop on site. Utilise existing access from Mill Hill. Site is located due south of Edenbridge town centre. Walking distance to centre and train stations. Bus stops on Mill Hill and current bus stop on site.	30
				33 <i>Land south of Four Elms Road, Edenbridge</i> Comments included under Chapter 1.	270
				34 <i>Land East of Bray Road, Edenbridge</i> Comments included under Chapter 1.	70
				35 <i>Currant Hill Allotments, Westerham</i> Access off Ryested Lane, localised widening would be required.	26
				36 <i>Land between Granville Road and Farleycroft, Westerham</i> Existing access may need widening / pedestrian facilities. Within walking distance of town centre / buses etc.	10
				37 <i>New Ash Green Village Centre, New Ash Green</i> Transport Statement required to assess the impact and public transport connections with Longfield Station together with cycle connections.	70
				38 <i>The Manor House, North Ash Road, New Ash Green</i> Existing access off North Ash Road.	35
				39 <i>The Forge, Ash Road, Ash</i> The site is accessed via Ash Road which loops around a small area of green space. The existing access could be utilised for future development,	29

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks Proposed Submission Version consultation and Additional Consultations

Pg	Chapter	Policy	Respondent	Commentary	
				avoiding the main Ash Road. Walking distance to New Ash Green village centre, with local bus stops. The site is within the southern boundary of New Ash Green village. There is no train station. Bus stops are available on Chapel Wood Road & North Ash Road	
				40 <i>Oast House Nursery, Ash Road, Ash</i> Existing access onto Ash Road, to be improved.	20
				41 <i>Otford Builders Merchants, High Street, Otford</i> Existing access onto High Street could be utilised.	7
				42 <i>Land south of Orchard House, Ash Road, Hartley</i> Existing access would require improvements.	10
				43 <i>Chelsfield Depot, Shacklands Road, Badgers Mount</i> Transport Assessment required. Secondary / emergency access will need to be provided. Site is close to A224 Orpington Bypass to provide access to the strategic highway network. Use of existing access on Shacklands Road. Secondary/emergency access will be required. The site is not within the confines of a defined settlement boundary. Pedestrian and cycle links to provide access to Badger Mount and Knockholt train station	100
				44 <i>Land west of the roundabout, London Road, Badgers Mount</i> Existing access onto London Road	27
				45 <i>Calcutta Club and Polhill Business Centre, London Road, Badgers Mount</i> Transport Statement required. Existing access from London Road can be utilised. Secondary / emergency access will be required. Site is not within a defined settlement boundary. Pedestrian footpaths along London Road to provide access to Badgers Mount and Knockholt railway station.	66
				46 <i>Highways Depot, Tonbridge Road, Chiddingstone Causeway</i> Site bound to the south by railway line, cricket ground to the west, and residential to the east. Use of existing access from B2027 Tonbridge Road. Footpaths available on opposite side of Tonbridge Road to access point. Within close proximity to Penshurst railway station.	8
				47 <i>Land rear of Brickyard Cottages, Tonbridge Road, Chiddingstone Causeway</i> Rural location. Existing access.	18
				48 <i>Middle Farm Nursery, Cray Road, Crockenhill</i> Existing access from Cray Road. Visibility may be an issue due to hedges and trees. Close proximity to Crockenhill village centre and local services.	30
				49 <i>Wested Farm, Eynsford Road, Crockenhill</i> Use of existing access but concerns regarding sustainability due to remote location. Not within a defined settlement. No pedestrian links on Eynsford Road	10
				50 <i>Gorse Hill Nursery, Gorse Hill, Farningham</i> Transport Statement required. Some vehicle parking on the southern part of the access strip to the nursery. Improvements required to existing access from Gorse Hill. Site is located approximately 1 mile north of the local centre of West Kingsdown. Local bus stops on Gorse Hill / London Road.	55

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Pg	Chapter	Policy	Respondent	Commentary	
				51 <i>Maplescombe Farm, Maplescombe Lane, Farningham</i> Maplescombe Lane is a narrow lane. The road widens immediately opposite the site, which appears to be utilised for informal parking. Maplescombe Lane is a narrow country lane with limited capacity to accommodate a large number of additional dwellings and associated vehicles. The site is not located within a settlement. Concerns regarding accessibility for pedestrians, cyclists and other modes of sustainable transport.	35
				52 <i>Fawkham Business Park, Fawkham Road, Fawkham</i> Existing access could be utilised from Fawkham Road. No particular concerns subject to level of development proposed. Site is located to the western edge of Longfield settlement boundary.	32
				53 <i>Grange Park Farm, Manor Lane, Fawkham</i> Access to be improved, potential visibility issues. Existing access could be utilised but would need to be improved, Manor Lane is a narrow country lane. Remote location.	32
				54 <i>Highfield Farm and Knocka Villa, Crow Drive, Halstead</i> No particular concerns subject to level of development proposed. Rural location. Existing access onto Crow Drive. Good visibility. Bus stops available on Polhill. Fairly remote location from defined settlements.	20
				55 <i>Deer Leap Stud Farm, Knockholt Road, Halstead</i> No particular concerns subject to level of development proposed. Existing access onto Knockholt Road. Site is located to the south western boundary of Halstead. Some bus stops located within close proximity of the site on Knockholt Road	13
				56 <i>Oak Tree Farm, London Road, Halstead</i> Existing access onto A224 London Road. Access route is less than 4 metres in width and therefore some widening is required. There should be sufficient space for 2 cars to pass each other at least every 40m. These spaces should be intervisible. Remote location.	37
				57 <i>Fort Halstead, Crow Drive, Halstead (plus 450 with pp)</i> Transport Assessment required. Extant permission provides access via Crow Drive to A224 Polhill. Proposed roundabout needing re-assessment. Secondary access required, possibly from Star Hill. Polhill junction to be assessed together with restricted traffic to Star Hill Road - junction assessment. Other junctions on A224 require assessment. Poor sustainable transport location. Additional bus services to Knockholt Station and primary schools required. Enhanced bus services required to Sevenoaks / Orpington. Improvement to cycle routes to station / villages.	300
				58 <i>College Road Nurseries, College Road, Hextable</i> Will require new access onto College Road. Potential visibility issues at access. Concerns regarding accessibility for pedestrians, cyclists and other modes of sustainable transport.	9
				59 <i>Egerton Nursery, Egerton Avenue, Hextable</i> New access is required off Egerton Avenue. Within walking distance of local facilities and local buses	30
				60 <i>Oasis Academy, Egerton Avenue, Hextable</i> Transport Assessment required. Capacity of surrounding roads and junctions would need to be assessed as part of TA. Existing access on Egerton Avenue may need some improvement.	190
				61 <i>Rowhill Farm, Top Dartford Road, Hextable</i> Improved access required.	16
				62 <i>Top Dartford Road, Hextable</i> Existing access, improvements required.	29

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Pg	Chapter	Policy	Respondent	Commentary	
Page 188				63 Gills Farm, Gills Road, South Darenth Former farm use, single track narrow lane for access with poor visibility. Single track lane. No services nearby.	16
				64 <i>Land at Oakview Stud Farm, Lombard Street, Horton Kirby</i> Existing access to the north west of the site, off Lombard Street. Some modifications and improvements required. Some services within walking distance. Approx 500m to local school.	42
				65 <i>The Cottage, Holmesdale Road, South Darenth</i> New access required. Holmesdale Hill has constrained width and would require removal of established trees. No footways in vicinity of the site.	9
				66 <i>Land south of West End, Kemsing</i> Current access is a farm track which will require improvements. Within close proximity to local facilities. Bus stops on West End.	20
				67 <i>Land south of Noahs Ark, Kemsing</i> Concerns regarding the site located south west of Noahs Ark and north of the railway line due to poor access and lack of visibility at the junction with Noaks Ark.	22
				68 <i>Meadow Cottage, Goathurst Common, Ide Hill</i> New access would be required. Visibility issues at junction with Wheatsheaf Hill (B2042). Not accessible or close to facilities.	14
				69 <i>JD Hotchkiss Ltd, London Road, West Kingsdown</i> Direct access off A20. Junction may require amendment. Some local facilities. Primary school > 800m.	31
				70 <i>Florence Farm Mobile Home Park, Main Road, West Kingsdown</i> Existing access requiring widening / junction improvement. Directly off A20. Some local facilities. Bus services.	16
				71 <i>Rajdani, London Road, West Kingsdown</i> Direct access off A20. Junction may require improvements. Some local facilities. Primary school > 800m	20
				72 <i>Terrys Lodge Farm, Terrys Lodge Road, Wrotham</i> Remote rural location with access to A20 nearby. Existing access would require some improvement. Narrow road but could accommodate low generation.	5
42	Chapter 2 Providing Housing Choices	Policy H1 Market and Affordable Housing Mix	Provision and Delivery of County Council Community Services	The requirement for all new housing to be built to M4(2) standard and 5% of development of 20 or more dwellings being built to M4(3) standard set out under Policy H1 is welcomed by the County Council.	
44	Chapter 2 Providing Housing Choices	Policy H2 Provision of Affordable Housing	Provision and Delivery of County Council Community Services	The Strategic Housing Market Assessment identified the need 442 Affordable homes per annum which equates to around 60% of the Government's housing requirement for Sevenoaks. It is agreed that such a level is not realistic, and the level of affordable housing provision set out in Policy H2 is broadly supported. The County Council is concerned, however, that these levels could be undermined by allowing developers to make provision in line with a more localised need, which could be perceived to be a lack of any contribution for off-site provision.	
49	Chapter 2 Providing Housing Choices	Policy H5 Housing Density	Provision and Delivery of County Council Community Services	The County Council recognises that this policy does not set any levels for housing density but appears to permit housing development that has a density reflective of the surrounding area. The policy could make housing density difficult to achieve planning consent, which in turn could impact on the level of housing delivered by the Local Plan as developers avoid intensification.	

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53	Chapter 3 Supporting a Vibrant and Balanced Economy	Policy EMP1 Supporting a Vibrant and Balanced Economy	Highways and Transportation	<p>KCC Highways has previously provided comments relating to the sites included in the Reg 18 consultation. An updated version of these comments relating to the sites going forward in the Regulation 19 consultation are as follows:</p> <table border="1"> <thead> <tr> <th>Site Reference EMP1</th> <th>Address</th> <th>Site Area (hectares)</th> <th>Employment Use</th> </tr> </thead> <tbody> <tr> <td>27</td> <td>Sevenoaks Garden Centre, Main Road, Sundridge</td> <td>1.68</td> <td>B1(a)</td> </tr> <tr> <td colspan="4">Transport Statement required. Subject to safety and capacity assessment, improvements may be required at Main Road and Dryhill Lane. Pedestrian, cycling and public transport links need to be considered due to the rural location.</td> </tr> <tr> <td>28</td> <td>Bartram Farm, Old Otford Road, Sevenoaks</td> <td>11.92</td> <td>B1-B8</td> </tr> <tr> <td colspan="4">Transport Assessment required. Access to be improved. Capacity assessments of surrounding highway network with mitigation where necessary. Cycling, pedestrian and bus connections require improvements.</td> </tr> <tr> <td>29</td> <td>Former Park and Ride, Otford Road, Sevenoaks</td> <td>0.75</td> <td>B1</td> </tr> <tr> <td colspan="4">Transport Assessment required. Access to be improved. Capacity assessments of surrounding highway network with mitigation where necessary. Cycling, pedestrian and bus connections require improvements.</td> </tr> </tbody> </table>	Site Reference EMP1	Address	Site Area (hectares)	Employment Use	27	Sevenoaks Garden Centre, Main Road, Sundridge	1.68	B1(a)	Transport Statement required. Subject to safety and capacity assessment, improvements may be required at Main Road and Dryhill Lane. Pedestrian, cycling and public transport links need to be considered due to the rural location.				28	Bartram Farm, Old Otford Road, Sevenoaks	11.92	B1-B8	Transport Assessment required. Access to be improved. Capacity assessments of surrounding highway network with mitigation where necessary. Cycling, pedestrian and bus connections require improvements.				29	Former Park and Ride, Otford Road, Sevenoaks	0.75	B1	Transport Assessment required. Access to be improved. Capacity assessments of surrounding highway network with mitigation where necessary. Cycling, pedestrian and bus connections require improvements.			
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Page 189	Chapter 3 Supporting a Vibrant and Balanced Economy	Policy EMP1 Supporting a Vibrant and Balanced Economy	Provision and Delivery of County Council Community Services	The retention of non-residential use of land and buildings and application of Article 4 Direction set out under is policy is supported by the County Council.																												
60	Chapter 3 Supporting a Vibrant and Balanced Economy	Policy EMP2 Town and Local Centres	Provision and Delivery of County Council Community Services	The County Council notes whereas Policies ST2, H4 and EMP1 all identify allocated sites, there are no allocated sites identified under Policy EMP2. KCC therefore requests clarity as to how the requirement for 32,000m ² of additional retail floorspace will be delivered within the district.																												
63	Chapter 4 Ensuring Well – Connected Communities are Supported by Local Infrastructure		Public Rights of Way and Access Service	<p><i>Supporting Evidence</i></p> <p>Further to our previous comments, it is noted that the Kent County Council Rights of Way Improvement Plan (ROWIP) is now referenced within the ‘Supporting Evidence’ section. The inclusion of the ROWIP is welcomed and supported, as it is a strategic and statutory policy document for the protection and enhancement of PRoW.</p>																												
65	Chapter 4 Ensuring Well – Connected Communities are Supported by Local Infrastructure		Highways and Transportation	<p><i>Paragraph 4.3</i></p> <p>Paragraph 4.3 of the Draft Plan indicates that Local Plans should be clear of what infrastructure is required for at least 5 years of the Plan period, who will provide the infrastructure, the funding required and how it aligns with the anticipated timescales of development coming forward. There are several sites where the impact of the proposed development has not been assessed and where the mitigating solutions are not identified and these include the strategic sites.</p>																												
65	Chapter 4		Public Rights of	<i>Transport</i>																												

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	Ensuring Well – Connected Communities are Supported by Local Infrastructure		Way and Access Service	KCC notes that no reference has been made to the PRoW Network, despite this being a valuable access resource that provides significant opportunities for walking and cycling in both urban and rural areas. New text should be inserted within this section to highlight the importance of the PRoW network, as it is a vital component of the highways and transport network.																																																
67	Chapter 4 Ensuring Well – Connected Communities are Supported by Local Infrastructure	Policy T1 Transport and Infrastructure	Highways and Transportation	<p>KCC recommends that the policy includes a requirement for developments to ensure the following:</p> <ul style="list-style-type: none"> • Safe and suitable access to the site can be achieved for all users; • Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up; • Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree; and • All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. <p>KCC considers that the policies contained within Section 4 (Transport), are largely consistent with district and county priorities, including Local Transport Plan 4, however would suggest that the Sevenoaks Cycling Strategy is added to the list of supporting evidence.</p>																																																
		Policy T1 Transport and Infrastructure	Provision and Delivery of County Council Community Services	<p>KCC notes that the documents available for consultation do have references to broadband, however KCC recommends that there are strengthened. For example the following statement included in the plan documents is typical.</p> <p><i>Where new development occurs, developers will be expected to ensure that development is technology-ready, including the provision for high quality telecommunications and broadband connections.</i></p> <p>KCC requests that the District Council considers the approach of Ashford District Council in their proposed Policy EMP6. This would ensure that no development was completed in the area without sufficient broadband, unless it is unreasonable to ask a developer for this.</p>																																																
Page 190	Chapter 4 Ensuring Well – Connected Communities are Supported by Local Infrastructure	Policy T1 Transport and Infrastructure	Provision and Delivery of County Council Community Services - Education	<p>Under Section 14 of the Education Act 1996, KCC has the statutory duty to ensure that sufficient school places are available to those who require a place. One of the consequences of this duty is that KCC have an obligation to alert other local authorities when development proposals are published that would inhibit of the delivery of the KCC statutory duty, without additional school capacity being provided by the developer or through CIL/s106.</p> <p>This assessment records the capability of the nearest school(s) to accommodate the school-age demand created by the development site, using the number of new dwellings reported. A narrative assessment is included to explain whether the Pupil Product Ratio could be accommodated, or whether additional capacity would be required. The Pupil Product Ratio is the number of pupils or students per new dwelling, at any one time. For Primary this is currently 0.28 pupils per new dwelling or, 28 pupils per 100 new dwellings. For Secondary this is currently 0.20 students per new dwelling or, 20 students per 100 new dwellings</p> <p>Primary</p> <table border="1"> <thead> <tr> <th>Planning Ref</th> <th>Development Name</th> <th>Units</th> <th>PPR</th> <th>Nearest Primary School</th> <th>Response including shortfall and solution</th> </tr> </thead> <tbody> <tr> <td>MX48</td> <td>Pedham Place</td> <td>2500</td> <td>700</td> <td>Anthony Roper PS</td> <td>Could NOT accommodate any of this demand locally. Two new 2FE (420) primary schools will be needed on this development</td> </tr> <tr> <td>HO48</td> <td>Brickyard Cottages</td> <td>18</td> <td>5</td> <td>Chiddingstone CE PS</td> <td>Could accommodate the PPR, despite all neighbouring schools being full</td> </tr> <tr> <td>H1M HO26</td> <td>Westerham Granville Farleycroft</td> <td>26 10 =36</td> <td>7 3 =10</td> <td>Churchill CE PS</td> <td>Could accommodate the PPR locally</td> </tr> <tr> <td>HO97 HO124</td> <td>Middle Farm Nursery Wested Farm</td> <td>30 10 =40</td> <td>8 3 =11</td> <td>Crockenhill PS</td> <td>Might be able to accommodate but Crockenhill PS is full. The nearest other school is High Firs PS which is also fairly full. Would need CIL to pay for expansions or enhancements to schools in the area</td> </tr> <tr> <td>HO127</td> <td>Gills Farm</td> <td>16</td> <td>4</td> <td>Darenth PS</td> <td>Could accommodate the PPR locally</td> </tr> <tr> <td>H1H</td> <td>Swanley Bus Garage</td> <td>74</td> <td>21</td> <td>Downsview PS</td> <td>Could NOT accommodate locally. Would need CIL to expand local schools</td> </tr> <tr> <td>HO26 MX50</td> <td>Chaucers Rear of School</td> <td>11 240 +251</td> <td>3 67 +70</td> <td>Dunton Green PS</td> <td>Could accommodate a small amount of this PPR, but NOT all. Would need CIL to fund a school expansion. This expansion would be necessary to accommodate the future demand from Ryewood and also some of the demand from the Halstead area.</td> </tr> </tbody> </table>	Planning Ref	Development Name	Units	PPR	Nearest Primary School	Response including shortfall and solution	MX48	Pedham Place	2500	700	Anthony Roper PS	Could NOT accommodate any of this demand locally. Two new 2FE (420) primary schools will be needed on this development	HO48	Brickyard Cottages	18	5	Chiddingstone CE PS	Could accommodate the PPR, despite all neighbouring schools being full	H1M HO26	Westerham Granville Farleycroft	26 10 =36	7 3 =10	Churchill CE PS	Could accommodate the PPR locally	HO97 HO124	Middle Farm Nursery Wested Farm	30 10 =40	8 3 =11	Crockenhill PS	Might be able to accommodate but Crockenhill PS is full. The nearest other school is High Firs PS which is also fairly full. Would need CIL to pay for expansions or enhancements to schools in the area	HO127	Gills Farm	16	4	Darenth PS	Could accommodate the PPR locally	H1H	Swanley Bus Garage	74	21	Downsview PS	Could NOT accommodate locally. Would need CIL to expand local schools	HO26 MX50	Chaucers Rear of School	11 240 +251	3 67 +70	Dunton Green PS	Could accommodate a small amount of this PPR, but NOT all. Would need CIL to fund a school expansion. This expansion would be necessary to accommodate the future demand from Ryewood and also some of the demand from the Halstead area.
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				H2D HO189 HO210 HO364 HO379	Station Approach Edenbridge Crouch House War Mem Hospital Driving Range =422 =118	30 340 15 30 7	8 95 4 8 2	Edenbridge PS	Could accommodate most of this PPR, but this would fill the school completely. There is no capacity in any other nearby schools. Some CIL funding might be required to upgrade school accommodation.
				HO315 HO378	Gorse Hill Nursery Grange Park Farm	55 32	15 9	Fawkham PS	Could accommodate a small amount of this PPR, but NOT all. New Ash Green PS or West Kingsdown CE PS might be able to accommodate, but this is some distance away with an already busy road route.
				HO49 HO138 HO150 HO307 HO328 HO368 MX24	Highfield Farm Dear Leap Stud Ordnance Depot Oak Tree Farm London Road Roundabout Polhill Business Centre Fort Halstead	20 13 100 37 27 66 750	6 4 28 10 8 18 210	Halstead PS	(NOTE the numbers for MX24 – Fort Halstead include the 400 new dwellings already agreed) Could accommodate a small amount of this PPR, but NOT all. The best solution would be an additional 1FE school (over and above the expansion needed for Dunton Green). Halstead PS site size is too small for expansion, as is Shoreham and St Katherines. Land is needed as well as CIL funding. What would be needed is either: i. a new 1FE school in the immediate area, or ii. a new 1.8 – 2.0 hectare site found to relocate Halstead Primary School onto, and the funding to build a new school.
				HO165 HO353	Business Park Orchard House	31 10	9 3	Hartley Academy	Could accommodate most of this PPR, but this would fill the school completely. There is no capacity in any other nearby schools. Some CIL funding might be required to upgrade school accommodation.
				H1J HO106 HO212 HO225 HO433	Top Dartford Rd College Rd Nurseries Egerton Nursery Oasis Hextable site Rowhill Farm	29 9 30 190 16	8 3 8 53 4	Hextable PS	Could accommodate most of this PPR, but this would fill the school completely. There is no capacity in any other nearby schools. Some CIL funding might be required to upgrade school accommodation.
				H1G HO198 HO222 HO274 MX9 MX56	Bevan Place Woodlands Birchwood Alder Way Upper Hockenden Farm White Oak Centre	100 66 39 20 25 80	28 18 11 6 7 22	Horizon Academy High Firs PS	Could NOT accommodate this PPR. What would be needed is a CIL funded 1FE expansion to a local school.
				HO346	Oakview Stud	42	12	Horton Kirby PS	Could accommodate locally.
				HO342	Goathurst Common	14	4	Ide Hill CE PS	Could accommodate locally.
				HO133 HO407	West End Noahs Ark	20 22	6 6	Kemsing PS	Could accommodate most of this PPR, but this would fill the school completely. There is limited capacity in nearby schools.
				HO109	Highways Depot	8	2	Leigh PS	Could accommodate locally.
				H2E HO384 HO402 MX55	Centre The Forge Oast House Nursery Manor House	70 29 20 35	20 8 6 10	New Ash Green PS	Could accommodate most of this PPR, but this would fill the school completely. There is no capacity in any other nearby schools. Some CIL funding might be required to upgrade school accommodation.
				HO102	Otford Builders Merchants	7	2	Otford PS	Could accommodate locally.
				MX43 H1B H1C HO217 HO226 HO365 MX29	Sevenoaks Sand Quarry Crampton Road Sevenoaks Gas holders Sevenoaks Town Council Adult Ed Centre Sevenoaks Hospital S'oaks Community	600 126 98 32 30 73 75	168 35 27 9 8 20 21	Seal CE PS St Johns CE PS Sevenoaks PS	Could NOT accommodate this PPR. The best solution would be an additional 1FE school. Land is needed as well as CIL funding. What would be needed is either: i. a new 1FE school in the immediate area, or ii. a new 1.8 – 2.0 hectare very local site identified to relocate a local school onto, and the funding to build a new school.
						=1013	=284		
						=41	=11		
						=274	=77		
						=330	=92		
						=154	=43		
						=1034	=290		

Pg	Chapter	Policy	Respondent	Commentary			
					Centre		
			HO410	Seal Hollow Road	13	4	St John's CE PS Could accommodate, but this would fill the school completely. There is no capacity in nearby schools.
			H2C	Swanley Centre	250	70	St Mary's CE PS Could NOT accommodate this PPR. What would be needed is a CIL funded 0.5FE expansion to a local school.
			HO4 HO298 HO357 HO388	Harringtons Nursery Cedar Lodge Swanley Village Nursery Wood Street	71 6 6 10 =93	20 2 2 3 =27	St Pauls CE PS Could NOT accommodate this PPR. What would be needed is a CIL funded expansion to a local school. St Pauls is a very constrained site.
			H1D H1E H2C HO5 HO381	School House Lane Johnsons Oak Lane BT Exchange Crownfields St Botolphs	56 54 102 20 12 =244	16 15 29 6 3 =68	St Thomas' C PS Lady Boswell CE PS Could NOT accommodate this PPR. What would be needed is a CIL funded 0.5FE expansion to a local school. Local options are currently prohibitively expensive.
			HO430	Holmesdale Rd	9	3	Sutton at Hone CE PS Could accommodate locally.
			HO35 HO78 HO129 HO272 HO326	Hotchkiss site Mobile Home park Terry's Lodge Rajdani Maplescombe Farm	31 16 5 20 35 =107	9 4 1 6 10 =30	W Kingsdown CE PS Could accommodate locally.

Secondary

Planning Ref	Development Name	Units	PPR	Nearest Sevenoaks Secondary School	Response including shortfall and solution
MX48 HO97 HO124 HO127 H1H HO315 HO378 HO165 HO353 H1J HO106 HO212 HO225 HO433 H1G HO198 HO222 HO274 MX9 MX56 HO346 H2E HO384 HO402	Pedham Place Middle Farm Nursery Wested Farm Gills Farm Swanley Bus Garage Gorse Hill Nursery Grange Park Farm Business Park Orchard House Top Dartford Rd College Rd Nurseries Egerton Nursery Oasis Hextable site Rowhill Farm Bevan Place Woodlands Birchwood Alder Way Upper Hockenden Farm White Oak Centre Oakview Stud Centre The Forge Oast House Nursery	2500 30 10 16 74 55 32 31 10 29 9 30 190 16 100 66 39 20 25 80 42 70 29 20	500 6 2 4 15 11 7 7 2 6 2 6 38 4 20 14 8 4 5 16 9 14 6 4	Orchard Academy	Orchard Academy is virtually full. There is no surplus capacity in Dartford. Could NOT accommodate a PPR of 822. A PPR of 882 for secondary would require a new 6FE Secondary school. This would need a site of between 5.5 – 6.5 hectares and a build cost likely to be in the £25m - £30m range If Pedham Place is not included, the total number of new dwellings reduces to 1,517. This equates to a PPR of 304 secondary students, which could NOT be accommodated within existing provision. This would require a 2.5FE expansion to an existing school. However, Orchard Academy could not accommodate a 2.5FE expansion on its existing site. The only viable solution would be to include Pedham Place and build a new 6FE secondary school.

Pg	Chapter	Policy	Respondent	Commentary					
				MX55	Manor House	35	7		
				H2C	Swanley Centre	250	50		
				HO4	Harringtons Nursery	71	15		
				HO298	Cedar Lodge	6	2		
				HO357	Swanley Village Nursery	6	2		
				HO388	Wood Street	10	2		
				HO430	Holmesdale Rd	9	2		
				HO35	Hotchkiss site	31	7		
				HO78	Mobile Home park	16	4		
				HO129	Terry's Lodge	5	1		
				HO272	Rajdani	20	4		
				HO326	Maplescombe Farm	35	7		
						=4107	=822		
				HO48	Brickyard Cottages	18	4	The Knole Academy Trinity School	Both the Knole Academy and Trinity School are full with already forecasted demand requiring KCC to consider proposals to enlarge Trinity to 6FE from 2019 and the Knole Academy to 10FE from 2021. No further enlargements would be possible on either site.
				H1M	Westerham	26	6		
				HO26	Granville Farleycroft	10	2		
				HO26	Chaucers	11	3		
				MX50	Rear of DG School	240	48		As such the area could NOT accommodate a PPR of 621.
				H2D	Station Approach	30	6		
				HO189	Edenbridge	340	68		A PPR of 621 for secondary would require a new 5FE Secondary school. This would need a site of between 5 – 5.5 hectares and a build cost likely to be in the £23m - £28m range. A 5FE school would be more resilient to budgetary pressures.
				HO210	Crouch House	15	3		
				HO364	War Mem Hospital	30	6		
				HO379	Driving Range	7	2		
				HO49	Highfield Farm	20	4		KCC note the local requests for a new secondary school in the Edenbridge area. However, the new housing planned would generate a maximum of 100 secondary students. If that number of students was added to the total of every secondary school student resident in Edenbridge, it would still barely produce 3FE. Such a secondary school would not be viable and it would extremely unlikely that the Department for Education would agree to fund such a school.
				HO138	Dear Leap Stud	13	3		
				HO150	Ordnance Depot	100	20		
				HO307	Oak Tree Farm	37	8		
				HO328	London Road	27	6		
				HO368	Roundabout	66	14		
				MX24	Polhill Business Centre	750	150		
				HO342	Fort Halstead	14	3		
				HO133	Goathurst Common	20	4		
				HO407	West End	22	5		
				HO109	Noahs Ark	8	2		
				HO102	Highways Depot	7	2		
				MX43	Otford Builders Merchants	600	120		
				H1B	Sevenoaks Sand Quarry	126	26		
				H1C	Crampton Road	98	20		
				HO217	Sevenoaks Gas holders	32	7		
				HO226	Sevenoaks Town Council	30	6		
				HO365	Adult Ed Centre	73	15		
				MX29	Sevenoaks Hospital	75	15		
				HO410	S'oaks Community Centre	13	3		
				H1D	Seal Hollow Road	56	12		
				H1E	School House Lane	54	11		
				H2C	Johnsons Oak Lane	102	21		
				HO5	BT Exchange	20	4		
				HO381	Crownfields	12	3		
					St Botolphs	=3102	=621		
				Education Provision Planning Summary					
				Based on the sites that Sevenoaks District Council has suggested be progressed, the following requirements would need to be met:					
				<ul style="list-style-type: none"> Two new 2FE (420) primary schools will be needed under s106, if the Pedham Place development progresses. One new 1FE (210) primary school will be required under s106, for the Halstead area; or 1FE expansion to a local school on a new site. 					

Pg	Chapter	Policy	Respondent	Commentary
				<ul style="list-style-type: none"> • One new 1FE (210) primary school will be required under s106, for the North Sevenoaks development. • 1FE expansion to an existing school in the Swanley area. • CIL contributions would be requested for the following areas to pay for enhancements to primary schools in the area: <ul style="list-style-type: none"> ○ Crockenhill ○ Dunton Green ○ Edenbridge ○ Hartley ○ Hextable ○ New Ash Green ○ Swanley ○ Swanley Village ○ Sevenoaks Town centre • One new 6FE secondary school under s106, on the Pedham Place development. If Pedham Place does not progress, then the demand reduces to 2.5FE, but there is no existing school in Sevenoaks that can be expanded. • One new 5FE secondary school under s106, in the Sevenoaks town area. <p>Education Provision Planning Observations</p> <p>KCC offers the following observations. It should be remembered that these observations are based on reported numbers, not forecasts, so KCC Children’s Young People and Education would not be able to support a proposal if these observations are not mitigated for.</p> <p>Primary</p> <ul style="list-style-type: none"> • Pedham Place would also generate demand to require 700 places of primary school children. A 2FE primary school provides 420 places, while a 1FE primary school offers 210 places. KCC do not create new schools with fractions of forms of entry (e.g. 1.5FE or 2.5FE) so the solution is to provide 2 x 2FE primary schools. As above the build could be completed by KCC or the developer • The new primary demand generated from developments in and around the Halstead area cannot be accommodated within existing capacity. Neither is there scope for further expansions to existing schools. The only solution is for a new 1FE primary school to be built. This would require a site size of 1.6 - 2 hectares of remediated land that would need to be transferred to KCC free of charge, under s106. Within the s106, KCC would be willing to build to BB103 standards with s106 providing for the developer to fund the entire cost of the school. Alternatively, KCC would agree to let the developer build, subject to design and other agreement. • The new primary demand generated from the Sevenoaks North developments cannot be accommodated within existing capacity. Neither is there scope for further expansions to existing schools. The only solution is for a new 1FE primary school to be built. This would require a site size of 1.6 - 2 hectares or remediated land that would need to be transferred to KCC free of charge, under s106. Within the s106, KCC would be willing to build to BB103 standards with s106 providing for the developer to fund the entire cost of the school. Alternatively, KCC would agree to let the developer build, subject to design and other agreement. <p>Secondary</p> <ul style="list-style-type: none"> • A development of 2500 new homes at Pedham Place would necessitate a new 6FE secondary school to be built on the development. This would require about between 5.5 – 6.5 hectares of remediated and buildable land; which must be transferred to KCC free of charge. Within the s106, KCC would be willing to build to BB103 standards with s106 providing for the developer to fund the entire cost of the school. Alternatively, KCC would agree to let the developer build, subject to design and other agreement. • If Pedham Place is not progressed, the demand generated from new development in the northern half of the district (2.5FE) could no accommodated locally. A second challenge is that there is no scope for enlargements in any nearby secondary schools. Without seeking to prejudice or influence any SDC decision, the obvious solution would be to build a new secondary school on the Pedham site. • The total number of new dwellings in the southern half of Sevenoaks district would generate 5FE of secondary need. There is no surplus capacity in any secondary schools in Sevenoaks, and there is no scope for any of the existing schools to be expanded further. A new school is therefore required, ideally in Sevenoaks town, or nearby. This would require about between 5.0 – 5.5 hectares of remediated and buildable land; which must be transferred to KCC free of charge. Within the s106, KCC would be willing to build to BB103 standards with s106 providing for the developer to fund the entire cost of the school. Alternatively, KCC would agree to let the developer build, subject to design and other agreements.
67	Chapter 4 Ensuring	Policy T1 Transport	Public Rights of Way and	It is noted that this policy now refers to the PRow network. While this reference is welcomed, the policy wording should be strengthened to help protect and enhance the PRow network, as per National Planning Policy Framework (NPPF) Section 98.

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	Well – Connected Communities are Supported by Local Infrastructure	and Infrastructure	Access Service	PRoWs are a vital component of the transport network, providing valuable opportunities for active travel across the District. Furthermore, development provides opportunities to create new links and enhance existing routes, which could encourage active travel and support a modal shift in travel for short distance journeys. With these points in mind, the Local Plan Transport policy should aim to protect and enhance the quality of PRoW contained within (or linking to) development sites. The inclusion of a PRoW reference will help support other policies within this document and send a clear message to developers that PRoW are a material consideration at the start of the planning process.
81	Chapter 6 Safeguarding places for Wildlife and Nature	Policy WN1 Safeguarding Places for Wildlife and Nature	Biodiversity	<p>KCC notes that the policy does not refer to the need for ecological surveys to be carried out to understand the ecological interest of any development site. The County Council considers that it will be difficult for any development to demonstrate that they are retaining and enhancing natural features/areas of interest if it is not clear what is present on site. The policy refers to the requirement for net gain but for any application to demonstrate they are achieving net gain the applicant will need to understand what is present on site and the only way to do this is by carrying out ecological survey(s).</p> <p>The policy states “<i>Any new BGI [Blue Green Infrastructure] should take account of the existing network and provide improvements and new connections where possible</i>”, the County Council would encourage the policy to be stronger to ensure the connections within the BGI are improved.</p>
86	Chapter 7 Ensuring New Development Respects Local Distinctiveness	Policy EN1 Design Principles	Public Rights of Way and Access Service	Following our previous response to the Sevenoaks Draft Local Plan consultation, the County Council welcomes the amendments to the wording to include a reference to the KCC PRoW ‘Good Design Guide’. This inclusion is welcomed and supported by the PRoW and Access Service, as it should promote good design in public path and countryside access management. The inclusion of PRoW text within this policy should ensure that the PRoW network is considered at an early stage of the design process and successfully incorporated into future developments.
92	Chapter 8 The Historic Environment	Policy HEN1 Historic Environment	Heritage Conservation	<p>The County Council notes the reference to the historic environment. However, the text depends on a source document ‘The Historic Environment Review for Sevenoaks District’ - with the intention to implement the recommendations of the Review. KCC is concerned that if the Review is incomplete or considered inadequate, then the application of the Local Plan to the historic environment will be inadequate. The Review document therefore also needs to be sound. The final Review document does not currently appear to be readily available online – however, KCC provided comments on an early draft (October 2017) which identified various ways in which the Review could be improved and in particular highlighted:</p> <ul style="list-style-type: none"> • That the Review was too focused on designated heritage assets; • That there are many more vulnerabilities and opportunities than were identified in the text. Opportunities could include, for example: tourism, a sense of place, a catalyst for regeneration, social exclusion and health; • That there was too little consideration of Sevenoaks’ pre-medieval heritage; • That the Areas of Archaeological Potential are in the process of complete revision (and replacement by Archaeological Notification Areas) and should not be mentioned; and • That many heritage assets do not fall into the themes identified by the Review. <p>KCC also noted that Recommendation 1 at that time was for the development of an overarching heritage strategy. There is no mention of this in this consultation, however, and it is unclear if it is intended to proceed with it. If not intended to proceed, then the Review cannot be said to contain ‘a positive strategy for the conservation and enjoyment of the historic environment’ as required by the NPPF (para 185). KCC would like confirmation as to whether it is intended to proceed with the full Heritage Strategy or whether the Local Plan will contain a working link to the final Historic Environment Review.</p> <p><u>Detailed comments on the Local Plan</u></p> <p>Policies HEN1 and HEN2, KCC considers to be sound but the comments below might be considered to strengthen the Local Plan further.</p> <p>8.2 To the list of benefits of the historic environment in this paragraph can be added social inclusion and public health.</p> <p>8.3 The text in this paragraph is unclear as it states that the Historic Environment Review includes a recommendation for the Historic Environment Review. KCC wonders whether this should actually be a recommendation for the Heritage Strategy?</p> <p><i>Policy HEN1 – The Historic Environment</i></p> <p>It should be noted that the Kent Historic Environment Record is not ‘guidance’ but rather the main source of historic environment information for Kent.</p> <p>8.4 KCC would suggest ‘monuments’ be replaced by ‘archaeological sites and monuments’ as for most readers the word ‘monuments’ does not suggest archaeological sites.</p> <p>8.12 As noted above and in recent discussions with Sevenoaks District Council, Areas of Archaeological Potential (AAP) will shortly be discarded as a dataset. In addition, the AAPs are not accompanied by guidance as suggested in the text. KCC recommends this sentence be replaced with “Sevenoaks District Council will work with KCC to</p>
96	Chapter 8 The Historic Environment	Policy HEN2 Heritage Assets		

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				<p>ensure that archaeological sites are preserved in-situ during the development control process or, if development is appropriate, are appropriately recorded.”</p> <p>8.17 So far KCC is not aware of if the District Council has had sight of the Kent Historic Environment Record details of the locally listed buildings from Sevenoaks town. It is essential that these are included in the HER if they are to be used properly in development control decision-making and identified by owners and developers early in the process. KCC requests that details of these and any future local list designations are sent to heritageconservation@kent.gov.uk as soon as possible.</p> <p><i>Policy HEN2 – Heritage Assets</i></p> <p>It should be noted that the County Council’s heritage conservation team are currently preparing advice for applicants writing Heritage Statements. This should be available by the end 2019.</p> <p><i>Performance Indicators</i></p> <p>The performance indicator for Heritage Assets is likely to prove unworkable “No loss of listed buildings, historic parks and gardens, scheduled ancient Monuments or sites of archaeological interest” as numerous heritage assets are lost to development every year. KCC suggests this indicator be replaced with “No loss of designated heritage assets - listed buildings, conservation areas, historic parks and gardens and scheduled monuments, and no loss of sites of archaeological interest or locally listed heritage assets except where fully justified and accompanied by appropriate recording.”</p>
98	Chapter 9 Climate Change, Flooding and Healthy Communities		Public Rights of Way and Access Service	<p><i>Supporting Evidence</i></p> <p>The acknowledgement of the Kent Active Travel Strategy is welcomed, but the County Councils ROWIP is not evidenced. The current ROWIP should be referenced as it is a statutory policy document for PRoW. It is crucial that this is referred to, as it is a strategic and statutory policy document for the protection and enhancement of PRoW.</p>
98 Page 196	Chapter 9 Climate Change, Flooding and Healthy Communities		Public Rights of Way and Access Service	<p><i>Health Wellbeing and Safety</i></p> <p>KCC recommends that reference is made to the PRoW Network. The PRoW network should be referenced within this section as it is a valuable access resource that provides significant opportunities for outdoor recreation. There is a growing body of evidence demonstrating that physical exercise in open green space can have a positive impact on mental health and wellbeing. The Local Plan should aim to increase the provision of high quality green infrastructure, creating opportunities for walking, cycling and equestrian activity.</p> <p>From a safety perspective, research shows that people are deterred from cycling along existing roads due to increasing levels of vehicular traffic. To address this issue and encourage cycling activity, especially amongst families with young children, there needs to be a greater provision of traffic free, off-road cycle routes across the region. The District Council should be aware that the PRoW and Access Service can help to address this issue by upgrading existing PRoW and creating new off-road routes for cycling.</p>
98	Chapter 9 Climate Change, Flooding and Healthy Communities		Public Rights of Way and Access Service	<p><i>Air Quality</i></p> <p>High quality walking and cycling routes provide opportunities for active travel across the district. The new local plan should ensure that developments incorporate convenient walking and cycling routes, which provide realistic alternatives to short car journeys. Reducing the number of short distance car journeys should help to address vehicle congestion on roads, which contribute towards air quality issues.</p>
99	Chapter 9 Climate Change, Flooding and Healthy Communities	Policy HE1 Health Wellbeing and Air Quality	Public Rights of Way and Access Service	<p>PRoW should be referred to within this policy as the network provides substantial opportunities for active travel and outdoor recreation, which can help to address issues associated with Health, Wellbeing and Air Quality.</p>
99	Chapter 9 Climate Change, Flooding and Healthy Communities	Policy HE1 Health Wellbeing and Air Quality	Countryside, Leisure and Sport	<p>KCC recommends the following Sport England guidance should be considered by the District Council:</p> <p>https://www.sportengland.org/facilities-planning/planning-for-sport/playing-fields-policy/ https://www.sportengland.org/facilities-planning/planning-for-sport/aims-and-objectives/ https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/ https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/facilities-planning-model/ https://www.sportengland.org/facilities-planning/active-design/</p>
103	Chapter 9 Climate Change, Flooding and	Policy CC1 Climate Change, Flooding and	Sustainable Urban Drainage Systems	<p>The County Council, as Lead Local Flood Authority previously made commentary on the Regulation 18 consultation dated 18 September 2018 and comments made within this response continue to be applied.</p>

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	Healthy Communities	Water Management		
106	Chapter 10 Leisure and Open Space		Public Rights of Way and Access Service	<i>Supporting Evidence</i> The County Councils ROWIP is not evidenced. The current ROWIP should be referenced as it is a statutory policy document for PRow. It is crucial that this is referred to, as it is a strategic and statutory policy document for the protection and enhancement of PRow.
107	Chapter 10 Leisure and Open Space	Policy OS1 Open Space, Sport and Leisure		The inclusion of a specific PRow section within this policy text is welcomed and supported by the PRow and Access Service. The additional text referring to long distance routes is also welcomed, though with respect to NPPF Section 98, the policy wording could be strengthened by specifically highlighting the 'North Downs Way' National Trail. There should be a requirement for applicants to record the route of any PRow affected by development, clarifying intentions for accommodating, diverting or enhancing paths. The policy should clearly state that planning applications that would adversely affect the existing PRow network will not be permitted.
General Comment on Sevenoaks District Council Local Plan - Proposed Submission Version			Minerals and Waste	<p>As the Minerals and Waste Planning Authority, the County Council is responsible for ensuring that mineral resources are not needlessly sterilised by other forms of development, thus ensuring that a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development. This safeguarding approach is supported by the National Planning Policy Framework (NPPF) and locally in the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP). The NPPF requires that development proposals should not be permitted within mineral safeguarding areas where they might constrain potential future use of the economic mineral resource. As such, the policies within the KMWLP aim to prevent the sterilisation of Kent's potentially economic mineral assets.</p> <p>Minerals are essential to the delivery of sustainable development and mineral planning considerations are key to ensuring that there is a sufficient supply of minerals to provide the infrastructure, buildings and goods that the country needs. Mineral planning considerations are a strategic matter that cross administrative boundaries and as required by the NPPF require effective communication between local authorities.</p> <p>You will be aware that in previous responses to the Sevenoaks Local Plan Issues and Options consultation and Regulation 18 consultation that the County Council drew attention to mineral and waste safeguarding matters that needed to be addressed in the emerging Sevenoaks Plan. Separately, workshops have been hosted by the County Council for local planning authorities to discuss Mineral and Waste Safeguarding matters, to aid local understanding of this matter. These matters do not appear to have been fully addressed. There is a requirement to address the safeguarding of economic minerals and existing permitted waste management facilities present within the District, with particular reference to the relevant policies of the adopted KMWLP.</p> <p>As Minerals and Waste Planning Authority, the County Council notes that a number of the proposed allocations in the consultation have mineral safeguarding implications that need to be examined in light of mineral planning considerations before the sites are allocated. This was raised in the County Council's response to the Regulation 18 consultation and attention was drawn to the need for Mineral Assessments to inform the plan making process.</p> <p>The County Council has not seen Mineral Site Assessments for any of the affected sites. If the assessments have been undertaken, it is requested that copies are provided to the County Council, so that these comments in this document can be reviewed. However, in the absence of Mineral Assessments for these sites, it is not possible to assess the mineral safeguarding implications or to consider whether an exemption to the safeguarding policy DM7 of the KMWLP applies and the County Council raises a holding objection.</p> <p><i>Sevenoaks Quarry</i></p> <p>The proposed allocation ST2 – 13 (Sevenoaks Quarry) would have significant consequences for mineral planning in the County and the wider South East in the event that the site were to be allocated and developed prior to the mineral reserve being worked out. The site currently benefits from an extant planning permission for mineral extraction until 2032 (reference SE/08/675) and forms a significant part of the County Council's landbank for soft sand, which is a key indicator for the need for further soft sand releases in the County.</p> <p>The County Council's current Mineral Sites Plan (currently at Regulation 19 stage) is predicated on the permitted reserve at Sevenoaks Quarry. The site is safeguarded under Policy CSM 5 of the KMWLP and is strategically important in maintaining a steady and adequate supply of construction sand. It currently makes a significant contribution to supply not only in Kent, but also the wider South East region. Its continued and effective working is therefore crucial to the delivery of the strategy of the KMWLP, as well as the emerging Kent Mineral Sites Plan.</p> <p>In the absence of evidence to demonstrate that the permitted mineral reserves can be worked prior to any housing development taking place, the County Council strongly objects to the allocation of the site. This is on the basis that it would prejudice the full and effective working of all mineral reserves and would sterilise permitted mineral resources, which would be contrary to the NPPF and to KMWLP policies. The County Council considers that in order to ensure that this policy is sound, KCC, as Mineral Planning Authority considers it necessary that provisions are incorporated into the Local Plan to require the permitted reserves to be worked in advance of housing development taking place.</p> <p>There is no evidence in the Proposed Submission Version of the Local Plan that the mineral reserves are intended to be worked prior to non mineral work taking place,</p>

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				<p>although it is noted that there is some information in respect of phasing. In respect of this phasing, the consultation document indicates, within the description of the allocation, that:</p> <p>“Some extraction is still taking place on the site. The Council is satisfied that there is a reasonable prospect that it will become available. As such, it is considered ‘developable’. Phase 1: years 6-10 and phase 2: 11-15, subject to confirmation of mineral extraction programme”.</p> <p>The commencement of construction under this phasing plan is considered to be premature to ensure that mineral planning matters are addressed. In light of previous consultation responses, the County Council was expecting the Proposed Submission Version of the Local Plan to include evidence to demonstrate that mineral extraction could be reliably completed before non mineral development takes place -this does not appear to be the case. The Plan, as it currently stands, lacks assurance that the effective working of the mineral reserve will take place and that this important economic mineral will not be sterilised. Further evidence is requested to demonstrate that this phasing will not prejudice the permitted reserves and undermine mineral planning in the South East. The site cannot be considered as “developable” until such a time that the permitted mineral reserves have been exhausted, in order to prevent their unnecessary sterilisation.</p> <p>Furthermore, it is noted that part of the rationale for allocating the site is that the “land has been subject to previous development”. However, unlike other types of development, mineral development is a temporary land use with an approved restoration scheme. It is not a brownfield site for planning purposes, which appears to have been part of the rationale used to support allocation.</p> <p>Finally, attention is drawn to the adjacent landfill activity at Greatness Quarry and the need to consider the implications of this land use activity on any future housing allocation, but also for residents of phase 1, in respect of their proximity to the Sevenoaks Quarry site and Greatness Quarry.</p> <p><i>Other Mineral and Waste Safeguarding Matters</i></p> <p>In the absence of evidence to demonstrate that mineral and waste safeguarding issues have been satisfactorily considered to address safeguarding policies (DM7 and DM8) in the adopted KMWLP, the County Council as Mineral Planning Authority raises a holding objection.</p> <p><i>Mineral Safeguarding</i></p> <p>Having compared the proposed sites of the Sevenoaks District Draft Local Plan with the Minerals Safeguarding Areas (MSA) Policies Maps of Policy CSM5 Land-Won Mineral Safeguarding of the KMWLP, the Minerals and Waste Planning Authority notes that the following proposed sites coincide with safeguarded economic minerals. These are:</p> <p style="padding-left: 40px;">River Terrace Deposits</p> <ul style="list-style-type: none"> • ST2-13 • ST2-29 • ST2-33 • ST2-59 • EMP 1-8 • EMP-1-27 <p style="padding-left: 40px;">Sub-Alluvial River Terrace Deposits</p> <ul style="list-style-type: none"> • ST2-41 • ST2-67 • EMP 1-8 <p style="padding-left: 40px;">Folkestone Beds</p> <ul style="list-style-type: none"> • ST2-13 • ST2-35 • ST2-36 • EMP 1-5 • EMP 1-27 • EMP 1-35 • EMP 1-36

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Page 199				<p>Hythe Formation (Kent Ragstone)</p> <ul style="list-style-type: none"> • ST2-68 <p>Where a proposed site is coincident with an MSA, a Minerals Assessment is required to assess the mineral quality and quantity. The Mineral Assessment should provide a recommendation from a reputable mineral industry and should refer to the relevant policies of the adopted KWMLP, specifically DM7 Safeguarding Mineral Resources, where exemption criteria to the presumption to safeguard are outlined. Further guidance on mineral safeguarding and Minerals Assessments can be found in KCC's Safeguarding Supplementary Planning Document: https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1</p> <p><i>Waste Management Facility Safeguarding</i></p> <p>The Proposed Submission Version of the Local Plan does not make reference to permitted and safeguarded waste management facilities that occur within the Sevenoaks District. KCC as the Minerals and Waste Planning Authority wishes to draw attention to the need for the Draft Local Plan to be aware that existing permitted waste management facilities are safeguarded, and any proposed development within 250m of these facilities should take into account Policy CSW16 Safeguarding of Existing Waste Management Facilities. The criteria outlining exemptions from the presumption to safeguarding are set out in Policy DM8 Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities of the KMWLP. The Minerals and Waste Planning Authority requires the continued lawful future operation of waste management facilities and for this to be recognised in the Local Plan. The following proposed sites appear to be within 250m of safeguarded existing and permitted waste management facilities:</p> <ul style="list-style-type: none"> Greatness Landfill Site 5 Vestry Rd, Sevenoaks TN14 5EL <ul style="list-style-type: none"> • ST2-13 Swanley Household waste Recycling Centre Farningham Hill Rd, Swanley BR8 8TJ <ul style="list-style-type: none"> • ST2-28 • EMP1-18 Countrystyle/Waste Recycling Group Plc. 20 Main Rd, Sundridge, Sevenoaks TN14 6EP <ul style="list-style-type: none"> • EMP1-27 <p>The Minerals and Waste Planning Authority for Kent wishes to remain involved in the plan making process for the Sevenoaks District Local Plan and would be happy to discuss the above matters. Should you require any further information regarding the above or wish to discuss it further, please contact a member of the Minerals and Waste Planning Policy Team at mwlp@kent.gov.uk or on 03000 422370.</p>
Potential Strategic Development Sites in the Green Belt Dec 2018				
MX58 Land west of Childsbridge Lane and south of the recreation ground, Kemsing	Highways and Transportation	<p>A Transport Assessment is required to assess the impact of the development and mitigation required. This should also include evidence of how safe and suitable access to the site can be achieved, and what opportunities for sustainable transport modes can be taken up.</p> <p>The proposed development will require a new access onto Childsbridge Lane and a secondary / emergency access would be required. Improvements to Childsbridge Lane are required including widening and facilities for pedestrians.</p>		
	Provision and Delivery of County Council Community Services - Education	<p>If this development is brought forward in conjunction with EM10/MX59, a new 1FE primary school will be required, to be built under s106 agreement as it is not possible to enlarge Kemsing Primary School, or any other primary school within a three mile radius.</p>		
	Sustainable Urban Drainage Systems	<p>The site is not within an area of flood risk but is shown to have a clear route of potential surface water flooding, running north south from Castle Drive to the motorway embankment. The underlying geology is clay and will not be suitable for infiltration. This means that any surface water volumes generated from the development will likely need to be attenuated on site with a controlled outflow to the local ditch system. Any proposed development would need to assess the implications of this potential overland flow path and account for attenuation areas within the development layout. Flood risk is not a constraint on development but surface water management should be considered as an important aspect which will constrain the site arrangements.</p>		

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			Public Rights of Way and Access Service	KCC recommends that development at this location should explore the creation of a new PRow link with Public Footpath SR66, located to the south west of the site. This would connect the development site with the surrounding PRow network, providing significant opportunities for outdoor recreation and sustainable access with Sevenoaks and Otford.
Page 200	EM10 / MX59 Land North and South of Kemsing Station, Kemsing		Highways and Transportation	<p>Information provided to date indicates that access to the site is proposed by means of a ghosted right turn lane from Watery Lane with a separate emergency access provided and this appears to be satisfactory in principle.</p> <p>The development is likely to lead to a significant increase in traffic along the rural road network, which is constrained in terms of width and forward visibility. Localised widening and passing points would be required in order to ease traffic movements whilst retaining the rural character of the area. The junction of A25/Saxby's Road has an existing crash record and the development proposal will intensify the use of the junction. Improvements are required at this junction and drawings should be provided with capacity and safety assessments. Additionally, improvements to the junction of Watery Lane and Honey Pot Lane are required to improve visibility.</p> <p>Pedestrian links with Kemsing and its facilities is an issue and improvements to PRow's are possible, however lighting on the pedestrian tracks may not be acceptable locally and these paths remain isolated routes. A minibus is proposed to improve accessibility to key facilities and which would provide a combination of commuter travel to the station, local schools and be available during the day for ad-hoc travel e.g. surgery, shops etc.</p> <p>Discussions are taking place with Network Rail with a view to providing improvements to pedestrian access to the station including access for disabled users, an extension to the platform and also for enhanced station car parking.</p> <p>A Transport Assessment is required to further assess the impact of the development and mitigation required.</p>
			Provision and Delivery of County Council Community Services - Education	If this development is brought forward in conjunction with MX58, a new 1FE primary school will be required, to be built under s106 agreement as it is not possible to enlarge Kemsing Primary School, or any other primary school within a three mile radius.
			Sustainable Urban Drainage Systems	<p>The site area south of Honey Pot Lane edged by Flood Zone 3. This area should be accounted for outside of any built forms. It would appear that a length of the watercourse has been culverted. It would be preferred that any development considers de-culverting or daylighting of this length given local flood risk issues. The EA Flood maps for surface water highlight extensive flow paths associated with the local stream and ponding areas north of the railway, which reflects a local low point. Localised flooding regularly occurs along Watery Lane and at the low point below the railway bridge. Management of any surface water generated from the development as well as accounting for off-site surface water which crosses the site will be important within any proposed development strategy.</p> <p>The underlying geology is clay and will not be suitable for infiltration. This means that any surface water volumes generated from the development will likely need to be attenuated on site with a controlled outflow to the local ditch system. Any proposed development would need to assess the implications of this potential overland flow path and account for attenuation areas within the development layout.</p> <p>Surface water management, both local flood risk and drainage will be a constraint on development but can be accommodated with appropriate consideration and technical review.</p>
			Public Rights of Way and Access Service	<p>The site assessment has failed to acknowledge the existence of Public Footpath SR89, which passes directly through the proposed development site, in addition to the extensive network of PRow located to the east of the site. It should be expected that improvements would be made to this network of access routes, in anticipation of the increased footfall, as occupants of the new residential development seek local opportunities for outdoor recreation and active travel.</p> <p>Concerns are raised with the proximity of the at-grade railway crossing next to the site, as this has not been identified in the assessment text. The suitability of the existing railway crossing infrastructure would need to be considered, as public use of the crossing is likely to increase as a result of the new development. Consideration may also need to be given to the delivery of new railway crossing infrastructure, which can provide a safe and sustainable access link between the development site and Kemsing Station.</p>
	MX4 / MX61 Land South of Redhill Road, New Ash Green		Highways and Transportation	<p>A development of this scale, and in this location, would have a significant impact on the capacity of the highway. KCC, as Local Highway Authority is concerned that the existing highway network to the south of New Ash Green is unsuitable to accommodate the level of traffic generated by this development site due to its rural nature and constrained width. Additionally, the junction of the A20 with Ash Lane requires improvements to safely accommodate the increase in traffic arising from this development. Two accesses would be required for a development of this scale. Pedestrian and cycle links required to New Ash Green village centre. Links with Longfield railway station also need to be improved.</p> <p>A Transport Assessment is required to assess the impact of the development and mitigation required. This should also include evidence of how safe and suitable access to the site can be achieved, and what opportunities for sustainable transport modes can be taken up.</p>
			Provision and Delivery of	A new school is proposed – however it would be 1FE, which might be challenging from a viability perspective to deliver. If this development was to be allocated, the County Council would need to further consider whether a new school is a better solution than a proposal to expand local schools where possible.

APPENDIX 1: KCC response: schedule of technical comments to Sevenoaks Proposed Submission Version consultation and Additional Consultations

Pg	Chapter	Policy	Respondent	Commentary
			County Council Community Services - Education	
			Sustainable Urban Drainage Systems	The site is not impacted by areas of flood risk or surface water flow routes. Flooding on the adjacent Highway (Hartley Bottom Road) should be considered and assessed. The underlying geology is suitable for infiltration through superficial deposits for portions of the site may be poorly draining. Surface water management should not constrain development within the site area.
			Public Rights of Way and Access Service	The site assessment has failed to acknowledge the existence of PRow SD73, SD233, SD234, which appear to pass directly through the proposed development site, in addition to the extensive network of PRow surrounding the site. It should be expected that improvements would be made to this network of access routes, in anticipation of the increased footfall, as occupants of the new residential development seek local opportunities for outdoor recreation and active travel.
Page 201	MX62 Land between Hartfield Road and Hever Road, Edenbridge		Highways and Transportation	A Transport Assessment is required to assess the impact of the development and mitigation required. This should include the cumulative impact of this site and the Regulation 19 sites off Four Elms Lane. The assessment should also include evidence of how safe and suitable access to the site can be achieved, and what opportunities for sustainable transport modes can be taken up.
			Provision and Delivery of County Council Community Services - Education	This scheme is proposed to include the delivery of a new school, which is welcomed, however, it would need to be full funded by the developer through s106.
			Sustainable Urban Drainage Systems	<p>The EA Flood maps for surface water highlight extensive flow paths which cross the site east/west. This is a significant constraint.</p> <p>The underlying geology is clay and will not be suitable for infiltration. This means that any surface water volumes generated from the development will need to be attenuated on site with a controlled outflow to the local ditch system.</p> <p>Surface water management, both local flood risk and drainage will be a constraint on development but can be accommodated with appropriate consideration and technical review.</p> <p>It should be noted that given the extent of surface water flow routes that the total developable area may be impacted and this may have impacts to the extent of development proposed. This has not been identified within the Local Plan presentation and is a major concern as the constraints on development need technical assessment to determine the magnitude of constraint. This is not an EA as it is not associated with Flood Zone 3 but is an LLFA matter which we would seek additional technical information.</p>
			Public Rights of Way and Access Service	<p>The site assessment has failed to acknowledge the existence of PRow SR613, SR625, SR626 and SR559, which appear to pass directly through the proposed development site, in addition to the extensive network of PRow surrounding the site. It should be expected that improvements would be made to this network of access routes, in anticipation of the increased footfall, as occupants of the new residential development seek local opportunities for outdoor recreation and active travel.</p> <p>Concerns are raised with the proximity of two at-grade railway crossings next to the site, as these have not been identified in the assessment text. The suitability of the existing railway crossing infrastructure would need to be considered, as public use of the crossing is likely to increase as a result of the new development. Consideration may also need to be given to the delivery of new railway crossing infrastructure, which can provide safe and sustainable access between the development site and the surrounding PRow network.</p>
Badgers Mount Neighbourhood Area Designation Consultation Dec 2018; and Halstead Neighbourhood Area Designation Consultation Dec 2018				
			Public Rights of Way and Access Service	KCC considers that the Neighbourhood Plan provides an opportunity to establish new planning policies that support the work of the PRow and Access Service and help deliver access improvements across the Parish, potentially through CIL payments received from development. With this in mind, the PRow and Access Service would welcome future engagement with the Parish Councils to consider local community aspirations for public access improvements and discuss the inclusion of PRow specific policy references within the Neighbourhood Plans that would help deliver these network enhancements.

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This assessment covers the mixed-use and housing sites allocated under Policy ST2 which does not cover all of the above components for housing supply. The assessment also has not been carried out for each individual site but done on the cumulative impact of allocated sites grouped into specific areas broadly in line with the Settlement Hierarchy used for the Local Plan. The allocated sites in Policy ST2 covers the following:

- Sites within existing settlements,
- Sites on developed land in the Green Belt, and
- Strategic sites in the Green Belt.

Based on the table of components shown above this covers a total of 3,934 dwellings. KCC notes that there is a minor discrepancy between this figure and the total number of dwellings under Policy ST2 which comes to 3,914. The following 5 areas have been used for the assessment covering a total of 3,457 dwellings, or 88% of the total housing delivered from the sites allocated under Policy ST2.

Area Assessed	No. of Dwellings
Sevenoaks Urban Area	1,287
Swanley & Hextable	1,021
Edenbridge	422
News Ash Green & Hartley	164
Badgers Mount/Halstead/Fort Halstead	563
Total	3,457

The remaining sites allocated under Policy ST2 are assumed to be capable of being accommodated within existing infrastructure capacity owing to their dispersed nature and the lack of any large sites over 55 dwellings. The total of 457 dwellings covered by these sites would, however, have a cumulative impact across the whole of Sevenoaks District with the principal impact being on Secondary education provision.

Pedham Place has been assessed separately as the designation of this as a “Broad Location for Growth” is not providing confirmation of the site as an allocated site with the Local Plan. The site would, however, have a significant impact on the provision of infrastructure for KCC services being by far the largest site identified within Sevenoaks District. Whilst assessed separately its proximity to Swanley warrants its assessment being put within the context of the allocated sites for the Swanley & Hextable area.

The impact of sites already completed has not been assessed as these would have already been accommodated within the current capacity of KCC’s Services providers in some instances necessitating improvements to capacity which have been funded by KCC without recourse to any funding secured by Sevenoaks DC through its CIL Charging Scheme.

In addition to the area assessments identified previously the following major sites, which are being consulted on separately, have also been assessed either separately or in conjunction with the areas previously identified where this is appropriate.

- MX4/MX61** – Assessed as additional development to the New Ash Green/Hartley Area.
- MX62/HO412** – Assessed as additional development to the Edenbridge Area
- MX58 and MX59** – Assessed separately for Kemsing but with the addition of two sites allocated under Policy ST2 for this area adding an additional 42 dwellings.

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The assessment has the following limitations: -

- i). It does not include sites that already have planning permission. These may be significant as development sites that have permission but have not yet come forward could add to the impact of the allocated sites under Policy ST2. However, there has been insufficient time to identify any specific sites that could be included with the exception of DRA Fort Halstead (450 dwellings).
- ii). It does not take into account the Windfall Sites as, by their definition, the location of these sites is unknown. A sensitivity test has been carried out that has allocated the estimated housing to be delivered by windfall sites across the assessed areas proportionately giving the following:

Area Assessed	No. of Dwellings from Allocated Sites	Proportionate dwellings from Windfall Sites
Sevenoaks Urban Area	1,287	416
Swanley & Hextable	1,021	330
Edenbridge	422	136
News Ash Green & Hartley	164	54
Badgers Mount/Halstead/Fort Halstead	563	182
Other Settlements	457	148
Total	3,914	1,266

- iii). The assessment only provides information on the demand generated by the planned development for each area. Further work is required with each KCC Service provider to identify the infrastructure needed to meet this demand. Further discussions will be needed with Sevenoaks DC, prior to submission of the Local Plan, in the preparation of the supporting Infrastructure Delivery Plan.
- iv). Detailed information is not currently available on the housing mix for the allocated sites. The assessment has, therefore, taken a worst case scenario that the development sites would be all housing. (Note: this only really has implications on education provision where pupil products are different for housing and flats.)

Assessment Results

The results of this initial assessment of the impact of the allocated sites contained within Reg 19 Submission Local Plan, along with the additional major sites consulted on separately, is shown in the attached table.

The broad implications of the planned development identified by the allocated sites under Policy ST2 of the Reg 19 Submission Local Plan are:

- a) Primary Education – There would be a likely requirement for additional provision of between 1FE and 2FE for the Sevenoaks Urban Area, Swanley & Hextable Area and Badgers Mount/Halstead/Fort Halstead Area.

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- b) Secondary Education – There is a total requirement for additional new provision of between 4FE and 6FE to accommodate the demand from the planned development.
- c) All other KCC Services (Community Learning, Libraries, Youth and Social Care) would require improvement and/or additional facilities to continue to deliver an acceptable level of service to new customers generated by the development. Further detailed work is required with each service provider to identify the nature of the improvements that need to be made but an indicative cost of these improvements is in the order of £1.25m
- d) The Pedham Place site is significantly large to support the provision of 2 new 2FE primary schools, a new 4FE-6FE secondary school and new health and community facilities. The education provision that this site could deliver would benefit primary school provision in the Swanley & Hextable area and secondary school provision across North Sevenoaks.
- e) The additional major sites MX4/MX61(New Ash Green) and MX62(Edenbridge) would both place additional pressure on education provision in the area requiring additional new provision of 1FE each.

Stephen Dukes
Developer Contributions Team
KCC Economic Development

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Assessment of Housing Sites Allocated under Policy ST2 by Area.

Area	No.of Dwellings	KCC Service		Demand Generate	Potential Impact
Sevenoaks Urban	1,287	Education:	Primary	up to 360 pupils	Requirement for up to 1.7FE additional provision to meet the demand generated by planned development.
			Secondary	up to 257 pupils	Requirement for up to 1.7FE additional provision to meet the demand generated by planned development. Existing secondary schools would reach over capacity during the Plan Period requiring new provision to accommodate demand from planned development.
		Community Learning & Skills		79 clients	Additional capacity required at a cost of £38,400.
		Library Services		597 clients	Additional capacity required at a cost of £264,000.
		Youth Services		63 clients	Additional capacity required at a cost of £72,000.
		Families & Social Care		41 clients	Additional capacity required at a cost of £93,300.
		Swanley & Hextable	1,021	Education ⁽¹⁾ :	Primary
Secondary	up to 204 pupils				Requirement for up to 1.4FE additional provision to meet the demand generated by planned development. Existing secondary schools would reach over capacity during the Plan Period requiring new provision to accommodate demand from planned development.
Community Learning & Skills				64-69 clients	Additional capacity required at an average cost of £32,500.
Library Services				465-515 clients	Additional capacity required at an average cost of £214,800.
Youth Services				41-57 clients	Additional capacity required at an average cost of £51,600.
Families & Social Care				33-40 clients	Additional capacity required at an average cost of £81,800.
Notes:	1. Development in the Swanley & Hextable area has the potential to impact on both primary and secondary schools within the Dartford area. There are 3 primary and 3 secondary schools within the Wilmington and Joydens Wood areas closest to Swanley and Hextable whilst slightly further afield there are an additional 6 primary and 3 secondary schools.				

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Area	No.of Dwellings	KCC Service		Demand Generate	Potential Impact
Edenbridge	422	Education:	Primary	up to 118 pupils	The Commissioning Plan for Education in Kent 2018-22 currently shows that the requirement for up to 0.6 FE additional provision to meet the demand generated by this planned development could be accommodated within the Sevenoaks Rural South West planning group for primary schools.
			Secondary	up to 84 pupils	Requirement for up to 0.6FE additional provision to meet the demand generated by planned development. Existing secondary schools would reach over capacity during the Plan Period requiring new provision to accommodate demand from planned development.
		Community Learning & Skills		27 clients	Additional capacity required at a cost of £13,100.
		Library Services		194 clients	Additional capacity required at a cost of £85,500.
		Youth Services		16 clients	Additional capacity required at a cost of £17,700.
		Families & Social Care		14 clients	Additional capacity required at a cost of £32,400.
New Ash Green & Hartley	164	Education:	Primary	up to 46 pupils	The Commissioning Plan for Education in Kent 2018-22 currently shows that the requirement for up to 0.2 FE additional provision to meet the demand generated by this planned development could be accommodated within the West Kingsdown, Hartley & New Ash Green planning group for primary schools.
			Secondary	up to 33 pupils	Requirement for up to 0.2FE additional provision to meet the demand generated by planned development. Existing secondary schools would reach over capacity during the Plan Period requiring new provision to accommodate demand from planned development.
		Community Learning & Skills		11 clients	Additional capacity required at a cost of £5,100.
		Library Services		75 clients	Additional capacity required at a cost of £33,000.
		Youth Services		7 clients	Additional capacity required at a cost of £7,500.
		Families & Social Care		6 clients	Additional capacity required at a cost of £14,200.

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Area	No.of Dwellings	KCC Service		Demand Generate	Potential Impact
Badgers Mount & Halstead/Fort Halstead	563	Education:	Primary	up to 158 pupils	The Commissioning Plan for Education in Kent 2018-22 currently shows that there is some spare capacity within the Halstead & Knockhalt planning group for primary schools. However, the requirement for up to 0.75 FE additional provision to meet the demand generated by this planned development would, in conjunction with the consented development for DRA Fort Halstead, would exceed this capacity requiring up 1.5FE new provision within the area.
			Secondary	up to 113 pupils	Requirement for up to 0.75FE additional provision to meet the demand generated by planned development along with a further 0.55FE to meet the demand generated by the consented development for DRA Fort Halstead. Existing secondary schools would reach over capacity during the Plan Period requiring new provision to accommodate demand from planned development.
		Community Learning & Skills		35 clients	Additional capacity required at a cost of £17,100.
		Library Services		242 clients	Additional capacity required at a cost of £106,900.
		Youth Services		16clients	Additional capacity required at a cost of £18,500.
		Families & Social Care		21 clients	Additional capacity required at a cost of £48,700.

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Assessment of Pedham Place (Broad Location for Development).

Pedham Place	2,500	Education:	Primary	up to 700 pupils	The development would require the provision of up to 3.3FE. It is also of a sufficient scale and size to be capable of on-site provision of 2 new 2FE schools which could some of the demand generated by allocated development within the Swanley & Hextable Area.
			Secondary	up to 500 pupils	The development would require the provision of up to 3.3FE and justify the provision of a new 4FE school. However, It is of a sufficient scale and size to be capable of delivering a 6FE school on-site provision that would provide additional capacity to accommodate demand from allocated development across the wider North Sevenoaks area.
		Community Learning & Skills	150 clients	The development would justify new on-site provision through the delivery of health and community facilities. This could be achieved by direct provision by the developer or through a contribution of around £1.1m for KCC to provide the requisite facilities.	
		Library Services	1,000 clients		
		Youth Services	60 clients		
		Families & Social Care	90 clients		

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Assessment of Additional Major Sites.

MX4/MX61 Land South of Redhill Road, New Ash Green with New Ash Green & Hartley	560	Education:	Primary	up to 157 pupils	The demand generated by this additional major site could not be accommodated by the primary schools within the West Kingsdown, Hartley & New Ash Green planning group and an additional 1FE provision would be required.
			Secondary	up to 112 pupils	Requirement for up to 0.75FE additional provision to meet the demand generated by this additional development site. Existing secondary schools would reach over capacity during the Plan Period and this additional demand would exacerbate the situation adding further justification for new secondary school provision for North Sevenoaks of 4-6FE.
	164	Community Learning & Skills		46 clients	Additional capacity required at a cost of £22,300.
		Library Services		333 clients	Additional capacity required at a cost of £147,100.
		Youth Services		32 clients	Additional capacity required at a cost of £37,000.
Families & Social Care		25 clients	Additional capacity required at a cost of £57,800.		
MX62/HO412 Land Between Hartfield Road & Hever Road, Edenbridge with Edenbridge	300	Education:	Primary	up to 84 pupils	Requirement for up to 0.4FE additional provision. Pupils generated by this additional development site would exceed the available capacity of the primary schools in the area.
			Secondary	up to 60 pupils	Requirement for up to 0.4FE additional provision. This additional development site would exacerbate the over capacity issues for secondary schools across the District adding to the pressure for a new school.
	422	Community Learning & Skills		19 clients	Additional capacity required at a cost of £9,300.
		Library Services		139 clients	Additional capacity required at a cost of £61,500.
		Youth Services		12 clients	Additional capacity required at a cost of £13,300.
Families & Social Care		10 clients	Additional capacity required at a cost of £23,500.		

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MX58 Land West of Childsbridge Lane, Kemsing	149	Education:	Primary	up to 126 pupils	Requirement for up to 0.6FE additional provision. The Commissioning Plan for Education in Kent 2018-22 currently shows that the demand generated by this additional development could be accommodated within the Sevenoaks Rural East planning group for primary schools.
			Secondary	up to 90 pupils	Requirement for up to 0.6FE additional provision. This additional development site would exacerbate the over-capacity issues for secondary schools across the District adding to the pressure for a new school.
MX 59 Land North & South of Kemsing Station	300	Community Learning & Skills		31 clients	Additional capacity required at a cost of £14,900
		Library Services		225 clients	Additional capacity required at a cost of £99,300
Land South of West End, Kemsing	20	Youth Services		23 clients	Additional capacity required at a cost of £26,200
Land South of Noahs Ark, Kemsing	22	Families & Social Care		16 clients	Additional capacity required at a cost of £36,000

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F2 CONSULTATION ON LAND AT COURT LODGE, POUND LANE, KINGSNORTH, ASHFORD (18/01822/AS)

Kent County Council has commented on the above consultation.

The following Appendices to the letter can be found on the KCC website amongst the reports for this meeting:

Appendix 1: PROW Network Map

Appendix 2: KCC Children, Young Persons and Education detailed response

Appendix 3 : KCC development contribution assessment for Primary Education

Appendix 4 : KCC Communities development contributions assessment

Appendix 5 : KCC Social Care assessment

Appendix 6 : General Site Transfer Terms

Appendix 7 : KCC Heritage response

Please note that this is an example of the information to be provided in the future.

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BY EMAIL ONLY

**Growth, Environment
& Transport**

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Sessions House
Maidstone
Kent
ME14 1XQ

Phone: 03000 415981
Ask for: Barbara Cooper
Email: Barbara.Cooper@kent.gov.uk

15 February 2019

Dear Sue

Re: Land at Court Lodge, Pound Lane, Kingsnorth (18/01822/AS)

Thank you for consulting Kent County Council (KCC) on the above outline application for the construction of up to 1,000 new homes and a local centre comprising retail uses, flexible office space and community facilities; including a primary school, a combined community hall and a site management suite. The application also includes a new means of vehicular accesses onto Pound Lane, Long Length, Magpie Hall Road, new pedestrian and cycle routes and green infrastructure.

KCC has reviewed the submitted documentation and would like to raise the following comments.

Highways and Transportation

KCC, as Local Highway Authority raises a **holding objection** to the proposed application, subject to the matters below being satisfactorily addressed by the applicant.

The application site is allocated in the Ashford Local Plan (Site S3), so the use of the site for development is accepted in principle by the County Council, as Local Highway Authority.

This application is not currently promoting the delivery of the Pound Lane Link Road (PLLR), so the County Council has considered the impact on local roads in the vicinity of the site. The main points of access to the site currently promoted by the applicant, as set out in the Framework Plan, are as follows:

- 1) A new three arm roundabout off Magpie Hall Road, together with a new spine road being provided off the roundabout into the centre of the development site. The proposal also includes the closure of the junction of Long Length at its junction with

Magpie Hall Road and a new priority junction provided off the main through route onto Long Length;

- 2) Two new priority junctions off Pound Lane;
- 3) A new priority junction off Long Length; and
- 4) Access via Site S4 in the Local Plan (land north of Steeds Lane and Magpie Hall Road).

Proposed Access Arrangements

The County Council has concerns that the access proposals do not consider the impact of the development on increased use of Pound Lane for vehicular traffic, cyclists and pedestrians, as the Pound Lane Link Road is not being promoted as part of this application.

The application also currently fails to properly address key walking and cycling routes to destinations such as John Wallis secondary school, Imagine Play Centre, and bus stops on Coulter Road and Britannia Lane. All of these destinations are outside the application site and as such, require new links in a northerly direction via Pound Lane and then via the existing Chartfields Estate and Britannia Lane. Improvements to walking and cycling routes are also required via Long Length and Merino Way.

It should be noted that there is currently no footway along Pound Lane from the proposed western access onto Pound Lane and along a section of Britannia Lane from the junction with Pound Lane. As a minimum, a two-metre-wide footway is required to connect into the existing footway on Britannia Lane (just to the south of the junction with Millbank Road). Further details are therefore required to be provided to the County Council to show how this facility will be provided.

There is currently an existing segregated footway / cycle way within Chartfields Estate that links from north of Pound Lane to Britannia Lane. Any pedestrian / cyclist seeking to access this footway / cycle way would need to cross Pound Lane, yet the proposal does not currently provide for an improved crossing point on Pound Lane. The applicant will need to investigate whether or not is possible to implement a speed limit reduction along Pound Lane to provide for an improved crossing facility. A minimum of two different week-long Automatic Traffic Counts are required in locations along Pound Lane, to be agreed with the County Council. Once the results of any speed surveys are known, the County Council will be able to discuss the most appropriate form of crossing facility required with the applicant.

A new footway / cycle way link from Pound Lane over the watercourse onto the footway / cycle way along Merino Way is also required. This is likely to be required in the form of a new three metre wide bridge over the watercourse.

The proposal currently fails to take into account the requirement for Site S5 in the Local Plan (Land south of Pound Lane) to provide a vehicle link from Ashford Road to the eastern boundary of the current application site (planning obligation 28 of the draft Section 106 Heads of Terms Agreement). It is the County Council's view that the eastern vehicle link onto Pound Lane, that is currently proposed, is not necessary and is not required, as it will encourage increased vehicle movements onto Pound Lane. The proposed link is not considered appropriate by the County Council, due to the width constraints along Pound

Lane and the direct potential for 'rat running'. From site measurements, Pound Lane is approximately five metres in width and there is a pinch point in the form of the bridge over the watercourse where the available carriageway width is 4.1 metres. A suitable vehicle link is proposed via Site S5 to be built to a Local Distributor Road standard, as agreed through the Kingsnorth Green planning application.

Even with the deletion of the eastern access onto Pound Lane, there will still be a western access built onto Pound Lane. This will result in a significant increase in the use of Pound Lane. Pound Lane is therefore required to be upgraded to a minimum of a 5.5-metre-wide standard throughout, up to the junction with Chart Road to cater for two-way vehicle movement. It is suggested that the western access is made the main through movement and that Pound Lane becomes the side arm of the junction. The proposed priority junction plan (1281-HL-102) should therefore be amended so that the main through route becomes Pound Lane north into the development site.

Transport Assessment (TA)

A28 Corridor – the County Council notes that the applicant has not modelled the impact of the development upon the A28 corridor from the junction with Chilmington Green Road up to Drovers Roundabout and M20 Junction 9. The A28 corridor is operating well in excess of its link flow capacity (as evidenced in the traffic flow spreadsheets supplied in Appendix F of the TA). This is also witnessed through severe queuing that currently takes place in both the AM and PM peaks on Great Chart Bypass, Chart Road and Templar Way (A28). Works to dual the A28 between Matalan and Tank roundabout were due to commence this year; however the developer of the Chilmington Green development has not provided KCC with the security payment to deliver the scheme. The developer is however allowed to build up to 400 dwellings until KCC can call upon the security payment. As such, works on the A28 scheme have yet to commence.

This development, once built out, is estimated to add 127 movements to the A28 corridor in the AM peak and 112 movements to the A28 corridor in the PM peak. The cumulative impact of this development, together with up to 400 dwellings at Chilmington Green, is therefore a severe impact without any mitigation proposals being proposed by this development, given that the A28 is already operating well in excess of theoretical link capacity.

Accident data - the accident data as submitted is out of date and needs to include the most recent three-year period up to January 2019. Upon request from the applicant, KCC will be able to provide this information.

Public Transport Improvements – the County Council notes that Stagecoach has yet to be consulted for its views on possible public transport improvements. KCC has nevertheless discussed the issue of required contributions with colleagues in the Public Transport Team at the County Council.

To date, KCC has sought £400,000 from the Kingsnorth Green development towards the improvement of services between the application site and Ashford Town Centre. This site is already served from the Ashford Road by a two hourly Stagecoach service 2A and an hourly subsidised service 11, giving 1.5 buses per hour. KCC would be seeking to increase this to

two buses an hour with a half hourly frequency provided to the Kingsnorth Green development across all routes.

These additional journeys could be provided either as a standalone service or additional journeys provided as 'shorts' on Stagecoach service 2A. At present, there is a lack of a turning point on Ashford Road to turn a bus; however, it may be possible to continue turning right along Magpie Hall Road to the proposed new roundabout with Chilmington Green Road. It may be possible to then extend the service into the Court Lodge development on commencement of phase one. KCC would be seeking £400,000 of funding from phase one of the Court Lodge development to extend this service into the site from Chilmington Green Road. Longer term, and on the basis of a new vehicular through route being provided from Ashford Road to Chilmington Green Road, there is the possibility that Stagecoach may wish to divert service 2A through the Court Lodge development site. There is potentially far greater patronage levels to be gained from up to 1,000 dwellings on this site. The link road should therefore be delivered as part of phase two of the development, at the very latest.

This will largely influence how KCC progresses in terms of the configuration of services from phase two onwards, but in order to ensure that the site receives a sufficient level of service, KCC would be seeking an additional £400,000 for phase two to extend the initial service into this part of the development and to improve service frequencies. A total of £800,000 is therefore sought towards improvements to local bus services in the vicinity of the site. KCC may decide in future to tender these services or alternatively the funding could go direct to Stagecoach to deliver an improved service in consultation with KCC. KCC would encourage further discussions between Stagecoach and Ashford Borough Council regarding this issue.

Trip Distribution and Assignment - full details of the agreed trip distribution and assignment should be included in the Transport Assessment.

Proposed Office Development - 350 square metres of B1 office spaces are being proposed as part of the planning application. The vast majority of the vehicle trips associated with this proposed use are likely to be external and so will be new trips on the local highway network. This is however not taken into account in the proposed trip generation for the site. Further junction modelling is therefore required on all of the junction assessments proposed to include the trip generation from the proposed offices.

Committed Developments - the Waterbrook Park and Park Farm South East developments need to be included in the committed development section of in paragraph 8.17 of the TA as these planning applications now have a resolution to grant planning permission. The trip generation from these proposed developments can be found in the corresponding Transport Assessments submitted with these planning applications.

Junction 5: Ashford Road / Magpie Hall Road / Steeds Lane - a scaled plan is requested, showing the proposed improvements to this junction that are being promoted as part of the Kingsnorth Green planning application so that KCC can review the dimensions as quoted in the PICADY assessment for the junction.

Junction 6: Long Length / Magpie Hall Road - the junction modelling results in Figure 9g of the Transport Assessment do not replicate what is being promoted at this junction in the

form of a new three arm roundabout, together with the closure of part of Long Length at its junction with Magpie Hall Road. The roundabout junction should be modelled based on a 2030 scenario with committed development; 2030 with committed development and Court Lodge; and 2030 with committed development with Court Lodge, Kingsnorth Green with Pound Lane closed.

Junction 9: A2042 / Kimberley Way / Norman Road - a capacity improvement scheme at this junction was implemented approximately two months ago. This provides three lane entry on all arms of the roundabout. The applicant is required to model the impact of their development on the as-built scheme.

A2070 / The Boulevard / Waterbrook Avenue junction - no junction assessment of the A2070 / The Boulevard / Waterbrook Avenue junction has been undertaken. This junction is within the ownership of Highways England and the only arm of the roundabout that is within the ownership of KCC Highways is The Boulevard. The County Council, as Local Highway Authority, needs to understand the impacts of the development on this arm of the junction. A mitigation scheme is proposed by Crest Nicholson (Finberry) at the roundabout known as the Bellamy Gurner scheme. Works to this roundabout to turn it into a signal controlled junction are likely to commence sometime this year. The applicant should test the impact of the proposed development on this scheme to ascertain whether or not there is sufficient capacity to cater for the proposed development.

Stage 1 Road Safety Audit - a Stage 1 Road Safety Audit is required for all of the proposed highway schemes below. This is to ensure that the County Council has the assurance that the proposal will not lead to any new highway safety concerns.

Proposed Priority Junction Pound Lane South (1281-HL-101)

As previously explained above, this junction proposal should be removed as it is not appropriate to encourage a substantial increase in vehicle movements along Pound Lane given its limited width. There is also a pinch point on Pound Lane at the location of the bridge that goes over the existing water course.

There is a desire by the County Council to secure the land required for the future Pound Lane Link Road, but this junction should not be provided as part of this application and should only come forward when the Pound Lane Link Road is provided. This plan should therefore be amended to show how a 6.75-metre-wide local distributor road can be provided up to the eastern boundary of the Court Lodge site to connect in with the Kingsnorth Green application site as discussed above, which can be secured through a Section 106 planning obligation.

There is, however, a need for this planning application to secure a new pedestrian linkage into the site from the existing footway that runs along the southern side of Pound Lane. This will provide a new direct link from the site to the Queen's Head Public House and the Ashford Road / Church Hill / Pound Lane junction. There is an agricultural access that runs just to the east of the watercourse by the bridge pinch point. This should provide a pedestrian link onto Pound Lane together with a new bridge to connect in with the existing bridleway that runs along the southern side of Pound Lane as the County Council does not

wish to encourage pedestrians walking in the carriageway to access the bridleway on the southern section of Pound Lane.

There does however need to be an alternative Secure by Design pedestrian / cycle link provided from Local Plan Site S5 up to the existing alignment of the Public Right of Way that runs to the far northern boundary of the site close to the junction of Pound Lane and Chart Road. This link should be provided directly in front of the most northern houses, so that it is lit and well overlooked. The provision of this link should be clearly shown in the Framework Plan document.

Britannia Lane On Road Parking Provision (1281-HL-26)

The County Council supports the proposal for a new parking lay-by on Britannia Lane. This will provide parking for up to six vehicles and ensure that Britannia Lane itself is clear of any parked vehicles. However, parking restrictions are required between the parking lay-by and the junction to the east serving numbers 2-42 Britannia Lane. The plan should be annotated to include the provision of double yellow lines to prevent any obstructive parking around the junction. The proposal will also require the removal of approximately nine street trees. These trees will need to be replaced at the cost of the applicant as part of the Section 278 Agreement between the applicant and the County Council. It is suggested that these trees could be replaced on the other side of the carriageway on Britannia Lane.

Proposed Priority Junction Pound Lane North (1281-HL-102)

As set out above, there are no details of required footpath provision along Pound Lane, linking into the existing footway on Britannia Lane. The proposed site access is 5.5 metres in width, but there are no details of required widening of Pound Lane to a suitable standard of 5.5 metres up to the junction with Chart Road to allow for two-way vehicle movement. Furthermore, vehicle tracking of the site access point needs to be provided for an 11.4 metre long refuse vehicle.

Proposed Priority Junction Long Length (1281-HL-103)

Vehicle tracking for an 11.4 metre long refuse vehicle needs to be provided for the proposed site access point.

Ashford Road / Pound Lane / Church Hill Mitigation (1281-HL-200)

The promoters of the Kingsnorth Green application site are proposing to signalise the junction of Ashford Road / Pound Lane / Church Hill. This has been secured through a respective planning condition for that site and is required prior to the commencement of Area Two or by the 151st dwelling (whichever is sooner). The junction modelling undertaken within the Transport Assessment demonstrates that the signalised junction will operate within 100% practical capacity and just over 90% theoretical capacity at 93.1% on the Ashford Road North and Church Hill arms in the PM peak.

The staging diagrams in the LINSIG assessment appear to show that the Pound Lane arm and Church Hill arm will run at the same time; however, no traffic will exit the Pound Lane

arm as a result of the Pound Lane closure. The proposal does not however take into account that there will be a small element of traffic that will exit Pound Lane at this junction, even with the closure of Pound Lane just to the west of Riverside Close. The junction model should therefore be re-run in both the AM and PM peaks based on a small element of traffic both entering and exiting Pound Lane from Ashford Road. There will be approximately 50 dwellings and the Public House (Queen's Head) that will still need to access Pound Lane from this junction. The applicant will need to agree the likely number of vehicle movements from Pound Lane onto Ashford Road with KCC as Local Highway Authority. Vehicle tracking is required to demonstrate that 16.5 metre long articulated vehicle can safely travel in a north - south direction along Ashford Road and that a minimum of two cars can safely wait in the right hand turn lane whilst seeking to turn right from Ashford Road into Church Hill. The signalisation of the junction does provide a safer layout and allows for the provision of formal pedestrian crossing facilities (something that the junction does not benefit from currently).

Romney Marsh Road Roundabout (1281-HL-211)

The proposal to increase the entry widths on all arms of the roundabout, whilst providing slightly more capacity, does not resolve existing safety issues at this junction as it will just encourage increased vehicle speeds into the roundabout at off-peak times. This roundabout junction currently features on KCC's Crash Remedial List and the County Council will be implementing a safety scheme at this junction in the next financial year. The County Council, as the Local Highway Authority is currently investigating a longer-term highway capacity improvement scheme at this junction, which provides enough capacity for all Local Plan sites up to the 2030 Local Plan scenario.

Subject to securing necessary Section 106 planning obligations, KCC is looking at delivering a scheme as a major project. The promoters of the Waterbrook Park site have devised a signalised roundabout scheme, together with a left-hand filter lane from Romney Marsh Road onto Bad Munstereifel Road. This scheme has also been subject to an independent Stage 1 Road Safety Audit. An outline scheme cost of £6,181,391 has been identified, of which £1 million has been secured from the Waterbrook Park development. The County Council has identified four further sites that can contribute towards this improvement as they will have a significant effect on this roundabout:

- Court Lodge (Policy S3 of the Local Plan);
- Kingsnorth Green (Policy S4 and 55 of the Local Plan);
- Park Farm South East (Policy S14 of the Local Plan); and
- Finberry (Policy S15 of the Local Plan).

The identified number of vehicle movements at the Romney Marsh Road roundabout in the PM peak period (this is the most challenging peak in terms of capacity) because of these sites has been identified by Kent County Council as below:

- Court Lodge – 217 movements;
- Kingsnorth Green – 195 movements;
- Park Farm South East – 57 movements; and
- Finberry – 64 movements.

Based on a pro-rata number of movements, the amount sought from this application site is £2,109,497. This contribution request may however change as a result of the increased trip generation from the proposed office development.

Forestall Meadow Roundabout (1281-HL-311)

In order to assess future capacity issues as a result of the proposed development, the applicant is proposing to provide three lanes of entry from Britannia Lane onto the roundabout and also widen the entry width and increasing the flare length on Ashford Road. This scheme is acceptable to the County Council as it provides a nil-detriment scenario subject to the provision of a Stage 1 Road Safety Audit.

Designer Outlet Roundabout (1281-HL-911)

The owners of the Designer Outlet have recently implemented a roundabout capacity improvement scheme at this roundabout, together with a new slip lane onto Romney Marsh Road from the new Southern Car Park. Details of this capacity improvement scheme were submitted as part of the Designer Outlet expansion planning application (14/01402/AS). The applicant is required to model the impact of the Court Lodge proposal on this scheme.

Roundabout with Long Length and Magpie Hall Road (1281-HL-611)

The proposed carriageway should be 6.75 metres in width, as per the Kent Design Guide for a local distributor road. The route is likely to be a bus route from Ashford Road so needs to cater for all types of vehicles including HGVs. As a minimum, a two-metre-wide footway needs to be provided on one side of the carriageway and a three-metre footway / cycleway on the other side in order to provide suitable pedestrian / cycle access from Stubbs Cross into Court Lodge and vice versa. A new footway connection is also required from the junction of Tally Ho Road / Magpie Hall Road to the proposed new roundabout. The proposed splitter islands at the roundabout can be used as pedestrian crossing points. The section of Long Length between the proposed northern and southern accesses should be downgraded to be a pedestrian / cycle link only to encourage vehicles to route through the development site. Lockable drop-down bollards should be provided at either end of Long Length to prevent unauthorised vehicle access. Vehicle tracking for a 16.5 metre long articulated vehicle needs to be provided for this roundabout to show that this size of vehicle can manoeuvre around the roundabout.

Additional notes

The proposed travel plan should be secured through a Section 106 planning obligation together with a £10,000 monitoring fee (£1,000 per annum over a 10 year period) so that KCC can effectively monitor the travel plan.

All dwellings with private off-street car parking should have an electric vehicle (EV) charging point installed and this should be subject to a planning condition. Where communal car parks are proposed, EV charging points should be provided at a rate of 10% of the total car parking provision.

Public Rights of Way (PRoW)

The County Council would like to ensure the applicant is aware of public footpaths AW298 and AW299, bridleway AW376 and restricted byway AW299A, which will be directly affected by the proposed development. The locations of these paths are indicated on the attached extract of the Network Map (Appendix 1).

The Design and Access Statement includes proposals for new pedestrian and cycle routes, walkable neighbourhoods and improved pedestrian and cycle connectivity. It proposes to safeguard opportunities for wider pedestrian and cycle linkage to Discovery Park West and considers a role for the Roman Road to provide this provision and links to the Park.

KCC is supportive of the proposals outlined in the Design and Access Statement in relation to the proposed pedestrian and cycle routes; and requests that in order to meet the pedestrian and cycle connectivity requirements for the site, footpaths AW298 and AW299 are upgraded to bridleways. AW298 will provide an important link to existing bridleway AW376, to the east, connecting to the proposed Chilmington Green bridleway and Discovery Park to the west. In addition, the upgrade of footpath AW299 to bridleway will provide pedestrian, cycle and equestrian access north to south through the site; providing a link to restricted bridleway AW299A to the north and connecting to Magpie Hall Road to the south. There is potential here to extend the route of the proposed Chilmington Green bridleway to provide a connection to the Court Lodge development to the south west.

The Design and Access Statement also states that multiple site accesses will be explored and that existing PRoW through the site will be retained and enhanced with new surfacing, signage and seating. Routes will be extended to provide interlinked movement, recreational routes and links north to Ashford, south to Stubbs Cross and west to Discovery Park and Chilmington Green will be included. The upgrades of footpaths AW298 and AW299 to bridleway, support Court Lodge's Site Access Strategy. They will provide traffic free routes linking to Stubbs Cross, Discovery Park and Chilmington Green and will greatly benefit the sites connectivity, further increasing opportunities available to residents for recreation, active travel and exercise.

KCC notes that the final design, including materials, seating and signage for the Roman Road is to be determined via a reserved matters application. The County Council requests that details of the PRoW are also included within any relevant subsequent applications. Furthermore, KCC notes that the application identifies two locations where carriageways interface with the Roman Road. KCC requests that the PRoW Network is included and that any crossing of the Roman Road or PRoW should be managed to ensure pedestrian, cyclist and equestrian safety, as required.

Greensands Way

The Greensand Way is an important route that has been recognised within the Chilmington Green development and forms part of the promoted long distance walk. Although within this site the Greensand Way has not been obstructed by any proposed building work and appears to run within an area of amenity green space, the alignment of the route has not

been shown on any maps and KCC requests clarification of the treatment of this route by the applicant.

In respect of ongoing maintenance, it will be expected that site operators take on maintenance responsibilities for any landscaping and enhancements to benefit the PRow network. In the case of any planted vegetation screening, this should be cut on a regular basis so that PRow are open and available to their full width at all times. If it is appropriate to do so, KCC requests that the maintenance responsibilities be added as a planning condition.

KCC would strongly advise the applicant to contact the County Council at its earliest convenience to address all PRow issues and discuss crossing points, surfacing and signage specifications, to ensure that the planning process is not unnecessarily delayed.

Provision and Delivery of County Council Community Services

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and is of the opinion that the scheme will have an additional impact on the delivery of its services, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution. The County Council has provided a summary below.

	Per Applicable House (1000)	Per Applicable Flat (0)	Total	Project
Primary Education	£4,535.00 per house	£1,134 per flat	Up to £4,535,000.00	Contributions towards a new 2FE Primary School at Court Lodge
Primary Education - Land	Freehold transfer at 'nil' cost to KCC of a 2.05ha site in accordance with our General Site Transfer Requirements, attached See Appendix 6 for KCC's site transfer requirements			
Secondary Education	£4,687.00 per house	£1,172.00 per flat	Up to £4,687,000.00	Contributions towards the new Chilmington Green Secondary School – Additional 2FE

'Applicable' excludes 1 bed units of less than 56 sqm GIA. Confirmation requested that 29 of the flats are under 56sqm GIA.

	Per Dwelling (1000)	Total	Project
Community Learning	£34.45	£34,451.65	IT and Equipment to enable outreach provision and increased capacity within existing local centres
Libraries	£108.32	£108,320.49	Book stock, IT and enhanced services at Stanhope Library
Youth Service	£27.91	£27,908.39	Equipment and mobile vehicle to enable the provision of outreach

			services in the area.
Adult Social Care	£77.58	£77,580.00	Fairlawns Respite Care, Ashford
	KCC requests that the on-site community facility is DDA compliant (Wheelchair accessibility requirements of the Equalities Act 2010 and Building Regulations approved document Part M), incorporates a dementia friendly design and Changing Place Facility (as per http://www.changing-places.org/install_a_toilet/design/changing_places_standards.aspx)		
	10 Wheelchair Adaptable Homes as part of the onsite affordable homes delivery		

Please note that these figures:

- are to be **index linked by the BCIS General Building Cost Index from Oct 2016 to the date of payment** (Oct-16 Index 328.3)
- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.

The full detailed assessment of the implications of this proposal on County Council community services is provided in Appendices 2-6.

Education

The County Council would like to raise the following comments on the proposal for a new school at the site.

The County Council's KCC General Site Transfer Requirements (Appendix 6) require that the entire site is located outside of any flood zone. The County Council notes that the current scheme shows that a small part of the education site will fall within the flood zone and requests that the education site is altered accordingly.

The County Council also notes that there is an overhead power line that runs over the education site and that this overhead power line currently has a building exclusion zone. The County Council recognises that concerns are often raised with overhead power lines and therefore requests the applicant has consideration of the KCC General Site Transfer Requirements, which sets out that no overhead cables are located within 250m of a new education facility.

The County Council notes that within the Design and Access Statement, paragraph 6.7, reference is made to the proposed education site containing public realm. The County Council would like to clarify that public realm on school sites is not acceptable, due to the need for the security. It is not possible for an education facility to take responsibility for land which is not secure, with unrestricted access. The budget for the school proposal will not allow for the public realm to be constructed, nor will the school have the revenue cost of maintenance of the public realm. The County Council recommends that the applicant makes the necessary amendments to rectify this issue.

Sustainable Urban Drainage Systems

The County Council, as Lead Local Flood Authority, has reviewed the information submitted and is generally satisfied with the principles of the design, namely limiting the surface water discharge rate from site to the existing Qbar value and for this to be discharged to an existing watercourse.

The discharge rate proposed, whilst acceptable, is slightly higher than that advised within Ashford Borough Council's latest SPD. The County Council requests that confirmation is sought as to the acceptability of the proposed rate (4.39l/s/Ha).

KCC would expect to see the drainage system modelled using Flood Estimation Handbook (FEH) rainfall data in any appropriate modelling or simulation software. Where FEH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of the County Council's latest Drainage and Planning Policy Statement (June 2017)¹; the FSR dataset should not be used.

As this is an outline application, the County Council is willing to accept the values used at this stage, but will expect for these be dealt with as part of the detailed design.

The County Council will also expect for it to be demonstrated that the receiving network is in a good working manner, for the proposed flows, prior to any connections being made, remedial works may be required should this not be possible.

KCC would recommend that the following conditions are attached to a decision notice:

1) Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the FRA prepared by Brookbanks dated 20th November 2018 and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.*
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.*

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off

¹ http://www.kent.gov.uk/_data/assets/pdf_file/0003/49665/Drainage-and-Planning-policy-statement.pdf

site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

2) No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report pertaining to the surface water drainage system, carried out by a suitably qualified professional, has been submitted to the Local Planning Authority, which demonstrates the suitable modelled operation of the drainage system such that flood risk is appropriately managed, as approved by the Lead Local Flood Authority. The Report shall contain information and evidence (including photographs) of earthworks; details and locations of inlets, outlets and control structures; extent of planting; details of materials utilised in construction including subsoil, topsoil, aggregate and membrane liners; full as built drawings; topographical survey of 'as constructed' features; and an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason: To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 165 of the National Planning Policy Framework (July 2018). This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Biodiversity

The County Council recognises that the applicant has carried out extensive ecological surveys within the site and surrounding area. The surveys provide a good understanding of the ecological interest which appears to be greatest around the existing hedges/ditches/water ways. The County Council notes that the majority of these areas will be retained or there is sufficient space within the proposed green infrastructure to implement mitigation.

KCC would like to highlight that ground nesting farmland birds (including skylarks) have been recorded and no information has been provided demonstrating how they will mitigate for the loss of farmland habitat.

KCC requests that further detail is provided with regards to mitigation, including a Mitigation Plan, clearly setting out how much habitat will be lost and subsequently created/enhanced and where the habitat will be created/enhanced. This will enable the application to demonstrate that appropriate mitigation can be implemented. The applicant should note that the Mitigation Plans will need to be adhered to in subsequent reserve matter applications, if outline planning permission is granted.

Further to the submission of a Mitigation Plan, KCC requests that the applicant submits a table detailing the areas of habitat which will be lost as a result of development, and the

habitat which will be created. KCC also requests that the applicant provides details of how they propose to mitigate for the loss of farmland habitat.

Heritage Conservation

The County Council provided a direct response to Ashford Borough Council on the 24 January 2019 in relation to heritage conservation. A copy of the response is attached in Appendix 7.

In summary, the County Council noted that the application site lies within an area of high archaeological potential associated with prehistoric and Roman activity and with possible medieval and later activity focused around Court Lodge Farm itself. Whilst the heritage assessment is reasonable, there are some key areas which need further consideration prior to determination of this application.

Minerals and Waste

The County Council, as Minerals and Waste Planning Authority, is responsible for ensuring that mineral resources and minerals infrastructure are not needlessly sterilised by other forms of development. This ensures a steady and adequate supply of minerals is maintained into the future to facilitate sustainable development. This safeguarding approach is supported by the National Planning Policy Framework (NPPF) and in the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP)². The NPPF requires that development proposals should not be permitted within mineral safeguarding areas where they might constrain potential future use of the economic mineral resource. As such, the policies within the KMWLP aim to prevent the sterilisation of Kent's potentially economic mineral assets.

The proposed development application site is partly located within a Minerals Safeguarding Area (MSA) as defined by Policy CSM5 "Land-won Minerals Safeguarding" of the adopted KMWLP, as shown on the Ashford Borough Mineral Safeguarding Areas proposals maps. The proposed outline development application site is coincident with the following safeguarded economic minerals:

- Sub-Alluvial River Terrace Deposits;
- River Terrace Deposits; and
- Limestone- Pauldina Limestone, Weald Clay Formation.

The submitted Framework Plan (Drawing No 147-P-09 Rev K) shows where potentially sterilising development may occur across the site. It would appear that the some of the Sub-Alluvial River Terrace and River Terrace Deposits in the central area of the application site could be at risk of sterilisation from the potential new residential, local centre and educational development. The area where the Pauldina Limestone is situated appears to be

² <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/planning-policies/minerals-and-waste-planning-policy#tab-1>

unaffected by potentially sterilising development, as this area is identified on drawing (147-P-09 Rev K) to be for green infrastructure and structural woodland planting.

The County Council notes that the application is in outline only and the layout of the development may change. Therefore, the County Council requests that a detailed Minerals Assessment is carried out by the applicant. The Minerals Assessment should clarify if the development of the site would sterilise the economically important minerals, and whether it is appropriate to revise the application to avoid this impact. Alternatively, the submitted Planning Statement, informed by the evidence of a Mineral Assessment, should be amended to justify as to whether there are circumstances that invoke any of the specified exemptions from the presumption to safeguard, as set out in Policy DM7 of the KMWLP.

The County Council and Minerals and Waste Planning Authority is happy to discuss this further with the applicant or the Borough Council and can be contacted at mwlp@kent.gov.uk or 0300 422370.

Countryside, Leisure and Sport

The County Council would like to ensure that the applicant considers Sport England's Active Design³. This publication encourages design of developments to build activity into people's lives with linking walkways and cycle routes to green space and community facilities.

The County Council will continue to work closely with the Borough Council to help to ensure the delivery of new housing and infrastructure in response to local needs. In addition, the County Council welcomes any further engagement with the Borough Council and the applicant as this planning application progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely



Barbara Cooper

Corporate Director – Growth, Environment and Transport

Encs:

[Appendix 1:](#) Extract of the Network Map

[Appendix 2:](#) Detailed Response regarding Provision and Delivery of County Council Community Services

[Appendix 3:](#) Education Assessment

[Appendix 4:](#) Community Learning & Youth Service

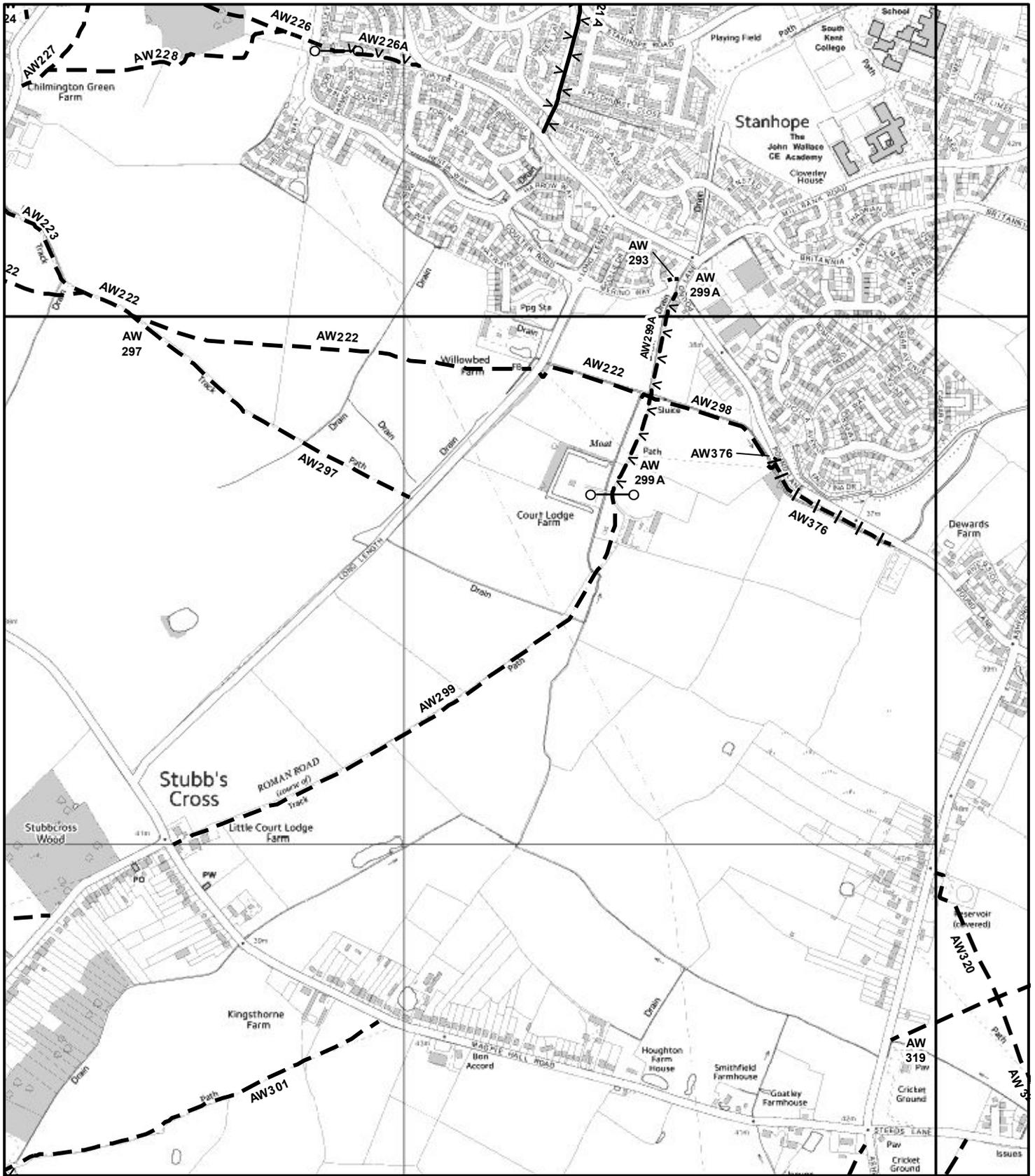
[Appendix 5:](#) Social Care Assessment

[Appendix 6:](#) General Transfer Requirements

[Appendix 7:](#) KCC Heritage Conservation Response dated 24 January 2019

³ <https://www.sportengland.org/media/3426/spe003-active-design-published-october-2015-email-2.pdf>

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- Footpath
- |— Bridleway
- ∨∨ Restricted Byway
- ∧∧ Byway Open to All Traffic
- Point path number or status changes
- Boundary of area covered by 1:2500 scale Network Map
- ▨ Area covered by 1:2500 scale Network Map

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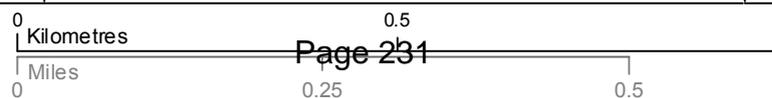
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Invicta House
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Maidstone
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Phone: 03000 415101
Ask for: Vicky Thistlewood
Email: allan.gilbert@kent.gov.uk

31 January 2019

Your Ref: 18/01822/AS
Our Ref: K/E/AS/18/01822 AG

Dear Sue,

**Provision and Delivery of County Council Community Services:
Court Lodge North, Pound Lane, Kingsnorth, Ashford
Planning Application: AS/18/01822**

We refer to the above planning application which concerns proposed residential development at **Court Lodge North, Pound Lane, Kingsnorth** and comprising: **Up to 1000 new households**.

The County Council has assessed the implications of this proposal in terms of the delivery of its community services and is of the opinion that it will have an additional impact on the delivery of its services, which will require mitigation either through the direct provision of infrastructure or the payment of an appropriate financial contribution.

The Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 (the CIL Regulations) (Regulation 122) require that requests for development contributions of various kinds must comply with three specific legal tests:

1. Necessary,
2. Related to the development, and
3. Reasonably related in scale and kind

These tests have been duly applied in the context of this planning application and give rise to the following specific requirements (the evidence supporting these requirements is set out in the attached Appendices).

Request Summary

	Per Applicable House (1000)	Per Applicable Flat (0)	Total	Project
Primary Education	£4,535.00 per house	£1,134 per flat	Up to £4,535,000.00	Contributions towards a new 2FE Primary School at Court Lodge
Primary Education - Land	Freehold transfer at 'nil' cost to KCC of a 2.05ha site in accordance with our General Site Transfer Requirements, attached See Appendix 4 for KCC's site transfer requirements			
Secondary Education	£4,687.00 per house	£1,172.00 per flat	Up to £4,687,000.00	Contributions towards the new Chilmington Green Secondary School – Additional 2FE

'Applicable' excludes 1 bed units of less than 56 sqm GIA. Please confirm that 29 of the flats are under 56sqm GIA.

	Per Dwelling (1000)	Total	Project
Community Learning	£34.45	£34,451.65	IT and Equipment to enable outreach provision and increased capacity within existing local centres
Libraries	£108.32	£108,320.49	Bookstock, IT and enhanced services at Stanhope Library
Youth Service	£27.91	£27,908.39	Equipment and mobile vehicle to enable the provision of outreach services in the area.
Adult Social Care	£77.58	£77,580.00	Fairlawns Respite Care, Ashford
KCC requests that the On-site Community facility is DDA compliant (Wheelchair accessibility requirements of the Equalities Act 2010 and Building Regulations approved document Part M), incorporates a dementia friendly design and Changing Place Facility (as per http://www.changing-places.org/install_a_toilet/design/changing_places_standards.aspx)			

	10 Wheelchair Adaptable Homes as part of the on site affordable homes delivery
High Speed Fibre Optic Broadband connection:	INFORMATIVE: Kent County Council recommends that all developers work with a telecommunication partner or subcontractor in the early stages of planning for any new development to make sure that Next Generation Access Broadband is a fundamental part of the project. Access to superfast broadband should be thought of as an essential utility for all new homes and businesses and given the same importance as water or power in any development design. Please liaise with a telecom provider to decide the appropriate solution for this development and the availability of the nearest connection point to high speed broadband. We understand that major telecommunication providers are now offering Next Generation Access Broadband connections free of charge to the developer. For advice on how to proceed with providing access to superfast broadband please contact broadband@kent.gov.uk
Highways	<i>Kent Highway Services will respond separately</i>

Please note that these figures:

- are to be **index linked by the BCIS General Building Cost Index from Oct 2016 to the date of payment** (Oct-16 Index 328.3)
- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.

Justification for infrastructure provision/development contributions requested:

The County Council has modelled the impact of this proposal on the provision of its existing services and the outcomes of this process are set out in Appendices **1, 2 & 3** attached.

Primary Education

The proposal gives rise to **210** additional primary school pupils during occupation of the development. This need, cumulatively with other new developments in the vicinity, can only be met through the provision of a new 2FE Primary School within the applicant site boundary.

This proposal has been assessed in accordance with the KCC Development Contributions Guide methodology of *'first come, first served'* assessment; having regard to the indigenous pupils, overlain by the pupil generation impact of this and other new residential developments in the locality.

The County Council requires a financial contribution towards construction of the new school at **£4,535.00 per applicable house for each 'applicable' house and £1,134.00 per applicable flat for each applicable flat** ('applicable' means: all dwellings except 1 bed of less than 56sqm GIA –please confirm the 2 x 1 bed flats proposed are below this threshold?).

A **Primary School site of 2.05ha** is required to accommodate a school capable of being expanded to 2 Forms of Entry in accordance with KCC policy. The Site should be in accordance with the attached KCC General Site Transfer Requirements (Appendix 4), with a

Licence for early access to allow County Surveyor site investigations prior to transfer and provided at nil cost.

Please note this process will be kept under review and may be subject to change (including possible locational change) as the Local Education Authority has to ensure provision of sufficient pupil spaces at an appropriate time and location to meet its statutory obligation under the Education Act 1996 and as the Strategic Commissioner of Education provision in the County under the Education Act 2011

KCC will commission additional pupil places required to mitigate the forecast impact of new residential development on local education infrastructure generally in accordance with its Commissioning Plan for Education Provision in Kent 2018-22 and Education and Young People's Services Vision and Priorities for Improvement 2017-20, March 2017.

Additional notes:

- Kent County Council welcomes the provision of the primary school within Phase 1 of the development, accompanied by early access to the site.
- The indicative position of the primary school within the draft Masterplan, appears to show the location being outside of the flood zone. The applicant should be mindful of KCC's site transfer requirements (Appendix 4), which requires the school site to be outside of the floodzone.
- Overhead cables and phone masts – the applicant should refer to KCC's Site Transfer requirements and ensure that these are met.
- Section 6.7 of the Design & Access Statement refers to the school site containing public realm. KCC cannot agree to this. School sites need to be secure and therefore, cannot take responsibility for land which is open to anyone to enter. In addition, schools do not have the revenue budget to maintain these areas.

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Secondary School Provision

The impact of this proposal on the delivery of the County Council's services is assessed in Appendix 1.

A contribution is sought based upon the additional need required, where the forecast secondary pupil product from new developments in the locality results in the maximum capacity of local secondary schools being exceeded.

The proposal is projected to give rise to **150** additional secondary school pupils from the date of occupation of this development. This need can only be met through the provision of accommodation at a new secondary school in the area.

Please note where a contributing development is to be completed in phases, payment may be triggered through occupation of various stages of the development comprising an initial payment and subsequent payments through to completion of the scheme.

The new secondary school accommodation will be provided through the additional 2FE at the new Chilmington Green Secondary School and delivered in accordance with the Local Planning Authority's Infrastructure Delivery Plan (where available); timetable and phasing.

Please note this process will be kept under review and may be subject to change as the Local Education Authority will need to ensure provision of the additional pupil spaces within the appropriate time and at an appropriate location.

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Community Learning

There is an assessed shortfall in provision for this service: the current adult participation in both District Centres and Outreach facilities is in excess of current service capacity, as shown in Appendix 2, along with cost of mitigation.

To accommodate the increased demand on KCC Adult Education service, the County Council requests **£34.45 per dwelling** towards the cost of providing additional equipment for outreach classes, local to the development.

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Libraries

KCC is the statutory library authority. The library authority's statutory duty in the Public Libraries and Museums Act 1964 is to provide 'a comprehensive and efficient service'. The Local Government Act 1972 also requires KCC to take proper care of its libraries and archives.

To mitigate the impact of this development, the County Council will need to provide IT, Equipment and additional library books to meet the extra demand to borrow library books which will be generated by the people residing in these Dwellings.

The County Council therefore requests **£108.32** per household to address the direct impact of this development, and the additional stock/equipment will be made available locally as and when the monies are received.

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Youth Service

To accommodate the increased demand on KCC services the County Council requests **£27.91 per dwelling** towards equipment and vehicle to enable outreach provision in the area.

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Social Care

The proposed development will result in additional demand upon Social Care (SC) (older people, and also adults with Learning or Physical Disabilities) services, however all available care capacity is fully allocated already, and there is no spare capacity to meet additional demand arising from this and other new developments which SC are under a statutory obligation to meet. In addition, the Social Care budgets are fully allocated, therefore no spare funding is available to address additional capital costs for social care clients generated from new developments.

To mitigate the impact of this development, KCC Social Care requires:

- a proportionate monetary contribution of **£77.58 per household** (as set out in Appendix 3) towards the Fairlawn Respite Care centre in Ashford.
- Ashford Borough Council is to ensure the delivery of **10 Wheelchair Adaptable Homes** (as part of the affordable housing element on this site), with nomination rights given in consultation with KCC Social Care; need as evidenced below:

Local Authority	High priority applicants needing wheelchair accessible housing	Comments on waiting time	Any other observations (Kent Agency Assessment: KAA)
Ashford BC	19	3 years	KAA

.....

Superfast Fibre Optic Broadband

Broadband Delivery UK (BDUK), part of the Department for Culture, Media and Sport, requires delivery of superfast broadband to all.

It is requested that Ashford Borough Council includes within any Planning Consent the requirement to provide 'fibre to the premise' (Superfast fibre optic broadband) to all buildings (residential, commercial, community etc) of adequate capacity (internal min speed of 100mb to each building) for current and future use of the buildings, as set out in the above Request Summary.

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Implementation

The County Council is of the view that the above contributions comply with the provisions of CIL Regulation 122 and are necessary to mitigate the impacts of the proposal on the provision of those services for which the County Council has a statutory responsibility. Accordingly, it is requested that the Local Planning Authority seek a section 106 obligation with the developer/interested parties prior to the grant of planning permission. The obligation should also include provision for the reimbursement of the County Council's legal costs, surveyors' fees and expenses incurred in completing the Agreement.

Would you please confirm when this application will be considered and provide us with a draft copy of the Committee report prior to it being made publicly available. If you do not consider the contributions requested to be fair, reasonable and compliant with CIL Regulation 122, it is requested that you notify us immediately and allow us at least 10

working days to provide such additional supplementary information as may be necessary to assist your decision making process in advance of the Committee report being prepared and the application being determined.

Kent County Council confirms, in accordance with CIL Regulation 123, there are no more than 4 other obligations towards these projects.

We look forward to hearing from you with details of progress on this matter.

Yours sincerely

Vicky Thistlewood

Development Contributions
Kent County Council

Appendices:

The following Appendices contain the technical details of the County Council's assessment process.

1. Education Assessment
2. Community Learning & Youth Service
3. Social Care Assessment
4. General Transfer Requirements

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KCC developer contribution assessment for Primary Education

District:	Ashford	1-bed:	100
Site:	Land at Court Lodge, Pound Lane, Kingsnorth	Houses:	700
Plan ref:	AS/18/01822	Flats:	200
Date:	30/01/2019	Total units:	1000

Note: Assumed housing mix of 70% houses, 20% flats and 10% 1-bed dwellings used

Current and forecast pupils on roll for schools within

Ashford East planning area

DfE no.	School	2017-18 (A)	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)
2272	East Stour Primary School	410	409	408	410	414	414
2061	Finberry Primary School	133	157	180	179	184	189
2686	Furley Park Primary Academy	584	609	612	620	629	646
3140	Kingsnorth CE Primary School	427	426	427	429	433	436
2285	Mersham Primary School	199	197	197	198	200	203
2276	Willesborough Infant School	379	378	360	366	378	384
5226	Willesborough Junior School	475	484	513	523	526	530
Current and forecast pupils on roll (excluding the expected pupil product from all new developments)		2,607	2,660	2,698	2,725	2,763	2,801
Required capacity to maintain 5% surplus capacity		2,744	2,800	2,839	2,868	2,908	2,949

Current and forecast capacity for schools within

Ashford East planning area

DfE no.	School	2017-18 (A)	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)
2272	East Stour Primary School	420	420	420	420	420	420
2061	Finberry Primary School	180	210	210	210	210	210
2686	Furley Park Primary Academy	600	630	630	630	630	630
3140	Kingsnorth CE Primary School	420	420	420	420	420	420
2285	Mersham Primary School	210	210	210	210	210	210
2276	Willesborough Infant School	390	390	360	360	360	360
5226	Willesborough Junior School	480	480	510	510	510	510
Current and forecast capacity (1)		2,700	2,760	2,760	2,760	2,760	2,760

(1) including expansion projects at **existing schools** that have successfully passed through statutory processes but may not yet be complete

Expected pupil product from new developments within:

Ashford East planning area

Planning reference	Development	Houses	Flats	Primary product
AS/18/00652	Land south of Park Farm East Hamstreet Bypass Kingsnorth Kent	328	25	94
AS/18/00584	Site of Former Klondyke Works Newtown Road Ashford	0	52	4
AS/18/00098	Waterbrook Park, Waterbrook Avenue, Sevington, Ashford	400	0	112
AS/16/01512	Hinxhill Park land between Hinxhill Road and Hythe Road, Willesborough (S106)	195	8	0
AS/15/01550	Highmead House, Hythe Road, Willesborough (S106)	19	6	0
Previously assessed developments in the area		942	91	209
This development		700	200	210

Assessment summary

Detail	2017-18 (A)	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)
Surplus / (deficit) capacity (excluding the expected pupil product from all new developments)	-44	-40	-79	-108	-148	-189
Expected pupil product from previously assessed developments	209	209	209	209	209	209
Surplus / (deficit) capacity including the expected pupil product from previously assessed developments	-253	-249	-289	-318	-358	-398
Expected pupil product from this development	210	210	210	210	210	210
Surplus / (deficit) capacity including the expected pupil product from previously assessed developments and this development	-463	-459	-499	-528	-568	-608
Expected pupil product from this development that on current plans for school provision cannot be accommodated	210	210	210	210	210	210

Background notes:

Pupil forecasts 2018 (base + migration) employed from September 2018. Incorporating roll data from Schools Census Autumn 2017. Data from the Health Authority includes pre-school children born up to 31st August 2017. Forecasts use trend data over the previous three years.

Expected pupil product from new developments within the planning area

Where a section 106 agreement has been secured for a development (indicated by code S106 in brackets), the expected pupil product from that development has been shown as zero. This indicates that the pupil product need arising from the development has been mitigated by the developer.

KCC developer contribution assessment for Secondary (Years 7-11) Education

District:	Ashford	1-bed:	100
Site:	Land at Court Lodge, Pound Lane, Kingsnorth	Houses:	700
Plan ref:	AS/18/01822	Flats:	200
Date:	30/01/2019	Total units:	1000

Note: Assumed housing mix of 70% houses, 20% flats and 10% 1-bed dwellings used

Current and forecast pupils on roll for schools within

		Ashford North non-selective and Ashford selective planning areas										
DfE no.	School	2017-18 (A)	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)
4092	Highworth Grammar School	997	1,023	1,029	1,005	1,003	1,006	1,007	1,007	990	992	990
6919	John Wallis CE Academy	974	1,017	1,092	1,145	1,185	1,235	1,274	1,282	1,268	1,284	1,297
4246	North School	879	840	829	882	923	953	1,000	1,015	1,009	1,018	1,027
4528	Norton Knatchbull School	888	894	901	908	867	869	868	869	856	857	856
4196	Towers School	851	917	992	1,063	1,103	1,125	1,162	1,167	1,139	1,135	1,126
4007	Wye School	454	471	499	528	553	577	595	599	585	578	570
Current and forecast pupils on roll (excluding the expected pupil product from all new developments)		5,043	5,161	5,343	5,531	5,634	5,765	5,906	5,939	5,848	5,864	5,866
Required capacity to maintain 5% surplus capacity		5,308	5,433	5,625	5,823	5,930	6,068	6,217	6,251	6,156	6,172	6,175

Current and forecast capacity for schools within

		Ashford North non-selective and Ashford selective planning areas										
DfE no.	School	2017-18 (A)	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)
4092	Highworth Grammar School	954	960	1,006	980	980	972	946	920	920	920	920
6919	John Wallis CE Academy	1,050	1,050	1,080	1,080	1,080	1,080	1,080	1,050	1,050	1,050	1,050
4246	North School	1,085	1,085	1,075	1,075	1,075	1,075	1,075	1,075	1,075	1,075	1,075
4528	Norton Knatchbull School	900	930	960	929	898	867	806	745	745	745	745
4196	Towers School	1,215	1,215	1,242	1,242	1,242	1,242	1,242	1,215	1,215	1,215	1,215
4007	Wye School	450	450	480	480	480	480	480	450	450	450	450
Current and forecast capacity (1)		5,654	5,710	5,843	5,786	5,755	5,716	5,629	5,455	5,455	5,455	5,455

(1) including expansion projects at existing schools that have successfully passed through statutory processes but may not yet be complete

Expected pupil product from new developments within:

		Ashford North non-selective and Ashford selective planning areas		
Planning reference	Details	Houses	Flats	Secondary product
AS/18/01801	Land between Pealers and Oakleigh, Church Road, Smeeth, Kent	31	0	6
AS/18/01592	Ashford Golf Complex, Bears Lane, Bethersden, Ashford, Kent, TN23 3BZ	10	0	2
AS/18/01554	Sand pit to the south of 200 and east of 198, Sandyhurst Lane, Boughton Aluph, Kent	18	0	4
AS/18/01550	The Gables, Mock Lane, Great Chart, Ashford, Kent, TN23 3DS	0	14	1
AS/18/01508	Recreation Ground between Halstow Way & Noakes Meadow, Ashford, Kent TN23 4EX	0	11	1
AS/18/01402	Eastern part of, Site of Pluckley Brickworks, Station Road, Pluckley, Kent	7	0	1
AS/18/01273	Land r/o 17 Townland Close Biddenden	12	0	2
AS/18/01168	Brundrett House, Tannery Lane, Ashford, TN23 1PN	0	144	7
AS/18/00881	Land North of 2 Home Farm Cottages Coach Drive Hothfield Kent	60	0	12
AS/18/00759	Land to the South of Sicklefield House Ashford Road St Michaels Tennterden	30	0	6
AS/18/00748	Land North east of Toke Farm and east of Minden Cottage Ashford Road Great Chart Kent	22	0	4
AS/18/00652	Land south of Park Farm East Hamstreet Bypass Kingsnorth Kent	328	25	67
AS/18/00644	Land to the North of St Marys Close and East of Ashford Road Hamstreet Kent	80	0	16
AS/18/00584	Site of Former Klondyke Works Newtown Road Ashford	0	52	3
AS/18/00572	Delcroft Woodchurch Road Shadoxhurst Ashford Kent TN25 1 LE	13	0	3
AS/18/00518	The Old Railway Station Headcorn Road Biddenden Ashford	15	0	3
AS/18/00321	Phase 2 Old Clockhouse Green, Canterbury Road, Challock	15	0	3
AS/18/00262	Land between Ransley Oast and Greenside, Ashford Road, High Halden	39	0	8
AS/18/00236	Land East of East Mountain Lane and Canterbury Road Kennington Kent	625	0	125
AS/18/00225	Land to the West of, Calleywell Lane, Aldington, Kent	58	6	12
AS/18/00098	Waterbrook Park, Waterbrook Avenue, Sevington, Ashford	400	0	80
AS/18/00056	Land between A2070 and Railway north of, Warehorne Road, Hamstreet, Kent TN26 2JR	70	0	14
AS/18/00029	Land South of Swan Hotel, Maidstone Road, Charing	135	0	27
AS/17/01926	Land rear of Charing Motors Ltd, Northdown Service Station, Maidstone Road, Charing, Kent	17	0	3
AS/17/01913	Land between 82-120 Front Road Woodchurch	10	0	2
AS/17/01868	Land rear of St Mary's Church, Church Hill, High Halden	31	0	6
AS/17/01646	Former Goods Yard, Bramble Lane, Wye	14	0	3
AS/17/01613	Lenacre Hall Farm, Sandyhurst Lane, Ashford	89	0	18
AS/17/01511	Godinton House, Godinton Road, Ashford	29	0	6
AS/17/01118	Prince Albert, 109 New Street, Ashford	0	14	1
AS/17/00952	Land East of Hope House, Ashford Road, High Halden (S106)	28	0	0
AS/17/00567	Former Wye College, High Street, Wye	13	25	4
AS/17/00538	Former Precinct 13, Ashford Road, High Halden	3	6	1
AS/17/00505	Yew Tree Park Homes, Maidstone Road, Charing	20	0	4
AS/17/00388	Land r/o 2 to 16 Longfield off Quarry Wood Aldington Kent	4	0	1
AS/17/00258	Land at rear of Rose Cottage Farm, North Street, Biddenden (S106)	45	0	0
AS/17/00032	Land off Chensenden Lane, Smerden	20	0	4
AS/16/01841	Land between The Hollies and Park Farm Close, Woodchurch Road, Shadoxhurst (S106)	12	0	0
AS/16/01515	Land between Smarden Charter Hall and Weathercock Pluckley Road, Smerden	25	0	5
AS/16/01512	Hinxhill Park land between Hinxhill Road and Hythe Road, Willesborough (S106)	195	8	0
AS/16/01412	Saxon Heights, land between Aldington Fresh Foods and Brockenhurst Roman Road, Aldington	11	0	2
AS/16/01271	Courtlands Church Hill, Bethersden, Ashford	15	0	3
AS/16/01198	Former Kent Highways Depot, Ashford Road, High Halden (S106)	25	0	0
AS/16/01157	Former Pledges Mill and South Kent College Site and land south of junction of Beaver Road (S106)	0	116	0
AS/16/00986	Former Travis Perking (South) Victoria Crescent, Ashford	0	14	1
AS/16/00981	Former Travis Perking (North) Victoria Crescent, Ashford	0	10	1
AS/15/01671	Former Powergen Site, Victoria Road, Ashford (S106)	25	387	0
AS/15/01590	Highmead House, Hythe Road, Willesborough (S106)	19	6	0
AS/15/01496	Land rear of Kings Head, Woodchurch Road, Bethersden, Ashford (S106)	24	0	0
Previously assessed developments in the area		2,642	838	470
This development		700	200	150

Assessment summary

Details	2017-18 (A)	2018-19 (F)	2019-20 (F)	2020-21 (F)	2021-22 (F)	2022-23 (F)	2023-24 (F)	2024-25 (F)	2025-26 (F)	2026-27 (F)	2027-28 (F)
Surplus / (deficit) capacity (excluding the expected pupil product from all new developments)	346	277	218	-37	-175	-352	-588	-796	-701	-717	-720
Expected pupil product from previously assessed developments	470	470	470	470	470	470	470	470	470	470	470
Surplus / (deficit) capacity including the expected pupil product from previously assessed developments	-124	-193	-252	-506	-645	-822	-1,058	-1,266	-1,171	-1,187	-1,190
Expected pupil product from this development	150	150	150	150	150	150	150	150	150	150	150
Surplus / (deficit) capacity including the expected pupil product from previously assessed developments and this development	-274	-343	-402	-656	-795	-972	-1,208	-1,416	-1,321	-1,337	-1,340
Expected pupil product from this development that on current plans for school provision cannot be accommodated	150	150	150	150	150	150	150	150	150	150	150

Background notes:

Pupil forecasts 2018 (base + migration) employed from September 2018. Incorporating roll data from Schools Census Autumn 2017. Data from the Health Authority includes pre-school children born up to 31st August 2017. Forecasts use trend data over the previous three years.

Expected pupil product from new developments within the planning area

Where a section 106 agreement has been secured for a development (indicated by code S106 in brackets), the expected pupil product from that development has been shown as zero. This indicates that the pupil product need arising from the development has been mitigated by the developer.

APPENDIX 2

KCC Communities

Development Contributions Assessment

Site Name	Court Lodge, Pound Lane, Kingsnorth
Reference No.	AS/18/01822 OUT
District	Ashford
Location (Ward)	Weald East
Assessment Date	15/01/2019
Development Size	1,000

COMMUNITY LEARNING & SKILLS		
	Centres	Outreach
Current adult participation in Ashford district	1,833	859
LESS Current Service Capacity	1,165	853
Initial capacity shortfall/surplus (Year ending 2011)	-668	-6
New adult participation from this development	46.36 clients	24.97 clients
Will service capacity be exceeded?	YES	YES
Contributions requested from this development		<u>£34.45 per dwelling</u>
<i>1000 dwellings from this proposal</i>		<u>£34,451.65</u>
Contributions requested towards		

YOUTH SERVICE	
	Centres
Current youth participation in Ashford district	2,062
LESS Current Service Capacity	1,594
Initial capacity shortfall/surplus (Year ending 2011)	-468
New youth participation from this development	39.83 clients
Will service capacity be exceeded?	YES
Contributions requested from this development	<u>£27.91 per dwelling</u>
<i>1000 dwellings from this proposal</i>	<u>£27,908.39</u>
Contributions requested towards	

LIBRARIES		
	Mobile Service Library	Library Stock
Libraries assessed for this development		
Current overall library borrower numbers in assessed area	6,975	6,975
LESS Area Service Capacity	3,160	6,975
Initial capacity shortfall/surplus (Year ending 2011)	-3,815	0
New borrowers from this development	547.25 borrowers	547.25 borrowers
Will service capacity be exceeded?	YES	YES
Contributions requested from this development		<u>£108.32 per dwelling</u>
<i>1000 dwellings from this proposal</i>		<u>£108,320.49</u>
Contributions requested towards		

Net contributions requested for KCC Communities' Services	£170,680.53
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APPENDIX 3				
	Social Care			
	Land at Court Lodge, Pound Lane, Ashford			
	AS/18/01822			
	1000 Households			
Ashford	Project	Project name	Cost per Household	Cost for this Site
	Building Community Capacity	Fairlawns Respite Care Centre	£ 77.58	
			£ 77.58	£ 77,580.00
and	10 Wheelchair Adaptable Homes	delivered as part of the on site affordable homes		

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General Site Transfer Terms

1. The developer/landowner to provide a formal site investigation report by a competent registered expert confirming that the land prior to transfer is free from the following:
 - contamination (including radiation),
 - protected species
 - ordnance
 - rubbish (including broken glass)
 - any adverse ground and soil conditions
 - occupation
 - archaeological remains

Should any of the above be present the developer/owner to implement an agreed strategy of remediation/removal prior to transfer to KCC.

2. The County Council to be granted a Licence for access onto the site, prior to transfer for the purpose of surveying and carrying out technical investigations.
3. The site and any associated areas i.e. playing fields are fit for purpose, above flood plain level, adequately drained and close to public transport.
4. The site to be provided to KCC level, if works are required to do so then they shall be undertaken by the owner and to an agreed specification and form of works
5. The site to be clearly pegged out on site to the satisfaction of the delegated representative of KCC's Head of Property, and fenced with GIS co-ordinates prior to completion of the transfer.
6. The site to be freehold unencumbered and conveyed with full title guarantee and vacant possession with no onerous covenants.
7. Prior to site transfer the developer/landowner is to provide, at their own cost and subject to KCC approval suitable free and uninterrupted construction access to a suitable location on the site boundary. Haul roads should be constructed, at no cost to KCC, and maintained to a standard capable of accommodating HGV's and other construction traffic.
8. Prior to the site transfer the developer/landowner is to provide, at their own cost and subject to KCC approval adopted services and utilities to an agreed location(s) on the site boundary of sufficient capacity and depth to accommodate the maximum potential requirement without mechanical aide upon transfer. Utilities to include, fresh water, foul, surface water, gas, electricity and telecommunications. Necessary statutory undertakers' plant (such as electricity sub-stations or transfer stations) shall be located outside of the site boundary and KCC shall not be liable for any costs (including legal costs) associated with the installation and commissioning of such plant.

9. The owner to provide KCC with full surface water drainage rights to allow discharge of all surface water from the school site into the owner's infrastructure without the requirement for storage tanks.
10. The developer/landowner is to provide temporary electricity and water supplies to the site from the start of construction if formal permanent utilities are not yet present.
11. Prior to the use of the site for its intended purpose ie a school, an adopted highway (or highway capable of being adopted), which is suitable for the intended use of the site is to be provided up to a suitable point on the site boundary together with a suitable alternative vehicular access for deliveries etc., if required. The highway and any alternative access is subject to approval by KCC and no maintenance charges shall be borne by the KCC should the developer chose not to adopt the road.
12. The developer/landowner to provide separate entrance and exit points on to the adoptable highway from the school site, capable of satisfying the Highway Authority's 'in and out' access requirements.
13. No mobile phone masts, overhead cables etc within 250m of a school site and where possible the developer/landowner to impose a covenant that none will be erected within this distance of any site boundary.
14. Rights to enter so much of the adjoining land within the ownership of the Developer as is reasonably necessary to carry out construction works on the site. The County Council to be responsible for making good any disturbance caused to the reasonable satisfaction of the adjoining owner in the exercise of these rights.
15. The landowner to be responsible for the County Council's legal costs and surveyor's fees together with administrative costs incurred during negotiations and in completing the Section 106 Agreement, taking transfer of the land including Land Registry costs, the granting of any easements/licences, or any other documentation and any Project Management agreements.
16. Plan of the site to a scale of 1:1250 to be supplied prior to transfer showing site levels, access, boundaries and details of any adjoining development. The plan is to be provided in a suitable electronic format together with paper copies. GPS Coordinates are to be marked on the plan.
17. Adjoining uses should not cause interference, conflict or be inappropriate in any way to the use of the site i.e. the curriculum delivery for schools. This also includes adverse conditions disruption and inconvenience by noise, dust, fumes, traffic circulation, artificial lighting etc.



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24 January 2019

SENT BY EMAIL

Re: 18/01822/AS – Land at Court Lodge Pound Lane Kingsnorth

Thank you for your letter consulting us on the outline application for construction of up to 1000 new homes, local centre, and associated works.

The site of this proposed development lies within an area of high archaeological potential associated with prehistoric and Roman activity and with possible medieval and later activity focused around Court Lodge Farm itself.

The site lies south of designated *Westhawk Farm*, Roman small town and south-east of *Brisley Farm*, the Iron Age funerary and settlement site. Both these sites are considered to contain remains of national importance and part of *Westhawk Farm* is a Scheduled Monument. The Roman road which leads south out of *Westhawk Farm* runs through this proposed development site and survives as a current hedgerow and field boundary and as features identified through geophysical surveying and archaeological investigations.

The site contains *Court Lodge* which is an identified heritage asset and is considered to be a later medieval moated manorial complex and post medieval farm. It may have originated as an earlier medieval residence and its proximity to the Iron Age/Romano-British road is of interest.

The site's topographical situation close to the channel of the East Stour is also of particular interest and there are patches of River Terrace Gravels. This raises the potential for early prehistoric remains. Geoarchaeological assessment work needs to be integrated with archaeological assessment of the site.

Much of this site was subject to preliminary archaeological assessment works through CgMs with a CgMs HBR, a Geophysical Survey by Stratascan (2007) and a rather limited Historic Landscape Assessment by Wessex Archaeology (2007).

This application is supported by a reasonable cultural heritage assessment. The earlier 2007 heritage reports have all been submitted as well as a revised and updated assessment by Orion. Heritage is considered in the ES in Chapter 10. I attach specific comments on Chapter 10. Although the heritage assessment is reasonable there are some key areas which need further consideration pre-determination of this application.

There is a need for further consideration of the Palaeolithic potential in view of the application site's location within the Stour Valley. A specialist geoarchaeological and Palaeolithic assessment is needed. Some assessment of this kind has been undertaken for a proposed utility scheme in this area and a similar assessment needs to be done for this proposed development.

The presence of the Roman road and the proximity of *Westhawk Farm* SAM to the north and *Brisley Farm* to the north west need to be interpreted in more detail and the Iron Age/Romano-British dynamics of this area need to be reviewed. This additional assessment is vital to ensure full understanding of the potential for significant remains within the application site. I welcome the proposal to preserve in situ the Iron Age/Roman road but there is high potential for associated remains to survive on this site and be a constraint on development. I recommend the need for more detailed assessment of the Iron Age/Romano-British heritage of the site and its immediate surroundings, including provide plans and overlays of the geophysical surveys and excavation plans of *Brisley Farm*, *Westhawk Farm*, *Stubbs Cross* pipeline scheme, *Chilmington Green* and topography.

The heritage assessment also needs to consider in more detail the modern heritage, potential for pill boxes, buried military structures associated with *Ashford Airfield*, etc.

The heritage assessment does not seem to include much documentary research and as such the origins of *Court Lodge* and its potential to contain significant Early Medieval and Medieval remains has not been fully assessed. A building has been identified through the Geophysical Survey by *Stratascan* but it is assumed it is Roman. However, it is actually still undated and given the potential origins of *Court Lodge*, it may well be of later date. Further research on *Court Lodge* would be helpful to ensure there is an appropriate understanding of the significance of *Court Lodge* and associated remains within the application site.

Chapter 10 provides a reasonable description of the known heritage assets, notwithstanding the elements noted above. However, there is little interpretation of this archaeology. Interpretation can provide a clearer picture of the potential for buried archaeology and clarify significance, thereby ensuring any proposed mitigation is sound and appropriate. In particular I would have expected greater interpretation of the implications of *Brisley Farm* Iron Age funerary site and *Westhawk Farm* Roman town in landscape terms, especially with the Iron Age/Roman road heading through the development site.

Subject to the additional deskbased assessment requested above, there will still be a need for predetermination evaluation fieldworks. Predetermination archaeological evaluation works would be appropriate, in accordance with NPPF paragraph 128, especially in view of the presence of the Roman road and the proximity of *Westhawk Farm* SAM and *Court Lodge Farm*. The trenching would be targeted and informed by the deskbased assessment and its aim would be to provide a better understanding of the extent of significant archaeology, especially related to Iron Age, Roman and Medieval heritage of the site.

I thoroughly welcome the proposal for preservation in situ of the Roman road and I am impressed with this approach by the applicant. The proposal offers an outstanding positive heritage mitigation measure and I support this completely. However, the area of

preservation in situ for the Roman feature needs to be informed. This can be achieved through the predetermination fieldwork mentioned above. If this route is to be a modern day routeway, there needs to be consideration on limiting the direct impact on the fabric of the Roman road, ditches and possible metalled surface. The methodology for dealing with this routeway needs to be informed and agreed with KCC Heritage. It would be preferable for this positive heritage mitigation measure to be included within the Heads of Terms to ensure the long term survival of the Roman feature.

In summary, the proposed development is within a sensitive archaeological area. There are known heritage assets within the site, including a Roman road and Court Lodge Farm, and associated designated heritage assets nearby. There is high potential for as yet unidentified significant Prehistoric and later remains. The site is south of the SAM *Westhawk Farm* and is crossed by the main routeway in to this Roman settlement. The description of heritage issues is reasonable but there are some key elements which need further deskbased assessment prior to determination of this outline application.

Prior to determination of this application I would welcome:

- A geoarchaeological and Palaeolithic assessment undertaken by a suitable specialist;
- More detailed interpretation of the Iron Age and Romano-British heritage including plans and overlays of relevant geophysical and excavation plans;
- More detailed assessment of Court Lodge Farm and its origins;
- More detailed assessment of the modern heritage, including identifying possible pillboxes or underground structures.

Once this additional deskbased assessment and interpretation has been submitted, there will be a need for targeted evaluation through trial trenching. In view of the potential for significant archaeology this targeted evaluation work will provide key information to guide the development scheme details and design, including the preservation in situ area for the Roman road. As such it is essential that this fieldwork is undertaken pre-determination.

I would be pleased to discuss the above further and would be happy to discuss the pre-determination requirements with the applicant or their archaeological consultant.

Yours sincerely

Wendy Rogers
Senior Archaeological Officer

Specific comments on ES Chapter 10 Heritage

1. 10.19 Recent investigations around Colmans Kitchen Wood have not found any evidence to support this theory regarding a defended locality within the high ground of the wood.
2. The Heritage assessment provides a good account of the baseline data but little assessment of what it means for Court Lodge site. There needs to be interpretation of the data.
3. With the assessment and interpretation of Iron Age and Romano-British assessment it would be useful to have a plan showing the *Westhawk Farm* geophysical survey and excavation plan aligned with Court Lodge geophysical survey.
4. Not sure I agree that the possible building identified in the geophysical survey, possibly of Roman date, is likely to be of local significance. If it is directly associated with Westhawk Farm it could be of national importance. This issue needs to be clarified prior to determination of this application.
5. The Medieval section does not consider the potential medieval origins of Court Lodge Farm.
6. There is no Modern heritage assessment. Currently assessments of the historic environment need to include assessment of 19th and 20th century remains, particularly industrial, religious, farming, civil etc. The DBA needs to be revised to include assessment of modern. Particularly are there any pill boxes or buried military structures on this site?
7. Designated Assets section should name Westhawk Farm.
8. 10.43 The assumption that the building within the area of the local centre is of local significance is not evidence based. Pre determination evaluation works are needed to inform this assumption, especially if the feature is in an area proposed for intensive development.
9. Actionable Mitigation – I do not agree with this section.
10. I am delighted at the proposal to preserve in situ the Roman road which has been identified and appropriately considered as part of the assessment. This is an extremely welcome approach and can be recognised as an outstanding positive heritage enhancement measure. I would however recommend that the preservation in situ area for this ancient routeway is evidence based and focused on the actual remains, not on the perceived alignment. Currently part of the route is matched by a fragmentary hedgerow. Enhancement works for the heritage asset and the hedgerow need to be informed and robust.
11. I welcome the proposal for archaeological evaluation of the site but maintain that targeted evaluation is needed to inform the detailed design. The potential Roman building, the Roman road and any other significant archaeology need to be identified early so that the final design can seek to preserve archaeology in situ rather than follow the course of excavation.