

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	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:

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				<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	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

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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	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.

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				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>
			Sustainable Business and Communities	KCC welcomes the inclusion of electric car charging points.
			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.

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				<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>

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				<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><i>Build</i></th> <th><i>Cost Range</i></th> <th><i>Average cost</i></th> <th><i>Land Required</i></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>	<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
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				<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 1911"> <thead> <tr> <th data-bbox="845 1869 1320 1911">Planning Area</th> <th data-bbox="1320 1869 1765 1911">Education Requirement</th> <th data-bbox="1765 1869 1988 1911">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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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 65	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.																								
			Heritage and Conservation	<p>The following initial archaeological appraisal of options 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:</p> <p>Scale</p> <p>1 Development of this site (or part of) should be avoided</p> <p>2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p>																								

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				<p>3 Significant archaeology could be dealt with through suitable conditions on a planning approval.</p> <p>4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>5 No known archaeological potential on the site or part of it.</p> <p>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.</p> <table border="1"> <thead> <tr> <th>Site no</th> <th>Site address</th> <th>Preliminary Heritage Assessment</th> </tr> </thead> <tbody> <tr> <td>GT1</td> <td>Bournewood Brickworks Stones Cross Road Crockenhill</td> <td>Potential for early 20th century industrial remains associated with Bournewood Brick Works site identifiable on 4th Ed OS map. <i>Formal archaeological works may be required, subject to details</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval</td> </tr> <tr> <td>GT2</td> <td>Early Autumn EastHill Shoreham</td> <td>Low potential for archaeological remains. 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT3</td> <td>St Georges Stables Well Hill Shoreham</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT4</td> <td>Station Court London Road Halstead</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval</td> </tr> <tr> <td>GT5</td> <td>Alexis Place Hockenden Lane Swanley</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT7</td> <td>Merry Lees Billet Hill Ash Cum Ridley</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT8</td> <td>Knatts Valley Caravan Park Knatts Valley Road West Kingsdown</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT9</td> <td>Hollywood gardens School Lane West Kingsdown</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT10</td> <td>Two Barns Knatts Lane West Kingsdown</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT11</td> <td>Fordwood Farm New Street Road Ash</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT12</td> <td>Seven Acre Farm Hever Road Edenbridge</td> <td><i>Low potential for archaeological remains</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> <tr> <td>GT16</td> <td>Park Lane Farm Park Lane Swanley Village</td> <td><i>Low potential for archaeological remains</i> 4Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</td> </tr> </tbody> </table>	Site no	Site address	Preliminary Heritage Assessment	GT1	Bournewood Brickworks Stones Cross Road Crockenhill	Potential for early 20 th century industrial remains associated with Bournewood Brick Works site identifiable on 4 th Ed OS map. <i>Formal archaeological works may be required, subject to details</i> 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval	GT2	Early Autumn EastHill Shoreham	Low potential for archaeological remains. 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.	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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	<p>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.</p> <p>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.</p>									
			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>
			Heritage and Conservation	The initial archaeological appraisal of options for the employment sites, set out in 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

Page	Chapter	Policy	Respondent	Commentary																		
				<p>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:</p> <p>Scale</p> <p>1 Development of this site (or part of) should be avoided</p> <p>2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible.</p> <p>3 Significant archaeology could be dealt with through suitable conditions on a planning approval.</p> <p>4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval.</p> <p>5 No known archaeological potential on the site or part of it.</p> <p>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.</p> <table border="1"> <thead> <tr> <th>Site no</th> <th>Site address</th> <th>Preliminary Heritage Assessment</th> </tr> </thead> <tbody> <tr> <td>EM1</td> <td>Land south of High Street Brasted</td> <td> <p>Potential for early prehistoric remains due to location on River Terrace Gravels. Some potential for archaeology associated post medieval settlement and industrial activity.</p> <p>Formal archaeological may be required subject to details</p> <p>Scale 3 - Significant archaeology could be dealt with through suitable conditions on a planning approval.</p> </td> </tr> <tr> <td>EM3 EM5 EM11 EM21</td> <td>Dunbrik Hub A25 Main Road Sundridge</td> <td> <p>Potential for early prehistoric remains in view of River Terrace Gravels. 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Page 80	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 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	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 96	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>

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				<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	The County Councils ROWIP is not evidenced. The current ROWIP should be referenced as it is a statutory policy document for PRow for the protection and enhancement of PRow.
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>
			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
			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?
			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>
Additional Comments			Waste Management	<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 to 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>