

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	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

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				<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.									
26-27	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
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				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

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				<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

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				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

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				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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				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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				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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Transport Assessment required. Access to be improved. Capacity assessments of surrounding highway network with mitigation where necessary. Cycling, pedestrian and bus connections require improvements.																																
53	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>																												

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

Pg	Chapter	Policy	Respondent	Commentary																																																
	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>																																																
67	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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Pg	Chapter	Policy	Respondent	Commentary					
				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.
						=330 =92			
						=41 =11			
						=274 =77			
						=1013 =284			
						=42 =12			
						=154 =43			
						=1034 =290			

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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.

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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.

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

Pg	Chapter	Policy	Respondent	Commentary
	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	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	<p><i>Supporting Evidence</i></p> <p>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>
107	Chapter 10 Leisure and Open Space	Policy OS1 Open Space, Sport and Leisure		<p>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.</p> <p>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>
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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				<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.
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.

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			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.
			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.