13 October 2022 at 7.00 pm

Council Chamber, Argyle Road, Sevenoaks
Published: 05.10.22

Sevenoaks
DISTRICT COUNCIL

This meeting will be livestreamed here:
https://www.youtube.com/channel/UClT1f_F5OfvTzxjZk6Zqn6g

Cabinet

Membership:
Chairman, Cllr. Fleming; Vice-Chairman, Cllr. Dickins
Cllrs. Dyball, Maskell, McArthur and Thornton

Agenda
There are no fire drills planned. If the fire alarm is activated, which is a continuous siren with a flashing red light, please leave the building immediately, following the fire exit signs.

		Pages	Contact
	Apologies for Absence		
1.	**Minutes** To agree the Minutes of the meeting of the Committee held on 20 September 2022, as a correct record	(Pages 1 - 8)	
2.	**Declarations of interest** Any interests not already registered		
3.	**Questions from Members (maximum 15 minutes)**		
4.	**Matters referred from Council, Audit Committee, Scrutiny Committee, CIL Spending Board or Cabinet Advisory Committees (if any)**		

REPORTS ALSO CONSIDERED BY THE CABINET ADVISORY COMMITTEES

5.	**Local Plan - Regulation 18 - Consultation**	(Pages 9 - 170)	Hannah Gooden Tel: 01732 227178
	⚷		
6.	**Leader Programme Closure Report**	(Pages 171 - 244)	Detlev Munster Tel: 01732227099
7.	**Capital Schemes Programme Update**	(Pages 245 - 266)	Detlev Munster Tel: 0173227099

〇━🔑   Indicates a Key Decision

➲   indicates a matter to be referred to Council

EXEMPT INFORMATION

At the time of preparing this agenda there were no exempt items. During any such items which may arise the meeting is likely NOT to be open to the public.

If you wish to obtain further factual information on any of the agenda items listed above, please contact the named officer prior to the day of the meeting.

Should you need this agenda or any of the reports in a different format, or have any other queries concerning this agenda or the meeting please contact Democratic Services on 01732 227000 or democratic.services@sevenoaks.gov.uk.

CABINET

Minutes of the meeting held on 20 September 2022 commencing at 7.00 pm

Present: Cllr. Fleming (Chairman)

Cllr. Dickins (Vice Chairman)

Cllrs. Dyball, Maskell, McArthur and Thornton

Cllrs. Clayton, Perry Cole, Edwards-Winser, Mrs Hunter, Osborne-Jackson and Streatfeild were also present.

CHAIRMAN'S ANNOUNCEMENTS

As a mark of respect and in honour of the memory of Her Majesty Queen Elizabeth II, who had died on 8 September 2022, the Cabinet, Members, and Officers present rose for a minute's silence.

At the end of the silence the Chairman gave Members the opportunity to share their thoughts, reflections, or condolences. The meeting was first addressed by the Chairman of the Council, Cllr Avril Hunter who advised that she had formally written to King Charles III, on behalf of the Council and all Sevenoaks District residents, expressing sincere condolences.

The Leader, followed by Members of Cabinet and the Council shared their thoughts.

34.   Minutes

Resolved: That the Minutes of the meeting held on 7 July 2022 be approved and signed by the Chairman as a correct record.

35.   Declarations of interest

There were no additional declarations of interest made.

36.   Questions from Members (maximum 15 minutes)

A Member asked a question about matters concerning the new business waste protocols as related go organisations such as village halls. The Chairman explained that due to new legislation which came into effect in 2021 all premises that were hired out where waste was created were required to have a notice in place. The same Member asked a supplementary question and the Chairman explained that the legislation had placed a duty upon the Council.

Another Member asked a question about the use of agency staff, seeking explicit recognition of the need for the recruitment and retention of permanent staff at

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the Council. The Chairman answered particularly with reference to the use of agency staff as the Council recovered from the effects of the Covid-19 pandemic.

37.   <u>Allocation Of Community Infrastructure Levy (Cil) Contributions To Local And Strategic Infrastructure Projects</u>

Members considered the recommendations from the Community Infrastructure Levy (CIL) Spending Board.

The Chairman noted that the process for assessing applications was a two-stage process as set out in the Council's Constitution and all the bids had been judged on merit. Following the Governance review of CIL, Net Zero had been added as a priority to bring inline the Council's Net Zero 2030 approach.

<u>Public Sector Equality Duty</u>
Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved: That

A. i) The £600,000 applied for an integrated Health Care Facility in Edenbridge should be approved on the following grounds:

- Strong economic, social and environmental benefits to the community;

- Will help to achieve net zero targets;

- Partnership working with other organisations;

- The scheme forms part of a planned strategy to address the need for Infrastructure;

- Evidence has been submitted to show that the scheme will be delivered;

- Strong local support for the scheme; and

- Clear public benefit

This would be subject to a legal agreement being signed within 6 months of the decision date (or such further time as may be agreed between the parties).

ii) if the legal agreement was not signed in accordance with the above then funding applied for would be refused for:

- Without a legal agreement the bid would fail to ensure the effective management of CIL funds; and

- Without a legal agreement to secure where the CIL money is spent the bid would fail to ensure sufficient certainty that the scheme will be delivered as applied for.

B. i) The £15,000 applied for, as set out in the report, for scheme "Refurbishment of the play ground on Kings George's Field, Westerham" be approved on the following grounds:

- Strong economic and social benefits to the community;

- The scheme supports local infrastructure;

- Partnership working with other organisations;

- The scheme forms part of a planned strategy/plan;

- Funding from other sources has been maximised;

- Evidence has been submitted to show that the scheme will be delivered;

- Strong local support for the scheme; and

- Clear public benefit

subject to a legal agreement being signed within 6 months of the decision date (or such further time as may be agreed between the parties).

ii) if the legal agreement was not signed in accordance with the above then funding applied for would be refused for:

- Without a legal agreement the bid would fail to ensure the effective management of CIL funds; and

- Without a legal agreement to secure where the CIL money is spent the bid would fail to ensure sufficient certainty that the scheme will be delivered as applied for.

C. i) The £60,000 applied for, as set out in the report, for scheme "Swanley new rugby pitch and associated facilities" be approved on the following grounds:

- Strong social and environmental benefits to the community;

- The project is identified in an adopted strategy/plan;

- Strong local support;

- Sufficient evidence has been submitted to show that the scheme will be delivered; and

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- Sufficient evidence has been submitted to demonstrate a strong link between new development and the scheme.

subject to a legal agreement being signed within 6 months of the decision date (or such further time as may be agreed between the parties) which shall require as conditions of payment that:

- Planning permission is granted within 3 years of the decision date.

ii) if the legal agreement was not signed in accordance with the above then funding applied for would be refused for:

- Without a legal agreement the bid would fail to ensure the effective management of CIL funds; and

- Without a legal agreement to secure where the CIL money is spent the bid would fail to ensure sufficient certainty that the scheme will be delivered as applied for.

D. i) The £91,000 applied for, as set out in the report, for scheme "Improvements to Weald Recreation Grounds" be approved on the following grounds:

- Strong economic, social and environmental benefits to the community;

- The project helps to achieve the Council's Net Zero ambitions;

- Partnership working with other organisations;

- The scheme is identified in an adopted strategy or plan;

- Evidence has been submitted to show that the scheme will be delivered;

- Strong local support for the scheme; and

- Clear public benefit

subject to a legal agreement being signed within 6 months of the decision date (or such further time as may be agreed between the parties) which shall require as conditions of payment that:

- Confirmation that planning permission is not required for the works; and

- Evidence to confirm that other sources of funding have been maximised and if necessary secured.

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ii)   if the legal agreement was not signed in accordance with the above then funding applied for would be refused for:

- Without a legal agreement the bid would fail to ensure the effective management of CIL funds; and

- Without a legal agreement to secure where the CIL money is spent the bid would fail to ensure sufficient certainty that the scheme will be delivered as applied for.

E. i) The £260,000 applied for, as set out in the report, for scheme "Eynsford new village hall with associated car parking and improved football pitch" be approved on the following grounds:

- Strong partnership working;

- Strong community benefit;

- Strong social and environmental benefit to the community;

- Strong Net Zero benefits; and

- Strong partnership working.

subject to a legal agreement being signed within 6 months of the decision date (or such further time as may be agreed between the parties) which shall require as conditions of payment that:

- all the funding for the project has been secured

ii) if the legal agreement was not signed in accordance with the above then funding applied for would be refused for:

- Without a legal agreement the bid would fail to ensure the effective management of CIL funds; and

- Without a legal agreement to secure where the CIL money is spent the bid would fail to ensure sufficient certainty that the scheme will be delivered as applied for.

F. i) The £251,900 applied for, as set out in the report, for scheme "Bradbourne Lakes Landscape Improvement" be approved on the following grounds:

- The project is identified in an adopted strategy/plan;

- Strong partnership working;

- Strong community benefit;

- Social and environmental benefit;

- Good management in place; and

- There is strong community support of the scheme.

ii)   The funding is to be subject to:

- all other funding being secured; and

- the receipt of planning permission (if required) within 5 years of the original decision date.

G. i) The £42,600 applied for, as set out in the report, for scheme "Stag Theatre Solar Panels" be approved on the following grounds:

- Strong economic and social benefits to the community;

- The proposal helps to achieve the Council's Net Zero ambitions;

- The scheme is identified in an adopted strategy or plan;

- Evidence has been submitted to show that the scheme will be delivered;

- Strong local support for the scheme; and

- Clear public benefit

subject to a legal agreement being signed within 6 months of the decision date (or such further time as may be agreed between the parties) which shall require as conditions of payment that:

- all the funding for the project has been secured

ii) if the legal agreement was not signed in accordance with the above then funding applied for would be refused for:

- Without a legal agreement the bid would fail to ensure the effective management of CIL funds; and

- Without a legal agreement to secure where the CIL money is spent the bid would fail to ensure sufficient certainty that the scheme will be delivered as applied for.

38.   Treasury Management Annual Report 2021/22

The Portfolio Holder Finance & Investment presented the report which sought approval of the Treasury Management Annual Report 2021/22. The Head of Finance set out that the Council had taken a cautious investment approach resulting in lower interest receipts, which were substantially below budget. However, the overall percentage rate of return exceeded recognised benchmarks.

Investment income was supplemented by the property investment strategy and the Council's trading company. Members were advised that interest receipts had improved in the current financial year due to the two Base Rate increases, but that this would be partially offset by the capital programme and housing acquisitions.

The Finance & Investment Advisory Committee had considered the same report and recommended it for approval.

Public Sector Equality Duty
Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

> Resolved: That Treasury Management Annual Report for 2021/22, be approved.

39. Financial Monitoring 2022/23 - to the end of July 2022

The Portfolio Holder for Finance & Investment presented the report which set out the Council's position for 2022/23 and the forecast position up to March 2023. The report had been considered by the Finance & Investment Advisory Committee who had recommended the proposed method of addressing the impact of the national pay negotiations to Cabinet.

The Head of Finance advised that the forecast end of year position presented previously had largely translated to this report, giving an unfavourable variance of £572,000. The National Employers for Local Government Services made a final offer in their pay negotiations that would increase this unfavourable variance by £600,000, and the Committee heard that this total variance should be considered as two costs: the mid-year expense and an ongoing future commitment.

Public Sector Equality Duty
Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

> Resolved: That the
>
> a) report be noted; and
>
> b) proposed method of addressing the impact of the national pay negotiations, be endorsed.

40. Housing Strategy 2022 - 27 Action Plan

The Portfolio Holder for Housing & Health presented the report which set out the action plan which set out how the agreed priorities would be delivered as part of the Housing Strategy 2022/27.

The Head of Housing advised that within the Action Plan there were 4 themes including, Developing the Sevenoaks District's housing offer: building new affordable homes, promoting quality and optimising range and suitability of new and existing homes, reducing homelessness and improving routes into permanent accommodation; and healthy people, homes and places,

Public Sector Equality Duty
Members noted that that consideration had been given to impacts under the Public Sector Equality Duty.

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Resolved: That the draft Housing Strategy Action Plan 2022/27, be adopted.

41.   <u>Draft Eligibility criteria for new affordable housing providers wishing to operate in the Sevenoaks District</u>

The Portfolio Holder for Housing & Health presented the report which sought approval for the eligibility criteria for new affordable housing development providers wishing to deliver homes in the District.

The Head of Housing advised that the criteria would give greater certainty to the Council that new affordable housing would be delivered by organisations who shared our ambitions and ways of working. It would also provide clarity to planning applicants on developments where new affordable housing was triggered by local plan policy.

<u>Public Sector Equality Duty</u>
Members noted that consideration had been given to impacts under the Public Sector Equality Duty.

Resolved: That the eligibility criteria for new affordable housing development providers, be approved.

IMPLEMENTATION OF DECISIONS

This notice was published on 21 September 2022. The decisions contained in Minutes 38 and 39 take effect immediately. The decisions contained in Minutes 37, 40 and 41 take effect on 29 September 2022.

<u>THE MEETING WAS CONCLUDED AT 8.09 PM</u>

<u>CHAIRMAN</u>

Item 05 – Local Plan – Regulation 18 – Consultation

The attached report was considered by the Development & Conservation Advisory Committee on 11 October 2022. The relevant Minute extract was not available prior to the printing of this agenda and will follow when available.

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LOCAL PLAN REGULATION 18 CONSULTATION

Cabinet – 13 October 2022

Report of: Deputy Chief Executive, Chief Officer - Planning & Regulatory Services

Status: For Decision

Also considered by:

Development & Conservation Advisory Committee – 11 October 2022,

Council- 15 November 2022

Key Decision: Yes

Executive Summary: This report presents the Regulation 18 Consultation Draft Local Plan to members for approval.

This report supports the Key Aims of:

Protecting the Green Belt

Supporting and developing the local economy

Supporting the wellbeing of residents, businesses and visitors

Ensuring that Sevenoaks remains a great place to live, work and visit

Portfolio Holder: Cllr. Julia Thornton

Contact Officer: James Gleave ext. 7326 / Hannah Gooden ext. 7178

Recommendation to Development and Conservation Advisory Committee:

That the Development and Conservation Advisory Committee:

a) Notes the report and agrees with the following recommendations to Cabinet as outlined below.

Recommendation to Cabinet: That Cabinet:

a) Approves the content of the 'Plain Text Version' of the Regulation 18 Consultation Draft Local Plan at Appendix 1 for public consultation purposes;

b) Agrees the presentation and formatting style of the consultation document, as reflected in the Indicative Formatted Version at Appendix 2; and

c) Delegates authority to the Chief Officer - Planning & Regulatory Services and the Development & Conservation Portfolio Holder, to approve the final formatting and presentation of the Regulation 18 Consultation Draft Local Plan and any minor pre-consultation text changes.

> d) Recommend that Council authorises officers to formally withdraw the December 2018 Regulation 19 Proposed Submission version of the Local Plan, which was submitted to the Secretary of State in April 2019, before the Regulation 18 Consultation Draft is issued for consultation.
>
> **Recommendation to Council:** That Council:
>
> Authorises officers to formally withdraw the December 2018 Regulation 19 Proposed Submission version of the Local Plan, which was submitted to the Secretary of State in April 2019, before the Regulation 18 Consultation Draft is issued for consultation.

Introduction and Background

1. Members were updated on the emerging Local Plan in July 2022, when Officers provided details of the various evidence base documents and the next steps to move the Plan forwards, including discussions with the Department for Levelling Up, Housing and Communities (DLUHC). The proposed timetable, in the form of the Local Development Scheme (LDS), was also presented and agreed by members at the meeting in July.

2. This report focuses on the Regulation 18 Consultation Draft Local Plan and a full version of the text that is proposed to be issued for consultation is attached at Appendix 1. This 'Plain Text Version' can be easily amended to reflect any recommendations from this committee or the Council's Cabinet.

3. Prior to being issued for consultation and once all comments have been incorporated, the agreed text will be passed to Urban Graphics to prepare the fully formatted consultation version. The Indicative Formatted Version at Appendix 2 contains a number of chapters from the plain text document to provide members with an indication of the final visual appearance and style.

4. As noted in the recommendations of this report, the final formatting and presentation of the Consultation Draft will be delegated for approval.

Discussions with DLUHC

5. Discussions with representatives from DLUHC remain ongoing and a further meeting is due to take place prior to the Local Plan being issued for consultation. Further updates on these discussions will be provided at the meeting.

The Emerging Local Plan

6. This Local Plan covers the period up to 2040 and is being issued for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires the local planning authority to invite representations on what the Local Plan ought to contain and the scope for responding to the document is broad. Whilst a Call for Sites exercise was held at the end of 2021, the Regulations do not preclude the submission of further sites for consideration.

7.   The proposed title of the document is 'Plan 2040' – with a strapline of 'A new Local Plan for Sevenoaks District'. The Plain Text Version at Appendix 1 will, hereafter, be referred to as the Consultation Draft.

Key content

8.   This Consultation Draft comprises 11 chapters, reflecting the main planning matters that are expected to influence development in the District up to 2040. Overall, the document seeks to manage the tension between meeting development needs and protecting our natural environment.

9.   The core of the document is the 10 point 'spatial vision' that proposed policies and allocations seek to deliver by 2040. This incorporates three overarching themes of:

   - The Council's 'Net Zero' agenda

   - Delivering places that promote good mental and physical health; and

   - Ensuring Design Excellence.

10. The Development Strategy for the plan reflects these aspects and provides a framework for meeting District-wide development needs. The strategy can be summarised as seeking to make best use and most efficient use of land in existing settlements, only releasing Green Belt land where there are exceptional circumstances for doing so.

11. Reflecting this approach, the Consultation Draft focuses on the potential to meet residential needs in existing settlements. In accordance with the LDS, a further Regulation 18 version of the Local Plan, including development opportunities outside of settlements, will be published for consultation in 2023.

12. The Development Strategy incorporates the requirements of national planning policy. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. These options include whether the strategy has been informed by discussions with neighbouring authorities, which have sought to accommodate unmet development needs outside of the District.

13. The Consultation Draft focusses rigorously on making the most of development opportunities in existing settlements, through a number of mechanisms. In addition to the Call for Sites exercise, members will be aware that a Settlement Capacity Study (SCS) has been undertaken to proactively identify development opportunities.

14. Officers are keen to explore other methods of making the best use of land, including opportunities to optimise the density of new development, in a way that does not have a detrimental impact on local character. Some locations will be more suited to taller buildings although this is not the only means of increasing development density. Well designed terraced housing can also significantly increase housing supply.

15. The Consultation Draft uses existing baseline densities to calculate the number of residential units that can be accommodated across the District.

Further work will be undertaken, using the District Wide Characterisation Study as a starting point, to robustly test whether these density assumptions can be increased in a sustainable manner.

16. Other mechanisms for making better use of land in existing settlements could include identifying areas of underused land with scope for intensification. In accordance with the NPPF, the Consultation Draft includes a policy to encourage development on sites of up to 1 hectare in size and the specific criteria that will need to be taken into account.

17. Proposed policies seek to maximise the delivery of affordable housing, reflecting the findings of the Targeted Review of Local Housing Needs (TRLHN). In addition to identifying type and tenure requirements, the document proposes a policy on Build to Rent homes, as a means of meeting affordable housing needs.

18. A range of other policies are proposed to deliver the spatial vision and the overarching themes outlined at paragraph 9. For the avoidance of doubt, protecting our natural and built environment will be a central aspect of this Plan.

19. To meet statutory requirements, the Consultation Draft presents reasonable alternatives to meeting identified development needs in existing settlements. Alternatives associated with all other areas of the District will be explored during the publication of the second Regulation 18 consultation in 2023.

Document Structure

20. Taking account of these considerations, the Consultation Draft will be structured as follows:

    - **Foreword from the Portfolio Holder for Development and Conservation**;

    - **Introduction:** incorporating the sub headings of the Purpose of the Consultation, What is the District, like?, Strategic Issues, Spatial Vision, Objectives and Key Diagram;

    - **Growth Strategy:** The overarching strategy to meet our needs, as described in paragraph 10 of this report;

    - **Housing:** Meeting housing needs, including affordable housing delivery;

    - **Employment and Economy:** Amount of land required to meet employment needs, providing the type of employment space required and supporting the rural economy;

    - **Climate Change:** Approach to meeting the Council's 'net zero' objectives;

    - **Design:** Encouraging design excellence across the District;

    - **Health and Wellbeing:** Promoting healthy places and spaces, responding to post pandemic trends;

    - **The Historic Environment:** Protecting the District's historic environment;

- **Natural Environment:** Protecting the District's natural environment;

- **Infrastructure and Community:** Ensuring the delivery of appropriate infrastructure to support planned growth;

- **Transport:** Maintaining a sustainable and efficient transport system with providers and partners; and

- **Glossary:** Explanation of terminology in the Plan.

The Consultation Process

21.   The Regulations contain specific, statutory requirements for the consultation process, including making the documents available for public inspection at the Council Offices and the publication of all consultation material on the Council's website.

22.   The adopted Statement of Community Involvement (SCI) identifies a number of additional potential consultation methods, including advertising the consultation process on social media and in the local press, holding public exhibitions and using emails and mail outs to invite comments. All of these methods will be considered over and above the statutory requirements

23.   Officers have procured a subscription to 'Citizen Space', a public consultation software tool that allows residents and other representors to directly comment on specific elements of the document. The package allows detailed analysis of responses and will be helpful in providing feedback to members, following the close of the consultation process.

24.   The Consultation Draft does not contain finalised policies for consideration. Instead, it indicates the likely key policy provisions and asks a series of targeted questions to determine whether the scope and coverage of the document is sufficient. The purpose of these questions, in line with the requirements of Regulation 18, is to determine what the plan ought to contain.

25.   The proposed consultation plan is attached at Appendix 3 of this report. Reflecting on the content outlined in paragraph 20, consultation question have been developed around the following themes:

- Making best and most efficient use of land in our settlements, including optimum development density and areas that are suitable for intensification;

- The Council's response to the existential threats associated with climate change;

- Strengthening the link between development planning and public health and making sure this link is clear in development proposals across the District;

- Making sure the requirement for design excellence and the character-based approach to growth is reflected throughout the plan;

- Meeting our housing needs and the delivery of the right type of affordable housing, including build to rent tenure;

- Maintaining and enhancing the District's economic competitiveness through the provision of the right type of employment space to meet needs in settlements and the rural area;

- Ensuring the resilience of our town centres in the post pandemic environment;

- Partnership working to deliver infrastructure that meets our needs;

- How to future proof the plan to take account of changing trends and emerging 'smart' technologies; and

- Protecting the natural and built environment, in line with national planning policy.

Development Management Policies

26. Once adopted, the Plan will have primacy in planning decisions. This means that planning applications will be determined in accordance with policies in the Plan, unless material consideration indicate otherwise. It is intended that policies will be positively prepared and in the majority of cases development proposals will be acceptable, subject to meeting clearly defined and robust criteria.

27. Officers have worked closely with colleagues in Development Management and other departments across the Council to ensure that the criteria used to assess planning applications are relevant and reflect the latest evidence. This collaborative approach will continue as the document moves through the regulatory process.

Design and Visual Appearance

28. Officers have commissioned Urban Graphics to re-evaluate the presentation and format of the emerging Local Plan. Their work is intended to reflect positive approach to strategic planning in Sevenoaks District and enhanced presentation will assist in the public engagement process.

29. The production of a formatted version is a lengthy process and once the text and content is embedded, the design software provides limited scope to make changes that are not disruptive to the entire document. To avoid abortive work, officers are seeking agreement of the Plain Text version at Appendix 1. The agreed text, inclusive of any changes suggested by members, will be passed to the designer to incorporate into the final presentation version.

30. The Indicative Formatted Version at Appendix 2 provides a strong indication of the presentational style of the document and officers would welcome comments from members on these non statutory aspects. Agreement of the final presentation and format of all chapters in the Plain Text Version at Appendix 1 is proposed to be delegated, in accordance with the recommendations in this report.

Emerging evidence base

31. The following paragraphs provide an update on the Local Plan evidence base.

District- Wide Character Study (DWCS)

32.   A member presentation on the recently completed DWCS took place on 22nd September 2022. Further details of this session will be provided at the meeting.

Green Belt Study

33.   Work is progressing on the Council's revised Green Belt Assessment and the methodology is being used by Tonbridge and Malling Borough Council (TMBC) in its own assessment work. The Green Belt study is less significant for this consultation process, which focusses on the opportunities to make better use of land in existing settlements outside of the Green Belt. The document will be more significant for the second Regulation 18 consultation, which is scheduled to take place next year.

Employment Needs Study (ENS)

34.   The ENS is now complete and available for inspection on the Council's website. In addition to identifying the amount of land required to meet employment needs up to 2040, this document reflects the market for office and industrial uses across the District and some of the future trends that are likely to influence employment provision. The assessment of needs in the rural economy also formed a key part of the work.

Strategic Transport Study

35.   This work has commenced in conjunction with TMBC to assess the impact of proposed development on the Strategic Road Network, as managed by Highways England. The Stage 1 baseline work, which establishes the current state of congestion on the highways network, is now complete. Further explanation of this work will be provided at the meeting.

The Infrastructure Delivery Plan (IDP)

36.   The IDP identifies infrastructure required to support planned growth over the period of the Local Plan. The document performs a dual function, in that it will also inform any changes to the CIL Charging Schedule and the associated infrastructure funding statement.

37.   As a live document, the IDP will develop alongside the emerging Local Plan, gathering detail as site specific information becomes available. The first iteration is expected to provide a high level assessment of infrastructure needs, based on discussions with infrastructure providers. The final draft, to be submitted for examination with the Regulation 19 version of the Local Plan, will contain a schedule of infrastructure provision, with costs, time horizons, standards of provision and capital programme information. The level of detail will largely be dependent on responses from infrastructure providers.

38.   A robust assessment of infrastructure requirements is an essential piece of evidence for the emerging Local Plan to ensure sustainable growth. Members will be updated as the document progresses.

Gypsy and Traveller Accommodation Assessment (GTAA)

39.   A new Gypsy and Traveller Accommodation Assessment (GTAA) has been undertaken which identifies a district-wide need for 43 additional pitches up to 2040. This need has been reduced to 37 pitches, due to the granting of planning permission since the GTAA was completed in April 2022.

Sustainability Appraisal

40.   Officers have appointed AECOM to undertake the on-going sustainability appraisal work to support the emerging Local Plan. Information on the Sustainability Appraisal Interim Report is available as a background paper to this report.

Duty to Co-operate (DtC)

41.   DtC engagement has continued over recent months. Further discussions have been held with neighbouring authorities in West Kent and nearby London Boroughs. Member briefings on DtC engagement activities will continue, as the Local Plan moves through the process.

Next Steps

42.   Subject to Cabinet approval, officers propose to issue the Regulation 18 Version of the Draft Local Plan for consultation later in the autumn, for an 8 week period. The consultation is expected to close in January 2023.

43.   Any amendments proposed by members will be incorporated in the intervening period and the formatted version of the document will be agreed, in accordance with the recommendations of this report. All sections of the document will then be uploaded to Citizen Space ahead of this date.

44.   The Local Plan will progress in accordance with the timetable as set out in the LDS, with a view to submitting the Plan for examination in the summer of 2024.

Emerging Trends

45.   A member presentation scheduled for October on the updated NPPF has been postponed, as this has not been published. The training session has been rescheduled for December 2022, pending review.

Key Implications

Financial

The production of the Local Plan will be funded from the Local Plan reserve.

Legal Implications and Risk Assessment Statement

Preparation of a Local Plan is a statutory requirement. There are defined legal requirements that must be met in plan making, which are considered when the Plan is examined by a Government Planning Inspector. Risks associated with the Local Plan are set out in the Local Development Scheme.

Equality Assessment

The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Net Zero Implications

The Council's Net Zero 2030 commitment includes working with communities to reduce carbon emissions in the District. The Local Plan has been identified as a key driver in achieving this aim.

Policies within the Local Plan seek to reduce the carbon impact of developments by ensuring sustainable building practices, champion the implementation of renewable energy resources and ensure new development supports climate resilience. Carbon sequestration schemes will also be supported in appropriate locations. Climate change mitigation and adaptation is not limited to the built development and features throughout the Local Plan, influencing policies related to design, flood risk and water management, open space and biodiversity.

In conclusion, it is anticipated that the recommendations in this paper will result in a decrease in carbon emissions throughout the district and support the resilience of the natural environment, strongly supporting the Council's Net Zero 2030 commitment.

Conclusion

Officers will be happy to take any questions on the content of this report at the meeting.

Appendices:

Appendix 1: Plain Text version of the Regulation 18 Consultation Draft Local Plan - for approval

Appendix 2: Indicative Formatted Version of the Draft Regulation 18 Local Plan – for information and comment.

Appendix 3: Consultation Plan

Background Papers:

Information on the Sustainability Appraisal Interim Report is available via the following link:

https://www.sevenoaks.gov.uk/downloads/download/878/emerging_local_plan_2022_-_evidence_base_documents

Richard Morris

Deputy Chief Executive, Chief Officer - Planning & Regulatory Services

Appendix 1

Plan 2040 – A new Local Plan for Sevenoaks District

Plain Text Version

Foreword from Councillor Julia Thornton
Development and Conservation Portfolio Holder, November 2022

I am pleased to be able to introduce this new public consultation document for the emerging Sevenoaks District Local Plan. Once adopted, this Plan will provide the framework for managing development in the local area and addressing the key planning issues within the District.

Planning for the next 15 years is not a simple task, particularly in light of the fundamental social, economic and to some extent environmental challenges we have all experienced over the past few years, since our last consultation on the Local Plan. All of these factors influence land use planning and we need to plan for change and have sufficient flexibility to respond to the unexpected.

We need your help to ensure that we have identified the right priorities and approaches for managing development and the sustainable and inclusive growth of the District. Sevenoaks faces a number of competing challenges, not least providing the affordable homes that our children and ageing relatives need whilst protecting the green spaces that our communities cherish.

This Plan contains policies to deliver new homes, vibrant high streets, the right type of employment spaces to ensure a healthy economy and new infrastructure to support growth, whilst protecting the natural environment and heritage buildings. It focuses on a number of key themes, to ensure that new development:

1. Promotes good mental and physical **health**,

2. Helps to deliver on our **Net Zero 2030** commitment to tackle climate change, including through low carbon development, and

3. Supports high quality **design**, to create places and spaces that respect local character.

This Plan will replace the existing Core Strategy (2011) and the Allocations and Development Management Plan (2015). It is also the first of several public consultations that we anticipate being undertaken, so there will be plenty of opportunity to make your views known and help frame what we intend to be an ambitious and appropriate plan for the District.

The document is based on a comprehensive and up to date evidence base for the local area. We are working with an extensive range of partners and stakeholders, including those responsible for health, education, transport and water, and our neighbouring authorities, to ensure that this Plan fully addresses all needs and challenges. It takes, as its starting point, the current state of the District and suggests a vision for 2040 that aims to protect and enhance the existing qualities of our area, whilst creating new places to help meet future needs.

We will particularly welcome contributions that help to achieve a genuinely shared and visionary plan with a focus on meeting the needs of all who live and work in the district.

Please let us know your views.

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Introduction

Overarching Statement
This Local Plan explains how the Council intends to meet development needs and protect the environment in Sevenoaks District between 2022 and 2040. The document focuses on the opportunities for new homes, employment spaces and infrastructure provision in existing settlements, A further document, covering all other parts of the District, will be issued next year. We are keen to receive your views on the proposed policies and allocations and hope that you will take the opportunity to submit your views.

Opening Chapter Statement
This Local Plan is issued for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Purpose of the Consultation

The Regulations ask for comments on *what the plan ought to contain.* We are inviting comments accordingly, and in particular we are seeking responses to the specific questions contained within the document.

The consultation questions are targeted, but there is an opportunity to provide additional information or comments at the end of the consultation.

This version of the Local Plan focuses on making best and efficient use of land in towns and settlements across the District, reflecting the strategy for meeting development needs, as explained in Chapter 1.

A further Regulation 18 document, covering land outside of these settlements, will be published next year. The final plan will cover land across the District as a whole, both inside and outside of settlements.

The document includes both strategic and non-strategic policies, as is indicated on the list of policies.

Subsection 1 – What is the District like?

Opening Chapter Statement
Sevenoaks District is located in West Kent, with the edge of Greater London to the north-west, Surrey to the west and East Sussex to the south.

The District has eight Neighbouring Authorities; London Borough of Bexley, London Borough of Bromley, Dartford, Gravesham, Tandridge, Tonbridge & Malling, Tunbridge Wells and Wealden. Sevenoaks District covers approximately 143 square miles and has a population of 120,500 (2021 Census Data).

There are a total of 56 settlements in Sevenoaks District, as set out in the District's Settlement Hierarchy (July 2022).

This includes the Principal Town of Sevenoaks Urban Area, the Towns of Swanley, Edenbridge and Westerham and many smaller settlements, the largest of which are the Local Service Centres of New Ash Green and Otford.

Demographics

The population of the District is expected to grow, and the structure of the population expected to change, over the plan period, due to an ageing populating, an increase in birth rate and internal migration patterns (largely due to people moving out of London into Sevenoaks). 22% of the District's population are currently aged 65 or over, and this figure is expected to grow to 24% over the plan period. This growing population and changing age structure presents a key challenge for the District.

There are areas of affluence in the District, as well as pockets of deprivation. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small areas in England. The IMD uses information about income, employment, health, education, crime and living environment to rank every small area in England from 1 (most deprived) to 32,844 (least deprived). According to the IMD, Sevenoaks District is the second least deprived local authority in Kent, behind Tunbridge Wells Borough, although there are areas that are within the 30% most deprived in the country, namely Swanley St Mary's and Swanley White Oak.

Sevenoaks District has generally high house prices. In 2020, the median house price in the District was £425,000, the highest in Kent, and house prices were 12.6 times annual earning. This makes it very difficult for first time buyers and young families to remain in the District. There is a requirement to provide 13,566 new homes over the plan period, including a buffer for flexibility in delivery, in order to meet the needs of the growing population. This includes a high proportion of affordable homes and specialist accommodation for older people.

The District has the lowest level of unemployment in Kent. The residents of the District are generally well qualified with only 8% of the population having no academic qualifications. There are a number of employment areas within the District, including at Vestry Estate in Northern

Sevenoaks and in Swanley. The majority of residents work in the West Kent area, with more than 40% working in Greater London. The District also has a strong rural economy, and many residents work from home, but issues with connectivity and broadband are common.

Landscape and Setting

The District has a high quality landscape with a mostly rural character. 60% of the District lies within the Kent Downs or High Weald Areas of Outstanding Natural Beauty. There are many areas of woodland, much of which is designated as Ancient Woodland. Parts of the District afford impressive views over Kent and the South East, particularly from the North Downs and the Greensand Ridge. The District is also rich in biodiversity with many Wildlife Reserves, designated areas as well as the Rivers Darent, Eden and Medway.

There are many historic settlements in the District, as is reflected in the high number of Conservation Areas and listed buildings. The District boasts many nationally recognised heritage assets including the historic estates of:

1. Knole;

2. Chartwell;

3. Hever Castle;

4. Penshurst Place; and

5. Lullingstone Castle.

Other places of interest include the National Trust village at Chiddingstone, Eynsford Castle ruin, Lullingstone Roman Villa, Otford Palace and Toys Hill (the birthplace of the National Trust).

Connectivity

Sevenoaks District is a popular place to live, partly because of its proximity to London and accessibility to Europe. Strong road connections are provided by the strategic road network providing good links to the wider region.

There are 14 train stations within the District, as well as others located just beyond the District border, many of which provide services into Central London in under an hour. The District is also well located for Gatwick and Heathrow airports, as well as the Channel Ports, Ashford and Ebbsfleet International stations.

Healthcare, Education and Retail

We want to ensure that the District is a safe place for all to live, work and travel, while encouraging healthy lifestyles and providing people with access to good quality healthcare. There are two minor injury hospitals: Sevenoaks Hospital and Edenbridge & District War Memorial Hospital, as well as 21 Doctors Surgeries.

There are no major medical facilities within the District for residents, who have to travel out of District to Tunbridge Wells Hospital, the Princess Royal University Hospital (PRUH) (Orpington), Queen Mary's Hospital (Sidcup), Darent Valley Hospital (Dartford), Maidstone Hospital and London hospitals.

Education within the District is varied with a mixture of state and private, primary and secondary provision. Whilst there are 42 primary schools, there are only five state secondary schools within the District:

1. Knole Academy;

2. Orchards Academy;

3. Trinity School;

4. Weald of Kent Grammar School Sevenoaks Annex; and

5. Tunbridge Wells Boys Grammar School Sevenoaks Annex.

Many children are being sent outside of the District, or privately, for their secondary education.

The District has vibrant town centres with many independent shops and a good retail offering. There is, however, some strong competition from nearby areas including Tunbridge Wells, Bromley and Bluewater. Some areas are in need of regeneration, including Swanley Town Centre and New Ash Green Village Centre. Areas outside of the towns are served by local services and facilities within villages. These services are of great value to local communities and contribute to the District's rural economy.

Subsection 2 – Strategic Issues

Opening Chapter Statement
The Council thinks that the following issues and considerations will be influential in shaping spatial development in Sevenoaks District over the period of the plan. They have informed the development of the Spatial Vision that underpins the objectives and all strategic policies.

I1. Delivering on Net Zero:

The impact of climate change will be a significant and pressing challenge for all of us over the period of this Local Plan. The objectives and strategic policies support the Council's wider net zero agenda, to reduce carbon emissions.

I2. Healthy Communities:

The global pandemic has reinforced the importance of spatial planning in maintaining public health. Policies should provide scope to deliver health infrastructure and promote positive physical and mental health outcomes.

I3. Promoting Design Excellence:

High quality design is central to the delivery of the strategic objectives in this plan. It lies at the heart of maintaining local character and more fundamentally, delivering places and spaces that function in a manner that is consistent with our planning policies.

I4. Homes to meet Local Needs:

Sevenoaks District remains an expensive place to live and many residents continue to struggle to find a home to meet their needs. Delivering genuinely affordable homes remains a key priority for the Council.

I5. Agile Economy and Resilient Town Centres:

The global pandemic has accelerated many of the existing trends, such as online shopping and home working, that have started to shape our local economy over recent years. Policies in the plan must provide a response to these issues alongside other Council strategies, to ensure our economy remains strong and resilient to change.

I6. Infrastructure to Support Planned Growth:

The Local Plan must provide mechanisms to deliver the necessary infrastructure to support planned growth.

I7. Protecting the Natural and Built Environment:

Natural resources and heritage assets remain key aspects of the District-wide character and continue to be valued by local residents. The emerging Local Plan will pursue a character-led approach to growth that protects these aspects.

I8. Resilience to Change:

Emerging evidence highlights the economic trends and demographic changes that will shape our District over the plan period. The plan must also incorporate flexibility to unexpected social, economic and environmental events.

Question
Are there additional issues that are likely to influence spatial development in the District over the plan period?

Subsection 3 – Vision and Objectives

Opening Chapter Statement
The Spatial Vision is vitally important in that it is both a starting point for all aspects of the Plan and a statement of how the District will look at the end of the Local Plan period, if strategic objectives are successfully delivered. The Vision has been informed by evidence that supports this Local Plan and also reflects the Council's wider objectives on matters such as Net Zero and health and wellbeing.

Key aspects of the Spatial Vision will be:

V1. **Achievement of the Council's Net Zero aspirations** - Significantly reducing carbon emissions and adapting to a changing climate.

V2. **Delivery of sustainable and equitable infrastructure** - To meet the needs of all residents, regardless of ethnicity, gender, age, disability or social group. In transport terms, we want to encourage sustainable transport choices, as long as the approach does not alienate particular groups – for example, an active travel strategy that provides genuine choices for an aging population.

Community infrastructure should be provided to meet the needs arising from planned growth, particularly in relation to health and education.

V3. **Healthy places and spaces, promotion of mental and physical health** - Incorporating green space and healthy design principles, to encourage good physical and mental health. Recognition of health as a principle that cuts across all policies in the plan.

V4. **V4 Homes to meet identified needs – Boosting the supply of homes including much needed affordable homes across the District:**

V5. **Greater economic competitiveness** - Through vital and viable, unique and flexible town centres, capitalising on the strategic location of the District and its functional economic links. Ensuring the delivery of the right type of employment space and supporting the rural economy are equally important in encouraging economic competitiveness.

V6. **Continued protection of natural resources** - Our district's valuable natural and historic built environment makes an important contribution to the quality of life of our residents and all who visit.

V7. **Embracing emerging trends, such as smart technology** - Future proofing and allowing flexibility, promoting innovation.

V8. **Responding to demographic change** - Addressing migration trends and demographic pressures, such as the aging population.

V9. **Continued engagement with neighbouring authorities** - Including London Boroughs.

V10. **Meeting development needs in a way that respects local character and promotes design excellence** - Encouraging high quality design for new development, delivering enjoyable and attractive places to live, work and relax, that respect local character and provide innovative ways to support mental and physical well-being.

Vision and Objectives	
Vision	**Objectives**
V1. Healthy places and spaces, promotion of mental and physical health - Incorporating green space and healthy design principles, to encourage good physical and mental health. Recognition of health as a principle that cuts across all policies in the plan.	**We will:** *OB1: Recognise the link between the places and spaces that we live in and the quality of residents' mental and physical health.* *OB2: Work closely with healthcare providers to develop policies that promote good physical and mental health as an outcome.*
V2. Achievement of the Council's Net Zero aspirations - Significantly reducing carbon emissions and adapting to a changing climate.	**We will:** *OB3: Ensure the Council's net zero objectives influence all development taking place in the District.* *OB4: Provide sufficient flexibility in policies to enforce changing national standards, best practice and evidence base updates that will enviably occur over the plan period.* *OB5: Allow residents to make lifestyle choices that make a positive contribution to net zero objectives.*
V3. Delivering design excellence in our built environment that responds to our distinctive local character and creates the heritage of the future - Demanding well-designed spaces that deliver exceptional places to live, work and relax, provide innovative ways to support mental and physical well-being.	**We will:** *OB6: Deliver a character-led-approach to development that demonstrates the Government's priorities for well-designed places. (National Design Guide, 2021: The Ten Characteristics of Place)* *OB7: Require the production of design codes for new development that meet the provisions of national planning guidance*
V4 Homes to meet identified needs – Boosting the supply of homes including much needed affordable homes across the District:	**We will:** *OB8: Deliver market and affordable homes to reflect the latest information on housing needs.*

Vision and Objectives	
	OB9: *Optimise the supply of new homes in existing settlements.* OB10: *Ensure new housing development makes best and most efficient use of land.*
V5. Greater economic competitiveness - Through vital and viable, unique and flexible town centres, capitalising on the strategic location of the District and its functional economic links. Ensuring the delivery of the right type of employment space and supporting the rural economy are equally important in encouraging economic competitiveness.	**We will:** OB11: *Promote resilient and agile town centres that are able to respond to change* OB12: *Encourage the delivery of workspace to meet occupier demands.* OB13: *Safeguard land to meet employment needs over the plan period.*
V6. Continued protection of natural resources - Our district's valuable natural and historic built environment makes an important contribution to the quality of life of our residents and all who visit.	**We will:** OB14: *Ensure the District retains a high quality natural environment over the period of the Local Plan including delivering bio-diversity net gain on new development.* OB15: *Continue to support development that protects and enhances the District's historic environment and ensures that it can be enjoyed by future generations.*
V7. Delivery of sustainable and equitable infrastructure - To meet the needs of all residents, regardless of ethnicity, gender, age, disability or social group. In transport terms, we want to encourage sustainable transport choices, as long as the approach does not alienate particular groups – for example, an active travel strategy that provides genuine choices for an aging population. Community infrastructure should be provided to meet the needs arising from planned growth, particularly in relation to health and education.	**We will:** OB16: *Work with stakeholders to address barriers that prevent residents from making sustainable transport choices.* OB17: *Support equal access to public transport services for all residents.* OB18: *Co-ordinate the delivery of necessary infrastructure to support planned growth.*
V8. Embracing emerging trends, such as smart technology - Future proofing and allowing flexibility, promoting innovation.	**We will:**

Vision and Objectives	
	OB19: Acknowledge smart technology as an emerging trend that is likely shape development in the District.
	OB20: Champion the use of smart technology, where it is able to address the key issues facing the District over the period of the plan.
V9. Responding to demographic change - Addressing migration trends and demographic pressures.	**We will:** *OB21: Bring forward policies with sufficient flexibility to respond to future demographic changes that will shape the District over the plan period.* *OB22: Ensure demographic shifts form the starting point for future evidence base and discussions with neighbouring authorities.*
V10. Continued engagement with neighbouring authorities - Including London Boroughs.	**We will:** *OB23: Continue to work with neighbouring authorities to respond to strategic matters.*

Question
Do you support the identified strategic Vision and Objectives?

Chapter 1 – Development Strategy

Overarching Statement
This Plan will deliver the new homes that our communities need, the right type of employment spaces and vibrant high streets to ensure a healthy economy and new infrastructure to support growth, whilst protecting the natural environment and our built heritage. This development strategy seeks to achieve these goals.

Opening Chapter Statement
Sevenoaks District is subject to numerous social, economic and environmental pressures that define our complex and often competing development needs. New homes are required for a growing population and new employment space must be delivered if the District is to remain economically competitive. Supporting infrastructure is essential, if planned growth is to be truly sustainable. The need to protect our green and natural spaces for current and future populations, has also never been greater. The proposed development strategy within this chapter provides a framework to meet these needs.

1.1 The National Planning Policy Framework (NPPF) set outs key national priorities to ensure that the planning system delivers sustainable development. This development strategy and the plan as a whole responds to and aligns with national policy in the NPPF, promoting the sustainable development of the District. This includes three dimensions; economic, environmental and social. In accordance with the presumption in favour of sustainable development (NPPF para. 11 a-b), this local plan aims to positively plan for the development needs of the area, including housing, infrastructure, employment and retail, it aims to protect and improve the environment and respond to climate change. The plan has been prepared in accordance with NPPF Chapter 3 (Plan-making), to provide a clear, deliverable, evidenced-based plan, as a platform for local people to shape their surroundings.

1.2 This Local Plan focuses on delivering the Council's Spatial Vision for 2040. The Plan covers the period 2022 to 2040, which fully complies with the NPPF requirement that plans should cover at least a 15-year timeframe from adoption. It is informed by an up-to-date evidence base which outlines development needs up to 2040. The Plan focuses on meeting the overarching objective of national planning guidance to bring forward sustainable development. It is prepared at a time of uncertainty across the three pillars of sustainability resulting from the societal changes that are emerging from the Coronavirus pandemic, economic instability and environmental impact of climate changes. The future direction of national policy also remains unclear and it is important that the Plan incorporates sufficient flexibility to respond, as these matters are resolved.

1.3 In addition to meeting District-wide development needs, the Local Plan will plan positively for new development and once adopted, will have primacy in planning decisions. This means the Council will be required to determine planning applications in accordance with policies, unless material planning considerations indicate otherwise. The Council expects new development proposals to reflect the conclusions of relevant evidence base documents that have informed the production of policies in this document.

1.4 The Local Plan must be positive in planning for new homes to meet our pressing needs and some difficult choices will need to be made in seeking the right balance between providing new homes supported by infrastructure, protecting and enhancing the natural, built and historic environment, and supporting the urban and rural economies. It is vital that new development makes best and most efficient use of land in sustainable locations whilst ensuring that new development is designed to the highest quality and helps to meet our net zero 2030 commitment.

Strategic Objectives
OB3 Ensure the Council's net zero objectives influence all development taking place in the District.
OB10 Ensuring new housing development makes best and most efficient use of land
OB18 Co-ordinate the delivery of necessary infrastructure to support planned growth.
OB23 Continue to work with neighbouring authorities to respond to strategic matters.

Subsection 1 – Summary of Development Needs

1.5 This Local Plan considers how best to meet identified development needs, as far as possible, given wider objectives. The headline needs for this District are:

Homes	714 units per annum
	(a figure provided by central government)
Employment land	5.7 hectares
Gypsy and Traveller pitches	43
Retail floorspace	Maintaining existing provision

1.6 The government provides a standardised assessment methodology for assessing housing need, which is based on household projections produced by the ONS that are adjusted to take account of affordability. For Sevenoaks, this means the provision of 714 homes per year. To put this figure in context, this would triple the approximately 250 homes which have been delivered each year over the past 10 years. Rolled forward, the Council's housing need for the entire Plan period (2022-2040) is 12,852 homes. Due to difficulties in supply over recent years, our housing requirement will also require a buffer of one year (714) to provide flexibility in delivery which results in an overall housing need of 13,566.

1.7 Meeting development needs, particularly housing needs, within a constrained environment is clearly a defining factor for this Plan. But just as important is the need to place a high value on the varied and distinctive places and communities that make up Sevenoaks District and ensure that any new development respects these differences and is designed to respond to **local character**. We want to create healthy **communities**, not just houses, and these places need to be supported by services and infrastructure to promote **well-being**, so that people and future generations will choose to live and work in these sustainable locations. We will promote low carbon development to help honour our **Net Zero** 2030 commitment.

1.8 We are working closely with our town and parish councils whom are preparing Neighbourhood Plans for their areas. Where site allocations are proposed in areas that are developing a Neighbourhood Plan, the Local Plan will set the high-level strategic aims in terms of land-use and the approximate quantum of development and the Neighbourhood Plan can provide more detail in terms of design, infrastructure and local character and distinctiveness.

Place-making priorities

Sevenoaks Urban Area	Swanley
Principal town, intensification of urban area, sustainable growth at station gateway and Tarmac quarry, supporting economic vitality of high street and local businesses.	Second town, regeneration priority focusing on the town centre offer. Opportunities for sustainable intensification and infrastructure improvements, capitalising on connections with London.
Edenbridge	**Westerham**
Infrastructure improvements, regeneration of High Street, growth of town (residential and economic) to support the provision and retention of facilities and services.	Growth in tourism and rural economy sector, connectivity improvements, and respect of sensitive AONB location.

Development Strategy – Existing Settlements

1.9 The Council's strategy is to fully explore opportunities to accommodate its strategic development needs in existing settlements. Green Belt land will only be released where there are exceptional circumstances for doing so and all reasonable alternatives have been explored, including opportunities in neighbouring authorities.

1.10 This version of the Plan is central to the Council's development strategy because it focusses on the potential that exists in settlements across the District, particularly in relation to new homes, and explores the opportunities to make the most of land in these areas. Taking account of all strategic objectives and policy requirements the Plan seeks to:

1. Promote a character driven approach to meeting development needs;

2. Proactively identify suitable and achievable development potential in existing settlements;

3. Identify and provide development aspirations and criteria for key development opportunities;

4. Encourage proposals that make best and most efficient use of land, including the delivery of development at sustainable densities;

5. Support the delivery of new homes on small sites up to 1 hectare in size;

6. Actively encourage the exploration of other mechanisms to deliver new homes, such as the intensification of under used land in existing settlements.

1.11 This initial consultation focuses on optimising development within existing settlements, within the boundaries of the District's towns and villages, where inset from the Green Belt. These are the most sustainable locations in the District, well served by public transport and with good access to services and facilities. Focusing development in these areas, in accordance

with national policy, will promote sustainable transport choices which are key to achieving the Council's net zero 2030 commitment.

1.12 We have considered sites in existing settlements submitted under the call for sites, but have also proactively identified development opportunities, through the Settlement Capacity Study (2022). We have used the brownfield register and other tools to maximise the contribution from previously developed land and have sought to optimise density on these urban sites, using the District-wide character study (DWCS), to guide the form of development, including gentle densification in existing lower density areas, and optimising densities in highly sustainable locations. This plan also explores options for the best use of land, through co-location and mixed-use development, to combine different land uses to ensure the most efficient development scenarios. Further work will be undertaken on all of these aspects as the Plan progresses, to consider whether there is any additional potential available from further increased densities and intensification, informed by the DWCS. This includes opportunities to explore the development potential of land at and surrounding Sevenoaks Station.

1.13 This consultation considers three density scenarios for the settlements, as defined below – Minimum Uplift, Optimum and Optimum Plus and comments are welcome on these options:

Settlement Density Options

Option 1 **Minimum uplift**	Option 2 **Optimum**	Option 3 **Optimum Plus**
Modest density increase across all sites.	Optimising density on sites, whilst respecting local character, with higher densities in sustainable locations (focusing on towns, as defined through the settlement hierarchy).	Maximum change - opportunities to maximise densities, particularly in town centres and close to transport hubs.

Settlement Density Scenarios

	Minimum uplift (dph)	**Optimum (dph)***	**Optimum Plus (dph)**
Town centre locations and close to transport nodes	150	150+	150+
Built up areas	50	100	150
Edge of built up areas	40	50	60

*Mid-point, to be further informed by character based approach
Further details on how these density levels have been set are included within the Housing chapter.

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1.14 The minimum uplift scenario will result in greater unmet need which will need to be accommodated in neighbouring areas or in the Green Belt. The minimum uplift scenario results in the provision of approx. 7,500 homes which leaves a shortfall of approx. 6,000 units over the plan period. This level of unmet need will be discussed with neighbouring authorities through the Duty to Co-operate.

Breakdown of Housing Supply

	Option 1 Minimum uplift	Option 2 Optimum	Option 3 Optimum Plus
Sites with planning permission at April 2022	2,800 (TBC)	2,800 (TBC)	2,800 (TBC)
Sites within existing settlements proposed for allocation	1,250 (TBC)	1,750 (TBC)	2,150 (TBC)
Windfall / small sites allowance	1,000 (TBC)	1,000 (TBC)	1,000 (TBC)
Future potential identified in Settlement Capacity Study	650 (TBC)	1,050 (TBC)	1,450 (TBC)
Sites with planning applications under consideration at April 2022	1,855	1,855	1,855
Potential identified through discussions with neighbouring authorities	TBC	TBC	TBC
TOTAL	7,555	8,465	9,255

1.15 This initial 'settlement focus' starting point is advanced as the 'base' building block for the new Local Plan strategy. By clearly establishing what level of development can be achieved in our settlements, this will inform ongoing discussions with neighbouring authorities, under the Duty to Co-operate, as to whether they are able to assist with accommodating any unmet need. The NPPF (para.141) makes it very clear that before considering Green Belt release, all other reasonable options for meeting development needs should be fully examined. It directs authorities to develop a strategy which first:

1. Makes as much use as possible of suitable brownfield sites/underutilised land

2. Optimises density of development, particularly in town centres and locations well served by public transport

3. Is informed by discussions with neighbouring authorities as to whether they could accommodate need

1.16 However, there are numerous barriers which may prevent neighbouring authorities from assisting with any unmet needs, including Green Belt, Areas of Outstanding Natural Beauty (AONB), Flood Zones and internationally-designated wildlife sites. These authorities are also required to meet their own challenging needs, in addition to potentially meeting the unmet needs of authorities other than Sevenoaks. The challenges of reaching any agreement via bilateral discussions are not insignificant, particularly in the absence of a sub-regional strategy.

1.17 Clearly there will be a balance between how much can be achieved within the highly constrained settlements within Sevenoaks District, which make up 7% of the District, what might be achieved elsewhere in neighbouring authorities through the Duty to Cooperate, and what might be achieved through potential Green Belt release.

Policy ST1 – A Balanced Strategy for Growth

It is suggested that the overarching strategic development strategy for the District focuses on the following priorities:

1. The balanced strategy for growth over the period 2022-2040, as outlined on the Key Diagram, aims to ensure that a minimum of 714 dwellings pa, together with 5.7 ha of employment land are developed, supported by strategic infrastructure and services;

2. Development should be focused within the boundaries of existing settlements, including building at higher density and optimising the use of previously developed 'brownfield land'. There will be a particular focus on sites that are close to services and facilities and/or well-connected by public transport, walking and cycling. Major schemes will be required to demonstrate they have made best and most efficient use of land, taking account of all relevant evidence base documents;

3. The four towns within the District – Sevenoaks, Swanley, Edenbridge and Westerham, will sequentially be the focus for development, with more moderate development within the Local Service Centres and Service Villages; and

4. Development proposals for the four towns will be expected to comply with the place-making proposals and priorities listed in the supporting text and emerging Neighbourhood Plans.

We will promote sustainable patterns of development by amending Green Belt boundaries only in 'exceptional circumstances', where there is a clear need, where sites have good access to services and facilities and their release has limited impact on the purposes of the Green Belt.

Green Belt release will be required if we are unable to meet needs within existing settlements or via the Duty to Co-operate with neighbouring authorities (and this will be subject to the subsequent Local Plan (Reg. 18) consultation in 2023.

Questions
Our proposed development strategy is summarised below: 1. Step 1: Focus on optimising density and utilising brownfield land in existing settlements (the focus of this Regulation 18 consultation)   2. Step 2: Robust Duty to Co-operate discussions with neighbouring authorities, informed by step 1 and the constraints of the District.   3. Step 3: Green Belt release, where required, in Exceptional Circumstances (to be covered within the subsequent Regulation 18 consultation)   Do you agree with this proposed development strategy?
We are considering density within existing settlements at different levels – Minimum Uplift, Optimum and Optimum + - which is your preferred approach? (select one of 3 or 'none of the above')
Are you aware of any additional sites in existing settlements which we have not yet considered?

Subsection 2 – Sevenoaks Railway Station

1.18 The Council recognises the development potential of land at and surrounding Sevenoaks Railway Station. There are opportunities to improve the public realm, enhance the arrival experience, complement the nearby town centre and make a meaningful contribution towards District-wide development needs. Development around the station that meets other policies in the Local Plan, supports the Council's wider objective to make best and most efficient use of land in existing settlements, before releasing Green Belt land.

1.19 The Station Area is one of the most accessible locations in Sevenoaks District, with fast and frequent train services to London, the south coast and across the wider county of Kent. Located approximately 750 metres to the north-west of the main retail and commercial core of Sevenoaks town, the station itself comprises a modern glass box style ticket hall to the west of London Road and a surface car park of 517 parking spaces to the east.

1.20 The station buildings are surrounded by an eclectic selection of land uses and under utilised sites, which give a unique but somewhat uncoordinated appearance. Overall, the area would benefit from a clearer sense of identity and cohesion that reinforces its relationship to Sevenoaks town centre, and other nearby development opportunities.

1.21 Working with local stakeholders, the Council will explore the preparation of a development strategy for the Station Area that provides a clear spatial vision, and considers factors such as the quantum and type of uses, scale and massing, development phasing and how these aspirations could be delivered. This work will build on existing evidence and Plans, such as the Town Centre Strategy, District Wide Characterisation Study, Settlement Capacity Study and the Draft Neighbourhood Plan for Sevenoaks Town.

1.22 Other objectives of the strategy could be to:

1. Ensure development is co-ordinated to create a clear identity for the area;

2. Bring forward a range of active uses and a vibrant new neighbourhood, which respects existing uses, residents and local character;

3. Re-enforce the relationship between the station, the town centre and the wider District;

4. Coordinate the proposals with other development opportunities, including Sevenoaks Quarry and Land East of the High Street, to deliver a coherent offer for the town;

5. Make the most of the existing public transport accessibility and explore the potential to create a more formalised public transport hub;

6. Deliver an enjoyable and attractive environment for local residents and the many thousands of people that pass through the station each year;

7. Respond to new ways of living and working that are emerging from the pandemic; and

8. Create a new destination for Sevenoaks town around the station that adds value and variety and brings prosperity to the wider District.

1.23 In addition to new residential development, it is considered that the area has the potential to support other uses, including flexible workspaces, a retail offer that complements the nearby town, cultural and community uses and improvements to the public realm. All of these aspects would be considered in an emerging development strategy.

Questions
What would you like to see in a development brief for the Station Area?
Do you have a view on the area of land that the brief should cover and sites that could be included?

Chapter 2 – Housing Choice for All

Overarching Statement
Everyone deserves to have access to a high quality home that meets their needs, in an area they wish to live and that they can afford. This is fundamental to happy, healthy, successful residents and thriving communities. The policies in this chapter ensure that the right types of homes are built to meet the needs of our current and future residents, including the Gypsy & Traveller community.

Opening Chapter Statement
Sevenoaks District is a very popular and well-connected place to live, but this also makes it expensive. Boosting the supply of market and affordable housing and ensuring the right types of homes are built in the right places will create a more dynamic housing market with more movement and where more people can find a suitable home that meets their needs.

2.1 The District is facing some significant challenges in relation to housing:

1. A growing and ageing population
   The population of the District is expected to grow by 6% over the plan period 2022-2040. But more significantly, the proportion of people aged over 65 is expected to grow by 24% over the same period and by 2040 it is expected that there will be an additional 6,394 residents aged 65 and over, making up 26% of the total population[1]. Accommodating the changing needs of households will be key in order to provide greater choice for existing and future generations and to promote healthy and sustainable communities.

2. A need for new housing
   Using the government's standard methodology for calculating housing need, there is a need for 714 new homes per year over the plan period 2022-2040, including a high proportion of new affordable homes and homes suitable for older people, presenting a major step change in the number of new homes needed compared with the previous Local Plan.

3. Affordability of housing
   Median house prices in the District are almost £100,000 higher than in the South East making it very difficult for first time buyers and young families to remain in the District. Delivering new housing that is genuinely affordable in an area where land prices are ever-increasing presents a major challenge.

4. Challenges to the supply of housing
   The District is significantly constrained by Green Belt and Areas of Outstanding Natural Beauty (AONB). Not only does this put the larger built up areas under pressure to

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[1] 2018-based population projections, ONS

deliver new housing development at higher densities without compromising character, it also impacts our rural communities, where generally there are fewer housing choices for those in need.

5. Ensuring choice in the housing market
   The structure of the District's population is expected to change and new housing development must meet the needs of our current and future residents in order to create a dynamic and balanced housing market.

2.2 The policies within this chapter aim to address these challenges, not just by boosting the delivery of market and affordable housing, but by ensuring that the right types of homes are built to meet the needs of our changing population.

Strategic Objectives
OB8 Deliver market and affordable homes to reflect the latest information on housing needs
OB9 Optimising the supply of new homes in existing settlements
OB10 Ensuring new housing development makes best and most efficient use of land

Subsection 1 – Housing Mix

2.3 A mix of homes of different sizes and types to meet the needs of the current and future population is essential to help create inclusive, healthy and mixed communities. The District is home to a variety of household types including families, singles, older people, people with a range of disabilities and people wishing to build their own homes.

2.4 The Targeted Review of Local Housing Needs 2022 (TRLHN), our key evidence on housing needs, tells us that the structure of the population is expected to change over the plan period. The delivery of new housing development should reflect the changing needs of households in order to provide greater choice for existing and future generations and to promote healthy and sustainable communities.

Size of homes

2.5 The District has a high proportion of larger homes, with 3, 4 and 5 bedroom homes making up 68% of the total housing stock. An ageing population means that household sizes are expected to fall over the plan period. By building more housing, with a focus on smaller and family homes, this will increase the proportion of lower cost housing available to buy so that first time buyers and young families have greater choice in the market, as well as enabling older people to downsize or 'rightsize', which will then have the knock-on effect of freeing up additional family housing.

Types of homes

2.6 The housing stock needs to adapt to meet the requirements of an ageing population, and to provide choices for older people who may be thinking of moving or who may need to move as their current home no longer matches their needs. A growing older population is also expected to result in a substantial growth in people with dementia and mobility problems, and some of these households will require adaptations to properties to meet their changing needs whilst others may require more specialist accommodation or support. This can be achieved through the design features of the optional technical standards set out in the Building Regulations under M4(2), accessible and adaptable dwellings, and M4(3), wheelchair user dwellings.

People wishing to build their own homes

2.7 Self and custom build housing can offer benefits over developer-built housing and people may choose this option for various reasons e.g. their current and/or future needs aren't being met through volume housebuilding, it may allow a more bespoke or flexible design, and in some cases it may present a more affordable housing option. The Council maintains and publicises a self build register to monitor demand, and where appropriate, match people and available plots. The Local Plan supports the provision of self-build plots to meet demand and to meet the Council's 'duty to grant planning permission' as required by the Self-build and Custom Housebuilding Act 2015, provided they are located in sustainable locations, close to public transport, walking and cycling routes, local services and community facilities.

Policy H1 – Housing Mix

This policy will ensure that a variety of house sizes and types are delivered across the District to meet the needs of the current and future population. Proposals for new housing development, including housing for local essential workers and people wishing to build their own homes, will be required to meet the following technical and design criteria:

1. Proposals should be informed by the dwelling mix profiles set out in the latest housing needs evidence (Targeted Review of Local Housing Needs 2022) where appropriate, unless it can be demonstrated that an alternative mix meets an identified need;

2. For new build housing development, commit to delivering all homes to meet the M4(2) standard for accessible and adaptable homes;

3. For new build schemes of 20 units or more, commit to delivering at least 5% of homes to meet the M4(3)b standard for wheelchair user dwellings, to be delivered as affordable housing for rent;

4. Provide homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment for the District to become Net Zero; and

5. Proposals should meet the minimum nationally described space standards.

Questions

Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of the policy?

Subsection 2 – Provision of Affordable Housing

2.8 Affordable housing is provided to eligible households whose needs are not met by the market. It is a key issue in the District given the high house prices relative to incomes. In 2020 the median house price in the District was £425,000, the highest in Kent, and house prices were 12.6 times annual earnings, compared with 7.8 times across England. This means that many people are unable to afford their own home on the open market without assistance. High housing costs have led to an increase in the number of households privately renting, rather than buying, and the out-migration of younger and economically active groups in search of cheaper housing elsewhere, including local essential workers.

2.9 The TRLHN identifies a net annual need of 423 households that require financial support to meet their housing needs. Building new affordable homes will help ensure that those requiring assistance receive it, and the increase in the supply of affordable housing will help to slow down the rise in housing costs, allowing those who aspire to own their own home the ability to get onto the housing ladder. In view of the scale of need, and subject to viability testing, it is considered that a target of 30% affordable housing on brownfield sites and 40% affordable housing on greenfield sites is realistic and achievable in light of the evidence, and will go some way in meeting the identified affordable housing need.

2.10 The TRLHN recommends a tenure split of 65% social housing (social and affordable rented) and 35% intermediate housing (homes for discounted home ownership and rent including First Homes) in order to meet needs. The vast majority of social housing delivered in the District in recent years has been affordable rented. Our experience however is that social rented housing generally provides the most affordable option and is affordable to a greater number of households.

Policy H2 – Provision of Affordable Housing

This policy will boost the delivery of affordable housing from developments with market housing, ensuring that overall viability is not prejudiced and that a mix of tenures is provided that meet the needs of the current and future population.

Proposals for new housing development will be required to contribute to the provision of affordable housing as follows:

Affordable Housing Requirements

Number of new homes proposed (net)	% affordable housing required	Type of affordable housing to be provided
0-5	0	N/A
6-9 (in Designated Rural Areas only)	20%	Financial contribution
10+ or >0.5 Ha (on brownfield land)	30%	

Policy H2 – Provision of Affordable Housing		
10+ or >0.5Ha (on greenfield land)	40%	On-site (unless the Council advises that a financial contribution is more appropriate)

Where the provision of on-site affordable housing applies, the recommended tenure split should reflect the latest housing needs evidence (Targeted Review of Local Housing Needs 2022) – 58% social rented, 7% affordable rented, 25% First Homes and 10% other intermediate tenures. First Homes should be offered at a discount of 50% of open market value.

On the occasion that it is demonstrated that this is not viable due to site specific circumstances, whether this relates to the proposal as a whole or an element, an alternative tenure split is to be agreed with the Council.

Where it is demonstrated that the required on-site provision is not viable or does not best meet identified housing needs and the Council agrees, one of the following options is to be agreed with the Council:

1. The provision of a reduced level of on-site affordable housing plus a financial contribution in lieu of the shortfall;

2. The provision of a reduced level of on-site affordable housing that meets a specific localised need e.g. a greater number of wheelchair accessible homes; or

3. The payment of a financial contribution in lieu of the provision of any on-site affordable housing.

On the occasion it can be demonstrated that the full affordable housing requirement is not viable and the Council agrees, a viability review is required upon first occupation or an alternative trigger point as agreed. This is to ensure that any uplift in the development value of the scheme is shared and contributes to the affordable housing provision, whether this be on site or as an off-site financial contribution.

All affordable housing delivered should not generate housing costs of more than 35% of gross household income.

Applicants are required to enter into discussions with the Council's Housing team, in consultation with registered providers, at the earliest stage of the application process where the provision of on-site affordable housing applies.

Questions
Do you think the proposed affordable housing contributions are reasonable and will help to achieve the aims of the policy?

Subsection 3 – Housing in Rural Areas

2.11 Opportunities to provide housing (especially homes suitable for older people) in rural areas of the District are much more limited than in the built up areas because of the Green Belt. Less scope for development in rural areas generally means fewer housing choices for those in need.

2.12 However, rural exception housing can provide homes to meet local housing needs as an exception to other Local Plan policies. It means that sites that would not normally be suitable for development, because of planning policy constraints, can be developed solely for housing to serve rural communities. Given the extensive network of rural settlements in the District, rural exception housing is a really important part of the housing stock. The Local Housing Needs Study (2017) confirms an increased level of demand for housing in rural areas.

2.13 All parishes are undergoing a five year rolling programme of local housing needs surveys, carried out in partnership with Action with Communities in Rural Kent (ACRK). Where a survey shows evidence of need, we will work with the local community and preferred affordable housing provider to identify and assist in delivering suitable sites.

2.14 We will also work with landowners of rural estates and Community Land Trusts to bring forward suitable rural exception housing to meet identified needs. This may be through an affordable housing provider or directly through the landowner where the Council's eligibility criteria for new affordable housing development partners can be met. The planning agreement attached to such development sites will ensure any landowner-led housing is delivered at the same cost to the tenant and held in perpetuity to meet identified housing needs.

Policy H3 – Housing in Rural Areas
This policy will ensure a sufficient supply of rural housing specifically for those who live in or have a connection to the rural areas of the District. Proposals for new housing development in rural areas that meet a specific local need will be required to meet the following criteria to be permitted as an exception to other Local Plan policies: 1. The local need has been identified in an up to date local housing needs survey;   2. The local need identified cannot be met by any other means through the development of non-Green Belt sites within the parish or, where appropriate, in the adjacent parish; and   3. A thorough site options appraisal has been carried out.   The Council expects rural exception housing schemes to provide 100% local needs housing to meet identified needs. However, on the occasion it can be demonstrated that a wholly local needs housing scheme is not viable or deliverable, and the Council agrees, it is expected that the market housing for sale will be used, in the first instance, to meet identified needs including housing for local essential workers, older people, plots for self build and co-housing.

Questions
Do you think the proposed criteria are reasonable and will help to achieve the aims of the policy?

Subsection 4 – Housing for Older People

2.15 Sevenoaks District has an ageing population. Those aged over 65 make up nearly 22% of the District's population and this number is expected to increase by 24% over the plan period. By 2040 it is expected that there will be an additional 6,394 residents aged 65 and over[2].

2.16 We need to respond to the changing population structure to ensure the housing offer across the District meets the needs of our older people, who are a vital and integral part of any local community. This can be done by delivering a broader housing offer for older people across the District and we are keen to diversify the range of more modern and appealing housing options available.

2.17 The TRLHN identifies a need for 1,044 additional units of specialist older persons accommodation over the plan period 2022-2040, of which 720 units should be provided as retirement housing (e.g. sheltered and extra care housing) and 324 units to be provided in the form of bedspaces in registered care homes. The characteristics of different types of specialist accommodation is set out in the table below. We will work with partners, including KCC Adult Social Care and other infrastructure providers, to deliver the right types of older persons accommodation in the right places.

Characteristics of Different Types of Specialist Accommodation

Type of specialist accommodation	What we expect to see in a proposal / how this is characterised
Retirement housing e.g. sheltered and extra care (generally C3 use class)	Purpose-designed self-contained living units (e.g. apartments) containing at least one bedroom often with a mini-kitchen with washing machine and living room, although in some cases these facilities may be shared/communal. The nature of this type of accommodation is akin to a small dwelling capable of accommodating a small household rather than a single occupant occupying a single room. Access to 24 hour care and support from support staff, warden or alarm system.
Specialist nursing / residential care (C2 use class)	Single bedrooms within a purpose-designed residential setting with communal kitchens, living rooms, quiet/family rooms, IT rooms and staff breakout rooms. Provision of personal and nursing care and support 24 hours a day with dedicated on-site nurse.

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[2] 2018-based population projections, ONS

2.18 We must also ensure that these homes are accessible, adaptable and technology enabled, as well as being safe and warm and in established and vibrant neighbourhoods, recognising the importance of attachment to place, social connections and access to services and facilities. Getting this right has a significant impact on people's health and wellbeing. Good quality housing where people can maintain their independence helps prevent physical frailty, supports positive mental health and reduces hospital admissions.

2.19 Loneliness amongst older people is a growing issue and housing options that will help to reduce this are encouraged. In many cases family support networks are essential in providing informal care and combating loneliness and isolation. This means housing options need to be provided in all settlements, including rural villages, to ensure older people may remain within their existing communities. This could be provided as co-housing schemes.

Policy H4 – Housing for Older People
This policy will ensure a sufficient supply and range of housing and accommodation suitable for older people, both market and affordable, in order to meet the specific needs of this group and to assist in the creation of mixed, balanced and inclusive communities.   Proposals for new retirement housing will be required to meet the following technical and design criteria, in addition to the criteria set out in the Housing Mix policy: 1. Proposals should reflect the latest evidence on older persons housing needs set out in the latest housing needs evidence (Targeted Review of Local Housing Needs 2022). Alternative methods of assessment will not be considered appropriate;   2. Be within sustainably located and well-connected areas of the District, where there is easy access to shops, community facilities including healthcare, public transport and other services appropriate to the needs of the future occupiers;   3. Be located in rural villages where an up to date local housing needs survey identifies a local need for older persons accommodation;   4. Incorporate the latest HAPPI (Housing our Ageing Population Panel for Innovation) design principles, where possible, in order to offer attractive alternatives to the current home;   5. Incorporate an accessible lift in flatted developments of 2 or more storeys;   6. Provide access to private and/or communal outdoor space; and   7. Provide high quality homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment for the District to become Net Zero.

Questions
Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of the policy?

Subsection 5 – Build to Rent

2.20 Increasing housing supply is challenging in a District that is so constrained, but it is clear that we need to find new ways of delivering new homes so that we can create a more dynamic housing market with more movement and where more people can find a suitable home that meets their needs.

2.21 One way to do this is to build high quality purpose built homes for private rent that are professionally managed and provide shared spaces and services, known as 'build to rent'. The build to rent sector can play an important role in meeting our identified housing needs, by boosting the number of smaller and more affordable units and delivering homes that can house people across a range of income levels, ages and household types. Whilst build to rent is well suited to house mobile professionals, it can also provide homes for local essential workers, for families and for older people.

2.22 The TRLHN sets out that, in Sevenoaks District, the private rented sector accommodates around 12% of households. 50% of these are located in Sevenoaks built up area with limited choice in the remainder of the District. Looking forward, the TRLHN identifies a need for 350 build to rent units over the plan period. Whilst this number is not particularly high we know that the current private rental market is buoyant in Sevenoaks, with upward rent pressure and fast lets, which are indications that the market is popular and demand may increase over the plan period. We are keen to engage with build to rent providers on the options available to meet this need.

2.23 Build to rent schemes are most appropriate in the built up areas of Sevenoaks, Swanley and Edenbridge, reflecting the most sustainable and well-connected areas of the District where there is easy access to shops, community facilities and public transport. This will help to promote health and wellbeing, support the local economy, reduce carbon emissions and promote environmental sustainability. Applicants will be expected to demonstrate how they have taken this into account in finalising their proposals.

Policy H5 – Build to Rent
This policy will boost the number of smaller and more affordable units through the delivery of private rented homes that can house people across a range of income levels, ages and household types. Proposals for build to rent schemes will be required to meet the following technical and design criteria, in addition to the criteria set out in the Housing Mix policy: 1. Be within the built up areas of Sevenoaks, Swanley and Edenbridge. These are sustainably located and well-connected areas of the District where there is easy access to shops, community facilities and public transport; 2. Meet the definition of build to rent as set out in the glossary; 3. Provide 20% on-site affordable housing in the form of one and two bedroom affordable private rented homes with rents capped at 80% of the open market value including any service charges;

Policy H5 – Build to Rent
4. Provide high quality homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment for the District to become Net Zero; and 5. Wherever possible incorporate public realm improvements to the benefit of the wider community.

Questions
Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of the policy?
Build to rent schemes often require a minimum number of units to be deliverable. What should that be in Sevenoaks District?

Subsection 6 – Smaller Sites

2.24 The NPPF requires us to identify land to accommodate at least 10% of our housing requirement on sites no larger than 1 hectare. Sevenoaks District needs to build approximately 13,566 new homes over the next 18 years, with 1,356 of these coming from sites no larger than 1 hectare (generally referred to as smaller sites).

2.25 Historically small sites have been crucial to housing delivery in Sevenoaks District and they continue to offer opportunities to grow the housing stock. Over the last 5 years small sites in our built up areas have provided over 20% of built homes district-wide.

2.26 The Settlement Capacity Study 2022 (SCS) identifies the potential for approximately 1,000 units to come forward in our existing built up areas, if we were to continue building at current densities. However, this potential is expected to rise significantly if all opportunities are fully explored and optimum densities are achieved in the most sustainable locations. Whilst these sites vary in character, ownership and existing usage, they are all considered to be suitable and achievable. Encouraging these sites to be developed to provide new homes, in a way that is consistent with other policies in this Plan, is vital to meeting the NPPF requirements.

2.27 This policy aims to encourage these sites to come forward and assist in demonstrating their deliverability/developability over the plan period. This approach also supports our development strategy by increasing densities and making effective use of land in our existing built up areas.

Policy H6 – Smaller Sites
This policy will support the provision of well-designed new places on smaller sites (no larger than 1 hectare) in existing built up areas through both planning decisions and Local Plan allocations. Proposals for new housing development on qualifying sites will be required to meet the following technical and design criteria: 1. The proposal demonstrates that it makes the best and most efficient use of land, utilising higher densities where appropriate, whilst also contributing to the creation of healthy spaces with improved connectivity; 2. The proposal meets identified development needs and contributes towards the delivery of different types and sizes of new homes; 3. Any loss of use is robustly evidenced and reprovided where required; and 4. Provides high quality homes built to high sustainability standards with built-in resilience to climate change and fuel poverty, which contributes towards the Council's Net Zero 2030 commitment for the District to become Net Zero.

Questions
Do you think the proposed technical and design criteria are reasonable and will help to achieve the aims of the policy?

Questions
What else can we do to encourage the delivery of suitable smaller sites in existing built up areas?
Is there anything else that we should include, or an alternative approach we should consider?

Subsection 7 – Housing Density and Intensification

2.28 This Plan sets a clear expectation for new residential development to make the best and most efficient use of land and respect local character. Homes across the District have traditionally been built at a relatively low density and proposals continue to come forward at densities below 35 units per hectare, which is now considered an inefficient use of land. There is scope to make better use of land, particularly on sites that are within settlements or close to public transport hubs.

2.29 The Council recognises that it is not necessary for new development to match the density of surrounding land uses. Well-designed higher density schemes can add variety and vitality to our places and spaces. Increasing the density of development in sustainable locations can help to ensure that land is used in the most efficient way, and that less land overall is developed. In Sevenoaks District, there are competing demands for use. The need for new homes is high, but the Green Belt covers the vast majority of the District. It is therefore crucial that the limited amount of land within settlement boundaries is used efficiently when considering proposals for new development. The Development Strategy chapter sets out the three growth options that can be achieved through utilising different density levels, all of which aim to make the best and most efficient use of land whilst respecting character.

2.30 Optimum densities should enhance the function of our places and meet the provisions of other policies in this Plan. Whilst there are some locations across the District that are suited to taller buildings there are other mechanisms for delivering higher density in a sustainable way, such as intensification of under-developed locations in existing settlements and the development of two storey terraced housing or townhouses to make better use of land.

2.31 The District Wide Character Study (DWCS) identifies six types of areas that are suited to higher density development:

1. Towns and local centres – these are described as having the best access to services and therefore are the most sustainable and suitable for denser forms of development;

2. Walking distance to towns and local centres – these areas encapsulate the 15 minute neighbourhood concept and advocate neighbourhoods in which those who live there can find everything they need in terms of work, retail, and leisure within 15 minutes of their home, via sustainable transport modes;

3. Train stations – areas within a 10 minute walk of train stations are recognised;

4. Bus stops – areas within a 5 minute walk of bus stops are recognised;

5. Bus service zones – reflects the areas covered by a regular bus service; and

6. High frequency transit spots – ranks train stations and bus stops based on their frequency and service with Swanley and parts of Sevenoaks ranked the highest.

2.32 Proposals for new residential development should reflect the conclusions of the Council's DWCS, respecting the sensitivity of places to change. Applicants will be required to

demonstrate how these considerations have been taken into account and be prepared to discuss development options at the pre-application stage.

Policy H7 – Housing Density and Intensification
This policy will ensure that new housing development makes the most efficient use of land. Proposals for new housing development should explore the opportunities to achieve higher densities. Further work will be undertaken to determine appropriate densities but the following guidelines are proposed, where they can be achieved without a detrimental impact on local character or amenity: 1. In highly sustainable locations including town centre locations and close to transport hubs, densities in excess of 150 dwellings per hectare should be achieved; 2. In existing built up areas, densities of 50-150 dwellings per hectare should be achieved; and 3. At the edge of the built up areas, densities of 40-60 dwellings per hectare should be achieved.

Questions
Do you think the proposed density guidelines are reasonable and will help to achieve the aims of the policy?
What do you think are appropriate locations for taller buildings / denser development?
Is there anything else that we should include, or an alternative approach we should consider, for any of the proposed housing policies?

Subsection 8 – Gypsies and Travellers

2.33 Gypsy and Travellers are an important part of the Sevenoaks District community and national policy states that we must plan for their housing needs in the same way as for the settled community. The Gypsy and Traveller Accommodation Assessment (GTAA) identified the need for 43 additional pitches up to 2040 including those members of the community who do not meet the Planning Policy for Traveller Sites definition. This need has been reduced to 37 due to the granting of planning permission since the GTAA was completed in April 2022.

2.34 We are developing a strategy to identify locations for additional permanent pitches, subject to site sustainability, suitability and impact on local character.

Policy GT1 – Gypsy and Traveller Site Allocations
Consideration will be given to whether a site: 1. Is sustainable, prioritising those close to existing services and facilities;   2. Has existing pitches, and whether those are permanent, temporary or unauthorised;   3. Has impact on local character, prioritising those lying outside of the AONB and with existing built form;   4. Has impact on protected areas such as Local Wildlife Sites, Ancient Woodland, SSSI; and   5. Will provide an acceptable living environment for future occupants in terms of size, noise and air quality and is not located within an area likely to flood.

Questions
Do you agree with the proposed strategy for identifying new Gypsy and Traveller pitch allocations in the most sustainable locations?
Is there anything else we should consider?
Do you have any sites for new Gypsy and Traveller pitches?

2.35 Not all Gypsy and Traveller pitches will be delivered through Local Plan site allocations. Proposals for new permanent gypsy and traveller pitches as well as transit pitches are likely to come forward and therefore for development management purposes we are proposing the following policy.

Policy GT2 – Gypsy and Traveller Accommodation
Accommodation for Gypsy and Travellers and transit pitches must take account of the policies within the Local Plan and should take account of the following criteria: 1. The site should be located close to services and facilities and access to public transport;

Policy GT2 – Gypsy and Traveller Accommodation

2. The site will provide an acceptable living environment for future occupants in terms of size, noise and air quality and is not located within an area likely to flood;

3. Safe and convenient vehicular, pedestrian and cycle access can be provided to the site;

4. The development will minimise the potential impacts on the surrounding character, landscape, including in Areas of Outstanding Natural Beauty, and biodiversity; and

5. Associated buildings, including amenity blocks, must be proportionate in scale and bulk to the pitches proposed.

Question

Do you agree with the development management policy?

Chapter 3 – Employment and Economy

Overarching Statement
Maintaining a vibrant and flexible local economy is essential to the delivery of sustainable development and the wider vision of this Plan.

Opening Chapter Statement
Sevenoaks District has a vibrant local economy and is well located to service the economy needs of London and wider south east region. The policies in this chapter seek to build on these locational advantages and supports the Council's wider strategy of ensuring the local economy remains resilient to change. Reflecting the evidence, key aims over the plan period are to deliver the right type of employment space, maintain vibrant town centres and support our thriving tourism sector.

3.1 In addition to identifying sufficient land to meet employment needs, policies seek to maximise the District's proximity to economic markets, delivering affordable and flexible floorspace that responds to occupier requirements. Ensuring a healthy rural economy is central to the District's economic success, alongside resilient town centres and a strong visitor economy.

Strategic Objectives
OB11 Promote resilient and agile town centres that are able to respond to change.
OB12 Encourage the delivery of workspace to meet occupier demands.
OB13 Safeguard land to meet employment needs over the plan period.

Subsection 1 – Economy

Delivering Economic Success

3.2 Identifying how much land is needed for office and industrial uses to meet employment needs is a key aspect of the Council's development strategy.

3.3 Specific sites will be identified for this purpose, alongside criteria based policies to determine planning applications for employment uses. This chapter will also provide a spatial response to longer-term economic challenges, to ensure the District remains economically competitive.

3.4 Matters such as the type of office space needed and maintaining a vibrant rural economy and tourist sector are also important. Officers have worked closely with colleagues from the Council's Economic Development team, to ensure these proposals are consistent with the corporate Economic Development Strategy.

Policy EMP1 – Delivering Economic Success

This policy will set out the key criteria for economic success, including:
 	
1. Delivery of 5.7 hectares of land to meet employment needs; and
 	
2. Enhancing the local economy and ensuring this success is shared amongst all residents, by:
 	
    i. Promoting locational strengths, including the proximity to London;
    ii. Working in partnership with other strategies that contribute to economic success;
    iii. Making best use of public transport links and seeking to improve those links where possible;
    iv. Developing walking and cycling networks and other mechanisms for sustainable travel;
    v. Recognising the contribution of the rural economy to economic success;
    vi. Cultivating resilience in our town centres;
    vii. Ensuring the local economy is able to diversify in response to emerging trends;
    viii. Supporting the delivery of appropriate and affordable forms of work space to meet current and future working patterns; and
    ix. Promoting the benefits of a transition to a low carbon circular economy to strengthen economic success.
 	
3. Delivering the wider objectives of this plan.

Questions
What are the factors that make Sevenoaks District a successful place for businesses to locate?

Questions
What steps could be taken to improve economic competitiveness across the District?
Are there further measures of economic success that should be considered over the plan period?
How should the Council encourage the development of the circular economy, which aims to reduce wastage, in the emerging plan?

Meeting Employment Needs

3.5 The amount of land required for employment purposes is identified in the latest Economic Needs Study (ENS). The Council will support proposals that reflect this document, including employment-generating uses that encourage occupiers to 'future proof' proposals through the delivery of flexible workspace that responds to longer term economic trends.

Policy EMP2 – Allocated Sites to meet Economic Needs
This policy will identify specific site allocations to deliver the quantum of employment land as listed in Policy EMP1 (5.7ha). Planning applications for development on these sites will be assessed against the policies in the plan. In accordance with the latest Economic Needs Study, the Council will seek the delivery of 4.1 ha of land for office uses and 1.6 ha for industrial activity.

Employment Uses

3.6 The Council is generally supportive of development that provides employment floorspace to meet future economic needs. This includes lower cost premises for small and start-up businesses, flexible office space and premises for industrial and warehousing operations.

3.7 Proposals resulting in the net loss of employment or premises will require appropriate marketing evidence, to explain the efforts made to retain the existing use. The content of this material should be discussed and agreed at the pre-application stage, but the applicant will need to demonstrate that the price, uses and terms at which the land or premises were, or will be, marketed are reasonable. The information listed in the policy is a minimum requirements and should form a starting point for discussion.

Policy EMP3 – Employment Floorspace
New Employment Uses A criteria-based policy is proposed to assess proposals for new employment space and the loss of existing space. Key principles may include: 1.   Development proposals for new employment floor space on sites currently in employment use will be supported; and

Policy EMP3 – Employment Floorspace

2. Development proposals for employment floor space on sites currently used for non-employment purposes will be considered on their merits. Where benefits arising from the proposed use would exceed the benefit of retaining the existing use, the development proposal will be supported.

Existing Employment Uses

Where a change is proposed from an economic use to another use, the Council is likely to require credible and robust evidence:

1. of an appropriate period of marketing for economic use; and

2. that the proposals would not cause unacceptable harm to the local economy.

Marketing evidence should prove that both the land and the premises have been widely advertised and marketed for a wide range of economic uses for at least one continuous year, immediately prior to submission of a relevant planning application.

The Council will expect the content of marketing evidence to form a key part of pre-application proposals. The evidence will be assessed in the context of:

1. the overall quality of the site as an employment location;

2. the level of occupation/vacancy of the site;

3. consideration of the suitability of conversion for start-up and micro businesses;

4. whether the existing employment use generates any adverse impacts on the adjoining area;

5. possible benefits from relocating the economic use;

6. possible benefits from using the site for alternative uses; and

7. the achievement of other plan objectives.

Marketing evidence will need to address the demand from both the freehold and leasehold markets, reflecting that the dynamics of the two markets may differ.

Question

Is there additional information that should be included in the marketing evidence to support the loss of employment uses?

Flexible and Affordable Workspace

3.8 The Council will support the provision of space that is sufficiently affordable to encourage start up business and sufficiently flexible to respond to changing occupier requirements. Overall, proposals for new economic floorspace are expected to be consistent with the latest

evidence on economic needs and applicants are encouraged to demonstrate this at the pre-application stage.

3.9 Landowners and developers should explore the potential to intensify activities on industrial land and consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential. Proposals will be assessed on a case-by-case basis, but will be supported in principle where there is no net loss of employment floorspace.

3.10 In addition to the other policies in this plan, proposals for the co-location of uses should take account of the following principles, which should be discussed at the pre-application stage:

1. Safety and security – the co-located scheme should be delivered in a way that does not adversely impact occupiers of employment or residential uses;

2. Layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict – areas of potential conflict between co-located uses should be highlighted at the earliest possible stage;

3. Design quality, public realm, visual impact and amenity for residents – proposed schemes should seek to deliver design excellence;

4. Housing quality and standards – ensuring that units delivered meet the requirements of all other policies in this plan; and

5. Air quality, including dust, noise, odour and emissions - co-located schemes may not be suitable where employment uses have localised environment impacts.

Policy EMP4 – Flexible Workspace, Affordable Workspace, Flexible Office Space and Co-location

This policy will set out the key criteria for economic success, including:
 	
 1. Delivery of 5.7 hectares of land to meet employment needs; and
 	
 2. Enhancing the local economy and ensuring this success is shared amongst all residents, by:
 	
      i.   Promoting locational strengths, including the proximity to London;
      ii.   Working in partnership with other strategies that contribute to economic success;
      iii.   Making best use of public transport links and seeking to improve those links where possible;
      iv.   Developing walking and cycling networks and other mechanisms for sustainable travel;
      v.   Recognising the contribution of the rural economy to economic success;
      vi.   Cultivating resilience in our town centres;
      vii.   Ensuring the local economy is able to diversify in response to emerging trends;

Policy EMP4 – Flexible Workspace, Affordable Workspace, Flexible Office Space and Co-location
viii.   Supporting the delivery of appropriate and affordable forms of work space to meet current and future working patterns;   ix.   Promoting the benefits of a transition to a low carbon circular economy to strengthen economic success; and   3.   Delivering the wider objectives of this plan.

Questions
What type of employment space is needed to support changing working patterns and practices across Sevenoaks District over the period of the Local Plan?
How should healthy workspaces be promoted in the plan?
What measures can the Council take to encourage sustainable employment space that contributes to its net zero objectives?

Economic Development in Rural Areas

3.11 The majority of land in Sevenoaks District is rural in character and the rural economy remains a key contributor to economic growth. Rural economic issues incorporate the agricultural sector, but extend far beyond this to a wide range of business activities. The expansion of home working and the 'work anywhere' philosophy has greatly expanded rural economic opportunity and a capable broadband network is essential to support this. The Council will support rural economic activities that are consistent with the provisions of the latest evidence on economic needs.

Policy EMP5 – Rural Economy
Support will be given to suitably located proposals which improve the balance of jobs in rural areas and diversify the rural economy, including: 1.   Development that meets the essential needs of agriculture or forestry interests;   2.   Appropriate and proportionate expansion of existing employment sites to enable the retention and growth of local employers;   3.   the reuse of suitable buildings for employment purposes;   4.   Business start-ups, home working, small scale employment and the development and expansion of small business in rural areas; and   5.   Proposals that improve internet connectivity for rural communities.

Question
Are there additional matters that should be included to support the rural economy?

Subsection 2 – Resilient Town and Local Centres

3.14 We want to ensure that the town centres within Sevenoaks District continue to thrive and remain at the heart of our local communities as a place for socialising, shopping, leisure and a wide variety of other activities. Our high streets will support the economic competitiveness of the District, to ensure our places remain vibrant and resilient.

3.15 The 'high street' has undergone rapid structural change in recent years, with the continued trend towards online shopping, click and collect and other forms of less place-based retail, which has no doubt been accelerated by the pandemic. However, other trends, including increased 'working from home' and the emergence of more independent retail, have also shaped our high streets. We need to support our high streets by allowing them the flexibility to manage and respond to change, to adapt and diversify and by promoting their individual, unique characters, as places where people continue to desire to visit.

3.16 The 2022 Town Centres Strategy recommends planning for stability (rather than expansion or contraction) in terms of the retail floorspace within our centres, supporting and improving the quality of existing retail and town centre offer and environment. Our evidence base assessment shows that there is no overriding need for an increase in either convenience (food) or comparison (non-food) floorspace in the District. It is acknowledged that high streets are changing, and Use Class E (commercial, business and services use) now allows for change of use between shops, offices, cafes and restaurants. The uses which attract people to different centres are widening and therefore a flexible approach is supported, to ensure that the high street meets a variety of needs and permits linked trips to a sustainable location.

3.17 There are four defined town centres within the District – Sevenoaks, Swanley, Edenbridge and Westerham. They each have a different role, character and catchment, and therefore have individual policies below, but together they form a network of small-scale centres which provide for the retail, leisure, employment and community needs of the District.

3.18 There are four service settlements – New Ash Green and Otford are defined as Local Service Centres and Hartley and West Kingsdown are defined as Service Villages within the Settlement Hierarchy 2022. Within the defined local centre boundaries, small-scale town centre uses, which meet the needs of the centre they serve, will be encouraged and should contribute to improving the quality of the local centre environment. Similarly, within defined village and neighbourhood centres a range of shops and facilities will be maintained to meet the day-to-day retail needs of the communities which they serve.

3.19 We are proposing tailored policies for each of our four town centres, and for the local centre in New Ash Green, which remains a focus for regeneration. These policies build on the recommendations from the Town Centres Strategy and developers are expected to demonstrate how it has been taken into account.

Policy TLC1 – Town and Local Centres (Strategic Policy)

This policy will:

1. Promote the unique characteristics of each of the town centres to allow them to thrive and form a network of complementary centres, which provide for the needs of the District;

2. Ensure town centres remain the focus for retail, leisure and other town centre activities, bringing people together in accessible locations to meet their needs. We continue to support a 'town centres first' approach, to ensure town centre uses are conveniently clustered together within defined town centre boundaries, and retail provision is maintained within the primary shopping areas;

3. Support town centre developments which include a residential element, to provide customer footfall within the town centre, provided that the residential element is not proposed at ground floor level (within the primary shopping area), other than that which falls under permitted development;

4. Consider an Article 4 Direction for Sevenoaks town centre primary shopping area, to restrict the Permitted Development change of use (Class MA) from Class E to residential;

5. Support local centres to provide for the day-to-day needs of the communities which they serve and resist the loss of shops and services where they are serving a local need, particularly where they are considered 'key' sustainable services in the Settlement Hierarchy;

6. Where strategic sites are proposed (i.e. approximately 100 units or more), it is expected that new small-scale convenience retail will be included within the site, to promote sustainable services which can be easily accessed on foot or cycle;

7. Town centre development, particularly where it includes work within the public realm, will be expected to meet the following criteria, where appropriate:

    i. Focus on quality, inclusive design
    ii. Development should be accessible, promoting walking/cycling and public transport use, with adequate parking, EV and cycling infrastructure and car clubs
    iii. Development should promote health and well-being, including community space/green space

8. Development should help to deliver the Council's Net Zero 2030 commitment.

Policy SEV1 – Sevenoaks Town Centre

The vision for Sevenoaks Town Centre in 2040 focuses on:

1. Raising the profile of its best assets - its historic town centre, array of independent shops and the impressive Knole;

Policy SEV1 – Sevenoaks Town Centre

2. Expansion of its cultural scene and diversifying the town's offer to match other prominent towns, including more things to do in the evening; and

3. An inclusive town centre - widening the leisure offer and providing new homes that support different income levels and life stages.

The following potential projects and development opportunities have been identified to help realise the future vision for Sevenoaks Town Centre. For further details of each of these projects, including delivery considerations, please see the Town Centres Strategy.

1. Strengthening connections to Knole Park;

2. Relocating the market;

3. Eastern town centre revitalisation;

4. Western town centre sites;

5. High streets streetscape enhancement;

6. Improving station arrival; and

7. Programme of events.

Policy SWN1 – Swanley Town Centre

The vision for Swanley town centre in 2040 focuses on:

1. A sustainable and welcoming market town that draws in residents and people from surrounding areas to come together and spend time;

2. An expanded retail offer with an emphasis on independents, food and drink, alongside an expanded community, leisure and civic offer;

3. A space for small businesses and co-working, and new homes of different types and tenures; and

4. High quality buildings and spaces that embrace and enhance Swanley's character.

The following potential projects and development opportunities have been identified to help realise the future vision for Swanley Town Centre. For further details of each of these projects, including delivery considerations, please see the Town Centres Strategy.

1. Improving the arrival experience of the Town Centre;

2. Transforming town square and Asda Walk;

3. Rebalancing space for pedestrians;

4. New and enhanced station connections;

5. Town Centre redevelopment – gradual; and

Policy SWN1 – Swanley Town Centre

> 6. Adjacent civic and community uses opportunity.

Policy EDN1 – Edenbridge Town Centre

The vision for Edenbridge Town Centre in 2040 focuses on:

1. A flourishing town centre that celebrates its history through investment and renewal of its handsome and historic High Street;

2. A transformed Leathermarket area as a focus for markets, events and activity in the heart of the town;

3. An aspirational place where people stay when visiting the District's attractions, with a variety of accommodation and a stronger food, drink, cultural and leisure offer; and

4. Enhancing connections to the river Eden with new activity alongside.

The following potential projects and development opportunities have been identified to help realise the future vision for Edenbridge Town Centre. For further details of each of these projects, including delivery considerations, please see the Town Centres Strategy.

1. Prioritising pedestrians on the High Street;

2. Improved access into the town centre;

3. Enhanced river connections;

4. Redeveloping the Leathermarket and backland sites;

5. Relocating the market; and

6. Shopfront renewal.

Policy WST1 – Westerham Town Centre

The vision for Westerham Town Centre in 2040 focuses on:

1. Being a charming rural town that celebrates its history and that remains a desirable place to live, work and visit;

2. A broadened offer for all age groups and families;

3. Connections to the wider Darent Valley, and improved public realm to reduce car dominance and create enjoyable streets and spaces; and

4. Meaningful alternatives to car-based travel.

The following potential projects and development opportunities have been identified to help realise the future vision for Westerham Town Centre. For further details of each of these projects, including delivery considerations, please see the Town Centres Strategy.

Policy WST1 – Westerham Town Centre

1. High Street streetscape;

2. Improving connections to the countryside;

3. London Road traffic filter;

4. London Road development opportunity;

5. Enhancing sustainable transport connections; and

6. A better visitor economy.

Policy NAG1 – New Ash Green Village Centre

The vision for New Ash Green Village Centre in 2040 focuses on:

1. A vibrant heart to a thriving village community, with shops and businesses supported by a refreshed and well-maintained shopping centre;

2. Flexible space for small and creative businesses bringing more footfall to the centre, as well as new homes of different types, sizes and tenures;

3. A renewed public realm with new focal points for events and pop-up activity;

4. Improving the edges of the shopping centre to open it up and draw people in, including new buildings which turn to face outwards; and

5. Celebrating the centre's one-of-a-kind character and modernist SPAN architectural style.

The following potential projects and development opportunities have been identified to help realise the future vision for New Ash Green Village Centre. For further details of each of these projects, including delivery considerations, please see the Town Centres Strategy.

1. Shopping centre edges;

2. Shopping centre public realm;

3. Upper storey improvements;

4. Connection to Longfield Station; and

5. Footpaths and arrival experience.

The projects identified are intended as flexible interventions that allow for further development opportunities to be explore in the future, if desired. This includes better integration with uses just outside of the village centre. Any proposal for the centre should consider its unique history and built character, continuity for existing businesses and the community significance of the local centre.

Questions
Do you agree with the approach of supporting and retaining the existing high streets rather than identifying areas for expansion or contraction?
Do you support or have any comments on the specific proposals for the five highlighted centres (please state which centre)?
Do you agree with the proposal to restrict the conversion of shops (class E) to houses at ground floor level in primary shopping areas?

Town Centre Development Management

3.20 Town centre boundaries and primary shopping areas will be defined for each town centre. A small-scale boundary change is being proposed in Sevenoaks Town – the local centre around the station is to be re-classified as part of the town centre. Both the existing primary and secondary retail frontages become the new 'primary shopping area' and this is extended to incorporate Blighs Meadow.

3.21 The national default threshold of 2,500sqm for undertaking an impact assessment of any proposed retail and leisure development outside of defined town centre boundaries, is considered too high in the Sevenoaks context. The default position comprises a significant proportion of existing floorspace, and therefore a lower threshold of 500sqm gross is recommended by our evidence base.

3.22 To promote health and wellbeing within our town centres, it is proposed to introduce criteria to manage planning applications which have an element of fast food. This will promote healthier food environments and control the concentration and clustering of Hot Food Takeaways. Applications for new hot food takeaways should not lead to an overconcentration of hot food takeaway use within any one individual locality by overly dominating the street scene or have an adverse impact on the standard of amenity. It is also appropriate to control the number of outlets where there are concerns regarding levels of obesity or where it exceeds average densities. Applications for hot food takeaway should include the provision of bins in the immediate vicinity to reduce littering in the public realm.

3.23 Evening economy uses can contribute positively to the vitality and vibrancy of town centres. However, if not properly managed, such uses can result in adverse amenity impacts for local residents and businesses (both individual and cumulative impacts) generated from anti-social behaviour, litter, noise and disturbance. To achieve a balance and protect local amenity, evening economy uses will be directed to town centre locations. Uses will be expected to support the broad objectives of the Council's Town Centre Strategy. The evening economy is inherently linked to the Council's Licensing and Environmental Health functions. Applicants are encouraged to liaise with colleagues in these teams prior to the submission of a planning application.

Policy TLC2 – Town Centre Development Management

This policy will:

1. Expect developers to demonstrate compliance with the Town Centres Strategy;

2. Ensure new development for town centre uses is located within defined town centre boundaries, and retail provision is maintained within the primary shopping areas;

3. Assess any development outside of the defined town centre boundaries, in accordance with the NPPF sequential test, to ensure all sequentially preferable locations are assessed in terms of their suitability and availability;

4. Propose an impact assessment for any retail and leisure development with a floorspace of 500sqm gross or above outside of defined town centre boundaries; and

5. Seek to limit the extent of hot food takeaway, where the number of approved establishments within a ward, equals or exceeds the UK national average, per 100,000 population. The details of numbers and location of existing outlets can be assessed using FEAT (Food Environment Assessment Tool); and

6. Proposals related to the evening economy should:

    I. Be consistent with the Council's Town Centre Strategy;

    II. Complement existing uses in the surrounding area and mitigate/prevent any adverse impacts on the amenity and continued operation of these uses;

    III. Demonstrate there would not be a significant adverse effect on amenity or function, particularly impacts on residential uses;

    IV. Promote access via sustainable modes of transport and avoid reliance on private vehicular transport, including private hire vehicles; and

    V. Investigate the potential for allowing daytime uses to activate the space, including on a meanwhile basis, where the use is only intended to operate during evening/night-time hours.

Questions
Does the proposed amendment to Sevenoaks Town Centre boundary look appropriate?
Do you support a lower Retail Impact Assessment threshold?
Do you agree with the proposals to manage hot foot takeaway applications?
What additional support do you think could the plan could provide for the evening economy in Sevenoaks District?

Subsection 3 – Tourism

3.23 Sevenoaks District is already a popular tourist destination. It benefits from an attractive natural environment, with more than 60% of the District covered by the High Weald and Kent Downs Areas of Outstanding Natural Beauty (AONB). Sevenoaks District is home to many historic towns and villages, as well as nationally recognised historic estates. The District boasts a number of key heritage assets, including Knole House, Chartwell, Hever Castle and Penshurst Place.

1.24 Nationally, the tourism sector was one of the hardest hit by the Covid-19 restrictions, as identified in the national tourism strategy, the Tourism Recovery Plan 2021. In Kent, an estimated 89% of tourism and hospitality facilities closed either temporarily or indefinitely – more than any other sector. This is certainly true for tourist attractions and accommodation throughout the District. However, as identified above, Sevenoaks benefits from an attractive natural environment and throughout the Covid-19 pandemic there was an increase in demand for outdoor attractions such as Knole Park, National Trust gardens and the District's extensive Public Right of Way (PROW) network.

1.25 Tourism has the potential to have a positive impact on the economy and character of the District. The main priorities are therefore the need to protect the existing tourism uses and accommodation, to encourage (where appropriate) an increase in the amount and quality of tourist accommodation and facilities, as well as balancing this need against the priority to protect the rural district and its heritage and landscape. The NPPF supports building a strong and competitive economy, including encouraging sustainable tourism that both benefits businesses, in urban and rural areas, and protects the countryside.

Policy TO1 – Tourism and the Visitor Economy
It is expected that development proposals will support, strengthen and protect the existing accommodation and attractions.

It is suggested that the loss of tourist attractions and accommodation will be resisted where possible. Exceptions will be made where equivalent facilities, which are equally accessible to the population, are provided. Alternatively, it should be demonstrated through evidence submitted, that the continued operation of the tourist attraction or accommodation is no longer needed or is financially unviable.

Proposals to provide new sustainable tourism development, including hotels, guesthouses, bed and breakfasts, outdoor accommodation, self-catering accommodation and new visitor attractions, will be supported after consideration of the following criteria:

1. Whether the location is readily accessible, by a range of means of transport including walking, cycling and by public transport;

2. The anticipated traffic generation by the proposal;

3. The impact of the proposal on local and landscape character and amenity;

Policy TO1 – Tourism and the Visitor Economy
4. The relationship to existing tourism development and whether the proposal is for the upgrading of those facilities; and
5. Whether the proposal will contribute to the diversification of tourist attractions in the District.

Questions
Do you agree that we should protect, support and encourage tourism businesses, visitor accommodation and visitor attractions, including heritage assets?
Do you agree that the loss of tourist attractions and accommodation should only be permitted where a clear justification for their loss is provided?

Chapter 4 – Climate Change

Overarching Statement
Addressing climate change is a pressing global and local concern. The measures to help tackle this significant issue, and the inevitable impacts, include energy efficiency and generation, sustainable transport and active travel, air quality, health and wellbeing, habitats and biodiversity, flooding, water supply and consumption and more.

Opening Chapter Statement
The need to address climate change mitigation and adaptation is found throughout this Local Plan and is central to our Spatial Vision. It is not only limited to built development, but also incorporates aspects of design, flood risk and water management, transport, open space and biodiversity.

Climate Change

4.1 The Council has made a commitment to work towards achieving net zero carbon emissions for the Council and its assets by 2030 (Council emissions). This is alongside an ambition to assist the District in becoming net zero, by working closely with local communities (District emissions) and to improve the resilience of the District to a changing climate (Climate resilience). This is collectively known as the Net Zero 2030 commitment. More information can be found at www.sevenoaks.gov.uk/netzero.

4.2 The Local Plan is a key driver in achieving the Net Zero 2030 commitment, through helping to reduce carbon emissions within the District and by ensuring resilient development. This is reflected in the overarching themes for the Local Plan.

Strategic Objectives
OB3: Ensure the Council's net zero objectives influence all development taking place in the District.
OB4: Provide sufficient flexibility in policies to enforce changing national standards, best practice and evidence base updates that will enviably occur over the plan period.
OB5: Allow residents to make lifestyle choices that make a positive contribution to net zero objectives.

Subsection 1 – Climate Change Mitigation and Adaptation

4.3 We are living in a changing climate. The UK Climate Change Risk Assessment (CCRA) 2022 stated that an increase in temperature will lead to future increased risks to human health and wellbeing, agricultural food productivity, public water supply and natural assets, as well as intensifying flooding up to 2050 and beyond.

4.4 The Climate Change Risk and Impact Assessment for Kent and Medway 2020 sets out that the key climate risks with the greatest potential impact on Kent are:

1. Increase in average temperature;

2. Heatwaves;

3. Drought;

4. Sea-level rise;

5. Heavy rainfall;

6. Flooding; and

7. Soil destabilisation and landslides.

4.5 Carbon emissions are a key driver of climate change. Sevenoaks District produces more than 450ktonnes of Carbon Dioxide (CO_2) each year. This is approximately 4ktonnes of CO_2 per person with the majority of emissions resulting from domestic energy use and transport as shown in Figure 4.1.

4.6 The Local Plan will include policies to ensure development has a minimal impact on the climate through:

- High quality and careful design;

- Reducing the need to travel;

- Promoting walking, cycling and public transport opportunities;

- Allocating development in sustainable locations;

- Supporting and promoting low carbon technologies; and

- Protecting and enhancing blue green infrastructure.

4.7 These measures also contribute to improvements in community health and wellbeing and air quality.

4.8 New development must be designed to be as low carbon as possible incorporating renewable energy resources and be resilient for the changing climate. There are already a number of well-established sustainability standards for buildings such as Passivhaus and the Building Research Establishment Environmental Assessment Method (BREEAM). These

standards have been widely used for many years to ensure new development meets higher standards of sustainability.

Policy CC1 – Climate Change (Strategic Policy)
This policy will seek to: 1. Ensure all developments recognise and support the Council's Net Zero 2030 commitment for the District; 2. Minimise carbon emissions where possible through effective spatial planning by promoting sustainable development, supporting local services and facilities, and sustainable movement; 3. Ensure developments incorporate measures to mitigate the causes of climate change and reduce emissions; 4. Support the delivery of appropriate renewable and low carbon energy schemes; 5. Ensure developments implement measures to support climate resilience and adaptation including supporting the natural environment, increasing water efficiency, incorporating sustainable drainage systems and avoiding areas at risk of flooding; and 6. Maximise opportunities for carbon storage and sequestration.

Questions
Do you agree that the Local Plan should seek to ensure development mitigates and adapts to climate change?
Are there any other ways the Local Plan can address climate change?

Subsection 2 – Low Carbon and Climate Resilient Development

4.9 Strategic Policy CC1 will be supported by development management policies and a climate change Supplementary Planning Document (SPD) to provide further detail on the implementation of the policies.

4.10 The majority of the carbon emissions from the District are from domestic properties, this is the third highest level in Kent. To reduce carbon emissions, developments must be built to a higher standard and reduce carbon emissions as much as possible.

Policy CC2 – Low Carbon and Climate Resilient Development
This policy will seek to ensure development is built to significantly reduce carbon emissions and to be resilient to a changing climate. It will include: 1. Scheme layout and design requirements to reduce energy use, make the most of natural heating and cooling and encourage active and low carbon movement; 2. Encouragement to use national recognised eco building standards such as Passivhaus and BREEAM and to meet the Future Homes standard as a minimum; 3. Requirements for low carbon and renewable energy technologies to be included in all new developments to reduce energy use; 4. Requirements for adaptation measures to be incorporated into schemes including green spaces, trees, porous surfaces, living roofs and walls, and water harvesting; and 5. **Climate Impact Assessments to be required for all developments to set out how they are achieving the lowest possible carbon rating, incorporating renewable energy measures and ensuring climate resilience.**

Questions
Do you agree with the use of climate impact assessments as a way to ensure developments significantly reduce carbon emissions?
Are there any other ways the local plan can ensure low carbon developments?

Subsection 3 – Low Carbon and Renewable Energy Generation

4.11 Low carbon and renewable energy technologies have an important role to play in transitioning to a low carbon economy and energy sector. The District is highly constrained, however there is still opportunity for low carbon and renewable energy technology.

4.12 The local plan will support schemes which support climate change mitigation whilst ensuring the character of the District is conserved.

Policy CC3 – Low Carbon and Renewable Energy Generation
This policy will seek to increase the use of low carbon and renewable energy generation. Appropriate proposals for low carbon and renewable technology schemes will be supported. Schemes will need to ensure that the character of the District and landscape is conserved and, where possible, enhanced.

Question
Do you agree with our approach to low carbon and renewable energy generation?

Subsection 4 – Flooding

4.13 Wetter winters as a result of climate change are likely to increase fluvial flood risk, which is flooding from rivers and areas of open water. A greater severity and frequency of storms is also likely to increase surface water flooding.

4.14 Figure 4.2 shows the areas of the District which are most at risk from fluvial flooding. The flood zones represent different severities of flood risk, from Flood Zone 1 having the lowest risk of flooding (shown as 'clear' on the Flood Map – all land outside Zones 2 and 3) to Zone 3b as a functional floodplain.

4.15 There is already significant national and local guidance in place to manage flood risk, in the form of the National Planning Policy Framework (NPPF) and local guidance provided by the Lead Local Flood Authority (LLFA). The Council Strategic Flood Risk Assessment (SFRA) for Sevenoaks District, carried out in 2022, identifies current sources of flooding and also takes into account the impact of climate change.

Policy W1 – Flood Risk in Sevenoaks District
This policy will require: 1. No development in areas at risk of flooding and no development taking place in Flood Zones 2 and 3, without agreement from the Environment Agency;   2. Any areas in new development schemes, that are created specifically to deal with flooding, to be designed to maximize wildlife and habitat opportunities;   3. Development on sites larger than 1ha in Flood Zone 1 to be subject to a Flood Risk Assessment (FRA) in accordance with the Council's SFRA, National and Local guidance and the LLFA drainage guidance and policy statements;   4. That each FRA should include the requirement for any mitigation measures and, where relevant, the assessment should also address the risk of flooding from surface water, groundwater and ordinary watercourses. Where there is evidence that water from these sources ponds or flows over the proposed site, the assessment should state how this will be managed and what the impact on neighbouring sites will be; and   5. That measures identified to mitigate the effects of flooding shall be installed and maintained at the applicants' own expense, or put into a management company to ensure their long term retention, maintenance and management.

Question
Do you agree with our approach to flood risk?

Subsection 5 – Sustainable Drainage

4.16 Sustainable Drainage (SuDS) can make a real difference to reducing flood risk by managing the quantity of surface water run-off from development, as well as moderate flow rates and prevent sudden water level rises following heavy rain.   They can also significantly reduce harm to valuable water resources by retaining water within the local hydrological system, as well as protecting water resources from pollution by filtering run-off.

4.17 Soft and hard landscaping should integrate SuDS and consideration should be given to how they can contribute to the quality of green space for the benefit of amenity, in terms of the visual features and attractiveness of a place, as well as recreation and wildlife.

4.18 The cumulative impact of small sites can have a significant impact on flood risk, and therefore, the inclusion of SuDS is essential on both smaller and larger developments.

Policy W2 – Sustainable Drainage

This policy will require that:
 	
1. All developments must incorporate natural flood alleviation measures and sustainable drainage provision which mimics natural flows and drainage pathways and ensures that surface water run-off is managed as close to its source as possible.
 	
2. Any drainage scheme must manage all sources of surface water, including exceedance flows and surface flows from off-site, provide for emergency ingress and egress and ensure adequate drainage connectivity. It will not be acceptable for surface water run-off to enter the foul water system.
 	
3. Sustainable Drainage Systems (SuDS) or other appropriate measures must also:
 	
    i.   Maintain public safety;
 	
    ii.   Provide sufficient attenuation to surface water flows as appropriate;
 	
    iii.   Ensure that there is adequate treatment of surface water flows, such that there is no diminution in quality of any receiving watercourse;
 	
    iv.   Ensure protection of groundwater; and
 	
    v.   Provide or enhance wetland habitat and biodiversity where possible.
 	
4. Approval of the design, phasing, long term management and maintenance of SuDS must be agreed prior to the development commencing.

Questions
Do you agree with our approach to sustainable drainage?
Is there anything else that should be incorporated into the policy to support sustainable drainage?

Subsection 6 – Water Management, Stress and Efficiency

4.19 Sevenoaks lies in an area of water stress and this will only become further exacerbated by climate change, as shown during summer 2022. Developments will need to incorporate water efficiency measures, including water harvesting, such as rainwater harvesting (including small scale water butts) and greywater harvesting.

4.20 Source Protection Zones (SPZ) for groundwater provides a third of drinking water in England and it is crucial that these zones are looked after to ensure that water is completely safe to drink. Developments should include robust protection measures, and consideration of drainage design and ground disturbance, to minimise potential impacts on groundwater quality and reduction in the availability of groundwater sources.

Policy W3 – Water Management, Stress and Efficiency
The policy will require that: 1. All new schemes will demonstrate that they are designed to promote water efficiency and achieve a mains water consumption target of 110 litres per head, per day or less;   2. Schemes should include appropriate water harvesting measures;   3. Development proposals must have regard to the Water Framework Directive, the Thames River Basin Management Plan and management plans for the River Darent and Eden;   4. New development must not deteriorate any existing watercourses and should actively enhance the natural function and habitats of watercourses wherever feasible;   5. Any necessary crossing points over rivers and watercourses should utilise clear spanning bridges, where possible, to allow natural river processes and wildlife to continue to utilise the river corridor; and   6. Major development schemes will undertake a Water Framework Directive Assessment setting out the existing ground and surface water baseline and the potential impact of the new development.

Question
Do you agree with our approach to water management including water efficiency measures?

Chapter 5 – Design

Overarching Statement
Design is so much more than what a place looks like, it is how it functions and how it is experienced. A well-designed space can have a huge impact on people's lives, affecting health and wellbeing, our sense of security and belonging. Fundamentally a well-designed space is key to the successful delivery of the strategic objectives of the Sevenoaks District Local Plan.

Opening Chapter Statement
The government has put design at the forefront of national planning policy and our local policies are being updated to reflect this. We will be ambitious in ensuring that all elements of the Local Plan will be successfully achieved through good quality design.

5.1 The government has put design at the forefront of national planning policy and our local policies are being updated to reflect this. We will be ambitious in ensuring that all elements of the Local Plan will be successfully achieved through good quality design. We are proposing that each chapter of the document will contain a design policy, where appropriate, which will set out how development can demonstrate that it complies with the policy. The aim is to make this a clear and user friendly document in order to support successful delivery.

5.2 This overarching Design chapter sets out how we can ensure that the standards of good design are incorporated into the District's new development.

Strategic Policy

All new development will create well-designed places that promote sustainable and healthy communities.

Strategic Objectives
OB6 Deliver a character-led-approach to development that demonstrates the Government's priorities for well-designed places. (National Design Guide, 2021: The Ten Characteristics of Place)
OB7 Require the production of design codes for new development that meet the provisions of national planning guidance.

Question
What Design Policies do you think would support the successful delivery of the Strategic Objectives?

Policy DE1 – Design Review Panel

A Design Review Panel is a panel of experienced design professionals from a range of disciplines, (for example: architecture, infrastructure, master-planning, sustainability) who meet to assess the quality of a proposed development. Following the presentation they produce a report based upon their findings. They are commonly used by local authorities to provide specific expert advice to support the determination of an application and are usually part of the pre-application process. Design South East is the local body that manages these for Local Planning Authorities.
 	
This policy will set out the criteria for selecting development proposals to be presented to the Design Review Panel and will likely include:
 	
    1. Size of development;
 	
    2. Location; and
 	
    3. Site constraints and sensitivity to change.
 	
There will be an accompanying SPD to provide guidance.

Question
Do you think this approach will support the delivery of new well-designed spaces within the District?
What criteria do you think should be used for presenting schemes to the Design Review Panel?

Policy DE2 – Outline Planning Applications
This Plan sets an expectation for new development, to make the best and most efficient use of land and respect local character (Policy H7). The aim of this policy is to ensure that a proposed density of development, within an Outline Planning Application, will be deliverable in accordance with wider national and local planning policies. In establishing the principle of development, at Outline Planning Application stage, this policy will set out the submission requirements.

Question
Do you agree that this will help to make optimal use of the potential of a site?
What documents should be required to be submitted at outline application stage to establish that the proposed development will be policy compliant?

Policy DE3 – Ensuring Design Quality
Government design guidance, the National Design Guide (2019) uses the 10 Characteristics of Well-Designed Places as a framework for assessing development. These are: 1. Context – enhances the surroundings;

Policy DE3 – Ensuring Design Quality

2. Identity – attractive and distinctive;

3. Built form – a coherent pattern of development;

4. Movement – accessible and easy to move around;

5. Nature – enhanced and optimised;

6. Public spaces – safe, social and inclusive;

7. Uses – mixed and integrated;

8. Homes and buildings – functional, healthy and sustainable;

9. Resources – efficient and resilient; and

10. Lifespan – made to last.

To support the understanding of the District's character, the Council commissioned a district-wide character study. The Sevenoaks District Character Study (DWCS) 2022 tells the story of the District by exploring its past and how it has evolved into what it is today. It identifies important themes and recent trends that are shaping the District as a whole, including how people live, work and spend time in the District. It identifies the different areas that make up the District and explores what makes each place special.

This policy will seek to require large sites to demonstrate that their development meets these 10 characteristics of place, utilising the DWCS.

Questions

Will this policy help to secure well-designed places?
Will this policy help new development respect local character?
What size of site should this policy apply to?

Policy DE4 – Design Codes

A design code is a set of simple, concise and illustrated design requirements, that are visual and numerical wherever possible, to provide specific and detailed parameters for the physical development of a site or area.

The National Planning Policy Framework (NPPF) states that design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Design codes and guides should provide a framework for creating high-quality places.

This policy will require developers to engage with the local community and stakeholders to deliver a design code for new development sites in accordance with the government's guidance on Design Codes.

Question
Do you think this policy will support the aim of national planning policy in delivering development that responds to local character and engages with the local community?

Chapter 6 – Health and Wellbeing

Overarching Statement
The Local Plan promotes the health and wellbeing of residents, workers and visitors to the District, through its role in shaping the built and natural environment. Through collaboration with partners and the design, construction and management of spaces and places, planning plays a key role in alleviating some of the District's most pressing health challenges.

Opening Chapter Statement
The quality of the built and natural environment can directly influence healthy behaviours and have positive impacts on reducing health inequalities.

6.1 It is important that provision is made to ensure all residents have the opportunity to improve their wellbeing, reduce social exclusion and isolation, stay physically active and live healthier lives. The importance of this has been particularly emphasised by the recent Covid-19 pandemic.

6.2 Good quality housing in a sustainable location, with access to green open space, can positively benefit social networks and opportunities for active travel.

Strategic Objectives
OB1 Recognise the link between the places and spaces that we live in and the quality of residents' mental and physical health.
OB2 Work closely with healthcare providers to develop policies that promote good physical and mental health as an outcome.

Subsection 1 – Health, Wellbeing and Safety

6.3 There are areas of affluence in Sevenoaks District, as well as pockets of deprivation. The Index of Multiple Deprivation (IMD) is the official measure of deprivation for small areas in England. According to the IMD, Sevenoaks District is the second least deprived local authority in Kent, although it should be noted that there are areas within the District that fall within the 30% most deprived in the country, namely Swanley St Mary's and Swanley White Oak. Opportunities to improve the wellbeing of the more vulnerable aspects of the community, and reduce social exclusion, will be sought and proposals supported.

6.4 Current population data shows that 22% of the District's population is aged 65 and over, and this proportion is expected to increase to 24% over the plan period. There is an increasing need to identify opportunities to improve the health and wellbeing of the older population, through medical infrastructure, social, community and recreational opportunities.

6.5 Public safety is of paramount importance and everyone has the right to feel safe in the places they live, work and relax at all times of the day. We will work closely with the Health and Safety Executive, The Environment Agency and Kent Police to establish whether additional measures should be included in the Local Plan to identify hazardous establishments, ensure risks to public safety are minimised and to take reasonable measures to prevent major incidents.

6.6 A Health Impact Assessment (HIA) is a useful tool in determining planning applications where there are expected to be significant or adverse impacts on health and wellbeing. HIAs help to achieve sustainable development by finding ways to create healthy and active communities, which can be shaped by the built environments which we live in.

6.7 Many factors combine to affect the health and wellbeing of individuals and communities, and the context of people's lives determine their health. To a large extent, factors such as where we live, the state of our environment, genetics, our income and education level, and our relationships with friends and family all have considerable impacts on health, whereas the more commonly considered factors such as access and use of health care services often have less of an impact.

6.8 The determinants of health include:

1. The social and economic environment;

2. The physical environment; and

3. The person's individual characteristics and behaviours.

Policy HW1 – Health and Wellbeing
This policy will seek to support healthy living opportunities, promote social inclusion and improve community cohesion To support healthy and safe communities new development should:

Policy HW1 – Health and Wellbeing

1. Be located within easy access to services and facilities;

2. Create opportunities for better active travel to including provision for safe cycle and pedestrian routes;

3. Be designed to minimise threats and improve public safety; and

4. Be designed to improve mental health and reduce loneliness and isolation.

Developments that reduce health inequalities and social exclusion will be supported.

The policy will set out requirements for HIAs to be submitted on the following new developments, which are expected to have significant impacts:

1. All major housing developments over 10 units;

2. For non-residential developments containing any of the following uses:

   i. Education facilities;
   ii. Health facilities;
   iii. Leisure or community facilities;
   iv. Betting shops;
   v. Hot food takeaways; and
   vi. Restaurants;

3. and for any other uses that could be considered to have a detrimental impact on physical or mental health (e.g. payday loan shops/vapour parlours/nightclubs)

Where unavoidable negative impacts on health, wellbeing and safety are identified, mitigation measures must be incorporated into the proposal.

Proposals will be encouraged to include green and community spaces to support social prescribing for both mental and physical wellbeing.

Questions

Do you agree that health impact assessments should be included for certain new developments?

How else can the Local Plan support healthy, inclusive and safe communities?

Subsection 2 – Air Quality

6.9 Vehicle exhaust is the main contributor to poor air quality in the District and there is a high dependency on private vehicles to make journeys to key locations within, and outside of, the District (e.g. stations, shops and community facilities). This has led to a number of hot spots in Sevenoaks, Swanley and in several smaller settlements along the A25, where air quality is particularly poor. In addition, three major motorways run through the District, which carry a considerable flow of HGVs using the port at Dover and the Channel Tunnel.

6.10 The District currently has 4 Air Quality Management Areas (AQMAs), all of which have been declared in relation to traffic emissions.

6.11 Measures to improve air quality include reducing the need to travel, providing electric vehicle charging points and promoting alternative modes of transport, including cycling. Secondary effects of these measures can also improve general health and wellbeing.

6.12 The Council will prepare a Supplementary Planning Document (SPD) to guide how developments will be expected to meet national and local air quality policies. This will set out how both onsite and offsite mitigation should be incorporated into schemes.

Policy AQ1 – Air Quality
This policy will seek to: 1. Ensure that new development does not have an unacceptable impact on air quality for new residents, the existing surrounding area and other areas connected to the development; 2. Ensure that onsite and offsite air quality issues are included when assessing the environmental impact of proposals; 3. Ensure that development which may have an adverse impact on air quality will be required to incorporate measures to reduce the impact to an acceptable level; 4. Ensure that suitable onsite and offsite mitigation measures should be incorporated into the scheme, including a financial contribution to strategic air quality improvement measures, if appropriate, such that future air quality is either improved or sustained at a level that would be achieved without the development; and 5. Require the design and location of new development to take account of the need to improve air quality, in accordance with the District's Air Quality Action Plan.

Questions
Do you agree that all new developments should have a neutral or positive impact on air quality?
What other measures could be included to improve air quality in the District?

Subsection 3 – Noise

6.13 All development should provide an acceptable standard of amenity for its occupants and should not result in significant harmful effects to surrounding uses. These harmful effects can include overlooking, loss of privacy or light, noise and pollution.

6.14 The Noise Policy Statement for England (DEFRA, March 2010) seeks to promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.

6.15 Noise sensitive developments should be located away from existing sources of significant noise, and potentially noisy developments should be located in areas where noise will not be such an important consideration or where its impact can be minimised. Acceptable noise levels will be based on acoustic assessments by accredited professionals.

Policy HW2 - Noise
This policy will seek to: 1. Ensure that new development provides adequate residential amenity for existing and future occupiers of the development with regards to noise; 2. Safeguard the amenities of existing and future occupants of nearby properties by ensuring that development does not contribute to, and avoids areas where occupiers of the development would be subject to, excessive noise and vibration; and 3. Ensure that development would not result in unacceptable noise levels from existing noise sources, which cannot be adequately mitigated.

Question
Do you agree with the policy approach to noise in new developments?

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Chapter 7 – Historic Environment

Overarching Statement
Sevenoaks District is home to a wealth of heritage assets, including around 1,700 listed buildings. This rich and diverse built heritage is set within a stunning medieval natural landscape of ancient woodland and farmland. A large proportion of the District lies within the Kent Downs Area of Outstanding Natural Beauty (AONB) and the southern tip lies within the High Weald AONB. Other areas lie within the distinctive historical Low Weald and North Kent Plains rural character areas, which sit within the Green Belt. The myriad of historic parks and gardens encompass aesthetic, botanic, scientific and social heritage and form an important part of the areas landscape heritage character.

Opening Chapter Statement
The historic environment is a valuable asset which can contribute to creating a sense of place and the wider strategic objectives of the District. These include economic development, urban regeneration, high quality urban design, placemaking and planning, the vitality and viability of our centres and rural economy, tourism, leisure, education and sustainability. It is important that planning decisions consider heritage assets in the District, alongside wider objectives as set out in this Plan.

Strategic Objectives
OB15 Continue to support development that protects and enhances the District's historic environment and ensures that it can be enjoyed by future generations.

Subsection 1 – Historic Environment

7.1 The policies in this Plan seek to draw together a comprehensive approach to conserving and enhancing the District's historic environment.

7.2 Heritage assets are identified in national planning policy as either designated or non-designated heritage assets.

7.3 Designated heritage assets are those with a statutory designation, such as:

1. Listed buildings;

2. Scheduled monuments;

3. Conservation areas; and

4. Registered parks and gardens.

7.4 Non-designated heritage assets do not have a statutory designation, but are still of local heritage significance. These include:

1. Locally listed buildings, structures and places;

2. Buildings and structures identified as making a positive contribution to the character of a conservation area; and

3. Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest.

7.5 The Council commissioned a Historic Environment Review (2017) to help us understand the District's historic environment as a whole. It considers the historic environment and designated and non-designated heritage assets, whilst also recognising that the landscape and local character are intrinsically linked to the setting of heritage assets and historic settlements, the pattern of development and land uses. As well as focusing on specific assets, it is important to consider the main themes and characteristics which help to form the District's local distinctiveness and which make a significant contribution to its heritage.

7.6 The Council wants to achieve development which is compatible with its local character and to protect and positively respond to heritage assets and their setting, as required by national planning policy.

Policy HEN1 – Protecting and Enhancing the Historic Environment
This policy will seek to protect and enhance our historic environment with development proposals required to respond sensitively to affected heritage assets and their setting, taking into account the following guidance: 1.   Local Plan policies relating to design, heritage assets and landscape character;

Policy HEN1 – Protecting and Enhancing the Historic Environment
2. Relevant research to understand the significance of the historic environment and specific assets it contains, including the Kent Historic Environment Record (HER) as a minimum;   3. Current best practice guidance produced by Historic England; and   4. Other principles set out in relevant local guidance, including the Kent Design SPD, Local List SPD, Sevenoaks District Historic Environment Review, Conservation Area Appraisals and Design Guidance, Sevenoaks Landscape Character Assessment, or any subsequent versions, and any historic environment guidance adopted by the Council.

Questions
Do you think this policy will support development that protects and enhances the historic environment?
Are there any additional policies that would protect and enhance the historic environment in new development?

7.7 National planning policy requires applicants to describe the significance of heritage assets affected by proposals, including any contribution made by their setting. Understanding the significance of heritage assets, and the contribution of their setting, is fundamental to the positive management and protection of the historic environment. All new development should demonstrate how it has understood and responded positively to the historic environment by making a positive contribution to local character and distinctiveness and, where possible, better revealing and enhancing the historic environment of the District.

Policy HEN2 – Sensitively Managing Change in the Historic Environment
This policy will require Planning Statements, Design and Access Statements and/or Heritage Statements to demonstrate: 1. That new development responds positively to local historic character;   2. An identification and assessment of heritage assets, including their significance, vulnerabilities and opportunities and the contribution of their setting; and   3. How this information has been used to inform proposals that sustain and enhance the historic environment and, where relevant, minimise and mitigate harm.

Questions
Do you think that this policy will support   sensitively managed change within in the historic environment?
Are there any additional policies that would support sensitively managed change in the historic environment?

7.8 Most archaeological sites are not scheduled monuments, but nonetheless play an important role in the historic environment. They contribute to a sense of place and provide people with a direct physical link to the past, as well as bringing to life stories and events occurring at an international, national, regional and local level. The known sites and areas of archaeological interest within the District are included within the Historic Environment Record as Areas of Archaeological Potential. Sevenoaks District Council will follow Kent County Council's guidance on 'Areas of Archaeological Potential'. They are considered to be heritage assets.

Policy HEN3 – Archaeology
This policy will seek to identify, protect and record the archaeology of a development site where appropriate and, where practicable, opportunities should be taken for the enhancement and interpretation of archaeological remains.

Questions
Do you consider that this policy will adequately support the protection of non-designated archaeological sites?
Are there any additional policies that would support the protection of non-designated archaeological sites?

7.9 The Council, working in partnership with key stakeholders, produced a Local List of buildings, structures and open spaces which are of local architectural and historic interest or that made significant contribution to local distinctiveness. The historic assets on this list are considered non-designated heritage assets. The buildings on the Local List are all located in Sevenoaks town.

Policy HEN4 – Locally Listed Buildings
This policy will seek to reaffirm the Council's recognition of the contribution the Local List makes in valuing and defining local distinctiveness and their status as non-designated heritage assets as a material planning consideration. It will also consider the expansion of the Local List to the wider District.

Question
Do you think the Local List should be expanded to the wider District?

7.10 The retention and reuse of our historic building stock can help reduce climate change by avoiding the higher carbon footprint associated with new construction. The inherent embodied energy of historic buildings means that their retention and care is consistent with modern concepts of sustainability and with the ambitions to reduce carbon emissions.

7.11 Heritage assets also need to adapt to meet changing needs by understanding and exploring opportunities to improve the energy efficiency of historic buildings. There will also

almost always be scope to find sensitive solutions to improve access to the historic environment and upgrade facilities and environmental performance.

Policy HEN5 – Responding to Climate Change in the Historic Environment
This policy will seek to ensure a sensitive and tailored approach to the design and specification of energy conservation measures is taken which recognises modern and historic buildings function differently. The Council will encourage creative design approaches to the upgrading of historic buildings where they enhance their significance. The 'whole building approach' will be promoted which seeks to save energy, sustain heritage significance, and maintain a healthy indoor environment through understanding the building in its context.

Questions
Do you think this policy will support a sensitive and successful approach to responding to climate change and energy efficiency in the historic environment?
Are there any additional policies that would support a sensitive and successful approach to responding to climate change and energy efficiency in the historic environment?

7.12 Shopfronts and signage form an important element in the street scene, both individually and in terms of the wider street setting. They can not only enhance the vitality of a place, but also contribute to the local distinctiveness and character of the townscape.

7.13 Retaining historic shopfronts makes a positive contribution to the historic character of a place. When a replacement shopfront is necessary it can be successfully integrated into their setting through the use of quality materials and by respecting the proportions of the building and character of the street scene.

Policy HEN6 – Shopfronts and Signage
This policy will seek to promote the retention of historic shopfronts and the enhancement of unsympathetic shopfronts within conservation areas. Applications for new shopfronts or alteration to existing shopfronts, and other forms of advertisement affecting heritage assets will be supported where the design, detailing, positioning, materials, colour, proportion and illumination respond positively to the character and design of the existing building and surroundings. This is both for the replacement of historic shopfronts and the enhancement of unsympathetic shopfronts and signage where they are to be replaced for historic buildings and areas.

Questions
Do you think this policy will recognise the value of historic shopfronts and ensure appropriate replacement in historic contexts?
Listed buildings with shopfronts already have statutory protection. Do you think this policy should apply outside conservation areas? And if so where?

7.14 Historic parks and gardens are an important part of the historic and natural environment of the District. Some of these historic parks and gardens are designated, and others are non-designated assets and are identified in the Kent Compendium of Historic Parks and Gardens and on the Sevenoaks Local List. There are likely to be others that are yet to be formally identified.

7.15 These contain a variety of features, such as: historic association with places, events and people, the open space itself, views in and out, the planting, water features, built features and archaeological remains. They often also play an important role in the setting of listed buildings and structures, to which they are intrinsically linked. There is a need to protect such sites and their settings from new development that may have a detrimental impact on the historic interest.

Policy HEN7 – Historic Parks and Gardens
This policy will seek to conserve and enhance the significance of historic parks and gardens by giving specific guidance on how applications will be assessed.

Questions
Do you think that this policy will support the conservation and enhancement of historic parks and gardens in new development?
Are there any additional policies that would support the conservation and enhancement of historic parks and gardens in development proposals?

Chapter 8 – Natural Environment

Overarching Statement
Sevenoaks District has a high quality and beautiful natural environment with a predominantly rural character. The sweeping landscape incorporates the chalk hills of the North Downs, stretches of enchanting woodland, historic parkland and areas rich in biodiversity.

Opening Chapter Statement
Sevenoaks District is an attractive place to live and work. The natural environment is a key character component of the District and should be conserved and enhanced for current and future generations.

8.1 More than 60% of the District lies within the Kent Downs or High Weald Areas of Outstanding Natural Beauty (AONB) and 11% of the District is covered in irreplaceable Ancient Woodland (compared with the UK average of 2%).

8.2 The District is rich in biodiversity and has a range of habitats varying from chalk grasslands, acid grassland, woodlands, rivers and open water and heathland.

Strategic Objectives
OB14: Ensure the District retains a high quality natural environment over the period of the Local Plan including delivering bio-diversity net gain on new development.

Subsection 1 – Landscape and Areas of Outstanding Natural Beauty

8.3 The Landscape Character Assessment 2016 provides a detailed review of the entire District, including the AONBs. National policy and legislation already sets out how the different designated areas should be managed and protected.

8.4 Developments in AONBs are expected to be modest and in line with the NPPF. They should conserve and enhance the District character of the AONB. Proposals should take account of the relevant Management Plan and associated guidance to produce sensitive and carefully designed schemes.

8.5 New developments should enhance the character of the AONB and the Management Plans can help to guide how a scheme may achieve this. Enhancements may include:

1. Improvement of scenic beauty, such as the removal or improvement of currently detrimental buildings or features, or by obscuring or distracting from negative features such as pylons, substations and major roads;

2. Supporting climate mitigation and resilience;

3. Restoring historic features and replacing existing materials with more appropriate and local materials;

4. Supporting the local economy by using local materials, including features reliant on local materials, such as wood for biomass boilers, supporting new rural business etc.;

5. Restoring historic settlement patterns, historic field patterns or historic routeways;

6. Allowing new appropriate public access;

7. Restoring native planting and natural features including trees, hedgerows, meadows and grassland; and

8. Improving tranquillity and reducing the existing impact of noise and lighting.

Policy NE1 – Landscape and Areas of Outstanding Natural Beauty (Strategic Policy)

This policy will set out local requirements to:

1. Conserve and enhance the distinctive features that contribute to the special character of the District in line with the Landscape Character Assessment, AONB Management Plans and associated documents;

2. Guide development in the AONB in line with the NPPF including managing major development;

3. Ensure developments within the AONB reflect the distinctive high quality area by identifying specific design criteria;

4. Require Landscape and Visual Impact Assessments for larger development proposals.

Questions
What do you think should be included in the policy and design criteria for developments in the AONB?
Do you agree that an assessment of landscape and visual impacts (LVIA) should be required for all new large developments?

Partnership Working in the Natural Environment

8.6 Projects which provide improvements to the natural environment, increase public enjoyment, promote climate resilience and provide health benefits both at the landscape scale, such as the Darent Valley Landscape Partnership Scheme and the Sevenoaks Greensands Commons Project, and at the local scale, such as woodland management projects, will be supported by the Council.

8.7 There are emerging proposals around the Bough Beech reservoir and Bore Place sites (see Figure 8.2), for potentially opening up Bough Beech reservoir to be more of a community resource. We will continue to work closely with both Bore Place and Sutton and East Surrey Water Services, to enhance the linked sites for people and nature.

8.8 This exciting project will play a part in delivering health and wellbeing (both physical and mental) over the plan period which is a central theme in this Plan. Nature and biodiversity and resilient employment are also local priorities, and this is likely to align well with many of the economic and environmental policies of the Council. Further information on this important site, which represents an significant opportunity for the District, will be included in subsequent versions of plan as it progresses towards adoption.

Subsection 2 – Biodiversity and Ecosystems

8.9 Sevenoaks District has a wide range of habitats and protected areas, including 42 Sites of Special Scientific Interest, 63 Local Wildlife Sites and 19 nature reserves.

8.10 The District is home to a number of nationally designated sites which will be highlighted on the policies map. There are a number of locally designated sites including Local Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves, Kent Wildlife Trust Reserves. These are protected for their biodiversity and ecological value.

8.11 The various ecological and habitat components across the District, alongside other areas of open space, are collectively known as the blue green infrastructure network. The network consists of the following sites and is shown as an interactive map:

Land of biodiversity value, including:

1. Sites of Special Scientific Interest (SSSIs);

2. Registered Historic Parks and Gardens;

3. Land designated under the Countryside and Rights of Way Act 2000 (CROW) including Common Land and Public Rights of Way;

4. Local Wildlife Sites;

5. Nature Reserves;

6. Woodland and Ancient Woodland;

7. Country parks;

8. Trees subject to Tree Preservation Orders;

9. River corridors and open bodies of water;

10. Cycle routes;

11. Sites identified in the Kent Compendium of Historic Parks and Gardens; and

12. Sites designated as Open Space including:

    o Amenity Greenspace
    o Natural and Semi-natural Greenspace
    o Provision for Children and Young People
    o Outdoor Sports facilities, playing pitches and playing fields
    o Allotments and community gardens
    o Green corridors
    o Cemeteries and Churchyards

Policy BW1 – Safeguarding Places for Wildlife and Nature (Strategic Policy)

This policy will seek to:
 	
    1. Protect the blue green infrastructure network;
 	
    2. Designate biodiversity areas that are not already protected through legislation such as Local Wildlife Sites; and
 	
    3. Support schemes and projects to enhance the blue green infrastructure network.

Questions
Is there anything else that should be identified as part of the District's natural landscape (blue green infrastructure network)?
Do you agree that locally designated sites should generally be protected from development?

Subsection 3 – Ashdown Forest

8.12 There are four internationally important sites within 10km of the boundary of the District, the most significant of which is Ashdown Forest which lies approximately 6km south of the District boundary. It is internationally important for nature conservation, reflected in its designation as a Special Protection Area (SPA), due to the presence of breeding Nightjars and Dartford Warblers and as a Special Area of Conservation (SAC), primarily due to heathland habitats. The European designations cover around 3,000ha.

8.13 The District's nearest settlement to Ashdown Forest is Edenbridge, which is approximately 12km from the site and a 2021 visitor's survey found that less than 2% of visitors to the Forest are from within Sevenoaks District.

8.14 We are members of the Ashdown Forest Officer Working Group and have signed a Statement of Common Ground to demonstrate our ongoing commitment to joint working on this important issue. Once adopted the Local Plan will be accompanied by a Habitats Regulations Assessment (HRA) to assess whether there are any adverse effect on the integrity of the European sites, as a result of development provided by the Plan, even in combination with other plans and projects. We will continue to work proactively with Natural England, neighbouring authorities and any other relevant bodies to understand the impact of the Local Plan on the Ashdown Forest.

8.15 To date, neighbouring authorities have sought modest developer contributions towards mitigating the impact of recreational pressure from new development, within a 7km zone of the forest. This zone just reaches into the District (a very small area around Fordcombe and Cowden as shown in Figure 8.3), but there currently is no development proposed in these areas as it is entirely washed over by the Green Belt. However, due to the possibility of windfall development, Natural England has recommended that Strategic Access Management and Monitoring (SAMMs) contributions are sought, to allow any windfall development within the 7km zone to proceed, whilst addressing their impact on the forest.

8.16 As there currently are no proposed site allocations within the 7km zone in the District, a strategic Suitable Alternative Natural Greenspace (SANG) is unlikely to be feasible but we will explore options for alternative provision. Tariff guidance is set out in the following document and is currently set at £1,170 per new residential unit [www.sevenoaks.gov,uk/downloads/file/1140/ ashdown_forest_special_protection_spa_strategy_tariff_guidance.](www.sevenoaks.gov,uk/downloads/file/1140/ashdown_forest_special_protection_spa_strategy_tariff_guidance.)

Policy AF1 – Ashdown Forest
This policy will require: 1. Any residential development in the 7km zone to provide a strategic access management and monitoring (SAMMs) contribution to address visitor impact on Ashdown Forest, in line with the SAMM strategy; and

Policy AF1 – Ashdown Forest
2. Major development within or adjacent to the 7km boundary to be assessed on a case by case basis to determine any additional mitigation measures.

Question
Do you agree with the approach to protecting the Ashdown Forest?

Subsection 4 – Biodiversity in Development

8.17 Biodiversity is found throughout the rural and urban areas of the District. All development can have a positive impact on biodiversity and should provide a measurable net gain.

8.18 Access to the natural environment and areas of high biodiversity value supports our spatial vision. It can also have a positive impact on health and wellbeing and can help reduce social and health inequalities. We are supportive of countryside projects such as community-led habitat management, health walks and wildlife/nature experiences especially those which encourage children and young people to engage with the natural environment.

8.19 Blue green infrastructure is essential to mitigating and adapting to climate change, ensuring that future generations can enjoy a healthy and thriving environment for years to come. The Council has committed to helping the District reduce carbon emissions and become more resilient to a changing climate through its Net Zero 2030 commitment.

8.20 The Council will continue to work with partners to develop projects to strengthen the blue green infrastructure network and improve access to, and understanding of, the natural environment. Partners include:

1. The North West Kent Countryside Partnership;

2. Kent Wildlife Trust;

3. Kent Downs and High Weald AONB units;

4. Town and Parish Councils.

8.21 Working with local authorities across Kent and Kent County Council, the Kent Nature Partnership, has concluded that a 20% target for biodiversity net gain for new development should be included in Local Plans. This is supported by a Kent wide viability study. A 20% target for Sevenoaks District is under consideration, and will be tested in the forthcoming viability assessment.

8.22 A Supplementary Planning Document covering biodiversity net gain will be prepared to set out the detailed requirements for biodiversity net gain, and will include both on-site and off-site net gain provision.

Policy BW2 – Biodiversity in New Development
The policy will seek to:
1. Achieve 20% biodiversity net gain from new development; and
2. Ensure proposals incorporate natural environment measures that help to support biodiversity, mitigate climate change and integrate climate resilience.

Question
Is the 20% biodiversity net gain target appropriate for Sevenoaks District?

Chapter 9 – Infrastructure and Community

Overarching Statement
Infrastructure underpins the successful operation and connectivity of a place. The existing and future provision of infrastructure is needed in the right place, at the right time to support the District's growth and development.

Opening Chapter Statement
This Plan supports the delivery of necessary infrastructure to meet the needs arising from new development. The timely provision of suitable and appropriate infrastructure to support growth, alongside the maintenance of existing infrastructure, is crucial to the well-being of residents, those who visit, provide services, invest and work in the District.

10.1 The delivery of housing and employment needs relies on the right infrastructure being in place to support planned growth. Suitable provision can include new facilities and services or upgrading existing infrastructure.

10.2 It is fundamental that places and communities are well connected with each other to access day-to-day services and facilities for future generations. The definition of infrastructure is wide and includes a range of services and facilities provided by both public and private bodies. This includes:

1. **Transport infrastructure:** Local and major transport, junctions, sustainable transport, parking;

2. **Green/Blue infrastructure:** Public open space, play space, Suitable Alternative Natural Greenspace (SANG), Public Rights of Way (PRoW), protected landscapes;

3. **Social infrastructure:** Education, health, sports and leisure facilities, emergency services, libraries and community centres; and

4. **Utilities and hard infrastructure:** Electricity, gas, water, sewerage, waste, telecommunications and broadband, flood defences.

Strategic Objectives
OB18 Co-ordinate the delivery of necessary infrastructure to support planned growth

Subsection 1 – Infrastructure Delivery

10.3 The extent to which infrastructure needs are met is variable across the District. Existing settlements are generally better served by public transport and medical and community facilities, although many of these services are operating near capacity. The rural areas can be more isolated with less access to, and provision of, infrastructure.

10.4 The Council will develop an understanding of the infrastructure needed to support growth through the production of our Infrastructure Delivery Plan (IDP), drafted with input from our main infrastructure providers. The IDP's priorities will help to inform the Council's annual Infrastructure Funding Statement. This document reports on the Council's infrastructure projects or types of infrastructure which will be prioritised for Community Infrastructure Levy (CIL) funding in the next financial year.

10.5 Successful infrastructure delivery is dependent on partnership working with infrastructure providers and developers, to ensure the services and facilities needed to support development are delivered in a timely manner. In some cases, it may be necessary for infrastructure to be provided in advance of development commencement. The Council will work with providers to ensure appropriate phasing.

Policy IN1 – Infrastructure Delivery
This policy will seek to: 1. Co-ordinate the appropriate delivery of new infrastructure to support development and growth within our District, in accordance with the Infrastructure Delivery Plan (IDP), which will be a material consideration in planning decisions. We will work with providers to retain, improve and provide new infrastructure to support development and help to ensure a high quality of life for residents of all ages.   2. Ensure that new development makes a contribution towards infrastructure needs arising from development, facilitating necessary infrastructure on or off site or where necessary retaining land for essential educational, community, health, movement, flood defences and Blue/Green Infrastructure to support the development.   3. Work with stakeholders to address barriers that prevent infrastructure from being provided including funding.

Questions
Should we consider anything else to deliver infrastructure?
We are considering identifying what specific infrastructure will be needed to support large developments. This may also prioritise infrastructure types. Do you think this is the right approach?
If we are looking to prioritise infrastructure, what do you consider are the most important types to support growth?

Blue/Green Infrastructure

10.6 Blue/Green infrastructure is an important aspect of the character and function of the District. The Natural Environment Chapter 8 sets out the extent of the existing blue/green infrastructure network and policies for its conservation and enhancement.

Transport

10.7 A well maintained transport network is a vital part of sustainable development. The Council's Movement Strategy proactively explains the key issues and priorities for sustainable movement and transport for the District. This includes reducing the need to travel, promoting active travel and smart technology, improving the cycling and walking network, encouraging the use of low emission vehicles and making it easier to access and use public transport.

10.8 The Local Plan supports the aims of the Movement Strategy and this is covered in the Transport Chapter 10.

Subsection 2 – Open Space

10.9 The Open Space, Sport and Leisure Study included a quantity and quality audit of the existing open spaces within the District under the following categories:

1. Amenity Greenspace;

2. Natural and Semi-natural Greenspace;

3. Provision for Children and Young People;

4. Outdoor Sports facilities;

5. Allotments and community gardens;

6. Green corridors; and

7. Cemeteries and Churchyards.

10.10 The study found that although the District has an adequate supply of most types of open space, the quality of the spaces could be improved. We will work with partners to identify opportunities to redevelop areas which are currently not fit for purpose or where improvements can be made.

10.11 The open spaces identified through the study will be protected through policy against inappropriate development. These spaces can be viewed on the interactive map.

Policy OS1 – Open Space and Recreation
This policy will encourage: 1. The retention of the District's designated open spaces shown for the current use and open space type unless it can be demonstrated that the tests set out in National Policy have been met; 2. The retention of all other open spaces of value to the local community, either because of use or contribution to local character. Local Green Spaces as defined by the National Planning Policy Framework will be designated through Neighbourhood Plans; and 3. The inclusion of Open Space in new development from the earliest design stage alongside onsite blue green infrastructure and biodiversity features. All new open space must include arrangements for long term maintenance and management.

Questions
Do you agree that new developments should include open spaces?
What else can we include to improve open space and recreation in the District?

Subsection 3 – Children and Young People Play Space

10.12 Play space for children and young people is a necessity in the creation of a new community.

10.13 The Open Space, Sport and Leisure Study identified an existing undersupply of fitness provision and children and young people's play areas across the District. Fields in Trust have produced recommended standards for the type and amount of play space that should be provided in new developments. We will adopt these standards as a minimum.

Policy OS2 – Children and Young People Play Space

This policy will encourage:

1. Housing developments to include children and young people's play space and apply, as a minimum, the following Fields in Trust requirements for the inclusion of equipped play space:

Fields in Trust Children and Play Space Standards

Size of Development	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)
5- 10 dwellings	Include	N/A	N/A
11-200 dwellings	Include	Include	N/A
201- 500 dwellings	Include	Include	Considered
500+ dwellings	Include	Include	Include

2. Where it has been clearly demonstrated that this is not feasible or viable, a lower level of provision must be provided as agreed by the Council;

3. New and high quality children's and young people play space including multiple pieces of attractive and engaging equipment, suitable to the location and serve the local community;

4. The creation of new children's and young people play space with accessible and inclusive equipment so that children and young people with special educational needs and disabilities can also use the space; and

5. The improvement and expansion of existing facilities directly adjacent or very close to a smaller development site if they cannot be delivered onsite. This will be considered on a case-by-case basis for smaller developments at the Council's discretion.

Questions

Do you agree with our approach to Children and Young People Play Space?

Are there any other criteria we should include for Children and Young People Play Spaces?

Subsection 4 – Education

10.14 The District's education facilities are vital to the continuing success of our residents and communities. Educational facilities are fundamental for supporting children and young people gain the necessary work and life skills and improve life opportunities.

10.15 We are in regular contact with Kent County Council as the education authority. There are 34 state primary schools in the District but only three secondary schools – Knole Academy and Trinity in Sevenoaks and Orchards Academy in Swanley (and two grammar satellite premises). Kent County Council has raised the existing three secondary schools are at capacity with no scope to expand.

10.16 There is an identified need for a new secondary school in the District during the plan period. Land for this will need to be identified, potentially in conjunction with a strategic development site. There is safeguarded land for a secondary school within Edenbridge up until 2040, subject to a legal agreement. There is also need for additional Special Educational Needs provision in the North of the District. These matters will be addressed as part of our subsequent Regulation 18 consultation in 2023 to respond to the latest available evidence on school place requirements.

Policy ED1 – Education
This policy will seek to: 1. Secure the provision of children's school places in existing, expanded or new primary and secondary schools. Where appropriate, this may include developer contributions (via S106 and/or CIL) and identifying new land opportunities. We will work in conjunction with Kent County Council to determine any new provision.

Questions
Do you agree with our approach to enhancing and increasing education provisions?
Are there any other priorities we should include in this policy?

Subsection 5 – Sports and Leisure Facilities

10.17 The Open Space, Sport and Leisure Study 2017 assessed the level of open space, sport and leisure provision within the District. The study found that the District is generally well served by leisure provision with sufficient indoor sports facilities, affording residents a range of activities including badminton, swimming, and fitness suites. Much of this provision is within local authority owned formal sports centres, informal village halls or within educational establishments. However, there is a shortage of formal community use agreements for educational establishments.

10.18 We intend on updating the Sports Facility Strategy during 2023 to take account of recent changes to White Oak Leisure Centre in Swanley and other facilities across the District.

10.19 The Playing Pitch Strategy 2018 assessed the quality and quantity of playing pitches across the District. It recommends all pitches should be retained, quality improved and provision for new facilities sought and supported. The strategy projected the impact of the level of demand in relation to the available facilities by 2035. The study identifies the following demand:

Playing Pitch Strategy 2018 Sports Demand

Sport	Demand Impact and Location
Football	The level of football provision demand is projected to grow by over 25% over the study period, with the greatest amount of growth attributed to Sevenoaks and Surrounds sub-area. The requirement for youth and mini pitches is likely to increase significantly. This growth is concentrated, but not limited to, the Sevenoaks and Surrounds and Upper Darent Corridor sub-areas.
Cricket	The future demand for cricket is projected to increase across the District, with an additional 104 matches to be played in 2035, taking the total demand for cricket pitches beyond 1,000 match equivalents for the season. The largest growth for cricket in the District is in Darent Valley sub-area which is projected to have an additional 42 matches played in 2035.
Rugby	The future demand for rugby is projected to increase across the District. This projected growth will further exacerbate the shortage of rugby pitch provision unless the issues with pitch quality are addressed. The maintenance regime for sites across Sevenoaks is not adequate to ensure that pitches are fit for purpose and able to withstand the high levels of demand for rugby, especially at the New Ash Green Sports Pavilion.

Sport	Demand Impact and Location
	There is projected growth of supply in the Sevenoaks and Surrounds subarea. There are the beginnings of plans to bring a WR22 AGP provision (capable of being used for contact rugby) in the area but these are at the very early stages. This should be encouraged as it appears to be the only feasible method of addressing the shortage of capacity for Sevenoaks and Surrounds.
Hockey	Projected growth indicates that unless the current situation changes, there is going to be a significant under supply of pitches particularly in Sevenoaks and Surrounds.
Tennis	To meet future demand of non-member play, it is imperative to invest in community accessible tennis courts particularly in the major population centres and growing urban areas within the District.

Policy SL1 – Sports and Leisure Facilities

This policy will encourage:

1. The retention of the existing sport and leisure provision within the District unless it can be re-provided, taking account of local needs and improvement to quality. This includes:
     i. All indoor sports facilities including swimming pools;
     ii. All sports pitches identified in the Playing Pitch Strategy;
     iii. Golf courses;
     iv. Multi-use games areas;
     v. Outdoor gyms; and
     vi. Playing fields and sites on education establishments.

2. Any redevelopment of sports and leisure provision to prioritise other sport and leisure uses first, then other non-residential employment generating uses before a wholly residential scheme;

3. Proposals to improve the quality of the District's existing leisure provision to provide facilities and access for all;

4. New playing pitches to be full size, be appropriately surfaced and capable of competition use unless not technically feasible;

5. Proposals increasing pay and play provision and/or community access;

6. New educational establishments to include community use facilities and be subject to formal community use agreements;

7. Proposals increasing the number of indoor or outdoor fitness stations;

8. Proposals for new playing pitches consistent with the Playing Pitch Strategy recommendations; and

Policy SL1 – Sports and Leisure Facilities
9. The ancillary use of sport or recreational facilities in developments where appropriate.

Questions
Do you agree with our approach to Sports and Leisure Facilities?
What else should we include to encourage sports and leisure facilities in the District?

Subsection 6 – Community Facilities and Services

10.20 Community facilities and services provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. The provision of local community facilities such as post offices, banks, public houses, schools (and redundant school buildings), surgeries, churches, community facilities, and public transport, help to build sustainable communities by supporting the local economy and/or providing day-to-day facilities minimising the need to drive.

10.21 This Local Plan seeks to retain local services and facilities in appropriate locations, to maintain the sustainability of our towns, local and neighbourhood centres, and ensures that communities continue to maintain access to day-to-day services and facilities. The policy should be applied to retail units considered to be addressing a need outside of established town and neighbourhood centres.

10.22 Community Right to Bid and Assets of Community   Value,   which   were   introduced in the   Localism Act   2011,   give   communities   powers   to   help   them   buy   local   facilities threatened with closure, which might offer communities an alternative option to retain community facilities.

Policy COM1 – Protection of Community Uses
This policy will seek to: 1. Protect the loss of local services and facilities where they are serving a local need. Exceptions will be made where equivalent replacement facilities equally accessible to the population served are provided, or where it is demonstrated, through evidence submitted that the continued operation of the service or facility is no longer needed or financially viable; and   2. Prioritise the reuse of redundant school and community buildings, where there is no requirement for an alternative educational use or the existing community use, to address local need for community facilities. Proposals for change of use or redevelopment for alternative non-community uses will only be considered if it is demonstrated by the applicant that there is no identified community need that can be facilitated through the site, or that community facilities that meet the identified need are incorporated into a wider mixed-use scheme.

Questions
Do you agree with our approach to protecting community uses?
What else can we include to protect community uses?

Subsection 7 – Water Infrastructure

10.23 The impact of climate change is evident in hotter drier summers and less predictable rainfall. This and population growth contribute to water stress and shortages. This issue is particularly important as the District falls within an area of serious water stress. There is a pressing need to use water more sustainably and manage its demand.

10.24 To ensure new development does not have a negative impact on the water supply and existing households are not negatively affected, we will continue to work and engage with stakeholders to address these issues.

10.25 Thames Water have consulted us on their draft Drainage and Wastewater Management Plan. The Long Reach catchment plan proposes a new sewerage treatment works (STW) site in Sevenoaks District to help manage future pressures on the existing STW. This needs further investigation and we will engage with Thames Water and Kent County Council as this develops.

Policy IN2 – Water Infrastructure
This policy will: 1. Require developers to ensure any necessary water or wastewater upgrades are in place before a development's occupation in order to avoid adverse impacts such as sewer flooding, pollution or issues of low/no water pressure. This can be addressed through the use of planning conditions; 2. Encourage the use of Sustainable Drainage Systems (SuDs) in development. This can have multiple benefits including assisting the prevention of water pollution, decreasing surface water run-off, reducing risk of flooding and creating green spaces; and 3. Support the inclusion of positive pumped devices in any basement development that is connected to the drainage network in order to protect the development from risks of sewer flooding.

Questions
Are there other areas of the District which have water capacity issues?
Do you agree with our approach to water infrastructure?
What else can we include to successfully manage the District's water infrastructure?

Chapter 10 – Transport

Overarching Statement
Transport connects people, goods and services between places. It is a necessity to access employment, housing, leisure, education and other elements of daily life. Transport is an integral consideration for the Local Plan's aspirations for Sevenoaks District to be a place to live, work and thrive.

Opening Chapter Statement
Residents and visitors need to travel to work, shops, schools and other services across the District. This Plan supports the delivery of sustainable transport choices helping all people to move conveniently and safely.

10.1 Sevenoaks District has good access to London and other parts of Kent by rail and is a popular place to visit. There is a high level of car ownership but limited public transport links to employment, education and tourism destinations.

10.2 The rural nature of the District can isolate residents contributing to loneliness and making it difficult for some people to access services. Some rural areas lack public transport increasing reliance on private vehicles. This creates barriers to social connections and services for older, younger and those on low incomes.

Strategic Objectives
OB16 Work with stakeholders to address barriers that prevent residents from making sustainable transport choices.
OB17 Support equal access to public transport services for all residents.

Subsection 1 – Sustainable Movement Network

10.3 Land use patterns and the rural nature of the District encourages the use of private vehicles as the primary mode of transport, and present particular challenges for sustainable transport options. The overreliance on public transport can however, result in congestion, air pollution and noise and can have negative health implications.

10.4 The Council's Initial Baseline Transport Assessment will determine the baseline transport data identifying any challenges and opportunities. It has identified congestion hot spots shown on Figure 10.2 below, and centre on M25 junction 3, Swanley Town Centre, Sevenoaks Town Centre, the A25 and the Edenbridge by-pass.

10.5 The Council's Movement Strategy explains our key priorities to encourage sustainable movement and transport across the District and beyond. This includes reducing the need to travel, promoting active travel, and improvements to the electric charging point networks and public transport services. To facilitate a sustainable movement network across the District, a balance must be struck between society's desire for convenient, private transport modes and their environmental impact. The priorities of the Movement Strategy are reflected in this Plan.

Policy T1 – Sustainable Movement Network
This policy will: 1. Ensure that new development is located near public transport infrastructure, services and facilities to enhance sustainable places;   2. Support the incorporation, enhancement and creation of cycling and walking routes and provisions within a new development that is connected to the wider transport network;   3. Create and strengthen interchanges between different transport modes (such as rail, bus, walking, cycling) to improve access and support first and last mile journeys by active travel;   4. Place cycling parking facilities at transport interchanges; and   5. Support the improvement of the public electric vehicle-charging network in accessible and strategic locations to encourage the uptake of electric vehicles.

Questions
Do you agree with our approach to a sustainable movement network?
Is there anything else to facilitate the sustainable movement network we should include in this policy?

Subsection 2 – Cycling and Walking

10.6 The Sevenoaks District Transport Assessment (December 2018) highlights the limited opportunities for walking and cycling within Sevenoaks District noting it has some of the lowest percentages of population walking to/cycling to work and education within Kent. These modes are not always an appealing alternative to the car and there is little infrastructure within the District to support cycling.

10.7 We aim to improve the infrastructure and environment to encourage people to walk and/or cycle as an alternative to car where appropriate. Developers will be expected to consider pedestrians and cyclists needs and the connection to the wider existing network from new developments initial stages.

Policy T2 – Cycling and Walking
This policy will: 1. Encourage new, safe and appealing cycling and walking routes to key locations and transport interchanges;   2. Enhance the existing cycling and walking routes, including Public Rights of Way (PRoW) routes, and improve the existing cycle and walking network within the development's vicinity, particularly leading towards services and facilities;   3. Support an adequate amount of cycle storage that is accessible, secure and weatherproof within new development;   4. Integrate new pedestrian and cycle routes with the PRoW and wider travel network;   5. Support the implementation of identified routes in the Local Cycling and Walking Infrastructure Plans;   6. Create safe and continuous routes for pedestrians and cyclists that align with desire lines and integrate into the wider network;   7. Prioritise pedestrians and cyclists needs within the development's design through traffic calming measures, limiting traffic speeds, appropriate materials and landscaping; and   8. Create new routes to fill existing gaps thereby enhancing the Public Rights of Way (PRoW) network connectivity.

Questions
Is it appropriate for walking and cycling to be in the same policy or should they be in separate policies?
Do you agree with our approach to cycling and walking?
Should we consider anything further to encourage cycling and walking?

Subsection 3 – Vehicle Parking

10.8 Car parking standards are required to ensure new developments provide an adequate level of off-street parking to meet the needs they generate and are not detrimental to the surrounding areas. New developments will need to provide car parking spaces complying with the relevant standards. Generally, development will only be permitted where it complies with Kent County Council's (KCC) current Parking Standards in KCC's Interim Guidance Note 3 (IGN3) to the Kent Design Guide or any superseding standards.

10.9 A flexible approach is required to reflect the availability of non-car alternatives and the proximity of key services, shops and jobs. The provision of car clubs on new developments can allow flexibility in car parking standards. We encourage new major developments in the District's towns to include car club spaces where feasible.

Policy T3 – Vehicle Parking
This policy will encourage: 1. Compliance with the current KCC vehicle parking standards in Interim Guidance Note 3 to the Kent Design Guide (or any subsequent replacement); 2. Vehicle parking to be conveniently located to and overseen by the development; 3. Developments to be well screened and integrate soft landscaping improving visual amenity; 4. For residential developments with unallocated parking spaces, sufficient space provided for electric vehicle charging points; 5. For non-residential developments, sufficient space within the site for the parking, unloading, loading of goods and manoeuvring of vehicles delivering and collecting goods; and 6. Bicycle parking to meet minimum standards with greater provision where feasible. Notwithstanding the above, the Council may depart from the established maxima or minima standards in order to: 1. Consider specific local circumstances including the development's accessibility to public transport, shops and services, highway safety concerns and local on-street parking problems; 2. Ensure the successful restoration, refurbishment and re-use of listed buildings or buildings affecting the character of a Conservation Area; 3. Allow the appropriate re-use of the upper floors of buildings in town centres or above shop units; 4. Consider the existing parking provision (whether on or off-site) for the building's existing use for redevelopment or change of use proposals and for the use of existing

Policy T3 – Vehicle Parking
public car parks outside of normal working/trading hours by restaurants and leisure uses; and 5. Consider a proposal's inventive parking design justifying less than the minimum provision.

Questions
Should we provide less car parking in developments situated in sustainable locations, for example, town centres?
Do you agree with our approach to vehicle parking?
Should we consider anything further to manage vehicle parking?

Subsection 4 – Electric Vehicle Charging Points

10.10 As part of our Net Zero by 2030 commitment, we will support electric and low emission vehicles and promote the necessary infrastructure. The Movement Strategy and the Low Emission and Electric Vehicle Strategy identify the need for more readily available and faster charging options both at home and out and about to support and increase electric vehicles use. We will be undertaking an Electric Vehicle Charging Infrastructure Study to identify needs, barriers and opportunities for electric vehicle charging across the District including considering the best types and locations of new chargers.

Policy T4 – Electric Vehicle Charging Points
This policy will require:

1. All non-residential developments with car parking to include electric vehicle charging points for employees or customers use. All proposals should include publically accessible rapid electric vehicle charging points where possible and appropriate. The number of points will be at the discretion of the Council and will be determined by:

     i. The size and type of the new development

     ii. The number of expected employees, customers or car parking spaces

     iii. The accessibility of the location

     iv. The expected length of stay

2. Within new residential developments, all new houses with a garage or off street parking must include an external electrical socket with suitable voltage and wiring for the safe charging of electrical vehicles;

3. Schemes for new apartments and houses with separate parking areas must include a scheme for communal charging points. The number of housing units will determine the number of points provided; and

4. All new developments must have sufficient infrastructure to provide additional charging points to meet future demand.

Management arrangements should be in place for all publically available or communal electric vehicle charging points to ensure charging points are working and readily available. This may include:

1. Regular maintenance to ensure points are not faulty;

2. Ensuring any faulty points are fixed quickly; and

3. Maximum charge times and sanctions for users who block access to a point for other users.

Questions
Do you agree with our approach to electric charging vehicle points?

Questions
Are there any other priorities we should include in this policy?

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Appendix 2

Indicative Formatted Version of the Draft Regulation 18 Local Plan

Our Local Plan

Our Plan is split into twelve chapters which cover all aspects of development and conservation.

This Local Plan has been written and produced by Sevenoaks District Council.
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Foreword

I am pleased to be able to introduce this new public consultation document for the emerging Sevenoaks District Local Plan. Once adopted, this Plan will provide the framework for managing development in the local area and addressing the key planning issues within the District.

Planning for the next 15 years is not a simple task, particularly in light of the fundamental social, economic and to some extent environmental challenges we have all experienced over the past few years, since our last consultation on the Local Plan. All of these factors influence land use planning and we need to plan for change, and have sufficient flexibility to respond to the unexpected.

We need your help to ensure that we have identified the right priorities and approaches for managing development and the sustainable and inclusive growth of the District. Sevenoaks faces a number of competing challenges, not least providing the affordable homes that our children and ageing relatives need whilst protecting the green spaces that our communities cherish.

This Plan contains policies to deliver new homes, vibrant high streets, the right type of employment spaces to ensure a healthy economy and new infrastructure to support growth, whilst protecting the natural environment and heritage buildings. It focuses on a number of key themes, to ensure that new development:

- promotes good mental and physical health,

- helps to deliver on our Net Zero 2030 commitment to tackle climate change, including through low carbon development, and

- supports high quality design, to create places and spaces that respect local character.

This Plan will replace the existing Core Strategy adopted in 2011 and the Allocations and Development Management Plan (2015). It is also the first of several public consultations that we anticipate being undertaken, so there will be plenty of opportunity to make your views known and help frame what we intend to be an ambitious and appropriate plan for the District.

The document is based on a comprehensive and up to date evidence base for the local area. We are working with an extensive range partners and stakeholders, including those responsible for health, education, transport and water, and our neighbouring authorities, to ensure that this Plan fully addresses all needs and challenges. It takes as its starting point the current state of the District and suggests a vision for 2040 that aims to protect and enhance the existing qualities of our area, whilst creating new places to help meet future needs.

We will particularly welcome contributions that help to achieve a genuinely shared and visionary plan with a focus on meeting the needs of all who live and work in the district. Please let us know your views.

Councillor Thornton,
Development and Conservation Portfolio Holder

How to use this document

Natural Environment 08

Chapter divider

The document is split into 10 Chapters covering the key issues and topics for the Local Plan. .

Strategic ojectives:

OB12:   Ensure the District retains a high quality natural environment over the period of the Local Plan.

OB13:   Support the principles of bio-diversity net gain.

Strategic objective

Each chapter sets out to meet at least one Strategic Objective and the relevant objectives are identified at the start of each chapter. The objectives reflect the key Vision and how this will be achieved.

Policy NE1
Landscape and Areas of Outstanding Natural Beauty

This policy will seek to:
- Conserve and enhance the distinctive features that contribute to the special character if the district.
- Set out criteria for development in the AONB in line with the NPPF including resisting major development.

www.sevenoaks.or.uk/localplan/policyST1

Policy table

Policies are identified throughout each Chapter, which set out how our Local Plan objectives and vision can be addressed, both strategically and through Development Management.

Consultation Questions:

1. What could be included in the policy and design criteria for developments in the AONB?
2. Do you agree that Landscape and Visual Impact Assessments should be required for all new large developments?

Questions

Each Chapter has a set of questions, which usually follow a policy. When responding to this consultation, please refer to the question number identified.

Contents

Introduction

00

This Local Plan explains how the Council intends to meet development needs and protect the environment in Sevenoaks District between 2022 and 2040. The documents focuses on the opportunities for new homes, employment spaces and infrastructure provision in existing settlements. A further document, covering all other parts of the District, will be issued next year. We are keen to receive your views on the proposed policies and allocations and hope that you will take the opportunity to submit your comments.

The purpose of the Consultation

00

This Local Plan is issued for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

These regulations ask for comments on *what the plan ought to contain* and we are seeking responses to the specific questions contained within the document.

The consultation questions are targeted, but there is an opportunity to provide additional information or comments at the end of the document.

The version of the Local Plan focuses on making best and most efficient use of land in towns and settlements across the District, reflecting the strategy for meeting development needs, as explained in Chapter 01.

A further Regulation 18 document, covering land outside of these settlements, will be published next year.

How to Comment

The consultation period runs from XXXX to XXXX.

Copies of the supporting documentation, which supports this document, can be viewed online at XXXX.

Comments can be submitted via our online survey on the Sevenoaks District Council website at: XXXX.

Online responses are preferred, however, where you are unable to respond online a PDF version of the survey can be downloaded and printed from the consultation page on our website.

Alternatively, papers forms can be collected from the following locations during normal opening hours:

- Sevenoaks District Council Offices, Argyle Road, Sevenoaks, Kent, TN13 2SH

- Your local Town or Parish Council

- Any library within the Sevenoaks District

Completed paper forms should be sent by post to the Strategic Planning Team at Sevenoaks District Council using the address above.

Comments should be received no later than midnight on XXXX.

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Figure 0.1: Distribution of settlements and Neighbouring Authorities

Map legend:

- Sevenoaks District Boundary
- Metropolitan Green Belt
- Adjoining District
- Principal Town
- Town
- Local Service Centre
- Service Village
- Village
- Hamlet

What is the District like?

00

Sevenoaks District is located in West Kent, with the edge of Greater London to the north-west, Surrey to the west and East Sussex to the south.

The District has eight Neighbouring Authorities; London Borough of Bexley, London Borough of Bromley, Dartford, Gravesham, Tandridge, Tonbridge & Malling, Tunbridge Wells and Wealden. Sevenoaks District covers pproximately 143 square miles and has a population of 120,500 (2021 Census Data).

There are a total of 56 settlements in Sevenoaks District, as set out in the District's Settlement Hierarchy (July 2022).

This includes the Principal Town of Sevenoaks Urban Area, the Towns of Swanley, Edenbridge and Westerham and many smaller settlements, the largest of which are the Local Service Centres of New Ash Green and Otford.

Figure 0.2: Regional Context

Demographics

The population of the District is expected to grow, and the structure of the population expected to change, over the plan period, due to an ageing populating, an increase in birth rate and internal migration patterns (largely people moving out of London into Sevenoaks). 22% of the District's population are currently aged 65 or over, and this figure is expected to grow to 24% over the plan period. This growing population and changing age structure presents a key challenge for the District.

There are areas of affluence in the District, as well as pockets of deprivation. The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small areas in England. The IMD uses information about income, employment, health, education, crime and living environment to rank every small area in England from 1 (most deprived) to 32,844 (least deprived). According to the IMD, Sevenoaks District is the second least deprived local authority in Kent, behind Tunbridge Wells Borough, although there are areas that are within the 30% most deprived in the country, namely Swanley St Mary's and Swanley White Oak.

The District has generally high house prices. In 2020, the median house price in the District was £425,000, the highest in Kent, and house prices were 12.6 times annual earning. This makes it very difficult for first time buyers and young families to remain in the District. There is a requirement to provide 13,566 new homes over the plan period, including a buffer for flexibility in delivery, in order to meet the needs of the growing population. This includes a high proportion of affordable homes and specialist accommodation for older people.

The District has the lowest level of unemployment in Kent. The residents of the District are generally well qualified with only 8% of the population having no qualifications. There are a number of employment areas within the District, including at Vestry Estate in Northern Sevenoaks and in Swanley. The majority of residents work in the West Kent area, with more than 40% working in Greater London. The District also has a strong rural economy, and many residents work from home, but issues with connectivity and broadband are common.

Landscape and Setting

The District has a high quality landscape with a mostly rural character. 60% of the District lies within the Kent Downs or High Weald Areas of Outstanding Natural Beauty. There are many areas of woodland, much of which is designated as Ancient Woodland. Parts of the District afford impressive views over Kent and the South East, particularly from the North Downs and the Greensand Ridge. The District is also rich in biodiversity with many Wildlife Reserves, designated areas as well as the River Darent, Eden and Medway.

There are many historic settlements in the District, as is reflected in the high number of Conservation Areas and listed buildings. The District boasts many nationally recognised heritage assets including the historic estates of Knole, Chartwell, Hever Castle, Penshurst Place and Lullingstone Castle. Other places of interest include the National Trust village at Chiddingstone, Eynsford Castle ruin, Lullingstone Roman Villa, Otford Palace and Toys Hill (the birthplace of the National Trust).

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TO
MEDWAY
TOWNS

COMMUTING TO
AND FROM LONDON

SWANLEY

A20   J3

M20

A20

A225

J4

M25

A224

TO
CHANNEL
PORTS

M26

J5

TO
MAIDSTONE
& KENT

A25

M25

SEVENOAKS

A25

A225

WESTERHAM

A21

TO LONDON
BRIDGE

TO
GATWICK

EDENBRIDGE

TO
TONBRIDGE & KENT

☐   Sevenoaks District Boundary
·   Bus Stop
≈   Railway Station
---- Railway Line
——   Motorway
——   Primary Road
——   A Road
——   B Road
——   Minor Road
▨   Metropolitan Green Belt

0   5 km
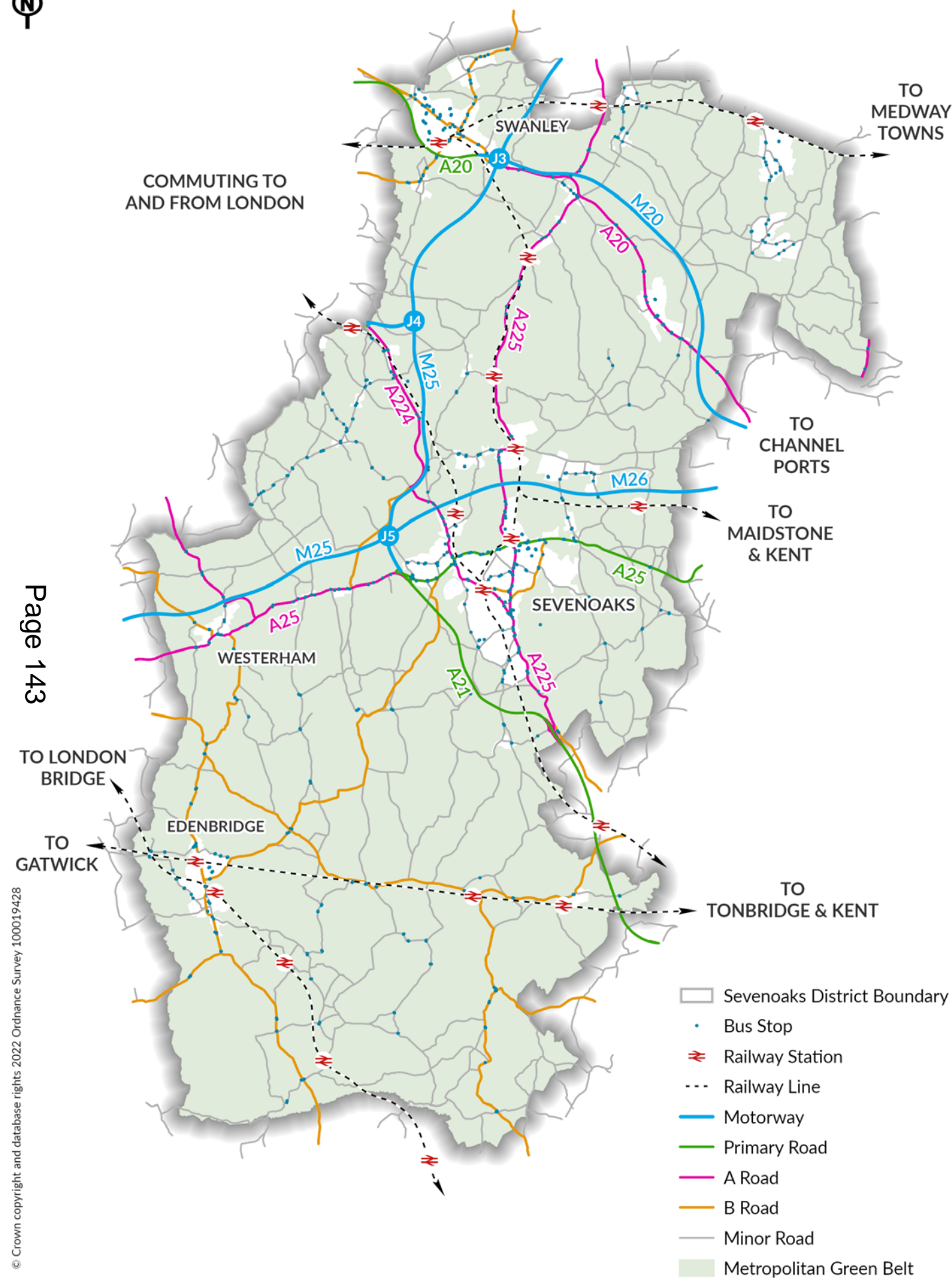
Figure 0.4: Connectivity

Connectivity

Sevenoaks District is a popular place to live, partly because of its proximity to London and accessibility to Europe. Strong road connections are provided by the strategic road network including access to the M25, M26, M20, A21, A20 and A25.

There are 14 train stations within the District, as well as others located just beyond the District border, many of which provide services into Central London in under an hour. The District is also well located for Gatwick and Heathrow airports, as well as the Channel Ports, Ashford and Ebbsfleet International stations.

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HEXTABLE
0   5 km
SWANLEY
SOUTH DARENTH
HORTON KIRBY
CROCKENHILL
FARNINGHAM
HARTLEY
EYNSFORD
NEW ASH GREEN
WEST KINGSDOWN
SHOREHAM
OTFORD
HALSTEAD
KEMSING
SEAL
SUNDRIDGE
BRASTED
SEVENOAKS
WESTERHAM
SEVENOAKS WEALD
EDENBRIDGE
LEIGH

☐ Sevenoaks District Boundary
▨ Metropolitan Green Belt
⇄ Railway Station
----- Railway Line
— Road
● Primary School
● Secondary School
● GP Surgery
● Hospital

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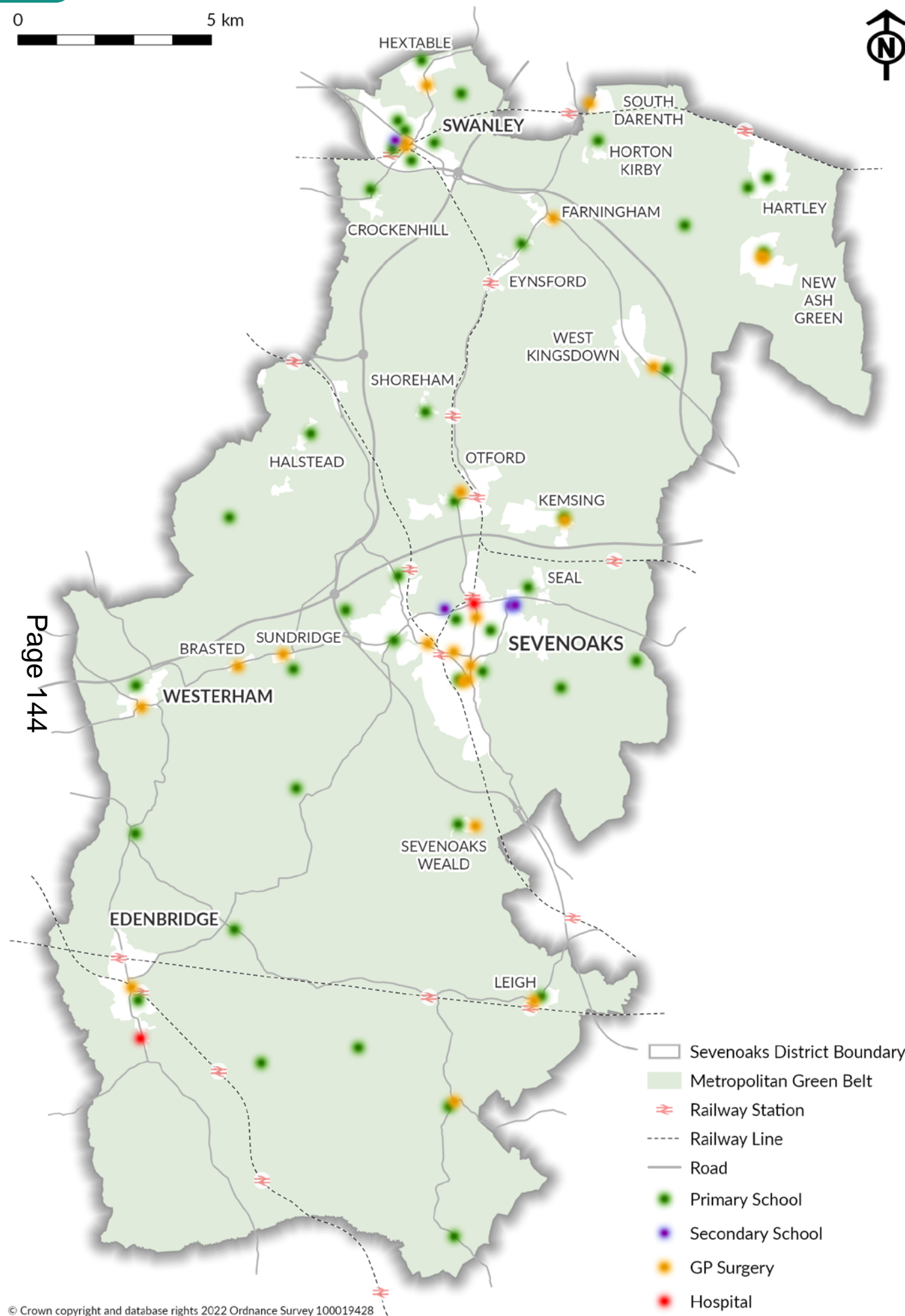
Figure 0.5: Doctors surgeries, hospitals, primary and secondary schools in the District

Healthcare, Education and Retail

We want to ensure that the District is a safe place for all to live, work and travel, while encouraging healthy lifestyles and providing people with access to good quality healthcare. There are two minor injury hospitals: Sevenoaks Hospital and Edenbridge & District War Memorial Hospital, as well as 21 Doctors Surgeries.

There are no major medical facilities within the District for residents, who have to travel out of District to Tunbridge Wells Hospital, the Princess Royal University Hospital (PRUH) (Orpington), Queen Mary's Hospital (Sidcup), Darent Valley Hospital (Dartford), Maidstone Hospital and London hospitals.

Education within the District is varied with a mixture of state and private, primary and secondary provision. Whilst there are 42 primary schools, there are only five state secondary schools within the District; Knole Academy, Orchards Academy, Trinity School and the Sevenoaks annexes for Weald of Kent Grammar School and Tunbridge Wells Boys Grammar School. Many children are being sent outside of the District, or privately, for their secondary education.

The District has vibrant town centres with many independent shops and a good retail offering. There is, however, some strong competition from nearby areas including Tunbridge Wells, Bromley and Bluewater. Some areas are in need of regeneration, including Swanley Town Centre and New Ash Green Village Centre. Areas outside of the towns are served by local services and facilities within villages. These services are of great value to local communities and contribute to the District's rural economy.

Strategic Issues

The Council thinks that following issues and considerations will be influential in shaping spatial development in Sevenoaks District over the period of the plan. They have informed the development of the Spatial Vision, that underpins the objectives and all strategic policies.
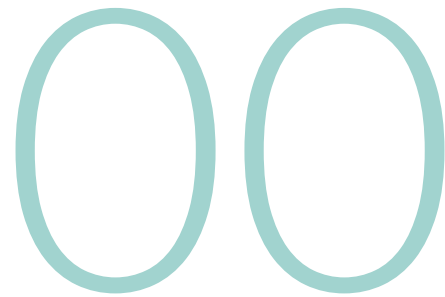
11. Delivering on net zero:
The impact of climate change will be a significant and pressing challenge for all of us over the period of this Local Plan. The objectives and strategic policies support the Council's wider net zero agenda, to reduce carbon emissions.

12. Healthy communities:
The global pandemic has reinforced the importance of spatial planning in maintaining public health. Policies should provide scope to deliver health infrastructure and promote positive physical and mental health outcomes.

13. Promoting design excellence:
High quality design is central to the delivery of the strategic objectives in this plan. It lies at the heart of maintaining local character and more fundamentally, delivering places and spaces that function in a manner that is consistent with our planning policies.

14. Homes to meet local needs:
Sevenoaks District remains an expensive place to live and many residents continue to struggle to find a home to meet their needs. Delivering genuinely affordable homes remains a key priority for the Council.

15. Agile economy and resilient town centres:
The global pandemic has accelerated many of the existing trends, such as online shopping and home working, that have started to shape our local economy over recent years. Policies in the plan must provide a response to these issues alongside other Council strategies, to ensure our economy remains strong and resilient to change.

16. Infrastructure to support planned growth:
The Local Plan must provide mechanisms to deliver the necessary infrastructure to support planned growth.

17. Protecting the natural and built environment:
Natural resources and heritage assets remain key aspects of the District-wide character and continue to be valued by local residents. The emerging Local Plan will pursue a character-led approach to growth that protects these aspects.

18. Resilience to Change:
Emerging evidence highlights the economic trends and demographic changes that will shape our District over the plan period. The plan must also incorporate flexibility to unexpected social, economic and environmental events.

Consultation Question:

1. Are there additional issues that are likely to influence spatial development in the District over the plan period?

Vision & Objectives
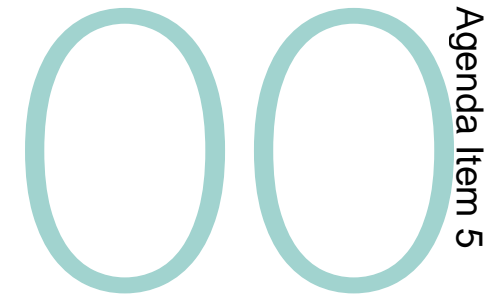
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The Spatial Vision is vitally important in that it is both a starting point for all aspects of the Plan and a statement of how the District will look at the end of the Local Plan period, if strategic objectives are successfully delivered. The Vision has been informed by evidence that supports this Local Plan and also reflects the Council's wider objectives on matters such as net zero and health and wellbeing.

Key aspects of the Spatial Vision will be as follows:

- **Achievement of the Council's Net Zero aspirations** - Significantly reducing carbon emissions and adapting to a changing climate.

- **Delivery of sustainable and equitable infrastructure** - To meet the needs of all residents, regardless of ethnicity, gender, age, disability or social group. In transport terms, we want to encourage sustainable transport choices, as long as the approach does not alienate particular groups – for example, an active travel strategy that provides genuine choices for an aging population.

  Community infrastructure should be provided to meet the needs arising from planned growth, particularly in relation to health and education.

- **Healthy places and spaces, promotion of mental and physical health** - Incorporating green space and healthy design principles, to encourage good physical and mental health. Recognition of health as a principle that cuts across all policies in the plan.

- **Greater economic competitiveness** - Through vital and viable, unique and flexible town centres, capitalising on the strategic location of the District and its functional economic links. Ensuring the delivery of the right type of employment space and supporting the rural economy are equally important in encouraging economic competitiveness.

- **Continued protection of natural resources** - Including the natural environment and biodiversity.

- **Embracing emerging trends, such as smart technology** - Future proofing and allowing flexibility, promoting innovation.

- **Responding to demographic change** - Addressing migration trends and demographic pressures, such as the aging population.

- **Continued engagement with neighbouring authorities** - Including London Boroughs.

- **Meeting development needs in a way that respects local character and promotes design excellence** - Encouraging high quality design for new development, delivering enjoyable and attractive places to live, work and relax, that respect local character and provide innovative ways to support mental and physical well-being.

Figure 0.4: Sevenoaks Key Diagram

Table 1
Vision and Objectives

VISION	OBJECTIVE
V1. Healthy places and spaces, promotion of mental and physical health - Incorporating green space and healthy design principles, to encourage good physical and mental health. Recognition of health as a principle that cuts across all policies in the plan.	**WE WILL:** **OB1:** Recognise the link between the places and spaces that we live in and the quality of residents' mental and physical health. **OB2:** Work closely with healthcare providers to develop policies that promote good physical and mental health as an outcome.
V2. Achievement of the Council's Net Zero aspirations - Significantly reducing carbon emissions and adapting to a changing climate.	**OB3:** Ensure the Council's net zero objectives influence all development taking place in the District. **OB4:** Provide sufficient flexibility in policies to enforce changing national standards, best practice and evidence base updates that will enviably occur over the plan period. **OB5:** Allow residents to make lifestyle choices that make a positive contribution to net zero objectives.
V3. Delivering design excellence in our built environment that responds to our distinctive local character and creates the heritage of the future - Demanding well-designed spaces that deliver exceptional places to live, work and relax, provide innovative ways to support mental and physical well-being.	**WE WILL:** **OB6:** Deliver a character-led-approach to development that demonstrates the Government's priorities for well-designed places. (National Design Guide, 2021: The Ten Characteristics of Place). **OB7:** Require the production of design codes for new development that meet the provisions of national planning guidance.
V4. Homes to meet identified needs – Boosting the supply of homes including much needed affordable homes across the District:	**WE WILL:** **OB8:** Deliver market and affordable homes to reflect the latest information on housing needs. **OB9:** Optimise the supply of new homes in existing settlements. **OB10:** Ensure new housing development makes best and most efficient use of land.
V5. Greater economic competitiveness - Through vital and viable, unique and flexible town centres, capitalising on the strategic location of the District and its functional economic links. Ensuring the delivery of the right type of employment space and supporting the rural economy are equally important in encouraging economic competitiveness.	**WE WILL:** **OB11:** Promote resilient and agile town centres that are able to respond to change. **OB12:** Encourage the delivery of workspace to meet occupier demands. **OB13:** Safeguard land to meet employment needs over the plan period.
V6. Continuing to protect and take opportunities to enhance our irreplaceable historic and natural environment – Our district's valuable natural and historic built environment makes an important contribution to the quality of life of our residents and all who visit.	**WE WILL:** **OB14:** Ensure the District retains a high quality natural environment over the period of the Local Plan. **OB15:** Support the principles of bio-diversity net gain
V7. Delivery of sustainable and equitable infrastructure - To meet the needs of all residents, regardless of ethnicity, gender, age, disability or social group. In transport terms, we want to encourage sustainable transport choices, as long as the approach does not alienate particular groups – for example, an active travel strategy that provides genuine choices for an aging population. Community infrastructure should be provided to meet the needs arising from planned growth, particularly in relation to health and education.	**WE WILL:** **OB16:** Work with stakeholders to address barriers that prevent residents from making sustainable transport choices. **OB17:** Support equal access to public transport services for all residents. **OB18:** Co-ordinate the delivery of necessary infrastructure to support planned growth
V8. Embracing emerging trends, such as smart technology - Future proofing and allowing flexibility, promoting innovation.	**WE WILL:** **OB19:** Acknowledge smart technology as an emerging trend that is likely shape development in the District. **OB20:** Champion the use of smart technology, where it is able to address the key issues facing the District over the period of the plan.
V9. Responding to demographic change - Addressing migration trends and demographic pressures.	**WE WILL:** **OB21:** Bring forward policies with sufficient flexibility to respond to future demographic changes that will shape the District over the plan period. **OB22:** Ensure demographic shifts form the starting point for future evidence base and discussions with neighbouring authorities.
V10. Continued engagement with neighbouring authorities - Including London Boroughs.	**WE WILL:** **OB23:** Continue to work with neighbouring authorities to respond to strategic matters.

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"

Development Strategy

01

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This Plan will deliver the new homes that our communities need, the right type of employment spaces and vibrant high streets to ensure a healthy economy and new infrastructure to support growth, whilst protecting the natural environment and our built heritage. This development strategy seeks to achieve these goals.

Development Strategy

01

Strategic objectives:

OB3: Ensure the Council's net zero objectives influence all development taking place in the District.

OB10: Ensuring new housing development makes best and most efficient use of land.

OB18: Co-ordinate the delivery of necessary infrastructure to support planned growth.

OB23: Continue to work with neighbouring authorities to respond to strategic matters.

Sevenoaks District is subject to numerous social, economic and environmental pressures that define our complex and often competing development needs. New homes are required for a growing population and must be delivered if the District is to remain economically competitive and supporting infrastructure is essential, if planned growth is to be truly sustainable. The need to protect our green and natural spaces for current and future populations, has also never been greater. The proposed development strategy within this chapter provides a framework to meet these needs.

CHURCH MEWS

" New homes are required for a growing population and must be delivered if the District is to remain economically competitive

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1.1   This Local Plan focuses on delivering the Council's Spatial Vision for 2040 and meeting the overarching objective of national planning guidance to bring forward sustainable development. It is prepared at a time of uncertainty across the three pillars of sustainability resulting from the societal changes that are emerging from the Coronavirus pandemic, economic instability and environmental impact of climate changes. The future direction of national policy also remains unclear and it is important that the Plan incorporates sufficient flexibility to respond, as these matters are resolved.

1.2   In addition to meeting District-wide development needs, the Local Plan will plan positively for new development and once adopted, will have primacy in planning decisions. This means the Council will be required to determine planning applications in accordance with policies, unless material planning considerations indicate otherwise. The Council expects new development proposals to reflect the conclusions of relevant evidence base documents that have informed the production of policies in this document.

1.3   The Local Plan must be positive in planning for new homes to meet our pressing needs and some difficult choices will need to be made in seeking the right balance between providing new homes supported by infrastructure, protecting and enhancing the natural, built and historic environment, and supporting the urban and rural economies. It is vital that new development makes best and most efficient use of land in sustainable locations whilst ensuring that new development is designed to the highest quality and helps to meet our net zero 2030 commitment.

"
To meeting District-wide development needs, the Local Plan will plan positively for new development and once adopted, will have primacy in planning decisions.

Summary of Development Needs

1.4   This Local Plan considers how best to meet identified development needs, as far as possible, given wider objectives. The headline needs for this District are:

- 714 homes pa (a figure provided by central government),
- 5.7 ha of employment land
- Maintaining existing level of retail floorspace.

1.5 The government provides a standardised assessment methodology for assessing housing need, which is based on household projections produced by the ONS that are adjusted to take account of affordability. For Sevenoaks, this means the provision of 714 homes per year. To put this figure in context, this would triple the approximately 250 homes which have been delivered each year over the past 10 years. Rolled forward, the Council's housing need for the entire Plan period (2022-2040) is 12,852 homes. Due to difficulties in supply over recent years, our housing requirement will also require a buffer of one year (714) to provide flexibility in delivery which results in an overall housing need of 13,566.

1.6   Meeting development needs, particularly housing needs, within a constrained environment is clearly a defining factor for this Plan. But just as important is the need to place a high value on the varied and distinctive places and communities that make up Sevenoaks District and ensure that any new development respects these differences and is designed to respond to **local character**. We want to create healthy **communities**, not just houses, and these places need to be supported by services and infrastructure to promote **well-being**, so people and future generations will choose to live and work in these sustainable locations. We will promote low carbon development to help honour our **Net Zero** 2030 commitment.

1.7   We are working closely with our town and parish councils whom are preparing Neighbourhood Plans for their areas. Where site allocations are proposed in areas that are developing a Neighbourhood Plan, the Local Plan will set the high-level strategic aims in terms of land-use and the approximate quantum of development and the Neighbourhood Plan can provide more detail in terms of design, infrastructure and local character and distinctiveness.

DEVELOPMENT NEEDS PLAN PERIOD 2022 – 2040

13,566 OVERALL HOUSING NEED

7,614 AFFORDABLE HOUSING £

1,044 ELDERLY ACCOMMODATION

43 GYPSY TRAVELLER PITCHES

5.7Ha EMPLOYMENT

RETAIL

2022   **2040**

£   Up to 7,614 (423 per year) genuinely affordable homes

1,044 units of specialist older persons accommodation, of which:
720 units (40 per year) of retirement housing and 324 bedspaces (18 per year) of residential nursing care

43 Gypsy & Traveller pitches

5.7 hectares of employment land, of which:
o4.1 hectares of office use and o1.6 hectares for industrial use

Supporting existing high streets rather than identifying additional retail space

Figure 1.1: Development needs Plan period 2022 - 2040

PLACE MAKING PRIORITIES

WESTERHAM

Growth in tourism and rural economy sector, connectivity improvements, and respect of sensitive AONB location.

SEVENOAKS URBAN AREA

Sevenoaks Urban Area Principal town, intensification of urban area, sustainable growth at station gateway and Tarmac quarry, supporting economic vitality of high street and local businesses.

SWANLEY

Second town, regeneration priority, focusing on the town centre offer. Opportunities for sustainable intensification and infrastructure improvements, capitalising on connections with London.

EDENBRIDGE

Infrastructure improvements, regeneration of High Street, growth of town (residential and economic) to support the provision and retention of facilities and services.

1. Sevenoaks Urban Area
2. Swanley
3. Edenbridge
4. Westerham

Figure 1.2: Place making priorities

Development Strategy – Existing Settlements

1.8 The Council's strategy is to fully explore opportunities to accommodate its strategic development needs in existing settlements. Green Belt land will only be released where there are exceptional circumstances for doing so and all reasonable alternatives have been explored, including opportunities in neighbouring authorities.

1.9 This version of the Plan is central to the Council's development strategy because it focusses on the potential that exists in settlements across the District, particularly in relation to new homes, and explores the opportunities to make the most of land in these areas. Taking account of all strategic objectives and policy requirements the Plan seeks to:

- Promote a character driven approach to meeting development needs;
- Proactively identify suitable and achievable development potential in existing settlements;
- Identify and provide development aspirations and criteria for key development opportunities;
- Encourage proposals that make best and most efficient use of land, including the delivery of development at sustainable densities;
- Support the delivery of new homes on small sites up to 1 hectare in size;
- Actively encourage the exploration of other mechanisms to deliver new homes, such as the intensification of under used land in existing settlements.

1.10 This initial consultation focuses on optimising development within existing settlements, within the boundaries of the District's towns and villages, where inset from the Green Belt. These are the most sustainable locations in the District, well served by public transport and with good access to services and facilities. Focusing development in these areas, in accordance with national policy, will promote sustainable transport choices which are key to achieving the Council's net zero 2030 commitment.

1.11 We have considered urban sites submitted under the call for sites, but have also proactively identified development opportunities, through the Settlement Capacity Study (2022). We have used the brownfield register and other tools to maximise the contribution from previously developed land and have sought to optimise density on these urban sites, using the District-wide character study (DWCS), to guide the form of development, including gentle densification in existing lower density areas, and optimising densities in highly sustainable locations. This plan also explores options for the best use of land, through co-location and mixed-use development, to combine different land uses to ensure the most efficient development scenarios. Further work will be undertaken on all of these aspects as the Plan progresses, to consider whether there is any additional potential available from further increased densities and intensification, informed by the DWCS. This includes opportunities to explore the development potential of land at and surrounding Sevenoaks Station, which is set out in the next section.

1.12 This consultation considers three density scenarios for the settlements, as defined below – Minimum Uplift, Optimum and Optimum + and comments are welcome on these options:

- **Minimum Uplift:**
  Modest density increase across all sites.

- **Optimum:**
  Optimising density on sites, whilst respecting local character, with higher densities in sustainable locations.

- **Optimum + (Maximum change):**
  Opportunities to maximise densities, particularly in town centres and close to transport hubs.

1.13 It should be noted that the minimum uplift scenario will result in greater unmet need which will need to be accommodated in neighbouring areas or in the Green Belt. Further details on density are set out in the Housing chapter.

	Minimum uplift (dph)	Optimum (dph)	Optimum + (dph)
Town centre locations and close to transport nodes	150	Mid-point, to be informed by character based approach	150+
Built up areas	50		150
Edge of built up areas	40		60

HOUSING SUPPLY COMPONENTS

Figure 1.3: Housing Supply Components

HOUSING SUPPLY COMPONENT	DESCRIPTION	MINIMUM UPLIFT	OPTIMUM PLUS
Baseline	Sites with planning permission at April 2022	2,800 (TBC)	2,800 (TBC)
Optimising potential in existing settlements	Sites within existing settlements proposed for allocation	1,200 (TBC)	2,100 (TBC)
	Windfall / small sites allowance	Up to 1,000 (TBC)	Up to 1,000 (TBC)
	Future potential identified in Settlement Capacity Study	665 (TBC)	1,480 (TBC)
Current major development in the Green Belt applications	Sites with planning applications under consideration at April 2022	1,775 + 150 C2 (TBC)	1,775 + 150 C2 (TBC)
Duty to cooperate	Potential identified through discussions with neighbouring authorities	TBC	TBC
TOTAL		**7,440 + 150 C2 (TBC)**	**9,155 + 150 C2 (TBC)**

Figure 1.4: Breakdown of Housing Supply
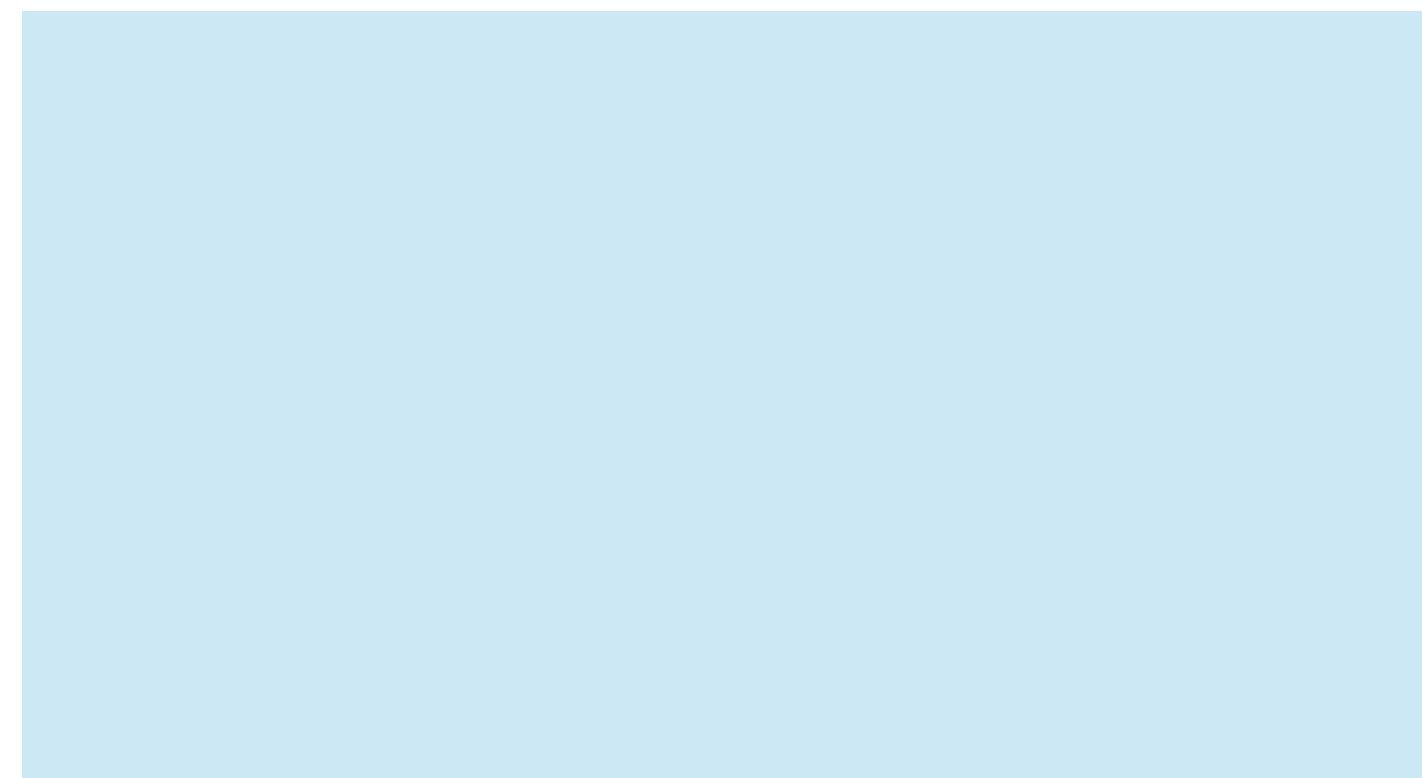
Figure 1.5: Pie charts showing housing supply components by geographical area

Sites within existing settlements submitted into the Call for Sites can be viewed on the SHELAA interactive map here [add link]

1.14 This initial 'settlement focus' starting point is advanced as the 'base' building block for the new Local Plan strategy. By clearly establishing what level of development can be achieved in our settlements, this will inform ongoing discussions with neighbouring authorities, under the Duty to Co-operate, as to whether they are able to assist with accommodating any unmet need. The NPPF (para.141) makes it very clear that before considering Green Belt release, all other reasonable options for meeting development needs should be fully examined. It directs authorities to develop a strategy which first:

- Makes as much use as possible of suitable brownfield sites/underutilised land;

- Optimises density of development, particularly in town centres and locations well served by public transport;

- Is informed by discussions with neighbouring authorities as to whether they could accommodate need.

1.15 However, it should be recognised that there are numerous barriers which may prevent neighbouring authorities from assisting with any unmet needs. Please see Fig. 5 which sets out the strategic constraints within these areas. These authorities are also required to meet their own challenging needs, in addition to potentially meeting the unmet needs of authorities other than Sevenoaks. The challenges of reaching any agreement via bilateral discussions are not insignificant, particularly in the absence of a sub-regional strategy.

1.16 Clearly there will be a balance between how much can be achieved within the highly constrained settlements within Sevenoaks District, which make up 7% of the District, what might be achieved elsewhere in neighbouring authorities through the Duty to Cooperate, and what might be achieved through potential Green Belt release.
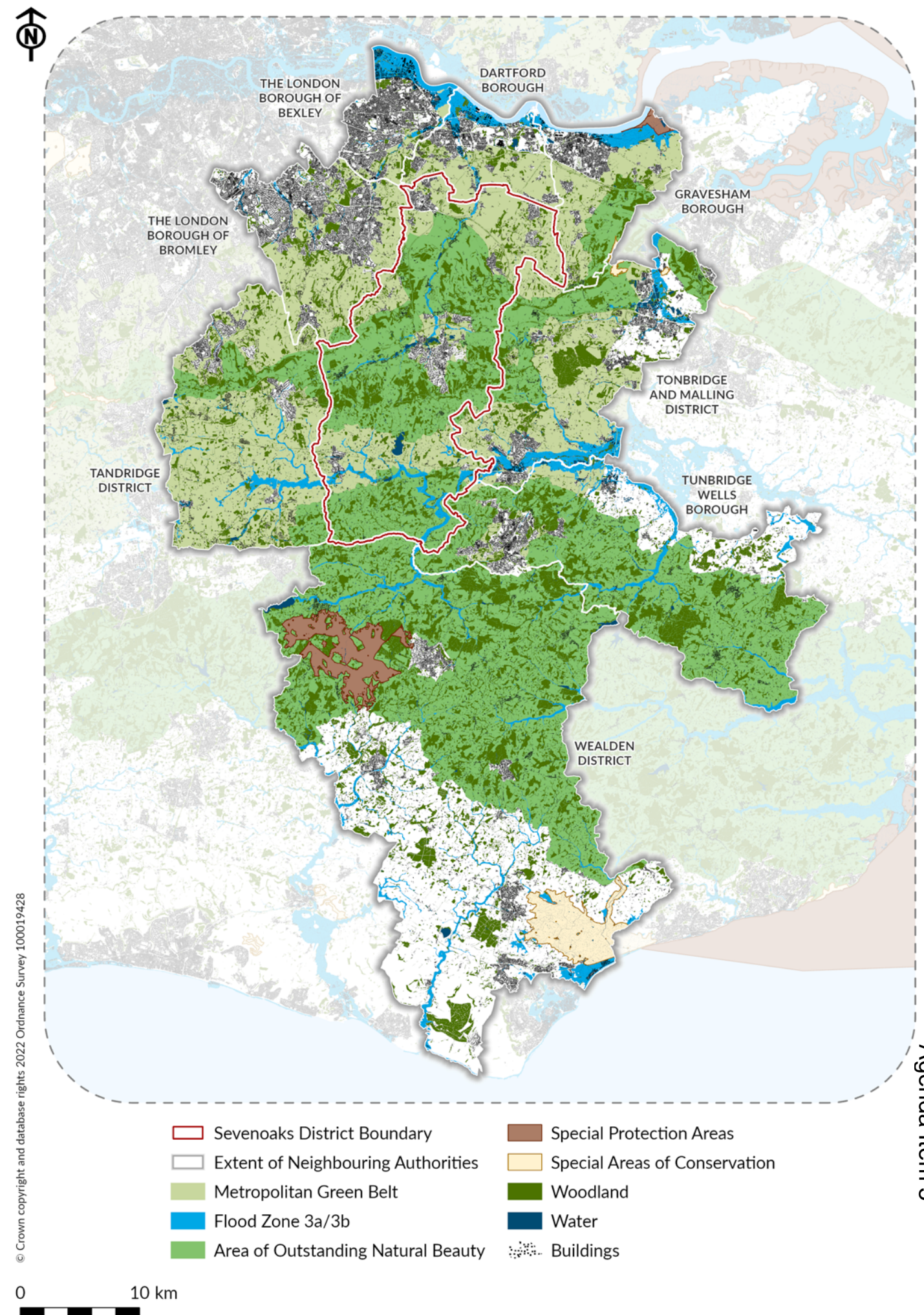
Figure 1.4: Map of constraints in neighbouring authorities

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Policy ST1
A Balanced Strategy for Growth in a Constrained District

It is suggested that the over-arching strategic development strategy for the District focuses on the following priorities:

The balanced strategy for growth over the period 2022-2040, as outlined on the Key Diagram, is to ensure that a minimum of 714 dwelling pa, together with 5.7 ha of employment land are developed, supported by strategic infrastructure and services.

Development should be focused within the boundaries of existing settlements, including building at higher density and optimising the use of previously developed 'brownfield land'. There will be a particular focus on sites that are close to services and facilities and/or well-connected by public transport, walking and cycling.

The four towns within the District - Sevenoaks, Swanley, Edenbridge and Westerham, will sequentially be the focus for development, with more moderate development within the Local Service Centres and Service Villages.

Development proposals for the four towns will be expected to comply with the place-making proposals and priorities listed in the supporting text and emerging Neighbourhood Plans.

We will promote sustainable patterns of development by amending Green Belt boundaries only in 'exceptional circumstances', where there is a clear need, where sites have good access to services and facilities and their release has limited impact on the purposes of the Green Belt. Green Belt release will be required if we are unable to meet needs within existing settlements or via the Duty to Co-operate with neighbouring authorities (and this will be subject to the subsequent Local Plan (Reg.18) consultation in 2023).

www.sevenoaks.or.uk/localplan/policyST1

Consultation Questions:

Our proposed development strategy is summarised below:

> **Step 1:** *: Focus on optimising density and utilising brownfield land in existing settlements (the focus of this Regulation 18 consultation).*

> **Step 2:** *Robust Duty to Co-operate discussions with neighbouring authorities, informed by step 1 and the constraints of the District.*

> **Step 3:** *Green Belt release, where required, in Exceptional Circumstances (to be covered within the subsequent Regulation 18 consultation).*

- *Do you agree with this proposed development strategy? (range)*

We are considering density within existing settlements at different levels – Minimum Uplift, Optimum and Optimum + - which is your preferred approach? (select one of 3)

- *Are you aware of any additional sites in existing settlements which we have not yet considered?*

Supporting evidence

- National Planning Policy Framework (NPPF) including standardised methodology for calculating Local Housing Need
- Targeted Review of Housing Need 2022
- Strategic Housing and Economic Land Availability Assessment – urban sites 2022
- Green Belt Assessment 2017
- Settlement Hierarchy 2022

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Sevenoaks Railway Station

1.17 The Council recognises the development potential of land at and surrounding Sevenoaks Railway Station. There are opportunities to improve the public realm, enhance the arrival experience, complement the nearby town centre and make a meaningful contribution towards District-wide development needs. Development around the station that meets other policies in the Local Plan, supports the Council's wider objective to make best use and most efficient of land in existing settlements, before releasing Green Belt land.

1.18 The Station Area is one of the most accessible locations in Sevenoaks District, with fast and frequent train services to London, the south coast and across the wider county of Kent. Located approximately 750 metres to the north-west of the main retail and commercial core of Sevenoaks town, the station itself comprises a modern glass box style ticket hall to the west of London Road and a surface car park of 517 parking spaces to the east.

1.19 The station buildings are surrounded by an eclectic selection of land uses and under utilised sites, which give a unique but somewhat uncoordinated appearance. Overall, the area would benefit from a clearer sense of identity and cohesion that reinforces its relationship to Sevenoaks town centre, and other nearby development opportunities.

1.20 Working with local stakeholders, the Council will explore the preparation of a development strategy for the Station Area that provides a clear spatial vision, and considers factors such as the quantum and type of uses, scale and massing, development phasing and how these aspirations could be delivered. This work will build on existing evidence and Plans, such as the Town Centre Strategy, District Wide Characterisation Study, Settlement Capacity Study and the Draft Neighborhood Plan for the area.

1.21 Other objectives of the strategy could be to:

- Ensure development is co-ordinated to create a clear identity for the area;
- Bring forward a range of active uses and a vibrant new neighbourhood, which respects existing uses, residents and local character;
- Re-enforce the relationship between the station, the town centre and the wider District;
- Coordinate the proposals with other development opportunities, including Sevenoaks Quarry and Land East of the High Street, to deliver a coherent offer for the town;
- Make the most of the existing public transport accessibility and explore the potential to create a more formalised public transport hub;
- Deliver an enjoyable and attractive environment for local residents and the many thousands of people that pass through the station each year;
- Respond to new ways of living and working that are emerging from the pandemic;
- Create a new destination for Sevenoaks town around the station that adds value and variety and brings prosperity to the wider District.

1.22 In addition to new residential development, it is considered that the area has the potential to support other uses, including flexible workspaces, a retail offer that complements the nearby town create, cultural and community uses and improvements to the public realm. All of these aspects would be considered in an emerging development strategy.

Consultation Questions:

1. What would you like to see in a development brief for the Station Area?

2. Do you have a view on the area of land that the brief should cover and sites that could be included?

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Natural Environment

08

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Sevenoaks District has a high quality and beautiful natural environment with a predominantly rural character. The sweeping landscape incorporates the chalk hills of the North Downs, stretches of enchanting woodland, historic parkland and areas rich in biodiversity.

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Natural Environment

08

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> "
> The natural environment is a key component of the character of the District

Strategic objectives:

OB14: Ensure the District retains a high-quality natural environment over the period of the Local Plan including delivering a 20% bio-diversity net gain on new development.

Sevenoaks District is an attractive place to live and work. The natural environment is a key character component of the District and should be conserved and enhanced for current and future generations.

8.1 More than 60% of the District lies within the Kent Downs or High Weald Areas of Outstanding Natural Beauty (AONB) and 11% of the District is covered in irreplaceable Ancient Woodland (compared with the UK average of 2%).

8.2 The District is rich in biodiversity and has a range of habitats varying from chalk grasslands, acid grassland, woodlands, rivers and open water and heathland.

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0   5 km

N

- ☐ Sevenoaks District Boundary
- Areas of Outstanding Natural Beauty
- Biodiversity Areas
- Parks, Open Spaces and Woodland
- Rivers and Areas of Open Water
- Urban Area

SWANLEY

LULLINGSTONE COUNTRY PARK

SEVENOAKS WILDLIFE RESERVE

SEVENOAKS

WESTERHAM

KNOLE PARK

EDENBRIDGE

BOUGH BEECH RESERVOIR

11%	Ancient Woodland
61%	AONB
42	SSSI
63	Local Wildife Sites
3	Rivers

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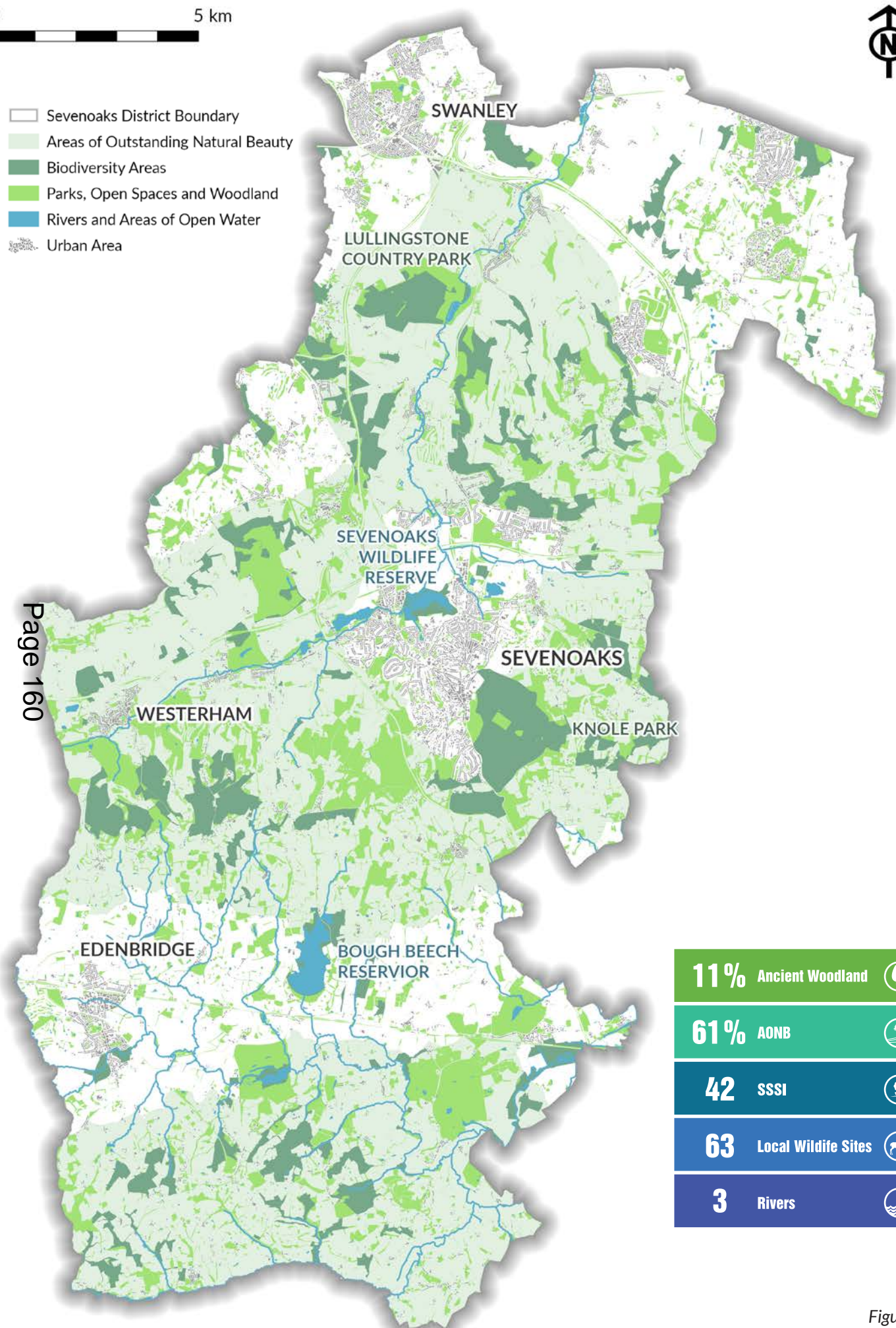
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Figure 8.1
Key Natural Environment Features of Sevenoaks District

Landscape and Areas of Outstanding Natural Beauty

8.3 The Landscape Character Assessment 2016 provides a detailed review of the entire District including the AONBs. National policy and legislation already set out how the different designated areas should be managed and protected.

8.4 Developments in AONBs are expected to be modest and in line with the NPPF. They should conserve and enhance the District character of the AONB. Proposals should take account of the relevant Management Plan and associated guidance to produce sensitive and carefully designed schemes.

8.5 New developments should enhance the character of the AONB and the Management Plans can help to guide how a scheme may achieve this. Enhancements may include:

- Improvement of scenic beauty such as, the removal or improvement of currently detrimental buildings or features; or by obscuring or distracting from negative features such as pylons, substations and major roads;
- Supporting climate mitigation and resilience;
- Restoring historic features and replacing existing materials with more appropriate and local materials;
- Supporting the local economy by using local materials, including features reliant on local materials such as wood for biomass boilers, supporting new rural business etc.;
- Restoring historic settlement patterns, historic field patterns or historic routeways;
- Allowing new appropriate public access;
- Restoring native planting and natural features including trees, hedgerows, meadows and grassland;
- Improving tranquillity and reducing the existing impact of noise and lighting.

Policy NE1
Landscape and Areas of Outstanding Natural Beauty

This policy will set out local requirements to:

- Conserve and enhance the distinctive features that contribute to the special character of the District in line with the Landscape Character Assessment, AONB Management Plans and associated documents;

- Guide development in the AONB in line with the NPPF including managing major development;

- Ensure developments within the AONB reflect the distinctive high quality area by identifying specific design criteria;

- Require Landscape and Visual Impact Assessments for larger development proposals.

www.sevenoaks.or.uk/localplan/policyST1

Consultation Questions:

1. *What could be included in the policy and design criteria for developments in the AONB?*

2. *Do you agree that Landscape and Visual Impact Assessments should be required for all new large developments?*

Partnership Working in the Natural Environment

8.6   Projects which provide improvements to the natural environment, increase public enjoyment, promote climate resilience and provide health benefits both at the landscape scale, such as the Darent Valley Landscape Partnership Scheme and the Sevenoaks Greensands Commons Project, and at the local scale, such as woodland management projects, will be supported by the Council.

8.7   There are emerging proposals around the Bough Beech reservoir and Bore Place sites (see figure 8.2), for potentially opening up Bough Beech reservoir to be more of a community resource. We will continue to work closely with both Bore Place and Sutton and East Surrey Water Services, to enhance the linked sites for people and nature.

8.8   This exciting project will play a part in delivering health and wellbeing (both physical and mental) over the plan period which is a central theme in this Plan. Nature and biodiversity and resilient employment are also local priorities, and this is likely to align well with many of the economic and environmental policies of the Council. Further information on this important site, which represents an significant opportunity for the District, will be included in subsequent versions of plan as it progresses towards adoption.

> *There are emerging proposals around the Bough Beech reservoir and Bore Place sites, for potentially opening up Bough Beech reservoir to be more of a community resource.*

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Legend

☐ Sevenoaks District Boundary
☐ Bough Beech Reservoir
★ Bore Place
🚉 Railway Station
---- Railway Line
— Primary Road
— B Road
— Minor Road
⋯ Buildings
■ Woodland
■ Water

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0   2.5 km
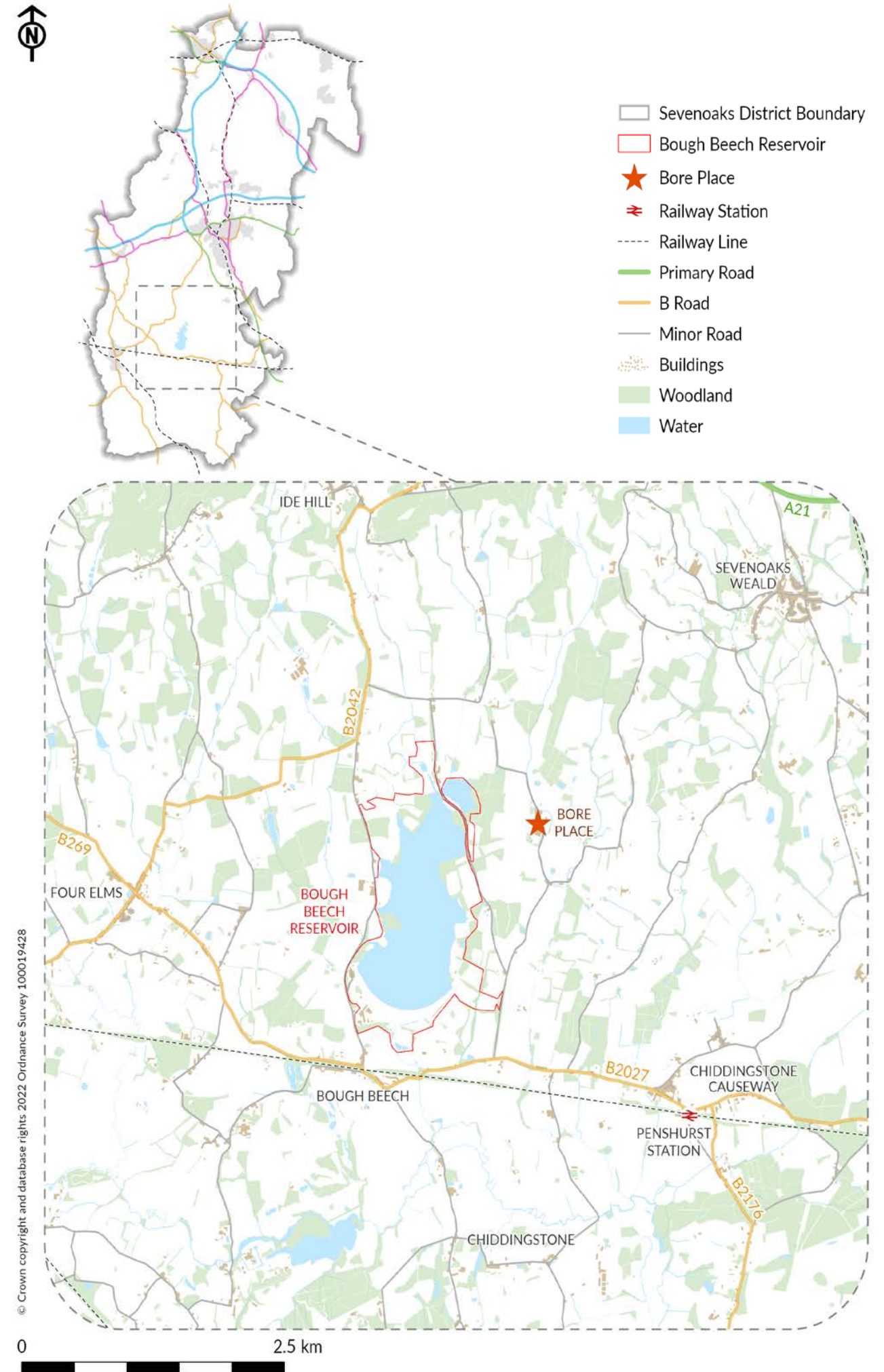
Figure 8.2 Bough Beech Reservoir and Bore Place

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"

The District has a number of nationally designated sites which will be shown on the policies map. There are also has a number of locally designated sites including Local Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves, Kent Wildlife Trust Reserves.

Biodiversity and Ecosystems

8.9 Sevenoaks District has a wide range of habitats and protected areas, including 42 Sites of Special Scientific Interest, 63 Local Wildlife Sites and 19 nature reserves.

8.10 The District is home to a number of nationally designated sites which will be highlighted on the policies map. There are also has a number of locally designated sites including Local Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves, Kent Wildlife Trust Reserves. These are protected for their biodiversity and ecological value.

8.11 The The various ecological and habitat components across the District, alongside other areas of open space, are collectively known as the blue green infrastructure network. The network consists of the following sites and is shown as an interactive map:. Land of biodiversity value, including:

- Sites of Special Scientific Interest (SSSIs);
- Registered Historic Parks and Gardens;
- Land designated under the Countryside and Rights of Way Act 2000 (CROW) including Common Land and Public Rights of Way;

- Local Wildlife Sites;
- Nature Reserves;
- Woodland and Ancient Woodland;
- Country parks;
- Trees subject to Tree Preservation Orders;
- River corridors and open bodies of water;
- Cycle routes;
- Sites identified in the Kent Compendium of Historic Parks and Gardens;
- Sites designated as Open Space including:
  - Amenity Greenspace;
  - Natural and Semi-natural Greenspace;
  - Provision for Children and Young People;
  - Outdoor Sports facilities, playing pitches and playing fields;
  - Allotments and community gardens
  - Green corridors;
  - Cemeteries and Churchyards.

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Policy BW1
Safeguarding Places for Wildlife and Nature

This policy will seek to:

- Protect the blue green infrastructure network;

- Designate biodiversity areas that are not already protected through legislation such as Local Wildlife Sites;

- Support schemes and projects to enhance the blue green infrastructure network.

www.sevenoaks.or.uk/localplan/policyST1

Consultation Questions:

1. Is there anything else that should be identified as part of the District's blue green infrastructure network?

2. Do you agree that locally designated sites should generally be protected from development?

Ashdown Forest

8.12 There are four internationally important sites within 10km of the boundary of the District, the most significant of which is Ashdown Forest which lies approximately 6km south of the District boundary. It is internationally important for nature conservation, reflected in its designation as a Special Protection Area (SPA), due to the presence of breeding Nightjars and Dartford Warblers and as a Special Area of Conservation (SAC), primarily due to heathland habitats. The European designations cover around 3,000ha.

8.13 The District's nearest settlement to Ashdown Forest is Edenbridge, which is approximately 12km from the site and a 2021 visitor's survey found that less than 2% of visitors to the Forest are from within Sevenoaks District.

8.14 We are members of the Ashdown Forest Officer Working Group and have signed a Statement of Common Ground to demonstrate our ongoing commitment to joint-working on this important issue. Once adopted the Local Plan will be accompanied by a 'Habitats Regulations Assessment' (HRA) to assess whether there are any adverse effect on the integrity of the European sites, as a result of development provided by the Plan, even in combination with other plans and projects. We will continue to work proactively with Natural England, neighbouring authorities and any other relevant bodies to understand the impact of the Local Plan on the Ashdown Forest.

8.15 To date, neighbouring authorities have sought modest developer contributions towards mitigating the impact of recreational pressure from new development, within a 7km zone of the forest. This zone just reaches into the District (a very small area around Fordcombe and Cowden as shown in figure 8.3), but there currently is no development proposed in these areas as it is entirely washed over by the Green Belt. However, due to the possibility of windfall development, Natural England has recommended that Strategic Access Management and Monitoring (SAMMs) contributions are sought, to allow any windfall development within the 7km zone to proceed, whilst addressing their impact on the forest.

8.16 As there currently are no proposed site allocations within the 7km zone in the District, a strategic Suitable Alternative Natural Greenspace (SANG) is unlikely to be feasible but we will explore options for alternative provision. Tariff guidance is set out in the following document and is currently set at £1,170 per new residential unit
www.sevenoaks.gov.uk/downloads/file/1140/ashdown_forest_special_protection_spa_strategy_tariff_guidance

Legend:
- Sevenoaks District Boundary
- Local Authorities
- Special Protection Area
- 7km Special Protection Area Zone
- Railway Station
- Railway Line
- Buildings
- A Road
- B Road
- Minor Road
- Woodland
- Water

Figure 8.3 – Ashdown forest

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Policy AF1
Ashdown Forest

This policy will require:

- Any residential development in the 7km zone to provide a strategic access management and monitoring (SAMMs) contribution to address visitor impact on Ashdown Forest, in line with the SAMM strategy;

- Major development within or adjacent to the 7km boundary to be assessed on a case by case basis to determine any additional mitigation measures.

www.sevenoaks.or.uk/localplan/policyST1

Consultation Question:

1. *Do you agree with the approach to protecting the Ashdown Forest?*

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Biodiversity in Development

8.17 Biodiversity is found throughout the rural and urban areas of the District. All development can have a positive impact on biodiversity and should provide a measurable net gain.

8.18 Access to the natural environment and areas of high biodiversity value supports our spatial vision. It can also have a positive impact on health and wellbeing and can help reduce social and health inequalities. We are supportive of countryside projects such as community led habitat management, health walks and wildlife/nature experiences especially those which encourage children and young people to engage with the natural environment.

8.19 Blue green infrastructure is essential to mitigating and adapting to climate change, ensuring that future generations can enjoy a healthy and thriving environment for years to come. The Council has committed to helping the District reduce carbon emissions and become more resilient to a changing climate through its Net Zero 2030 commitment.

8.20 The Council will continue to work with partners to develop projects to strengthen the blue green infrastructure network and improve access to and the understanding of the natural environment. Partners include:

- The North West Kent Countryside Partnership
- Kent Wildlife Trust
- Kent Downs and High Weald AONB units
- Town and Parish Councils

8.21 Working with local authorities across Kent and Kent County Council, the Kent Nature Partnership, has concluded that a 20% target for biodiversity net gain for new development should be included in Local Plans. This is supported by a Kent wide viability study. A 20% target for Sevenoaks District is under consideration, and will be tested in the forthcoming viability assessment.

8.22 A Supplementary Planning Document covering biodiversity net gain will be prepared to set out the detailed requirements for biodiversity net gain and will include both on-site and off-site net gain provision.

Policy BW2
Biodiversity in new development

This policy will seek to:

- Achieve 20% biodiversity net gain from new development;
- Ensure proposals incorporate natural environment measures that help to support biodiversity, mitigate climate change and integrate climate resilience.

www.sevenoaks.or.uk/localplan/policyST1

Consultation Question:

1. *Is the 20% biodiversity net gain target appropriate for Sevenoaks District?*

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Appendix 3

Consultation Plan

Sevenoaks District Local Plan – Regulation 18 Consultation Plan

Wednesday 16th November 2022 – Wednesday 11th January 2023 (8 weeks)

Consultation

The consultation will be hosted and run via our online consultation database, Citizen Space. Stakeholders will be able to respond to as little or as many questions as they decide.

Our preferred method of response will be online via the consultation portal, however comments will also be accepted by email to planning.policy@sevenoaks.gov.uk or by post to the Strategic Planning Team, Council Offices, Argyle Road, Sevenoaks, Kent, TN13 1HG.

Printable versions of the response form will be made available to download from our website and will be provided to all Libraries and Town and Parish Councils across the District.

Publication

We will work with the Communications Team to put together a Social Media campaign, including targeted posts on Facebook, Twitter, Instagram and LinkedIn. This will include regular posts throughout the consultation period.

We will also organise a Public Notice, as well as an article in the Sevenoaks Chronicle to publicise the consultation. An article has also been prepared for the Autumn edition of InShape, which will be delivered to all households within the District.

Commuters are seen as a hard to reach group, and therefore Officers will visit the key commuter stations within the District to distribute leaflets publicising the consultation.

A hard copy document, along with posters, postcards and leaflets will be delivered to all libraries and town and parish councils in the District, ahead of the start of the consultation. They will also be provided with further information on the consultation, including a link to the printable response form.

A QR code will be created and included on all posters, postcards and leaflets. This will link directly to the consultation online. It is envisaged that the consultation will also be included in SDC email footers and auto-responses.

Stakeholder Engagement

It is proposed that the Strategic Planning Team will host four Drop-in Sessions as set out below:

- Sevenoaks Town
- Swanley
- Edenbridge
- Sevenoaks Town ("Mop up session")

Officers will also explore the option to run Drop-in Sessions via Zoom.

It is also proposed that Officers attend sessions at the Districts secondary schools, as set out below, to speak with older students about the purpose of the Local Plan and consultation. This is likely to include a non-technical summary of the Regulation 18 consultation and a 'slimmed down' consultation response form.

- Trinity School
- Knole Academy
- Orchards Academy
- Weald of Kent Grammar School – Sevenoaks Annex
- Tunbridge Wells Boys Grammar School – Sevenoaks Annex

It is also envisaged that the Planning Policy team will attend the Local Strategic Partnership meeting on Monday 28th November 2022, and the Town and Parish Council Forum on Thursday 20th October 2022.

We will inform all Councillors and Town and Parish Councils when the Development and Conservation Advisory Committee (DCAC) papers are made publically available.

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Item 06 – Leader Programme Closure Report

The attached report was considered by the Improvement & Innovation Advisory Committee on 4 October 2022. The relevant Minute extract was not available prior to the printing of this agenda and will follow when available.

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LEADER PROGRAMME CLOSURE REPORT

Cabinet – 13 October 2022

Report of: Detlev Munster – Strategic Head Property and Commercial

Status: For Consideration

Also considered by: Improvement & Innovation Advisory Committee – 4 October 2022

Key Decision: No

This report supports the Key Aim of:

Increased economic growth making Sevenoaks District a location of choice for business and providing local jobs – Community Plan 2022-2032

Encouraging businesses to locate within the District and West Kent - Economic Development Strategy 2022-2027

Ensuring businesses are able to access suitable support to develop and grow – Economic Development Strategy 2022 - 2027

Portfolio Holder: Cllr Peter Fleming

Contact Officer: Richard Cavanagh, Ext. 7390

Recommendation to Innovation and Improvement Committee: That the recommendations below be recommended to Cabinet

    a) Notes the findings of the report and the on-going auditing requirements regarding post-payment monitoring and file retention;

    b) Notes the 2014 LEADER programme successfully awarded £1,812,550 of grant funding to rural businesses in West Kent, which in turn leveraged over £4.5m of investment into the sub-region's economy and notes;

    c) Notes that the Government has awarded Rural England Prosperity Funding to Sevenoaks District Council and the Council will seek to apply the good practices learnt from the LEADER Programme and build on its Legacy.

Recommendation to Cabinet: That Cabinet

    a) Notes the findings of the report and the on-going auditing requirements regarding post-payment monitoring and file retention;

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b) Notes the 2014 LEADER programme successfully awarded £1,812,550 of grant funding to rural businesses in West Kent, which in turn leveraged over £4.5m of investment into the sub-region's economy and notes;

c) Notes that the Government has awarded Rural England Prosperity Funding to Sevenoaks District Council and the Council will seek to apply the good practices learnt from the LEADER Programme and build on its Legacy.

Reason for recommendation:

The LEADER Programme has now come to an end, and an evaluation report was undertaken. The evaluation report points out that the programme had a positive impact on the District's rural economy stimulating growth and employment. The Council intends building on LEADER's legacy and use the knowledge gained to help deliver a new rural economic development programme.

1. Background

West Kent LEADER is a source of grant funding available to farmers, growers, foresters, rural businesses and communities to help secure a sustainable future for rural West Kent. LEADER is a bottom-up, community-led approach to the delivery of the Rural Development Programme for England (RDPE), funded by the EU European Agricultural Fund for Rural Development (EAFRD).

West Kent LEADER covers the West Kent Partnership area of Sevenoaks, Tunbridge Wells and Tonbridge & Malling and is managed by Sevenoaks District Council, as the Accountable Body (AB).

The current programme has been running since 2014 providing important grant funding to local rural businesses to support the rural economy.

2. Accountable Body

SDC has been the Accountable Body for West Kent LEADER for both this programme and its predecessor and is tasked with delivering the programme on behalf of the West Kent Partnership. LEADER staff at SDC are externally funded by the Rural Payments Agency (RPA).

3. Evaluation of the LEADER Programme

As part of the closure of the LEADER programme, West Kent has drafted an **Evaluation Report** in partnership with other LAG areas in Kent and Surrey, whom have been informally networked under the auspices of the 'Kent Surrey Sussex LEADER Network'. This Network of SE England LEADER partners has met monthly for the last two LEADER programme rounds, dating back to 2009. The Network was set-up to share best practice and encourage knowledge sharing between the LAG partners, to offer mutual support and advice on managing the LEADER programme, and to discuss and feedback on national LEADER and wider-rural policies and LEADER-specific processes with 'one-voice'. Sussex declined to take part in the evaluation, which was not a mandatory obligation for LAGs to undertake.

In addition to an evaluation of the success of the programme in West Kent (and the other LAG areas), the report also includes feedback from Executive Local Action Group members (the decision-making body which assessed grant applications and awarded funding), as well as a sample of grant beneficiaries.

It should also be noted that the outputs referenced in the Report are forecast outputs as whilst the project grants were administered during this programme round, the delivery of outputs extends until 2024. There is an ongoing post-payment monitoring requirement for Sevenoaks District Council to liaise with projects and undertake annual checks to make sure outputs have been achieved – a process which was temporarily suspended during the Covid pandemic.

The final draft Report is attached at **Appendix A** for members to note. A Future Funding paper is also attached at **Appendix B**, with recommendations on how a future scheme should be implemented. A summary of the key findings are below.

4. Key findings

Projects Portfolio

The Level of Uptake and Grant Awards

- During the course of the programme, 109 Expressions of Interest (EOIs) were received from proseptive grant applicants. Of these, 56 were awarded a grant. This represented a conversion rate of 51% from EOI to funded project status.

- Subsequently, six of the grant funded projects withdrew after being issued with their Grant Funding Agreement. As such, West Kent has ended the programme period with **50 projects**.

Grant Sizes

- The smallest grant awarded was **£3,820** and the largest was **£149,762**. The average grant size in West Kent was **£36,251**.

- In all, 29 projects supported low level grant projects (under £20,000). This equates to roughly 60% of the projects awarded funding.

- For larger grants, West Kent awarded 9 projects grants of over £50,000, of which 5 projects were each given over £100,000.

- These 9 projects accounted for a total of £929,561, approximately half of the committed spend across West Kent. I.e. approximately 50 per cent of West Kent's total committed spend was awarded to just one-fifth of projects supported.

Leverage

- West Kent LEADER's total grant award of £1,812,550 has overall leveraged £4.5m of investment into West Kent.

- Of the 50 projects which were awarded grant status, 48 projects were at approximately 40% intervention rate (the maximum rate for profit making

projects). The other two projects were awarded grants at 32.5% and 15% of total eligible costs.

West Kent LEADER by district

The split of funding across the 3 local authorities within the West Kent LAG area has been proportionate, with each local authority areas receiving about one-third of the funding each.

The districts which make up the West Kent Partnership have thus far benefited as follows:
- Nineteen businesses in the Sevenoaks District have benefitted from a £609k share of this funding.
- Seventeen businesses in Tonbridge and Malling have received £591k.
- Thirteen businesses in Tunbridge Wells have received £592k.
- An additional sum of £19k has been awarded to a small part of Gravesham which sits in the West Kent area.

Budget and Committed Expenditure

West Kent was allocated **£2,193,593** of LEADER grant funding for the 2014-20 programme period.

- West Kent issued £1,812,550 in grant funding support to projects across the area.
- In addition, £417k has been spent on staffing and indirect running costs to manage the programme.

Performance Delivery

Outputs are still to be fully achieved and recorded as part of the Programme's Post-Payment Monitoring, with some projects to complete their outputs by the end of 2024. As such, investment in projects across West Kent will result in the following **forecast** output achievements:

- Number of jobs created: **74.4**
- Wage bill increase: **£1,454,480**
- Number of additional day visits: **7,101**
- Number of additional overnight visits: **9,862**
- Number of new techniques developed: **27**
- Number of new products developed: **19**

5. Evaluation Report's Conclusions

- **Supporting farming, forestry and rural businesses:** The LAG gave priority to supporting farming, forestry and rural businesses, with a target of directing 70% of the programme's grant resources to these sectors. This target was achieved with 80.9% of the programme's grant committed spend being allocated to the farming, forestry and rural businesses.

- **Distribution of funding across West Kent:** The West Kent LEADER programme has been successful in splitting their allocation of funding broadly equally between the 3 main district councils which make up the West Kent area.

- Key feedback from Executive members of the LAG highlights issues with the objectives of the current programme, which they believe focusses too much on job creation and not on projects which support the wider community (in contrast to previous programme rounds).

- Both ELAG members and grant beneficiaries believe the current application process is too onerous and deters worthy smaller rural businesses from applying for support. A significant amount of funding awards are relatively small (the majority of funds awarded by West Kent were under £20,000). There is a feeling that the onerous nature of the current application process encourages applications larger businesses adept at bidding for funding and results in the same people and businesses being award funding. The Report therefore recommends smaller grant applications require less scrutiny than those applicants requesting larger level of investment.

- Overall, the Report recommends that any future funding scheme utilises the LAG local-led delivery model and the current structures and networks in place under the current LEADER programme. However, the Report also recommends a future scheme places less emphasis on job creation and greater support for community groups and projects (as was the case for the previous LEADER programme, 2006-13), and that the application process is simplified for those applicants requesting smaller levels of funding (e.g. under £20,000).

6. Sevenoaks District Council's ongoing obligations

The 2014-20 LEADER programme will officially close on the 31 December 2022. However, as part of the UK Government's obligations to the EU LEADER (and wider structural fund) programmes, we are required to carry out various reporting functions beyond this closure date for monitoring and auditing purposes. Under the terms of SDC's contract with Defra, the Council's ongoing obligations include:

- Post Payment Monitoring: All closed projects have to be monitored on the delivery of their contracted outputs for the three years after their final grant payment. Advice from the RPA is not to currently approach projects we identify as having been significantly disaffected by Covid (e.g. to check on job creation targets when baseline staff have been furloughed and businesses are not allowed to open to customers). As a rule, projects have split their outputs over a three-year period from receipt of their last claim. According to this time-scale, SDC will be required to report on post-payment monitoring outputs up to the end of 2025.

- Archival of LEADER documents: Under the terms of our LEADER contract, the Council is obliged to hold all LEADER documentation for a period of 7 years beyond the closure of the programme, up to 31 December 2029. This is in order to comply with EU audit requirements (e.g. should the EU, or the UK Government, request to undertake a retrospective audit of a project). To accommodate this, a Service Level Agreement is being drafted for Sevenoaks District Council to archive all 2014-20 project documents up to 31 December 2029.

7. New Funding

In September 2022, Government announced details of the Rural England Prosperity Fund. The Rural Fund is a top-up to the UKSPF and is available to eligible local authorities in England. It succeeds EU funding from LEADER and the Growth Programme which were part of the Rural Development Programme for England. Sevenoaks District Council was awarded

an indicative amount of £501,308 and Tonbridge and Malling Borough Council and Tunbridge Wells Borough Council were also awarded funding.

The new Fund is complementary to the UK Shared Prosperity Fund, and the Council is required to update its UKSPF investment plan by the end of November 2022. Once the investment plan is approved by Government, the Fund will take effect from the 01 April 2023 and will provide capital funding to:

- support new and existing rural businesses to develop new products and facilities that will be of wider benefit to the local economy. This includes farm businesses looking to diversify income streams; and
- support new and improved community infrastructure, providing essential community services and assets for local people and businesses to benefit the local economy

The Council is currently in discussions with its West Kent partners to determine how best it can collaborate in delivering this new Fund and build on LEADER's legacy.

Other options Considered and/or rejected

Not applicable to this report.

Key Implications

<u>Financial</u>

Not applicable to this report

<u>Legal Implications and Risk Assessment Statement</u>

Not applicable to this report

<u>Equality Assessment</u>

Not Applicable to this report

<u>Net Zero Implications</u>

Not Applicable to this report

Appendices

Appendix A – Kent & Surrey LEADER Evaluation Report (Final Draft)
Appendix B – Future Funding Paper
Appendix C – Grants Actual and Committed by Local Authority

Background Papers

None

Detlev Munster
Strategic Head of Property and Commercial

Kent & Surrey LEADER Evaluation Report - Draft

Produced on behalf of East Kent, Kent Downs and Marshes, West Kent and Rural Surrey LEADER Programmes

Report structure

The report is structured as follows:

- **Part 1** provides an introduction to the report

- **Part 2** provides an overview of the national LEADER Programme in England, the National Priorities and how the LEADER programme operates at a local level via a system of Local Action Groups and the principle of Community Led Local Development.

- **Part 3** individually examines each of four LAG Programme areas across Kent and Surrey and will look at:
  - Headline analysis for each LAG area, including the quantified core outputs and impacts to date and anticipated in the future
  - The resulting project portfolio for each area, including the volume and type of projects approved in each LAG area and the split of investment by national priorities and local themes.
  - Case studies for each LAG Programme area

- **Part 4** looks at the processes involved in the delivery of LEADER across the 4 LAG areas, with feedback from grant beneficiaries, LAG Executive Board members and Accountable Body Programme staff. This section will report on:
  - Cumulative summary of LEADER investment across Kent and Surrey, as well as cumulative outputs
  - In depth analysis of the processes used to identify and approve projects, including publicity outreach and the application and approval process.
  - Feedback on the LAG and Community Led Local Development model from members of the LAG Executive Board
  - Feedback on the claims process
  - Wider economic, environmental and social benefits delivered by LEADER investment as identified by grant beneficiaries

- **Part 5** provides conclusions and lessons learnt from the four programme areas.

Part 1: Introduction

The LEADER Programme is a rural community-led, local development scheme (CLLD) providing funding and advice for projects in England which help businesses and rural communities to grow and develop the local rural economy.

As part of this, Programme grants to assist rural businesses and communities were awarded by a network of Local Action Groups (LAGs). For the 2014-20 Programme, 79 LAGs operated across England.

LAGs are entirely autonomous in their decision-making and represent an agreed, defined area. Regional Groupings were formed for reporting back to the Rural Payments Agency and Defra. The **South-East of England Group 1 (SE1)** covers the LAG areas of Kent, Surrey and Sussex.

The South-East LEADER Group 1 and the Kent, Surrey, Sussex Network

The LAG areas in Kent, Surrey and Sussex oversaw six separate LEADER Programmes, each managed by their own respective LAG under the direction of an accountable body (usually a local or county council) which were responsible for providing administrative support and governance to the LAG. The Accountable Bodies were Kent County Council, Surrey County Council, The West Kent Partnership, West Sussex County Council and Plumpton College.

The SE1 Network was particularly active and met every six weeks to not only agree collective responses to the RPA and Defra on policy, but also to share best practice, suggest improvements to the Programme and cooperative working. It was known as **the Kent Surrey Sussex Network (KSS)**.

A Joint Evaluation covering Kent and Surrey

With the exception of the Sussex-based LAG areas (who have undertaken their own internal assessments), the remaining members of the South-East Group covering the LAG areas of **Kent** and **Surrey** have collaborated on this report to undertake a joint-evaluation across their four respective LAG areas.

Together, the Kent and Surrey LEADER programmes have reviewed their LEADER Programmes and explored future socio-economic initiatives for the respective Accountable Bodies to consider and to help inform future rural development/grant programmes as part of any initiatives the UK Government has for replacing EU structural funding Programmes (recognizing that the newly launched Rural England Prosperity Fund – 'REPF' - will provide a funding framework with capital grants for the rural economy for a number of District and Local Authority areas for 2023/24 and 2024/25.)

A joint evaluation is a more comprehensive evaluation

By combining our efforts, the four LAG areas (East Kent, Kent Downs & Marshes, West Kent, and Rural Surrey) are able to provide a **more in depth evaluation** of the

programme across Kent and Surrey. A joint evaluation adds value having access to a larger data set detailing programme expenditure, project type and outputs.

The uncertain nature of replacement funding and the wider regional context

This report aims to make recommendations to support the continued use of LEADER's Community Led Local Development (CLLD) approach to **rural funding** as part of any future UK rural funding replacement scheme. The principle of CLLD remains and should be factored into future models.

Scope of the Report

The aim of this evaluation is to assess the four LEADER programmes across Kent and Surrey, looking at how the programmes have been delivered, the wider benefits achieved due to intervention, and lessons learnt, which can be used to inform and recommend how any future UK rural funding scheme could operate.

This assessment draws on local insights and wider knowledge to evaluate the processes and impact of funding, as well as identifying constructive recommendations and lessons.

- The report will carry out an assessment of the extent to which projects have contributed towards the achievement of outputs and priorities set out in the respective Local Development Strategies and LAG Delivery Plans.

- The report will identify how the experiences of the LEADER Programme can shape future funding opportunities in Kent and Surrey. This will be used to develop a **Future Positioning Paper** on how best to use future rural grant funding such as the REPF as highlighted above to support businesses and rural communities. The Future Positioning Paper will:
    - Identify the key elements of the programme that achieved jobs and growth and any common characteristics shared by successful beneficiaries that could be replicated in future funding.
    - Make recommendations for how LAG partnerships could be improved and adapted to support the delivery of future rural funding.
    - Identify if a CLLD approach would be an effective mechanism to support the achievement of objectives in key regional and sub-regional policies. This will include an assessment of whether the current LAG boundaries are appropriate.
    - Assess whether there were any key elements missing from LEADER, which would have supported businesses to achieve better outputs.
    - Consider the case for the involvement of rural communities in the design, development and delivery of future grant funding in rural Kent and Surrey and the role of animation in delivering this.

Interim evaluation

It should be noted that the nature of LEADER funding is that outputs are typically contracted to be delivered over a period of three years after their final claim has been paid. In addition, due to the COVID pandemic, there is an acceptance that projects lost significant periods of time in which to deliver their original targets. This has resulted in some projects having to re-profile the delivery of outputs to allow for the disruption COVID during 2020-21. Consequently, the success of the programme in terms of outputs achieved cannot be fully measured yet and, in a number of instances, not until the three-year post-payment monitoring has been completed in 2024-5.

Study approach

This document has been drafted in order to record the delivery and impact of the programme across four LAG areas in Kent and Surrey. Data has been drawn from:

- Desk-based research of programme documentation including each of the LAG's Local Development Plans;
- Statistical analysis of contracted outputs and performance indicators by each LAG area and LEADER priority – with raw data taken from, the national database of LEADER projects;
- Primary research to gather qualitative information from a sample of grant beneficiaries from each LAG areas on their experiences, the impact grant funding had on their business or organization and the wider intended and unintended benefits to the rural economy and area.
- Primary research to gather qualitative information on the administration of the fund from members of the 4 Executive Local Action Groups across Kent and Surrey;
- Consultation with the respective Accountable Body programme delivery teams;
- Any other relevant research or studies that demonstrate the effectiveness of LEADER and applying this to the LEADER Programmes in the SE1 area.

Part 2: The LEADER Programme

What is LEADER funding?

LEADER is a European Union structural fund initiative for assisting rural areas to improve their quality of life and economic prosperity, and has been made available to farmers, growers, foresters, rural businesses, environmental and heritage organisations, and communities to help secure a sustainable future.

LEADER is a French acronym which translates as "Liaison Among Stakeholders in Rural Development".

The LEADER Programme (part of The Rural Development Programme for England (RDPE) is a way of spending money on local issues, identified by people living in that area. This bottom up identification of local problems leads to locally tailored opportunities based on the social, economic, environmental and land based needs of the LEADER area.

It is characterised by **autonomous local decision-making.** The money is locally controlled, with decisions about which projects are assisted being made by a Local Action Group (LAG), a group of local volunteers with local knowledge and expertise in their rural area who operate under the established principle of **community led local delivery** to deliver a Local Development Strategy.

LAGs are community panels comprised of volunteer representatives of local private, public and voluntary sector organisations with a wide range of experience and knowledge of local rural issues in their area. Membership includes representatives of forestry, farming rural businesses and community organisations. By bringing together local people with expertise and knowledge of the relevant sectors and the local rural area and economy, each LAG is able to make sure that LEADER funding is being used to fund local responses to identified local needs. The success of LEADER is in its localised decision-making.

How LEADER is delivered across England

From UK Government to Local Action Groups

In England, the **Rural Payments Agency** (RPA) is the delegated body tasked with delivering the Rural Development Programme for England. To document how the funding will be administered and disseminated across England, the RPA produced an Operational Programme setting out the eligibility criteria for awarding funding, the national priorities which LEADER funding needs to deliver against and the process for awarding and disseminating funds across the country.

Local Action Groups

Typically, government grant schemes are usually administered by larger regional organisations, such as Local Enterprise Partnerships or, prior to that, English Government Offices or Regional Development Agencies. The LEADER scheme, however, is based on a much smaller **sub-regional** distribution and management system of grant funding delivery via a network of **Local Action Groups (LAGs)**. Throughout England, there were **79** LAGs in operation at the start of the Programme.

An **Executive Board (ELAG)** is identified from within the wider LAG comprising of individuals who are able to give more time to the development and work of the LAG vis-à-vis helping to co-ordinate, deliver the programme and make funding decisions. In this respect, the ELAG is a subgroup of the wider LAG and the decision-making body tasked with making sure the local programme is being delivered according to the **Local Development Strategy (LDS)** and an annually prepared Business Plan. The ELAGs review full grant applications for approval and check that those projects which are awarded grants deliver against nationally and locally-set priorities. Typically, the ELAG will meet every 6 to 8 weeks.

In the South-East of England covering the counties of Kent, Surrey and Sussex (the South East Group 1 area), there are 7 LAGs in operation.

Accountable Bodies

Each Local Action Group is overseen by an Accountable Body. The Accountable Body is the lead partner for administrative and financial matters, and is responsible for the governance of the Programme in its area. The role involves:

- Contracting with successful applicants for individual projects;
- Providing an internal audit function and procuring external audit (if applicable, depending on fund requirements);
- Processing claims, securing Programme funds from the Managing Authority or nominated payments agency (The Rural Payments Agency)
- Supporting the Local Action Group to ensure correct procedure and compliance;
- Reporting to the Managing Authority on the performance of the LEADER programme in its area.

The Accountable Body will typically be a Local Authority or organization with established procedural governance systems.

Eligibility Criteria

National and Local Priorities

National Priorities

Each Local Action Group makes decisions on LEADER funding based on a set of National and Local Priorities. The National Priorities are laid down by Government (Defra) in the Operational Programme.

The National Priorities for the last LEADER Programme are;

1. Support for increasing farm productivity
2. Support for micro and small enterprises, and farm diversification
3. Support for rural tourism
4. Provision of rural services
5. Support for culture and heritage activities
6. Support for increasing forestry productivity

For all priorities, the emphasis is on providing jobs and growth within the rural area.

Local Development Strategies & Local Priorities

Aligned to the national priorities, Local Action Groups set specific local priorities in a Local Development Strategy (LDS). The LDS will be informed by local economic conditions, needs local policy.

Local priorities are set within local themes and are developed through the local knowledge and experience of LAG members, who represent diverse local sectors including land based businesses, food production, entrepreneurs and SMEs, the environmental sector, community-based, heritage and cultural organisations, and economic development teams within local authorities.

The Local Themes for each LAG are detailed in the following chapters.

What does LEADER fund?

LEADER is a **capital** grant scheme. In other words, it only funded capital projects (e.g. the purchase of equipment or building costs). Revenue funding was only considered in exceptional circumstances.

How much grant funding is available for projects?

The minimum grant allocation was £2,500 (although LAGs were free to set their own levels). The maximum amount varied by priority but was typically between £50,000 and £100,000 (increased under certain circumstances). Grants were awarded at a rate of 40% of total eligible costs for commercial projects, 80% for non-commercial projects and in some circumstances 100% where there was no direct economic gain for the applicant and where the benefits were wholly enjoyed by the local area.

Who can benefit?

LEADER funding was available to:

- Farmers;
- Foresters;
- Tourism businesses;
- Rural businesses;
- Environmental and Heritage organizations
- Voluntary organizations
- Rural community organizations.

To be eligible for funding, applicants had to demonstrate they met at least one of the local investment priorities.   Projects which were able to demonstrate increased job numbers and/or increased productivity were given priority.

Area specific funding

LEADER is also **area-specific** and only applications from within the defined geographical boundary of each LAG were eligible.

Part 3: The Kent & Surrey LEADER programmes

The following section looks at the 4 LEADER areas across Kent and Surrey.

Each section details the local development priorities for the respective areas, how LEADER funding was disseminated and where funding was targetted, and as assessment of how each programme area has delivered against the targets detailed in the Local Development Strategies.

The four LEADER areas are:

- **West Kent LEADER**
- **East Kent LEADER**
- **Kent Downs and Marshes LEADER**
- **Rural Surrey LEADER**

2014-20 Programme

For the 2014-20 programme, there was an additional Government requirement to focus funding on projects which promoted economic growth and job creation. This was a significant change from the previous programme (2007-13), which also supported community projects to support and sustain important community groups in rural areas. A national target of 70 % of project funding was to be allocated to projects that directly delivered jobs and/or growth.

Forecast Outputs

Outputs included in the following LAG area sections are forecasts. They are still to be fully achieved and recorded as part of the Programme's Post-Payment Monitoring, with some projects to complete their outputs by 2025.

Kent Surrey Sussex Network

The end of this section, looks at the Kent Surrey Sussex LEADER Network, comprising the various accountbale bodies tasked with supporting and delivering the LAG programmes across the sub-regional programmes areas in Kent, Surrey and Sussex. As previously explained, this report is focussed on those LEADER programmes in Kent and Surrey only, which make up the majority of the KSS Network.

West Kent LEADER

Summary

- **50** local projects supported
- **£1.812 million** grant awarded, resulting in over **£4.5 million** of investment into West Kent

- Number of jobs created: **74.7**
- Wage bill increase: **£1,454,480**
- Number of additional day visits: **7,101**
- Number of additional overnight visits: **9,862**
- Number of new techniques developed: **27**
- Number of new products developed: **19**

West Kent Area: Overview

West Kent LEADER lies within the three local authority areas of Sevenoaks, Tonbridge and Malling and Tunbridge Wells plus parts of Gravesham south of the A2. In total this is an area of approximately 550 square miles and represents some 38% of Kent.

Local Priorities

West Kent's Local Development Strategy (LDS) committed to give high priority to projects which supported:

- The growth of local farming and forestry enterprises, with an emphasis on job creation and economic growth through diversification, new techniques and products.
- A desire to develop new or expanded existing small and medium-sized rural enterprises, with particular emphasis placed on projects which add value to the rural economy and create additional local employment opportunities.

70% of the programme's grant resources would be allocated to the key areas of farming, forestry and rural businesses. The remaining 30% of funds would support tourism, culture and heritage and rural services (again, with priority given to projects which contributed to job creation and economic growth).

Further to the national priorities and the local needs and challenges highlighted in the West Kent LDS, the LAG set the following **local priorities**:

- Improve competitiveness and financial sustainability of West Kent's farming and forestry
- Encourage innovation and diversification in West Kent's land-based sector
- Support new and existing rural businesses and promote entrepreneurship in rural West Kent

- Encourage the development of local heritage and rural tourism-related businesses
- Promote the provision of additional rural services to encourage vibrant rural communities
- Ensure best practice in land management and promote sustainable development

Programme Delivery

The delivery of the programme is overseen by the West Kent Local Action Group (LAG), supported by the Accountable Body's LEADER Programme Team, with Sevenoaks District Council acting as the designated Accountable Body for the West Kent Partnership.

West Kent Local Action Group (LAG)

The West Kent Local Action Group (LAG) was responsible for drafting the Local Development Strategy (LDS), under the authority of the Accountable Body and making decisions on which projects applicants to award funding.

The wider LAG was developed over the course of the previous LEADER programme and consists of 59 members from across all sectors including local community, public sector, private sector and civil society with a strong landowner / farmer involvement. Membership is representative of the local area and reflects the funding priorities in West Kent, which are to largely support the land-based sector and rural businesses. Some members represent pan-Kent, regional and national bodies, to help ensure that there is joined up thinking across the region with complementary working.

The membership of the ELAG for this programme was 23, which ensured an average meeting attendance of 10 – 12 representatives from the full cross sector of interests, with a wide range of experience and expertise.

The LAG Executive met on average every six to eight weeks and a total of 29 meetings were held over the lifetime of the Programme.

Accountable Body

The West Kent Partnership (WKP), the economic and strategic partnership operating across Sevenoaks District and the boroughs of Tunbridge Wells and Tonbridge & Malling, provides overall management and support for the LEADER programme and has endorsed the priorities as set out in the Strategy.

On behalf of the West Kent Partnership, **Sevenoaks District Council** acts as the accountable body to run the programme across West Kent. Sevenoaks DC has been the Accountable Body for West Kent LEADER for both this programme and its predecessor.

The Programme Team

For the majority of the programme, SDC employed a Programme Manager and Support Officer to deliver the programme, alongside the West Kent Partnership co-ordinator. All three members of staff continued in their roles from the previous LEADER programme, ensuring continuity of expertise and knowledge from the previous round.

The LEADER team sits within the wider Economic Development Team at Sevenoaks District Council.

Programme Overview

Over the course of the Programme, West Kent LEADER:

- Received 109 Expressions of Interest
- Supported 50 projects
- £1.812 million has been awarded in grant funding, attracting £4.5m investment into West Kent
- Projects are projected to create 74.4 jobs

Committed Expenditure

West Kent spent £1.807 in grant funding to September 2022 (with an additional £5,000 to be spent by the end of 2022).

In addition, the Accountable Body has claimed approximately £410k in Running Costs and Animation for staff working on the programme (and any indirect costs incurred).

Projects Portfolio

The Level of Uptake and Grant Awards

West Kent LEADER has supported 50 grant funded projects.

As higlighted above, during the course of the programme, 109 Expressions of Interest (EOIs) were received from proseptive grant applicants. Of these, 56 were awarded a grant. This represented a conversion rate of 51% from EOI to funded project status.

Grant Sizes

The smallest grant awarded was **£3,820** and the largest was **£149,762**. The average grant size in West Kent was **£36,251**.

Distribution of Grant by Size
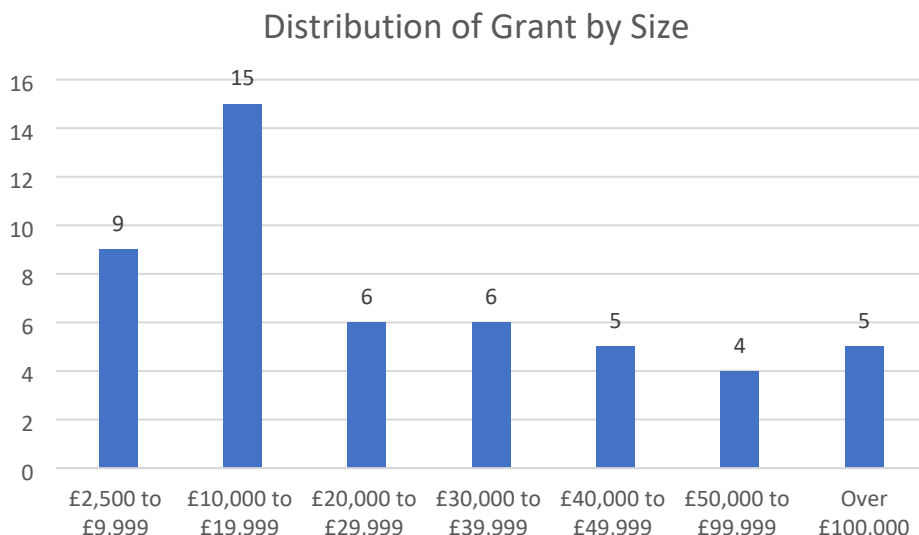
Most funded projects (15) fell within the **£10,000 to £20,000** grouping. In all, 29 projects supported low level grant projects (under £20,000). This equates to roughly 60% of the projects awarded funding. Within this, almost 20% of all grant beneficiaries were for small projects under £10,000.

Leverage

West Kent's total grant award of £1,812,550 has leveraged an additional £2.687m of project investment, resulting in over **£4.5m** of investment into West Kent.

West Kent LEADER by district

The split of funding across the 3 local authorities within the West Kent LAG area has been proportionate, with each local authority areas receiving about one-third of the funding each.

Most projects were awarded to projects in the Sevenoaks District Council area (19), followed by Tonbridge and Malling (17) and then Tunbridge Welles (13).

Despite having slightly fewer projects, Tunbridge Welles actually had a slightly larger share of the total committed spend than Tonbridge and Malling.

Split of West Kent Projects by Local Authority District

£19,000
1
£592,000 13
£609,000
19
£591,000
17

- Sevenoaks DC
- Tonbridge and Malling DC
- Tonridge Welles DC
- Gravesham DC
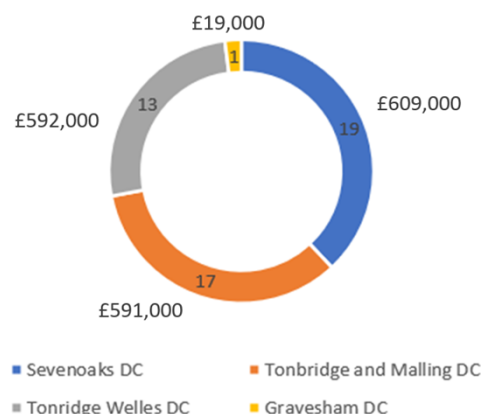
Performance against National Priorities

Type of project beneficiary

Split of projects by National Programme Priority and grant allocation.

Grant Award by National Priority
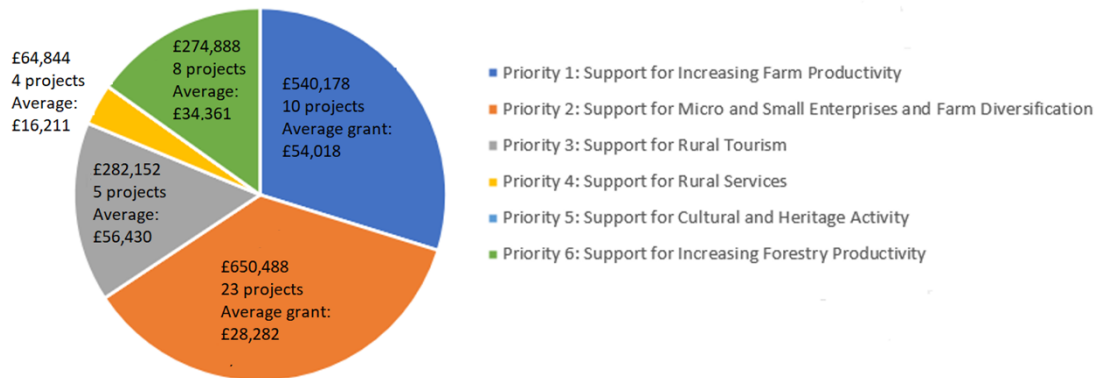
£64,844
4 projects
Average:
£16,211

£274,888
8 projects
Average:
£34,361

£540,178
10 projects
Average grant:
£54,018

£282,152
5 projects
Average:
£56,430

£650,488
23 projects
Average grant:
£28,282

- Priority 1: Support for Increasing Farm Productivity
- Priority 2: Support for Micro and Small Enterprises and Farm Diversification
- Priority 3: Support for Rural Tourism
- Priority 4: Support for Rural Services
- Priority 5: Support for Cultural and Heritage Activity
- Priority 6: Support for Increasing Forestry Productivity

Conclusions

Supporting farming, forestry and rural businesses: The LAG gave priority to supporting farming, forestry and rural businesses, with a target of directing 70% of the programme's grant resources to these sectors. This target was achieved with 80.9% of the programme's grant committed spend being allocated to the farming, forestry and rural businesses.

Distribution of funding across West Kent: The West Kent LEADER programme has been successful in splitting their allocation of funding broadly equally between the 3 main district councils which make up the West Kent area.

WEST KENT CASE STUDIES

COBHAM BOWLS CLUB

THE BUSINESS: Cobham Bowls Club was founded in 1921 and is one of the oldest bowls clubs in Kent. It is affiliated to both Bowls England and Kent County Bowls Association. It is mixed club with approximately 90 bowling members, whose ages range from teens to 90's. It hosts competitive games at National, County and District level, as well as their own Internal Competitions and, equally important, friendly social games with other clubs and amongst members. The club strives to offer something for everybody and seeks to promote the game to all irrespective of age or ability, whether for competition, exercise or general wellbeing.

PROFILE
- **Location** Gravesend, Kent
- **Priority 4: Provision of Rural Services** Investment in new/existing workplace
- **Total Project Cost** - £130,217
- **LEADER Grant -** £19,533
- **Intervention rate** – 15.00%

OUTPUTS
- **Population benefitting:** 1,469

THE PROJECT: Cobham Bowls Club applied for a grant to install a new artificial all-weather bowling green and 4 new floodlights, helping to prolong the bowling life of existing elderly members and new elderly members the club is aiming to attract (as well as attracting other members across a broader age range). The new artificial surface will be more durable than natural grass, less prone to damage and will require lower maintenance and associated costs. The installation of floodlights will provide more user time, allowing the club to be open all year round instead of just for 6 months each year.

THE RESULTS: With the all-weather purpose green and the installation of floodlights, Cobham Bowls Clubs is now able to offer bowling from 10.00am to 10.00pm throughout the entire year. The speed of the green is constant and similar to that of an outdoor grass surface in high summer. This enables younger bowlers and the frail to enjoy their bowls throughout the year. As a result of this project, the club is open over a longer period and able to be used by a larger number of people, offering a social outlet to many in the local area and benefitting an estimated 1,469 people.

BORE PLACE

THE BUSINESS: Bore Place dates back to the 1300s. A substantial property in late Tudor times, by the 1800s the land and property were farmed by tenant farmers. The core of Bore Place House is late Tudor and the converted farm buildings date from the 1700s. In the early 20th century the buildings were added to as part of a thriving mixed farm, and the house renovated. The Commonwork Trust was set up in 1977 by Neil and Jenifer Wates after they bought Bore Place in 1976. The founders' vision was to explore how to live and work sustainably, understanding and recognising the interconnectedness of the environmental, social, economic and political aspects of sustainability. Bore Place works towards sustainable solutions in farming, education and the environment and welcomes 1000s of visitors, of all ages and abilities throughout the year. Some come to develop their own work and projects, others to take part in the other activities and opportunities Bore Place offers.

PROFILE
- **Location**: Chiddingstone, Kent
- **Priority 2: Support for Micro & Small Enterprises and Farm Diversification** Business Development
- **Total Project Cost** - £321,728.00
- **LEADER Grant** - £128,691.20
- **Intervention rate** – 40.00%

OUTPUTS
- **Overnight stays**: 2,100
- **Wage bill increase:** £7,000
- **Jobs created:** 0.35 FTE

THE PROJECT: Bore Place applied for a grant to bring a dilapidated heritage building into use as 2 two-bedroom holiday lets, to provide high quality accommodation in an area lacking accommodation. One of the properties will be fully accessible to enable people of all abilities to stay on the farm. Visitors will also support the wider rural tourism economy.

THE RESULTS:
Bore Place now offers two holiday let cottages to people visiting this part of Chiddingstone in Kent, increasing visitor numbers to the farm and benefitting other local businesses by bringing visitors and custom to the local economy. It has restored a heritage asset and developed an income stream to maintain the asset and provided two new holiday cottages into the district for farm stays.

KENT DOWNS DAIRY

THE BUSINESS: Kent Downs Dairy Ltd is owned and operated by the Betts family which has been dairy farming at Platt House Farm since 1947 and as family farmers in Kent since 1495. The dairy farm is also involved in cheese production as has been producing cheese as Winterdale Shaw since 2006. The farm also operates a farm shop selling a range of English cheeses and other farm produce. Kent Downs Dairy Ltd was incorporated in April 2020 in response to an increase in the demand for locally produced products.
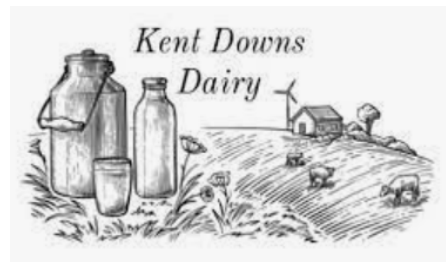
PROFILE

- **Location** : Wrotham, Sevenoaks, Kent
- **Priority 2: Support for Micro & Small Enterprises and Farm Diversification** Business development (food and drink)
- **Total Project Cost** - £149,653.00
- **LEADER Grant** - £59,861.20

OUTPUTS

- **Jobs created:** 2 FTE
- **Wage bill increase:** £30,000

THE PROJECT: Kent Downs Dairy was awarded grant funding to:

- Install a milk pasteurising and cream separator to produce milk for sale.
- Bottling and capping machine for milk produced on site, and a labelling machine to include the relevant company details and other key messaging to be included on the sold bottled product.
- An electric van to distribute the milk to purchasers.
- To upgrade their electrical supply to power the milk processing equipment described above.

East Kent LEADER

Provisional headline outputs (subject to final review and sign off by KCC Programme staff)

- Supported **32** projects (average grant per project £45,648)
- £1,460,726 has been awarded in grant funding into East Kent
- Number of jobs created: 62 (average grant per job created was £23,560)
- Wage bill increase: **£1,178,775**
- Number of additional day visits: **123,852**
- Number of additional overnight visits: **13,287**
- Number of new production techniques developed: **14**
- Number of new products developed: **31**

[under review by Kent County Council programme staff – to be included in Final Version]

Kent Downs and Marshes

Summary of outputs (please note these are provisional and subject to review and sign off by Kent County Council Programme Staff)

- Supported **54** projects (average grant awarded per project £35,629)
- **£1,923,961** has been awarded in grant funding
- Number of jobs created: **92 (average grant per job created £20,913)**
- Wage bill increase: **£1,351,849**
- Number of additional day visits: **11,583**
- Number of additional overnight visits: **6,087**
- Number of new production techniques developed: **32**
- Number of new products developed: **9**

[under review by Kent County Council programme staff – to be included in Final Version]

Rural Surrey

[under review by Surrey County Council programme staff – to be included in Final Version]

Kent Surrey Sussex LEADER Group

The Kent Surrey Sussex (KSS) networking group was set up in 2009. Membership of the KSS group covered six LEADER areas in total: 3 LEADER areas in Kent, 1 in Surrey and 2 in Sussex. The LAG programme areas were:

- East Kent (new area. Joined 2014)
- Kent Downs & Marshes
- Rural Rother & Weald
- West Sussex
- Rural Surrey

The Group was set up to:

- Share good practice between members for learning;
- Identify and resolve common issues;
- Discuss and respond to various policies and processes laid down by Defra with 'one voice'.
- Explore opportunities for joint working;
- Sharing programme costs such as on publicity, appraisals and evaluations.
- Represent the area at national LEADER meetings.

Benefits

This collaboration has been extremely useful for all member groups, with each Accountable Body programme lead being able to regularly liaise to discuss common issues, share best practice and explore opportunities for collaborative working. This has continued during the current programme round.

Mutual support and sharing resources

- The KSS network provided support to the Rural Rother & Weald LAG, initially for the first six months, whilst they recruited new members of staff and develop a new accountable body and make a prompt start to the programme.

- The three Kent LAGs discussed further opportunities to share the appraisal function between them, with the programme manager from another Kent LAG appraising projects on a reciprocal basis and reporting to the LAG appraisal panel. This helped to make better use of the resources available, promote awareness between programme managers of potentially complementary / best practice projects underway in neighbouring LAGs and allowed the sharing of the different skills and areas of expertise of the programme staff in different subject areas.

- The three Kent LEADER groups worked collaboratively to promote the "LEADER in Kent" initiative, holding joint drop-in sessions as part of the consultation process and working with stakeholders on looking at pan-Kent projects across the Kent Downs AONB and the High Weald AONB.

- The Kent LEADER programmes also explored options for joint projects. Where a joint project was agreed between the Kent LAG areas, one particular LAG area took the 'lead' for the project.

Joint analysis of policies, procedures and guidance and ability to represent their views and interests with 'one voice'

- The Group discussed new government policies, procedures and guidance, as drafted by Defra and the RPA (e.g. amended reporting forms). A designated member of the Group would feedback and liaise with Defra or the RPA and then feedback to the wider group.

- KSS meetings allowed members to relay their experience of using new guidance or procedures to the wider group, as well as highlighting particular issues experienced (e.g. where other members might experience a similar issue).

- Members would also report back on any conferences attended relevant to the work of the LAG or rural funding and inform others of the key points.

Meetings

The KSS Group met once a month for the duration of the 2014-20 programme.

Some meetings included representatives from the Local Enterprise Partnership (LEP), Rural Payments Agency (RPA), as well as other LAG Programme Managers from outside the membership invited to share their experiences on certain projects or local issues.   This allowed the KSS Group to prepare jointly and put questions to key representatives where there were issues or queries regarding new processes and/or guidance and set out their issues together.

Joined-up thinking and Strategic fit with the wider Local Enterprise Partnership (LEP)

The various members of the KSS Group all fell under the local LEP and this allowed them to jointly consider how they collectively represented and delivered on the wider rural strategic goals of the LEP.

In particular, where LEP funding was available in support of wider rural policies across the South East, the KSS members were able to consider how to complement LEP support with additional LEADER funding. For example, where the South-East LEP (SELEP) provided strategic input and investment to support project infrastructure, the LEADER programmes could invest additional funds to provide capital support to the individuals and businesses, for example in equipment purchase. This meant that the individual programmes could tailor their investment priorities to complement the wider aims of the LEP in a cohesive and joined-up way.

Part 4: The Management Structure and Delivery

Local Action Groups

The survey was sent to members of the Executive LAG (or Decision-making LAG), rather than the wider LAG membership. This was because the ELAG has a greater role in the decision-making processes for awarding LEADER grant money and requires a greater commitment of time than that expected of a wider LAG member (who would only typically attend a couple of meetings of year).

ELAG membership

Across the combined LAG areas, the largest group of members were from the private sector (62.96%), with a third of members from the public sector (33.33%) – mainly from local authorities within the LAG area - and the remainder from the third sector, i.e. non-governmental and non-profit-making organisations or associations, including charities, voluntary and community groups (18.52%).

What sectors did/do you represent?
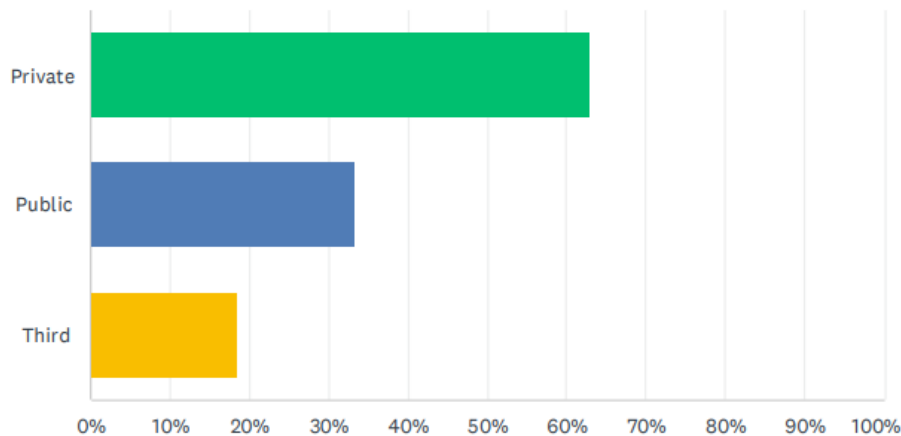
Members' expertise, skill or experience

- The most LAG Executive members had **business** expertise, skills or experience (70.37%), those from a **farming** background (48.15%) and those who worked in **rural services** (44.44%). One-third had expertise in the **tourism industry** (33.33%).
- Less well-represented groups included those within the **culture and heritage industry** (18.52%) and those who had a **forestry** background (14.81%).
- A remainder group of 14.81% identified as bringing 'other' skills or expertise to the ELAG, which from the survey details mainly indicate a background in public sector provision such as local government or elected representatives.

Examples of members' backgrounds include:
- Chartered surveyors practicing in rural matters
- Land agents acting on behalf of various landowners and farmers
- Farmers and members of National Farmers Union (NFU)
- Those with previous district councillor or local government experience
- Academics in rural studies
- Business backgrounds
- Business advice and support backgrounds
- Representatives of nature partnership bodies and AONBs

What is your expertise, skill or experience you bring to the LAG?
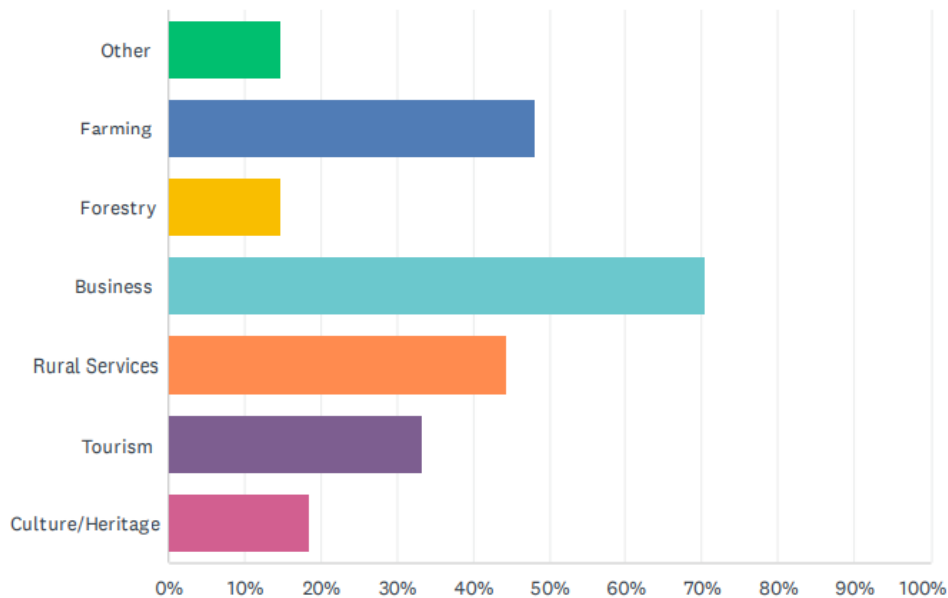
As can be seen from the findings, each LAG represents a **broad range of expertise and backgrounds**. This is vitally important to gathering a range of perspectives and experience: it enables local decision-makers to develop a detailed, considered and wide-ranging Local Development Strategy; it also enables grant applicants to have recourse to a local decision-making group with a range of relevant skills and knowledge to help advise and support applicants.

Some respondents felt that without the broad range of LAG members involved in decision-making, the current programme could have been too narrow in its remit, effectively operating as an agricultural/land-based programme, and not a rural programme. It was therefore "vital to ensure that not only the current programme could deliver for rural communities but that any future programmes received learning from this one so that agendas on left-behind areas or levelling up might have recent successes to build on."

To make sure each LAG had broad representation, the Accountable Bodies undertook various outreach and LAG recruitment exercises and training to engage and attract a wide range of diverse local expertise e.g. local rural bodies and organizations, advertising for LAG members at rural events and through other established rural networks and rural communication channels.

Time spent on LAG related work

Across the combined 4 LAG areas, the average amount of time spent on ELAG related work was just over 7 hours (i.e. one day) per month, including attendance at meetings, reading background papers, emails, supporting applicants and travelling to meetings. The least amount of working hours was 2 hours and the most was 20 hours per month. In fact, 10% of respondents reported working just 2 hours per month and another 10% reported working more than 2 days. The rest broadly fell within spending half-a-day to a full-working day per month.

Regularity and number of meetings

In terms of the commitment, all respondents stated that the number of, and regularity of ELAG meetings, were **about right**. Whilst there were some small differences between the four LAG areas, each ELAG met at least once a month with exceptions for a month in the summer and during the Christmas holiday period: on average, 10 meetings per year. The regularity of meetings was determined by the volume of applications to be reviewed. The most common view was that the number of meetings was **sufficient** to manage the work and that the level of commitment was correct to consider applications for funding properly. It was felt any increase in meeting regularity would have been too much for those with other commitments.

"The meeting frequency was sufficiently spaced to allow applications to come in, be assessed and evaluated before making any decisions"

"Good mix to allow business owners to allocate time off to invest in LAG meetings as well as being able to prepare for cases presented."

Respondents felt each meeting had a manageable number of project applications to prepare for and review with sufficient time for a detailed discussion to make considered decisions. Additional feedback stated this was largely due to the work of the **Programme Staff**, who had already assessed Expressions of Interest from prospective projects and then managed the pipeline of project applications presented to members of the ELAG at each meeting. Feedback opined the meetings were constructive and effective in terms of appraising applications and making considered decisions. Moreover, the number and frequency of meetings did not impose too heavily on ELAG members' time and other commitments.

"We met when there were a number of applications to review – the [programme] team organised things very well"

"With this timescale we were able to read the papers and discuss the applications in enough detail to properly consider them and come to a decision"

Benefits of LAG membership

All respondents described their experience of being an ELAG member as either Good (34.62%) or Very Good (65.38%) and highlighted a number of benefits from their membership.

The **most** important benefits were:

1. **Gaining a greater understanding of their local rural economy and the wider issues facing their rural areas**

2. **Increased knowledge sharing between members**

3. **Exposure to innovative ideas and best practice**

The most important benefit to ELAG members was **"Gaining a greater understanding of their local rural economy and the wider issues facing their rural areas,"** with 96.15% stating this was either Important (38.46%) or Very Important (57.69%). Members felt membership gave them a greater insight into the challenges faced by rural SMEs. It was also an opportunity to keep up-to-speed on issues affecting the rural economy and to be able to support rural businesses. Several responses highlighted how their participation in the LAG brought a wider knowledge and understanding to the LAG's collective role but also how other members' experience and expertise enhanced their own knowledge and understanding of wider issues. LAG members felt they were able to impart a lot of knowledge and experience but that they also learned a lot as well about other aspects of the rural economy (across a range of sectors), including the wider issues their area faced and the various support mechanisms which could be employed to help rural businesses and develop robust rural economies and communities.

The second most important benefit was **"Increased knowledge sharing between members".** One respondent stated that the LAG had a far wider base of experience than other rural-based organisations like the Country Land and Business Association (CLA). The ELAG also had members from local government, which added another dimension to the knowledge of the group, bringing experience of public sector policy and administration to sit alongside private and third sector interests. This fostered a greater awareness and understanding of the other sectors represented on the committee. Overall, respondents felt there was a good mix of public, private and third sector experience, with a pool of different knowledge and skill sets.

The third most important benefit was **"Exposure to innovative ideas and best practice".** This was a key element towards contributing towards improving economic outcomes, as innovation and sharing best practice allowed other businesses to develop, thereby creating a stronger rural economy. Several members saw the value in approving innovative projects that would have not been possible without LEADER and there was an opportunity to learn from successful projects which could benefit other businesses and organizations in the local area. Membership of the ELAG also gave exposure to how rural businesses were developing or diversifying and this knowledge helped the ELAG to advise and improve prospective project applications for funding: with a mix of member experience, learning from previous projects and using examples of successful innovation as examples of best practice. Members felt they also benefited from a greater understanding about the range of rural diversification being implemented across the different agricultural, horticultural and forestry sectors, and it was often through good examples of diversification that rural businesses were able to adapt and survive in a sustainable way whilst also often benefitting the wider rural economy (increasing growth and creating jobs).

Least important were **"Personal development opportunities for you and your business"**, **"Opportunities to work collaboratively with other LAG members"** and **"Increased networking with other rural businesses"** (considered not important by 34.62% of respondents).

This demonstrates a seemingly **altruistic** motivation for members to be involved in local decision-making. Indeed, a common theme throughout the survey feedback was the satisfaction and personal enjoyment LAG members got from using their experience to help applicants and, ultimately, contribute to improving their local rural economy and the wider community. To this end, members:

- assisted in the development of local businesses and the wider economy by imparting their knowledge to inform and shape local development strategies and also to develop better project proposals and plans as part of their assessment of grant applications;
- gave their time to promote and support the rural sector, enabling effective improvement across the local rural economy and community; and
- contributed to improving economic outcomes by encouraging and supporting innovation and learning by approving projects that otherwise would not have been undertaken (and using these as a basis for developing learning more widely).

Managing a balanced mix of funded projects

The overwhelming majority of respondents felt their LAG had successfully managed a balanced mix of funded projects, with 96.15% describing their LAG's performance as either Good (30.77%) or Very Good (65.38%). The remaining 3.85% described their LAG's performance as Satisfactory.

Apart from the information provided in the technical appraisals, how do you think the LAG performed in managing a balanced mix of funded projects across the LAG area and the LEADER priorities (farming, tourism, business, heritage, forestry)?
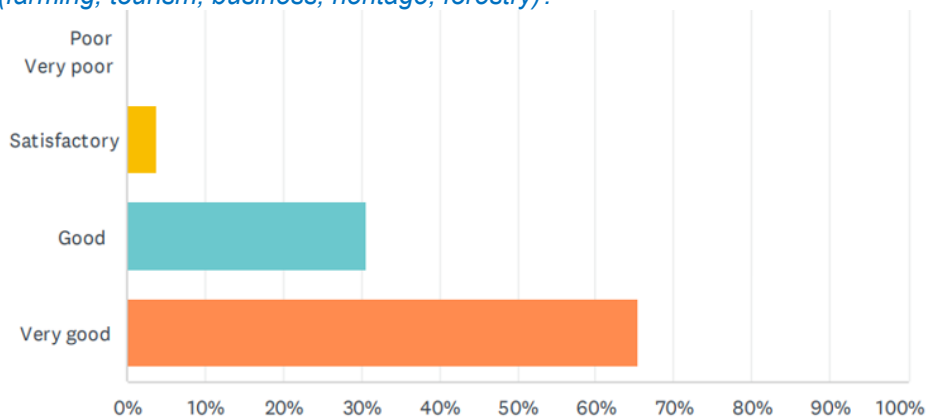
Respondents attributed this success to two factors:

- **Outreach, publicity and promotion** were common themes to explain why LAG areas had been successful in achieving a good mix of projects across different local themes. There had been a mix of business engagement to raise awareness of LEADER funding locally and over the course of the two LEADER programmes dating back to 2006, the accountable bodies and local authorities within their LAG area had become more effective at outreach methods and promoting LEADER. As such, the range of applications was diverse and spread across the range of local businesses and organisations which LEADER supports.

- **Effective programme management**: Several responses cited the excellent management of the programme by programme staff as a key factor in successfully promoting LEADER across the LAG area. This ensured a fair mix of representation on the ELAG Board, so that project applicants from various sectors had their sector represented on the Board who understood the relevant sectoral issues and opportunities.   The representative ELAG, with the support of programme staff, were mindful of ensuring a balanced mix of projects across local priority themes, with programme staff assisting in the sifting and assessment of project applications to make sure the overall portfolio was broad across their respective priorities.
- Programme staff were also instrumental in facilitating the process for deciding the local priorities within the LDS and making sure the strategy covered all national priorities. Through managing the administrative function of the ELAG in determining local priorities and managing the assessment process, staff were both mindful and well-placed to make sure the project portfolio was wide-ranging and not predominantly focussed on one or two priorities. It was their efforts in making sure LEADER was promoted to a wide range of sectors, businesses and organisations and facilitating the assessment and appraisal process to make sure there was a mix of projects which supported the area's local priorities as set out in the LDS. As one respondent remarked, "the ELAG was always aware of the priorities allocated in the LDS."   Other respondents praised that programme staff for their research and briefings on project applications.

However, a minority felt that if their area did create a good mix of projects across priorities, this was achieved **more by luck than by design.** Whilst some respondents acknowledged they were presented with a very diverse mix of projects for assessment, some sectors were not as well represented as others. One respondent commented that it was **only in retrospect** that balance is viewed as good and this might not be due to successful targeting of the LEADER fund across a wide range of local sectors and businesses. To ensure the balance if better in future, they suggested **better targeting of under-represented sectors**, with a stronger communications strategy and resource, as well as ring-fencing some budget for particular under-represented sectors.

Local Decision-Making

The importance of local decision-making

Almost all respondents agreed that local decision-making was Very Important (96.15%) to awarding grant funded support.

Overall, how important do you think local decision-making is to awarding grant funded support?
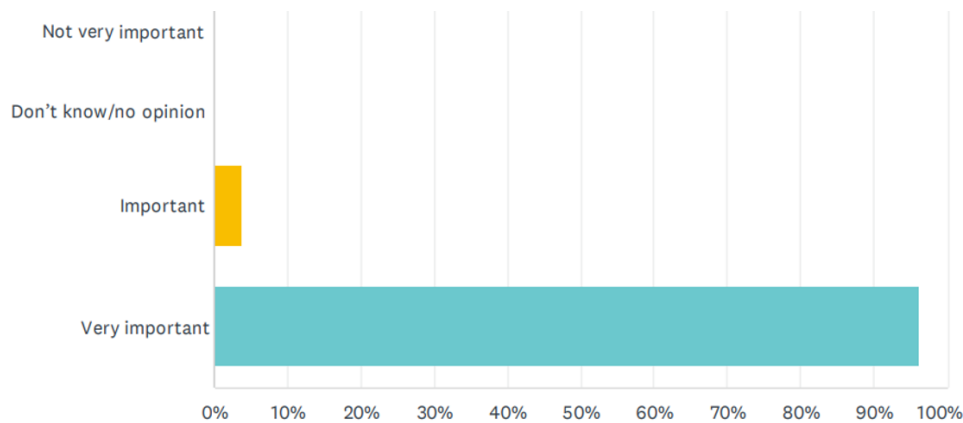
The reasons given as to why local decision-making was important, included:

- Local people have knowledge of the unique local challenges to their area and not all areas are the same: Respondents stated the national and regional rural investment policies prior to LEADER did not serve local rural communities adequately, effectively "leaving them behind" as one respondent commented. In essence, different areas have different needs: as such, meeting the challenge of local problems requires local people who know the area and can set-out a response. LEADER's focus on localism encourages local decision-makers to develop broad mix of bespoke investment priorities (under the umbrella of national priorities); the resulting targeted investment contributes to economic growth and, where applicable, community development, helping to remedy local issues with local solutions. In this sense, LEADER has proven to be much more effective than a strategy being set by a more distant larger-regional body, lacking knowledge of the nuances of local areas. Local business leaders and individuals are acutely aware of the local issues and concerns. It is this knowledge of the local conditions and needs of the business and local communities which leads to better decision-making and better **outcomes** for the local area.

  "It is about finely nuanced investment that meets local need, has been decided on in an accountable fashion, and brings about meaningful change."

- Building local resilience: LEADER has also been successful in that it has built a process and system of resilience in local communities. There is a functioning local body with increasing expertise which can identify local issues, set a strategy to remedy these issues by prioritising funding and confidently assess and award grants to worthy, deliverable, sustainable and effective projects. In effect, a local approach cements the local effort and encourages continuity and engagement locally. In a post-LEADER environment, the structures and the people which delivered rural funding programmes under LEADER are still there and these networks can be used to develop other new rural programmes, using or copying existing administrative structures. ELAG members have built-up important knowledge of the area and the skill set to assess grant funding applications.

The importance of a LAG for bottom-up and localised approach to a rural grant funding scheme

Respondents were asked to assess in terms of importance various perceived benefits a LAG brings to rural grant funding. The three most important factors were that a LAG:

1. **Provides local knowledge of the rural economy, sectors and businesses**

2. **Provides a local network of existing private businesses, public sector and third sector expertise to consider grant applications**

3. **Provides a good understanding of the local needs in the local economy and wider sectoral needs (farming, forestry, tourism, etc.);**
   and

   Provides a bottom-up approach to choosing locally needed projects to solve local issues

The highest-ranking benefit of a LAG structure for effective local decision-making was **"Provides local knowledge of the rural economy, sectors and businesses"** with 100% of respondents stating this was Important (3.85%) or Very Important (96.15%). Respondents felt this was important as decisions were made in the geographical area being affected, by local partners who know the area, the local businesses and community organisations, and the issues and opportunities relevant to the area. This was therefore the best opportunity for local intelligence to be reflected in decision making

Second was **"Provides local network of existing private businesses, public sector and third sector expertise to consider grant applications,"** again with 100% of respondents stating this was Important (15.38%) or Very Important (84.62%). The collective knowledge of the Board meant that there was always someone who had expertise to assess the applicant proposal. The breadth of knowledge also meant that the Board had a wider pool of knowledge which could offer additional advice to enhance the application (e.g. through positive suggestions to improve the project or by attaching conditions to the grant): each Board member was able to bring a unique perspective to the application based on their own background and expertise.

The third most important benefit was shared between two functions, both with 23.08% stating it was Important and 76.92% as Very Important. The statement **"Provides a good understanding of the local needs in your local economy and wider sectoral needs (farming, forestry, tourism, etc)"** was important to respondents who felt that local knowledge in rural development was crucial to the success of the programme. Feedback indicated that even at county level, there were unique sub-county issues and opportunities which were better served at a sub-county level. The contrasts within Kent alone highlighted why it was necessary to have three distinct LAG areas for East Kent, Kent Downs and Marshes, West Kent, irrespective of the split into three distinct areas primarily being driven by population size. It was also true that these three areas of Kent each had different issues and

needs: which is why their local priorities were not the same across the county. As members of the LAG were from the local area, there was a very good understanding of the local economy with a good spread across the LAG area. Most projects that were evaluated had a LAG member who knew the project area.

Joint-third was *"Bottom-up approach to choosing locally needed projects to solve local issues",* again with 23.08% stating this was Important and 76.92% viewing this as Very Important. Feedback stated that only local decision-makers truly understood the importance of project outputs and outcomes on the local economy and community. Local decision-makers were therefore acutely aware of the type of projects required to bring about successful outcomes for their areas. Any attempt to make decisions above the LAG (sub-regional) level would be undertaken by people disconnected from the local needs of the area.

Other additional benefits derived from a localised model included:

- **Decision-making is not faceless:** Decision-makers lived in the local area and represented sectors within the local area. This gives confidence to applicants that the decision-makers understand local issues and can make a considered judgement. It's likely the applicants will know the people, businesses, organisations and local authorities represented on the decision-making body. Appraisers of application forms were also locally sourced and were therefore engaged in the issues with a local knowledge of the rural economy. As such, the localised approach meant there was a greater consideration and appreciation of local issues and the implications for certain sectors regarding funding decisions.
- **Localism encourages and emboldens small-businesses requiring modest but critical investment:** Feedback suggested that a localised model encouraged smaller local businesses to apply for funding – indeed, a large proportion of grants were for relatively modest amounts. , Some feedback suggested smaller businesses can be put off from applying for funding from a larger regional body representing a larger area, perhaps in the knowledge that the number of applicants for funding would also be larger (and therefore more competitive). Many structural fund grants are set at a higher minimum grant level, whereas for LEADER the minimum grant is £2,500. As such, the amount of funding required by the project applicant is not necessarily onerous or burdensome, particularly if there are seeking smaller levels of investment. The breadth of grant level investment makes it a programme which can benefit small start-ups which require small grants or much larger businesses seeking significant grant investment.

Accountable Body & Programme Support

Feedback from members of the ELAG and also the various Grant Beneficiaries of the Programme highlighted the important role Programme Staff played in supporting both the decision-making body (with the administration of the Programme) and assisting projects with developing their applications and guiding them through their programme experience.

The importance of Programme Staff to managing the LAG

Respondents were asked what they felt was particularly useful in having LEADER programme staff in place working with the LAG. The three highest positive responses were::

1. **Giving LAG members advice and support with application appraisals**

2. **Giving applicants personal assistance with application advice and support**

3. **Giving professional help and guidance to applicants – sharing their knowledge and expertise to create better projects**

ELAG members stated that *"Giving LAG members advice and support with application appraisals"* was the most important function provided by Programme Staff, with 96.25% of respondents saying this was Very Important, with the remaining 3.85% describing this as Important. The Programme Staff provide important assistance to the project applicants, liaising with them during the application process and assisting them in developing their proposals. Staff also engage an independent appraiser (or a dedicated member of the Programme Staff) to undertake a review and score each application, with the programme staff presenting the appraisal to ELAG members at regular meetings. Queries on the application were often directed to programme staff to answer or to ascertain further information. As such, the programme staff were in an important element of the process to advise and support the ELAG members with queries on applications prior to their decision on whether or not to award funding.

"The LAG is also a Non-Executive board so without the programme staff nothing would be done."

The second ranked function was **"Giving applicants personal assistance with application advice and support,"** with 92.31% of respondents stating this was Very Important and 7.69% viewing this function as Important. The Programme Staff undertake an initial assessment of Expressions of Interest and often advise prospective applicants to develop their proposals as per the application format. LEADER attracts applications from a significant number of small rural businesses, often with very little experience of developing proposals for grant assistance. As with other national schemes, the LEADER application process is prescriptive and often viewed as detailed and burdensome to complete. It is therefore helpful to the applicant to have recourse to dedicated staff who can assist them with completing their application; it is also important to ensuring that businesses or organizations wishing to secure funding are not put off by the process and that deserving projects are not deterred from the process because they lack the experience or know-how of applying for government funds.

"The application system was so very difficult like too much of central government systems that without this support only the larger companies

would be able to apply for grants most being put off by the application process."

The third most popular statement was *"Giving professional help and guidance to applicants – sharing their knowledge and expertise to create better projects".* Programme staff were on hand throughout the programme to help and advise beneficiaries applying for funding, using their experience of assessing similar projects and lessons learnt from how those similar projects performed.

Other benefits of having a dedicated programme staff included *"Programme staff keep LAG members informed of project progress, providing output monitoring data and project updates".* The post-payment monitoring of outputs needs to be managed and reported so that the ELAG and other interested parties (e.g. the Accountable Body and local authorities within the LAG area) can quantify the success the of programme investment. It is incumbent on the programme staff to gather data directly from the projects and report this back to all interested parties, in particular the LAG members who undertook the initial funding decision based on the project rationale.

Another benefit is that *"Programme staff act as a conduit with other LEADER programmes for knowledge sharing, best practice or ability to pursue cross-LAG joint projects."* The programme staff responsible for managing LAG areas across Kent, Surrey and Sussex have developed a strong relationship, meeting at monthly intervals over the course of both this and the previous LEADER programme. This has been very useful in terms of sharing knowledge and best practice between the LAG areas. However, the scope to pursue cross-LAG joint projects has been limited. Whilst there were examples in the previous programme, cross-LAG projects were not pursued during the current programme. In part, this is because the ability to work on cross-LAG projects requires larger geographical projects to come forward and this has simply not happened.

There has traditionally been greater cooperation between the three Kent LAG areas, though this in part could be due to projects being largely county or inter-county in their nature. Feedback from the ELAG survey also raised the issue that inter-territorial cooperation (and also trans-national co-operation) work was not conducted in the spirit of previous programmes: inter-territorial and trans-national budgets needed to be bid for centrally (rather than included as part of each LAG's budget).

Where there was co-operation (in the case of pan- Kent projects), the project would be led by one LAG alone, regardless of the geographical reach of the project across other LAG areas: again, examples were solely in relation to Kent-wide organisations who wanted to deliver a single project across multiple LAG areas. Feedback also highlighted the lack of national LAG events and there was disappointment that events did not focus on examples of best practice in rural community-led local development, but rather were primarily focussed on the administration of the fund. As such, the role of programme staff in knowledge-sharing and brokerage of co-operation projects was vital and totally dependent on each LAG area developing their own networks in lieu of a national or regional network.

The **least** important role was regarding the programme staff's role in *'Providing an informal networking and local knowledge/intelligence brokering service, linking people, businesses and organizations for their mutual benefit'.* Whilst 96.15% of responses said this was Important (30.77%) or Very Important (65.38%), this statement scored the lowest in the Very Important response rate of those surveyed. This probably also reflects that more can be done in this regard.

Other Structural Fund programmes such as the European Social Fund and the European Regional Development Fund often have local networks of projects where project sponsors and organizations can regularly meet and network. However, ESF and ERDF projects are generally run over a much longer time period with significant revenue and/or capital investment and, as such, many of the projects gain value in talking to other projects about their project and their shared issues regarding their administrative responsibilities (e.g. quarterly grant claims and data monitoring). LEADER is different in that the projects are often much smaller, bespoke and the investment work is time-limited to the purchase and installation of capital equipment. There are no formal networks for grant beneficiaries to meet with other projects. Rather, programme staff are instead on-hand to link people, businesses and organizations together based on their knowledge of the area and the sectors.

> *"The staffing of the LEADER project was the thing that really made it work as an effective grant making organization. The staff had to liaise with central government/Defra/other LEADER groups, help people enquiring with funding, with their applications, bringing forward applications to the executive, administering contracts and checking expenditure . . . goes on and on. They really did a good job."*

The survey identified other key benefits of having a dedicated programme staff managing the LAG:

- Effective Communication: LAG programme staff are the central communicative function linking all aspects of the programme together. Several respondents highlighted the programme staff's role in linking the disparate parts of the process together and acting as a conduit between several groups (from conveying national policies and processes to the LAG, publicising the funding locally, acting as a link between the appraiser and the LAG decision-making body, and communicating with other LAG areas for wider knowledge sharing). As one respondent stated, programme staff are "the glue that stick everything together."
- Continuity: As local authority staff with experience of running the LAG administrative functions, the programme staff provide an important level of continuity and resilience for local decision-making. Their presence enables expertise to be developed and a more effective and efficient programme to be delivered. Indeed, it is this continuity of expertise and knowledge that will greatly assist in delivering other post-LEADER rural schemes.
- Ownership and accountability (managing the entire process): The programme staff perform a wide variety of functions across the management of the programme from start to finish. In many respects, they bind the administration of the LAG throughout the various phases of activity: recruiting members to the LAG; overseeing the publicising of the fund; managing the application process; facilitating the appraisal of applicant proposals and presenting

suitable projects to the Board; undertaking audit visits to projects to provide assurance expenditure commitments have been met as per grant agreements; processing project claims subject to proof of expenditure; and undertaking post-payment monitoring to ascertain if outputs targets have been met.

"I find it difficult to see how the LEADER operation in its various aspects (applications, assessments, advice, networking etc) could operate satisfactorily without the presence of staff."

- Strategic support: The programme staff facilitated the process of developing the local development strategy and its local priorities, taking into account the wider relevant strategies of local authorities within the LAG areas and other sub-regional and national policies and priorities. The ELAG needed this knowledge provided by programme staff to strategically join the dots between local, regional and national rural policy.

LAG satisfaction with LEADER support staff

The vast majority of ELAG members described the support they received from Programme Staff as either Good (7.69%) or Very Good (88.46%). However, 3.85% described this support as being Poor.

Overall how do you rate the support you received from the accountable body tasked with governance of the LAG (i.e. the local authority Programme Staff providing direct support, guidance and advice)?
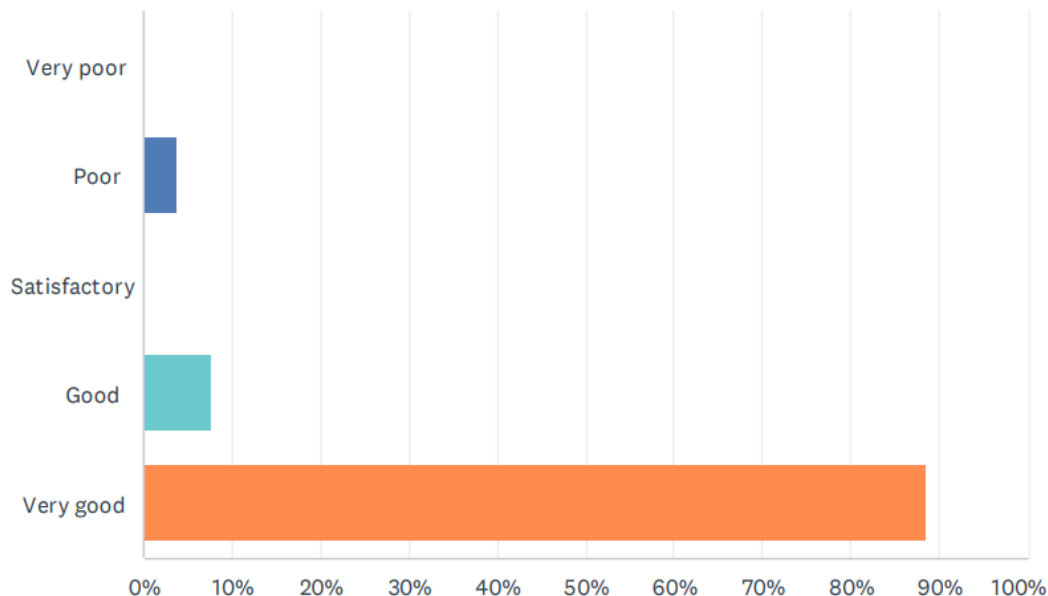
Respondents were very positive regarding the support they received from programme staff:

"The LAG was provided with good quality accurate information and the programme staff were able to provide assistance when required."

"They provided expert support and insight . . . Paperwork was meticulous."

"The project team are very knowledgeable and helped us understand better the projects put forward."

"Very accessible and supportive and responsive staff."

Issues

For those who felt the performance of programme staff was poor, their issues were with the Accountable Body's wider policies and resource provision for the rural sector. Some respondents drew a line between the (valued) support provided by programme support and what they perceived as a wider lack of support for rural development interests.

Application and Appraisal Process

The ability of the Kent and Surrey programmes to secure strong and varied portfolios of projects was dependent on having a well-run application and appraisal process, which utilised wide ranging local expertise and knowledge in assessment and decision-making.

This section looks at the Application and Appraisal process from the perspective of both the project beneficiaries who successfully applied for funding and the members of the ELAG Executive Board tasked with assessing their applications as decision-makers.

A Complicated and Onerous Process in Need of Reform

The LEADER application and approval process is designed to be both robust in its ability to interrogate project proposals and consistent in the level of assessment regardless of the grant award or the size of the applicant business or organisation. Each applicant must demonstrate clearly their project rationale and submit themselves to a thorough examination and that process is consistent for all applicants. However, as can be seen further below, both Grant Beneficiaries and ELAG grant decision-makers feel the process is too detailed and onerous, particularly when a significant number of grants are viewed as 'small' scale support.

The Beneficiary Perspective

Overall, as can be seen from the chart below, well over half of beneficiaries surveyed stated that they found the application process to be either **Difficult** or **Very Difficult**. By contrast, just over 20% of beneficiary respondents thought the process was Easy.

Overall, how easy did you find the application process for your LEADER project?
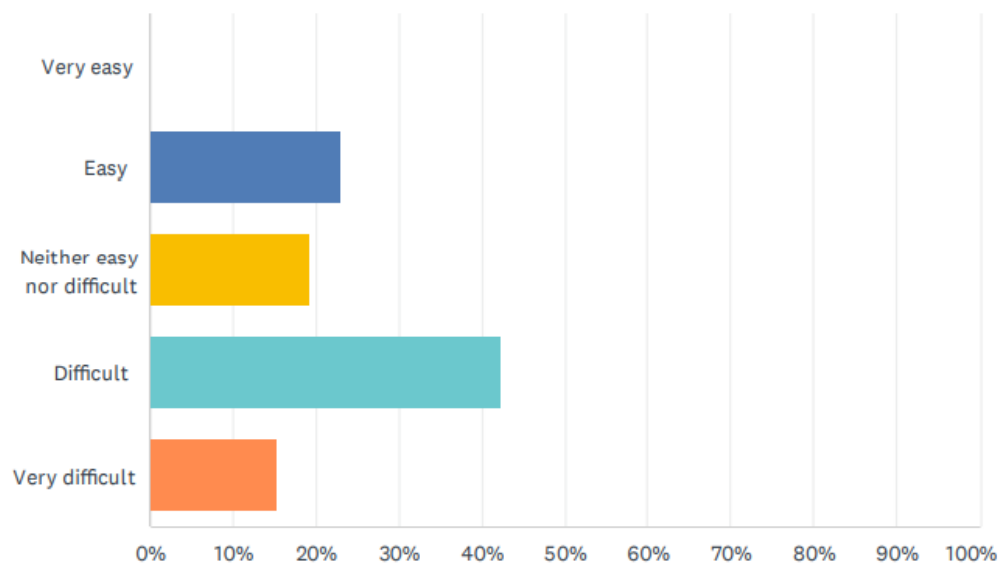
The application process was seen as being **too detailed** and **onerous**, which many respondents felt put off many prospective applicants from applying. It was commonly referred to as **"complicated"**, time-consuming, frustrating to complete, and for some required professional support from a consultant. It was felt that the application form did not appreciate a small rural business needs or perspective, which required a more simplistic yet focused approach.

> *"I seem to recall there were over 100 pages of forms to be filled and accounts to be rendered, in a two-stage application. You could never call this easy."*

> *"It took literally hundreds of hours of senior management time to complete all the paperwork for instance getting three quotes for everything, making presentations, completing follow up forms."*

> *"For the first round it took a solid month of doing nothing but completing the forms."*

The LAG Executive Board Perspective

Based on their experience of assessing applications and feedback from applicants, respondents were asked to rate the overall application process including the application form, applicant guidance and the LAG decision-making process.

Almost 70% of the respondents thought that the overall application process was either Good (50%) or Very Good (19.23%). The local delivery was generally described as excellent with respondents saying the process worked.

> *"It is a fair process with good guidance and decision-making process."*

However, just over one-fifth described the process as merely Satisfactory (23.08%) and 7.69% described the overall application process as Poor. There was some concern expressed for the level of information the applicants had to provide an agreement with many applicants that, in this respect, the application process was far too onerous. There was also dissatisfaction with the level of information the LAG decision-makers had to review, with several stating they often felt overwhelmed.

Overall, there was a recognition that the process had to be robust to fully test applicants but that, in a significant number of cases, the level of rigor was disproportionate to the relatively small grant amounts being applied for.
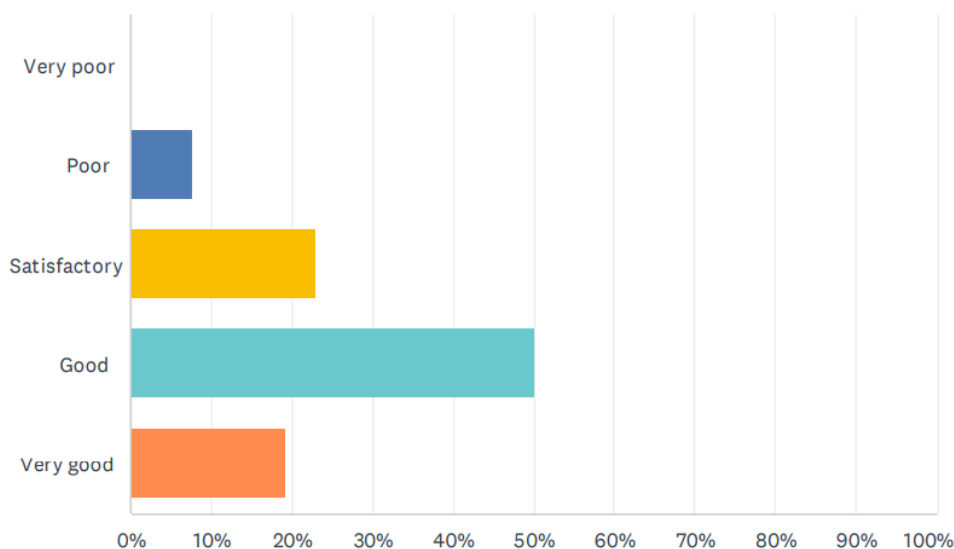
What is interesting about the perspectives of both grant beneficiaries and LAG decision-makers is the recurring opposing themes of the process being, on the one hand, too onerous on the applicants against the demand for rigor in making sure applications are of sufficient quality to succeed in their stated outputs and the projects are sustainable.

The Application Process

To assess a typical applicant's journey through the Application Process we asked a sample of grant beneficiaries to comment on the following elements of the process:

- Application Form
- Application Handbook and Guidance
- Support of the Programme Delivery Team

The Application Form

Over half of respondents described completing the form as being either **Difficult** (42.31%) or **Very Difficult** (15.38%). By contrast, less than 20% of respondents described the application as easy to complete.

How easy was the application form to complete?
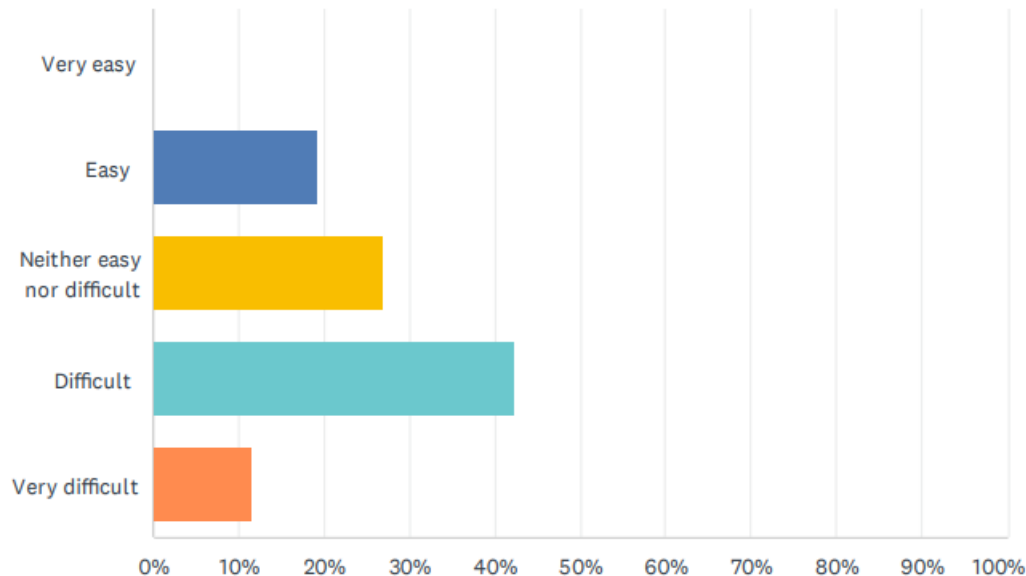
Too onerous versus the need for rigour

Too onerous to complete

Several **beneficiaries** were critical of the application form, stating it was "very time consuming and intense" with "a lot of writing for each section". Beneficiaries felt that the questions took a lot of research and information to answer fully to the standard required and you needed to have some experience of the process to be able to do this correctly.

> *"The whole process was difficult, for someone who's not a professional "applier-of-grants"."*

Feedback from **members of the LAG Executive Board** also recognised the pressure the application form and process placed on applicants, many of which were unfamiliar with the grant funding application process:

Several LAG members described the application process as being overly complex for the applicant, stating many applicants would have found the form and process daunting despite having support from the programme team.

A number of LAG members also felt the process was too onerous for the relatively small grant amounts being applied for.

LAG members also feared the process may have deterred some potential projects from applying, particularly smaller businesses which might have little experience of drafting funding bids and likely to be put off by the level of information required.

Onus on rigour and testing the business model

However, other **beneficiary respondents** accepted there was a need for a detailed form based process and they were accepting of this process to receive public funding and the rigour involved to test the rationale and develop a stronger case to deliver success.

> *"The process is incredibly thorough as it should be given that it is public money investing into projects."*

> *"Inevitably it was long and detailed because the Lag team did not want to waste money."*

The requirement for applicants to undergo a thorough examination was also supported by some **members of the LAG Executive Board** who emphasised the following benefits:

- A rigorous process can **weed-out weak applications**. As the information provided was comprehensive, any potential shortfalls were identified with either weak projects withdrawing or the project benefitting from a level of scrutiny to manage and negate identified risks.
- A rigorous process also **makes better applications**, focussing the applicant's mind on the deliverability of their project to produce outputs with outcomes which will be sustained in the future. The process required the applicant to demonstrate how investment would produce outputs which would be sustained post-grant investment, thereby strengthening their application.

> *"It helped the applicant to fully investigate what they wanted to do, and what further options might be available to help make it a success."*

> *"It was very thorough, so it forced people to think about their project quite deeply."*

> *"Whilst some applicants felt the process was too complex, this helped make sure the full applications were viable projects."*

Overall, LAG members felt that the application process was suitably thorough to make the applicant think seriously about why they wanted the funding. The level of information required meant applicants had to give a great deal of time and thought to their application and be fully committed to the process.

Previous applicant experience or greater resources makes the process easier

Another common theme was that the level of detail required to complete the form was acceptable to those with previous experience of applying for grant monies or with the required skill set to complete the forms and provide the information. For

those who were less experienced, the form was much more daunting and the process significantly lengthier.

"I think this was due to my inexperience and not the form itself."

"As a small rural business, it was not easy to adapt to the format of the application form."

It is important to emphasise that the typical LEADER applicant is not the same as applicants for other larger EU or UK grant schemes and, as such, they do not have the personal experience or resources to complete a process held to the same standard as that applied to much larger businesses and organisations.

Usability of the form

Concerns were raised over the format and design of the application form, with many respondents stating they felt the form was not easy to complete due to its design:

"Forms were poorly formatted online; bits were password protected and the categories were tricky to navigate. Printing the whole lot out & colour coding it with pens helped, though it used up a tree or two..."

However, there were some respondents who were more accepting of the process and the level of detail required in the application felt the form was not "unnecessarily complex" and information required was generally clearly requested and possible to provide. Though, it should be noted, these respondents were the exception, with only 20% stating they found the form to be easy, though a larger percentage of respondents (just under 30%) stated they found the form to be neither particularly easy or difficult to complete.

Application Handbook and Guidance

The application handbook and guidance received very good feedback from project beneficiaries, with almost 80% of those surveyed stating they were Satisfied or Very Satisfied.

How satisfied were you with the application handbook and guidance with helping you to complete your application?
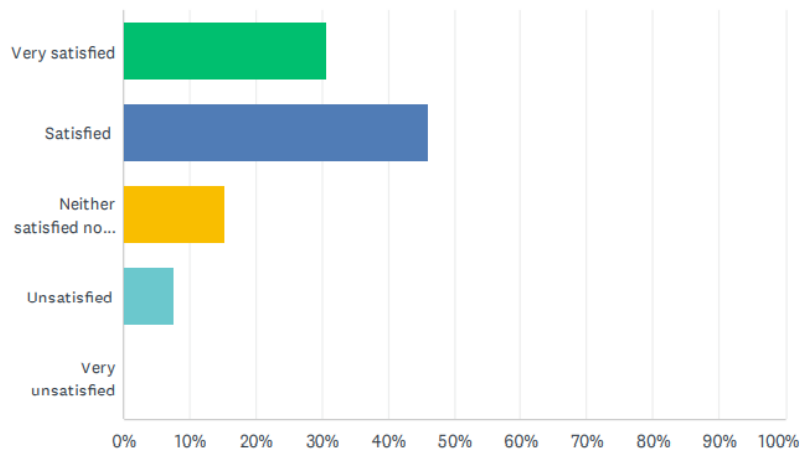
At first glance, this positive feedback sits at odds with the majority of respondents who replied that the application process and application form were onerous, complex and difficult to complete. However, as one respondent stated who found the handbook to be **"very useful and walked you through each section well"**, their issue with the application was **"not knowing the answers to the questions."**

> *"Very thorough application handbook with great guidance to complete the application."*

Whilst there was general consensus that the application handbook and wider guidance were well-written and useful, several respondents still stated they would not have been able to complete the application form without the additional support from the local programme staff

> *"The guidance was first class - any questions relating to the handbook were answered quickly and clearly"*

Of those who felt that the application handbook and guidance was not helpful, they stated that the application handbook was **"incredibly long and complicated"** and **"a lot to take in"**.

This again demonstrated the issue with the application was not just how the form and guidance were presented, but more significantly about the type of businesses applying for funding and their lack of experience completing funding applications and/or their lack of resources and experience in dealing with government grant funding schemes. In this respect, the LEADER application is as detailed and thorough for a small rural business with limited resources and experience to complete as would be a similar grant funded scheme – such as ESF or ERDF – for a large organisation, charity of local council to complete.

Programme Support Team

Another key theme to emerge from the **beneficiary** feedback was the importance of having a dedicated programme support team to help the applicants through the process, dealing with any queries and giving the applicant the opportunity to have

face-to-face communication and support when required. The support provided by the various programme teams were mentioned as a significant factor in being able to complete the form.

Many highlighted the support they received from the LEADER group in guiding applicants through the process, which negated many of the complications they had in completing the application process.

One successful project applicant stated that when their business applied for additional funding the level of programme support they received diminished due to staff shortages towards the end of the programme and the application process became impossible. This emphasised how important the support they received from staff had been in relation to their previous application. They felt that LEADER was aimed at businesses which had staff experienced in applying for grant funding and it was therefore important to have a dedicated programme team to help guide the less experienced applicants through the application process.

"[The Programme Team] were extremely helpful and I couldn't have got through the forms without them."

"It was difficult but thankfully we received excellent support from LEADER staff."

"We had huge assistance from the local Leader team but the process itself was complex."

Similarly, **members of the LAG Executive Board** also recognised that applicants required a significant level of support to develop their project proposal prior to assessment and that for those without the financial means to hire a consultant, the accountable body's programme support team were an invaluable resource and instrumental in supporting applicants to develop and progress applications.

Appraisal and Assessment Process

For the Appraisal Process we surveyed the **members of the LAG Executive Boards** tasked with appraising the applications and reaching decisions on whether to award grant funding.

- The importance of local decision-making
- Assessing application and appraisal information
- Programme support team
- How the process can be improved

The importance of local experience and wide representation to appraising applications

Wide-ranging local expertise

LAG members were keen to emphasise how their wider range of local expertise covering various different sectors and with a good understanding of the local economy, community and rural geography were essential to being able to make sound judgements on which projects to award grant funding.

The assessment process allowed members with a wide range of expertise and experience to take a balanced view of the merits of the projects before them.

The appraisal process worked well in that it had experienced and knowledgeable LAG decision-makers who could assess the project rationale, outputs, outcomes and benefits working alongside a permanent programme staff who were experienced in the process and supporting the LAG in their decision-making.

For example, some cases were considered particularly difficult where the LAG had to assess the impact a project might have (displacement) on other local businesses. As such, local knowledge of the economy and the area was vital.

Assessing application information

Respondents were asked if the overall detail provided to help them make a considered decision on appraising a project application sufficient or was there too little or too much information.

When assessing project application form and appraisal, was the overall detail of information provided to help you make a decision sufficient or was there too much or too little information?
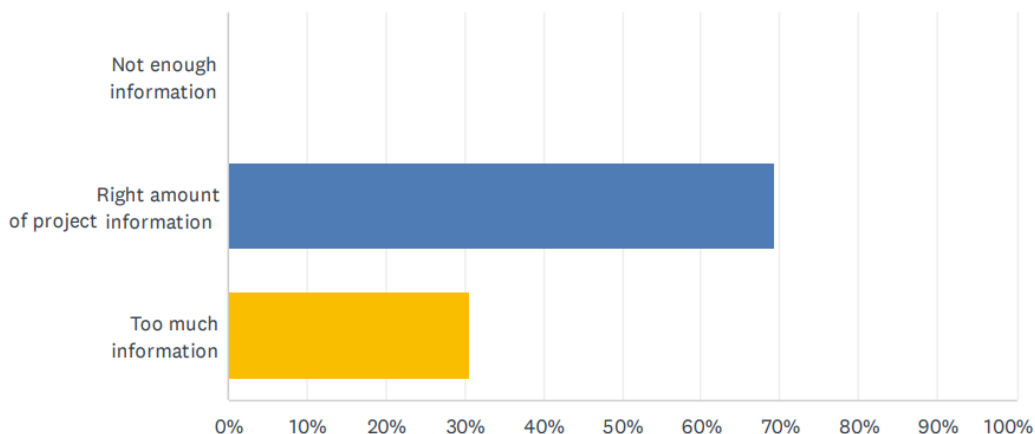
Almost 70% felt the amount of information detailed in the LEADER application and assessment forms and supporting information was correct and the balance of information was also sufficient. Respondents felt this was evidenced by projects successfully delivering on their objectives, implying the ELAG reached a considered and correct decision.

However, a significant minority of 30.77% felt that they had too much information. As reported above, a number of respondents felt the appraisal documents duplicated

a lot of information within the application form, though to some extent this is to be expected as it is an assessment of that application.

Too much information

Some respondents described the level of detail as sometimes being **overwhelming** in relation to the time they could commit. Of note, one of the appraisers responded that there was too much information.

A significant number of respondents felt there was too much duplication of information in the appraisal process. Respondents also stated that there was an element of duplication of the information provided within the application form and the appraisal form. On occasions, some respondents felt they didn't have time to read documents fully prior to meetings due to the time available from receipt of the documents to the meeting.

It was suggested that if project information were available online it could make the review and assessment process easier for LAG members to navigate, as opposed to receiving emails with several attachments.

Rigidity of the prescribed assessment and appraisal forms

Feedback stated there was also an issue with the presentation of information, which was not easily comprehensible due to the rigidity of the prescribed appraisal and assessment forms. Respondents wished to see a more succinct level of information presented to them, with a summary of the key points: *"a well-designed pro-forma provides all the necessary information to make a decision".*

In practice, the ELAGs were able to request additional information from applicants, with programme staff liaising with and assisting projects with advice and guidance. Were the application process to be simplified, additional information could still be requested, but only if necessary.

Improvements to the process

LAG decision-makers were asked if they were satisfied with the level of information they had to make a considered decision of awarding grant monies, how they would improve the process and to consider what other information would help them to make better decisions.

Survey respondents were asked what further information would have made their decision easier when considering applications. To this end, they would like to see:

- Business plans: Some respondents felt that projects should include a detailed business plan, which was not a requirement under the current programme. Some wanted to see more information on the project's exit strategy if the project could not fulfil its stated objectives.
- Summary document: To deal with some feeling overwhelmed with information, some wanted to have a summary appraisal document of key

project information, including an overview of the project, costings, output targets, and impact and benefit assessments to the local area.

- **Best practice case studies:** Some respondents wanted to see examples of projects from other LEADER groups to see which type of projects worked well and if there was any learning which could be applied to their local area. This could also be relevant if a similar project was presented for grant funding and members to refer to a relevant case study for information.

Other issues with the process

The ELAG members also highlighted various other issues with the application and appraisal process which they felt needed improving:

- **Constraints of the geographical area:** It was suggested that some local areas were excluded from LEADER funding because their post-code fell just outside the LEADER designated area and more discretion would be given to decision-makers, particularly if the project would have a beneficial impact for the wider populace within the LEADER area. Consequently, some worthwhile projects were not considered or progressed due to these geographical constraints.
- **Underrepresentation and outreach success:** Feedback also raised a concern that funding tended to go to the same businesses who were aware of the funding scheme and suitably skilled to undertake the application process, resulting in the "usual suspects applying for and getting grant support". We therefore need to understand how we can reach those who need support but who for whatever reason aren't applying.
- **Constraints of acceptance criteria:** LAG members also feedback that they felt there was too much emphasis on jobs and growth for this LEADER programme round. They felt this deterred other community projects from applying as there was an assumption successful projects needed to deliver economic outputs.
- **Delays to awarding grant status:** Some highlighted contributing factors which delayed decisions being made which meant projects missed their initial delivery milestones. Blame was apportioned to applicants for missing information in their application, to external decisions such as planning permission, and to delays due to referrals made to the RPA for additional advice.

Programme Support Team – supporting the appraisal process

Programme staff were on hand throughout the programme to help and advise both beneficiaries applying for funding and the decision-makers assessing the funding applications and acted as a link between the two when the LAG required further information. Responses highlighted the reliance LAG members have on programme staff to assess and interpret applications and provide quality appraisals for the LAG members to consider.

Support offered from programme staff was cited by LAG members as a significant reason why the process worked well. LAG members stated the programme staff

made process easier to manage for both applicants and those tasked with making decisions.

A dedicated programme team also brought an element of consistency to the process, ensuring the programme maintained a standard of assessment which was applied across all projects.

Part 5: Conclusions and Lessons Learnt

Whilst LEADER has been an important funding scheme for local rural areas, the 2014-2020 programme has lost much of the traditional LEADER values evident in previous iterations of the programme. The LEADER approach in **England** is meant to emphasise and action a bottom up, community led engagement and decision-making process to deliver tailor made assistance and investment to specific area issues and opportunities but, unfortunately, much of this approach has been lost in the operation of the current Programme.

Due to the Managing Authority (RPA) making the current LEADER Programme as 'risk averse' and over prescribed as possible the LEADER Programme has changed from being a Rural Development Programme based on locally led Development Strategies, focussed on local issues but within the context of the bigger picture, into a grant giving tool hamstrung by an overly bureaucratic process that does not have the end user in mind.,

The concept of local-led decision-making, despite the over prescription of the process by the RPA, has resulted in a range of good projects being awarded grants and delivering job creation outputs. However, in placing more emphasis on safe projects which result in job creation, the programme is now less inclined to find innovative solutions to local problems (as previously intended). Moreover, local decision-makers have been told to look less favourably on community projects as they don't create jobs, despite being able to transform peoples' lives and self-worth, reduce loneliness and provide a sense of community to those who most need it.

Whilst the Programme is no longer what it was or was meant to be, the **idea** behind LEADER is still very much valid.

Lessons Learnt

What has worked well?

1. Localism and Community Led-Local Delivery

LEADER is successful because it is a programme run and administered by local people who have a vested interest in the wider rural socio-economic development of their area.

Balanced and Representative Local Action Groups

This **bottom-up approach** of spending money on local issues, identified by people living in the local area works well. Ultimately, this approach is dependent on:

- **A balanced Local Action Group with a broad range of skills and expertise:** The key to the development of LAGs is to ensure there is a balanced membership. For a rural funding scheme to be effective, it requires a local, independent voluntary group with breadth of local expertise and influence who understand what is required to advance improvement for a cross section of local residents (be that jobs, infrastructure, development, facilities, support, advice, community and environmental needs). They provide local intelligence, contacts and talent/skills sets, and ability to facilitate and influence local development (the eyes and ears on the ground). This development can contribute to and help influence other strategies and equally aid their delivery. They understand the distinctiveness of their area, what it needs and what it can offer. For a LAG to be effective in identifying local needs and remedies (as identified and set out in the Local Development Strategy), it is important to attract a broad and representative cross-sector membership to mirror (or represent) the local area it serves.
- **A representative Executive LAG (ELAG) to drive the agenda and progress:** In order to make consistent decisions with an oversight of the programme's key objectives, the LAG needs an Executive Board to steer decision-making, ideally with a strong Chairman. LEADER areas in some parts of England suffered performance wise due to lack of engagement from their LAG, so it's important to make sure there is a driving force within each LAG structure to make it function to the best of its ability. This is the role of the Executive Board.

A balanced and representative LAG with a broad range of skills and expertise is also vital to developing a well thought out **Local Development Strategy (LDS)**. Identification of local issues (via consultation and as set out in the Local Development Strategy) leads to locally tailored opportunities based on the social, economic, environmental and land-based needs of the LEADER area. The better the LDS, the more committed these volunteers are to helping the Programme succeed, so getting the right membership and producing a strategy which inspires and has 'buy-in' is critical to the programme's success.

Autonomous local decision-making

The budget is locally controlled, with decisions about which projects to support being made by the LAG. There is no direct political interference. Final decisions are made by the LAG Executive Board.

The four LEADER programmes across Kent and Surrey have all performed well because the programme areas have created LAGs with broad representation of their local areas, which were able to correctly identify local needs and solutions using the expertise and knowledge of their members as set out in their respective local development strategies.

2. A successful programme requires a dedicated programme team

Each Local Action Group (LAG) is facilitated by **Programme Staff with the skills and ability to work with applicants** to develop projects that deliver the Local Development Strategy (LDS) and respond to local needs and development.

- They guide and encourage the applicant through complex process of project development, application, and claims.
- They advise and support the LAG and ensure the proper governance of the Programme is maintained.
- They also have local knowledge and intelligence and can provide advice to applicants on other funding programmes that may be more suitable to the applicant.

The staff are 'boots on the ground', have experience of what does and does not work and can challenge (fresh pair of eyes) an applicant on a potential project, raising questions that the applicant may not have thought of and/or eliminates problems further down the line. Staff are open and accessible and can provide a human touch to what is, for some, a daunting process.

Programme Staff across Kent and Surrey have established productive working relationships with the grant beneficiaries to help them develop their applications and offer ongoing advice and support after a grant award has been made to make sure projects are compliant with funding guidelines. The support of Programme Staff was viewed as incredibly important by grant beneficiaries in helping them develop their project proposals and navigate the application process (hand-holding). Likewise, Programme Staff were also highly lauded by LAG members for their administration of the programme and overseeing the process of application, appraisal and assessment. Staff were also vital in raising awareness of the LEADER programme and galvanizing interest across the local area.

3. The importance of small grants to rural communities

Whilst the Kent and Surrey LEADER programmes provided several grants between £50,000 and £150,000 to larger businesses across their areas, it is important to

emphasise that the majority of LEADER grants are relatively small and provide support to new start-ups or small rural businesses. It is often the case with other funding schemes that small businesses are not eligible for support as the minimum grant is much higher and they do not have the financial resources to provide a higher level of match-funding. LEADER is different in that it often supports small businesses with small but important grants.

It is clear from our survey data that LEADER funding has been valued by grant beneficiaries and enabled projects to go ahead which otherwise would not have without LEADER investment. The programme has also been able to support a range of projects, supporting a wide variety of businesses and organizations to deliver an equally wide set of activities: almost unique when it comes to government funding initiatives. It should also be noted that part of what makes LEADER special is it offers **small grant support**, whereas most programmes have a much higher minimum entry level of support, thereby dissuading or prohibiting smaller projects from applying. LEADER is an important funding outlet for small businesses and community organizations in rural areas, allowing them to address very specific issues relevant to their business or area to create jobs, grow their business or provide wider, often lasting, benefits to their local community. Without LEADER investment, these activities would not have able to progress.

4. Match funding has resulted in increased investment in the local areas

The nature of a match funding programme means that LEADER funding has attracted additional private investment into the local rural economy which otherwise would not be there. LEADER applicants are required to state if they would be able to undertake their projects without funding as part of the eligibility criteria. Consequently, without LEADER funding these projects would not go ahead and the additional private investment in the area would not happen.

The intervention rate

It should also be noted that grant intervention of 40% results in 25% more overall investment in the area than a typical match-funding intervention of 50%.

For every £100k of grant intervention at 40% of project costs, projects invest £150k of private investment, totaling £250k of overall investment. Whereas £100k of grant intervention at 50% results in projects match-funding a further £100k, resulting in £200k of overall investment. For this reason, for the majority of projects, an intervention rate of 40% is still desirable for them to apply for funding and, at the same time, will result in greater investment in the local area (as much as 25% more investment).

What has not worked well or does not work?

1. Over focus on jobs and growth

The evolution of the Leader process from what it was under previous Programmes to what we have now. The changes to the Programme in England have not, overall, led to improvement. **Too much** focus on jobs and productivity has hemmed in the breadth of the Programme and its ability to respond to wider local needs. It has altered the balance of the Programme and moved it away from a willingness to assist projects that can support and underpin the development of jobs and growth. As a consequence, local infrastructure and support projects that give a roundness to the LDS and better reflect local needs, have been proportionally neglected.

2. An evolving process in constant change

The process has never been 'right' and has been subject to numerous alterations throughout its period of operation, suggesting that neither the RPA nor the LAGs are entirely happy with it. It is a curate's egg. This has caused confusion, inconsistency, and frustration with the constant tinkering at national level. It has often sown doubts and uncertainty in the minds of Programme staff (*hard to get it right*)... We all make it work, but it is almost despite, rather than because of, the prescribed nationally laid down process.

It is true that this Programme has been blighted by a 'stop start' nature for external reasons beyond the control of the RPA, such as the EU referendum, three General elections, local elections, and a comprehensive Spending Review. Consequently, it has struggled to get traction or momentum, with newer LAGs probably struggling most. This has been beyond the control of the RPA or the LAGs.

LEADER has been in operation in the UK for almost three decades. Whilst programmes do evolve and changes are sometimes required to prescribed forms and guidance, the point has surely been reached where each new programme can move forward with confidence that the administration of the programme and the various forms and guidance can remain consistent for the given period. Any changes should be made when moving from one programme period or iteration to the next, **not** during the programme itself.

3. Overly complex and bureaucratic

The Leader approach is an important mechanism for targeting rural economic and community growth, but the current programme is an extremely complex bureaucratic structure. There is wide recognition that it has provided both economic growth and underpinned community cohesion, but the scale of the bureaucracy involved tends to defeat its original purpose.

Applications were assessed against national guidelines, meaning the process was heavily prescribed and subject to a high level of scrutiny. Consequently, Local Action Groups had no recourse to simplify that process.   Whilst it was acknowledged that there may have been legal requirements to provide certain information, several requests were made for information to be presented more clearly by overhauling the application form and prescribed reporting forms.

The 'one size fits all' application approach has not led to the intended consistency it was designed for. It has made the process too rigid, too inflexible and takes away

the willingness and ability of LAGs to 'give it a go' of 'take a punt' with some projects. There has been too much emphasis on compliance at the expense of common sense and not trusting the decision makers on the ground to reach a conclusion on a project by applying proportionality.

The project beneficiaries' journey through the application process was described by both project beneficiaries and the LAG Executive Board as **difficult** and **onerous,** and the level of scrutiny was often disproportionate to the grant sums being awarded. Though, decision-makers also recognised the need for rigor in the process and that, overall, the process worked well despite the demands placed on the applicants.   For the applicant the volume of information required for a £5k project is much the same as for a £50k project. Proportionality is, again, lost. Projects are lost. It was felt these deterred applications from otherwise worthy projects who lacked experience and expertise bidding for grants.

The process has become over complicated and over engineered which associates LEADER with onerous bureaucracy; a long-winded undertaking that puts off many potential applicants, rather than a robust and rigorous process that challenges the applicant to come forward with well thought out projects that can benefit themselves and the local area.

Not all applicants could commit to the application process: Such was level of detail required to complete the application, not all applicants could sufficiently commit to the application process. There was concern that the time and resource commitment required to complete the application process ultimately deterred prospective applicants from applying and possibly led to some applicants withdrawing. One issue is that LEADER applicants are mainly small businesses or local charities, with less experience of completing government funded grant schemes. They are not necessarily experienced or sufficiently resourced to easily provide the level of information required to the standard required. Some successful LEADER applicants hire a consultant to complete the application form for them; smaller LEADER applicants are not in a position to do so, putting them at a considerable disadvantage. This created a divide between those applicants able to write bids, or employ someone who could, and those who had little experience of doing so. The latter were therefore more reliant on the LAG programme staff for advice and support and making an otherwise "difficult process far easier". There is a fear that previous difficult experience of the application process may deter other good projects from applying, leading to just the same businesses applying for funding (which is commonplace).

As such, the application and appraisal process would benefit from refinement to make it simpler to complete for applicants and less onerous for appraisers and decision-makers. It should be streamlined and simplified for all projects regardless of the size of grant being requested. Moreover, the system should be proportionate so that those applicants requesting smaller grants are not required to provide the same level of information and detail as those requesting larger grants. Similarly, the appraisal and assessment of applications should also be less onerous for those decision-makers tasked with considering these small grant applications.

A simplified and streamlined application and appraisal process would help to ensure that prospective applicants are not put off from applying, that the process has the end user in mind, and that it might incentivize repeat applications if the process is considered worthwhile for the gains (a number of applicants stated they would not apply for funding again due to the level of bureaucracy). The process should be user-friendly and for those without the experience of previously applying for public funding. It would be useful for the RPA to look at other small grant organisations to see a comparative analysis of the level of information required from the applicant and the level of scrutiny required of the grant making body, e.g. The Prince's Trust or even small business bank loans. There is probably much to learn in terms of making the process easier for all involved.

There was no proportionately in the process

All applicants were held to the same level of examination via the application and appraisal process. LAGs had no discretion to reduce the level of scrutiny or streamline the process for smaller grant applications.

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Future funding scheme

With the UK Government's exit from the European Union, the Government is considering its options for a new rural funding scheme to replace LEADER.

We believe there is still a strong case for a dedicated rural development programme. We also believe that the model should broadly follow the LEADER approach of bottom-up community led local delivery. It is important to highlight that with the launch of the Government's Rural England Prosperity Fund, some Districts and Boroughs will have a mechanism for offering capital grants within the rural economy. This covers the funding period 2023/24-2024/25. The West Kent Partnership is currently exploring a LEADER type scheme to run to maximize the scale and breadth of the opportunity.

This section sets out the case for continued rural investment, why the LEADER approach should be continued in all but name, but also why a future programme needs to refocus on previous iterations of LEADER (such as the 2007-13 programme) with less emphasis on economic delivery, whilst important, but with more focus on supporting rural communities.

The case for continued rural investment

Local challenges, opportunities and continued beneficiary demand

As can be seen from the large number of Expressions of Interest, successful applications and high commitment of allocated funds, there is a clear **demand** for intervention from local businesses and community organisations. These projects have brought about real benefits to their local rural communities in terms of job creation, business growth and community enhancement and cohesion. As our survey of grant beneficiaries clearly highlights, there are still high levels of demand for the continuation of support for rural development activity.

The challenges and opportunities highlighted in each programme's Local Development Strategy are still pertinent. Whilst rural funding in the shape of LEADER has made a real difference to those successful grant beneficiaries – and, indeed, often resulting in wider benefits to their local communities – the investment is finite and limited by the overall grant allocation. Programmes can only deliver according to the supply of funding, but the **demand** for intervention is still clearly greater than the supply of investment. Consequently, there is a clear case to continue with a locally-led rural funding scheme with a successful track record.

We have considered how a future funding scheme should look, building on the LEADER delivery model. Our recommendations are as follows:

1. A new scheme must follow the Community Led Local Delivery (CLLD) model

A new scheme will require **continued sub-regional local decision-making.** LEADER works because it focuses on local areas utilising the knowledge and expertise of a wide range of local decision-makers. Any future scheme should therefore continue to work a localised level, certainly below the larger LEP level used for other larger funding schemes and a larger strategic remit. As such, the current LEADER **structure** should remain in place as a template at the very least. It may need tweaking, geographies may need adjusting but there is a successful, working model in existence. This uses local expertise and knowledge to address local issues and develop local economies and communities. The structure has local buy-in and engagement and a track record of delivering. **It makes a difference.**

The structure of the new LAG (for use of a better acronym) should remain non-political and made up of a cross section, but balanced, representation of local organisations, business groups, NGOs and individuals etc. who have a vested interest in their local area. The list is not exhaustive but needs to be made up of partners that can bring expertise, knowledge, skill sets, influence, and contacts.

The new scheme should keep the current structure in place as a template for future local development and funding programmes. It may need tweaking, geographies may need adjusting but there is a successful working model in existence. This uses local expertise and knowledge to address local issues and develop local economies and communities. The structure has local buy-in and engagement and a track record of delivering. It makes a difference.

2. A new scheme must use existing networks

LEADER has been successful in setting up effective Local Action Groups with a broad range of local knowledge and expertise. It would be a waste to lose these people and their knowledge. As such, we strongly believe that a future scheme must work on the basis of having a Local Action Group to identify local needs and set out strategies to meet local challenges or opportunities.

In order to effectively do this, the LEADER Local Action Groups must be maintained. This will save considerable time and expense and ensure a significant level of continuity with the previous scheme. It will also ensure confidence in the new scheme and buy-in from the membership.

3. Priorities must continue to balance Local and National Responsibilities and Priorities

A future scheme should continue to balance both national and local responsibilities and priorities. As with the current LEADER scheme, the national body (presumably the RPA) will need to set the broad principles of the programme in support of different sectors of the rural economy, as well as developing the prescribed forms and guidance to ensure consistency of administration throughout England. We recognize that there needs to be broad national priorities highlighting the sectors to be supported and a consistent eligibility criteria to be applied across England.

Likewise, we recognize reporting and guidance requires a prescriptive approach to ensure all local groups follow the same guidelines from setting up local action groups, developing local strategies and appraising and assessing project applications.

There should then be appropriate devolution to Local Action Groups to adapt the wider national priorities into local priorities but LAGs must be given autonomy to manage their programmes locally in relation to their local needs. The success of LEADER to date has been its ability to allow local areas to set their own local priorities which reflect their own local challenges, needs and opportunities. This must remain.

There should not be an over-emphasis on awarding grants to projects which create jobs or economic growth. LAGs should be able to decide the criteria for the activity it wants to support. If that means a greater emphasis on community or tourism schemes, then that should be the decision of the LAG.

In this regard, the current system works with the UK government being responsible for setting national priorities to direct the general focus of programme, with local decision-makers taking into account other regional and sub-regional influences (i.e. setting their own local approaches with some alignment to the larger Local Enterprise Panel regional priorities and the broader national priorities). Indeed, Local Development Strategies clearly set out local priorities and how they also fit under the broader LEP and national targets. This approach provides a good structure to ensure a general consistency of contributing towards broader regional and national objectives whilst having the flexibility to develop approaches specific to local needs.

4. The Local Development Strategy is still the correct vehicle to deliver change

The Local Development Strategy is the mechanism to deliver change. It should be the vehicle to draw down funds based on its own outputs and outcomes. This can be monitored and success or otherwise evaluated. It should not be subject to a prescriptive set of national priorities which do not necessarily meet the specific needs of the local area; **rather, it should be specific to the needs of the local area and set out clear local priorities.**

Consequently, any future scheme should maintain the Local Development Strategy as the driver for change.

5. Programme support is key to the success of any future scheme

Many rural businesses said they would not have been able to complete their application journey without the support of a dedicated programme team offering them help and assistance throughout. Many small businesses do not have the experience of bidding for funding and lack the resources to hire a consultant to undertake the application on their behalf. Consequently, rural businesses often find

it difficult to bid and access external funding and the provision of support during the application process is often required in this context.

As such, any future scheme must retain the involvement of a dedicated programme team to help applicants develop their project proposals in line with the eligibility criteria and assessment guidance.

Moreover, the Local Action Groups were also very much dependent on having the support of a programme team to run the administrative function of the LAG and also advise on national guidance and various relevant local issues. The programme team is also the best conduit to link LAGs together and raise awareness of any future funding programme.

The system of having an Accountable Body being responsible for the administration of the programme should also remain. Local authority staff have the requisite skills and expertise to successful manage the administration of the LAG, monitor and evaluate progress and report to central government.

6. The application and appraisal process must be robust and rigorous but not onerous

We recognise that the process should be robust and rigorous in order to develop good project proposals ad sufficiently test the project rationale.

Yet it should also be flexible enough to allow local decision making in response to specific local needs. This requires a higher degree of trust for locally appointed/agreed (but non-political) decision makers to administer the Programme without excessive interference from the managing authority.

There is a concern that the process deters prospective applicants who might otherwise have a good project proposal but don't have the skills or experience of undergoing a lengthy and detailed application process.

The process and prescribed forms therefore need to be both accessible and simplified. Although grant-making processes are necessarily rigorous as it involves the giving of public funding, the feedback form users is very critical of the system. A future programmes needs to ensure a balance so that genuinely good projects are not put off from applying.

7. The application and appraisal/assessment process should be proportionate

A future funding scheme should recognise the difference between projects at the lower end of the grant giving scheme and those much larger grants at the top end. It does not make sense to hold both to same standards of detail and rigor in either the level of information the applicant has to provide or the level of information the LAG needs to consider. Grants are contractual and applicants need to meet certain

business or company checks to make sure they are legitimate. If outputs cannot be delivered, then recovery can either remain an option or the low-level grant written-off. But these low-level grants do not require the level of probity currently demanded. Therefore, a future scheme should keep the principle of rigor for larger grants of £30,000 and over, but smaller grants should not be held to the same standard.

A new scheme should have a dual process for delivering small interventions as well as larger ones, e.g. a simplified application process for small requests for grant assistance.

The replacement to LEADER should be designed so that the process is necessarily robust and rigorous, yet flexible enough to allow local decision making in response to specific local needs.

There also needs to be a higher degree of trust for locally appointed/agreed (but non-political) decision makers to administer the Programme without excessive interference from the managing authority.

8. A future scheme should not over focus on jobs and growth but return to supporting wider community development

A return to local transformation projects and not just an economic grant scheme: Programme support staff, LAG Board members and prospective grant beneficiaries are all united in wanting a scheme to return to the previous iteration of LEADER, which awarded grants to projects that brought about change locally without the requirement to produce jobs or economic growth. Whilst these aims are important, rural grants should also address issues of isolation and those affecting communities in rural areas. We would welcome a return to a Programme that can act as a catalyst for change locally and is a development programme rather than one that has simply become a grant giving mechanism. We also believe this is in line with the Government's levelling up agenda, which is not restricted to economic growth targets but recognises the need to develop and transform areas for community benefits.

9. Grant intervention should remain at 40%

It should also be noted that grant intervention of 40% results in 25% more overall investment in the area than a typical match-funding intervention of 50%.

There is clear demand for support at 40% intervention for commercial projects and no evidence to suggest that a project contribution of 60% has necessarily dissuaded projects looking for a 50-50 split of project costs. A grant intervention of 40% brings in 25% more overall investment and a future scheme should continue to operate on this basis, as it provides more overall investment and allows for more grant funding to go to more projects.

10.   A new scheme should have greater scope

Rural funding should be extended to revenue projects: Any new Programme should not be limited to assisting capital projects. Revenue projects should be included and the Local Group (LAG) should be able to commission projects to deliver local change and development. It should also have a process for delivering small interventions as well as larger ones.

Extending the programme to other rural areas and larger rural towns: Under the current scheme, some projects have been ineligible because the applicant business or organisation sits just outside the designated LEADER area. We think there should be more discretion for LAGs to accept applications from otherwise very good projects who are prohibited from applying due to their location. At present there are some rural businesses in what we would still consider to be rural areas who cannot apply for LEADER funding because they fall between the designated LEADER areas and this also needs to be addressed.

Why should a new locally led Programme be restricted to rural areas? Is this the chance to extend the 'approach' to urban areas, especially larger rural towns? Could we not also consider the same 'approach' for coastal areas (FLAGs)?

11.   The programme should remain consistent for each designated period

Consistency of approach and consistent use of processes: A future replacement scheme should have an agreed Programme with agreed processes and practices from the start. Having the benefit of running LEADER and rural grant schemes for several decades, along with other EU structural funds, should by now mean that lessons have been learnt and a capable, efficient and effective scheme is embedded at national, regional and local levels. Surely, by now, there is enough knowledge, skills and expertise at every government level (national and local) for a scheme to be set-up and run without the need to change it. The avoidance of changing guidance and rules once the Programme is operational would be welcomed by all in the administration of rural funding. Lessons can be learned, and changes implement between programme round: there are no reasonable excuses to keep amending programmes during their operational phase.

We therefore recommend that the future scheme:

- **Develops an agreed programme with agreed processes and practices from the start. The avoidance of changing guidance and rules once the Programme is operational.**

12.   The Running and Animation Costs should be based on allocation to areas and not committed spend

The Running and Animation Costs (RCA) for staff resources are linked as a direct proportion of committed spend. However, when a project withdraws the committed spend is reduced and the amount of RCA is subsequently reduced as well. It is very difficult to plan effectively when the RCA programme budget fluctuates and, in instances where there are late project withdrawals near the end of the programme, each programme has to apply for dispensation to have a greater proportion of committed spend in order to sufficiently resource their programme team. This is not an ideal way of setting the programme's staffing budget. Running and animation costs should instead be based as a proportion of grant allocation to the area rather than the end result of the committed amount awarded to projects. The current system does not take account of the amount of work which goes into dealing with Expressions of Interest, withdrawals prior to and after Grant Funding Agreements have been issued.

13.   Future opportunities for collaboration

One aspect of the LEADER programme which could be improved is the opportunity it gives to grant beneficiaries to network with each other develop opportunities for collaborative working. Whereas other structural fund programmes such as the European Social Fund (ESF) and European Regional Development Fund (ERDF) often establish networks of grant beneficiaries, this is not replicated for LEADER funding. In part, this is probably because LEADER funding covers a much wider diverse mix of projects, with businesses ranging from new or small enterprises to large local rural businesses or farming businesses. ESF and ERDF programmes tend to have more similar businesses and consistency of activities and outputs. However, the establishment of network groups for grant beneficiaries could be a welcome addition to a future funding scheme. Greater communication and networking between grant beneficiaries would allow:

- The development of productive working relationships and opportunities for joint-working and collaboration, as well as sharing best practice.
- The opportunities for LAG areas to network with neighbouring LAG areas, again giving grant beneficiaries access to a wider pool of businesses and networking opportunities.
- Greater networking and coordination between individual LAG areas in a network similar to that established between Kent, Surrey and Sussex LAGs, allowing LAGs and Accountable Bodies to share best practice, develop opportunities for cross-LAG collaboration (e.g. on marketing or staff resources), as well as developing cross-area priorities where LAGs might fund projects over a larger cross-LAG geographical area.

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Appendix C: Breakdown of LEADER Project Grant (Paid and Committed) per Local Authority

Project no.	Grant Claims Paid (Actual)	Claims to be paid (committed)	Total Paid and Committed
Tunbridge Wells			
100869	8,050.86		
100871	5,959.92		
100946	13,502.26		
101347	15,362.40		
101910	19,659.20		
102252	21,416.40		
103604	16,542.22		
105406	38,340.00		
106210	145,105.35		
106680	37,676.00		
110161	105,200.00		
112080	149,762.48		
113975	15,756.00		
	592,333.09		592,333.09
Gravesham			
114098	19,532.55		19,532.55
Tonbridge and Malling			
101152	28,775.60		
103903	49,996.35		
104094	11,982.20		
104446	19,000.00		
104982	8,890.29		
105324	25,600.00		
105528	117,624.00		
106134	34,967.28		
107522	80,493.60		
107762	42,798.40		
109290	20,686.50		
110160	18,407.76	1,954.90	
112319	16,816.00		
113182	36,216.40		
114096	10,932.00		
114112	6,363.73		
117434	59,761.20		
	589,311.31	1,954.90	591,266.21
Sevenoaks DC			
101478	49,220.23		
102683	49,861.54		
103778	45,947.68		
104630	10,646.00		
105533	23,165.60		
107041	13,454.00		
107582	8,556.00		
108432	76,277.72		
108485	39,400.00		
108638	10,836.68	3,283.70	
109303	4,671.77		
109555	8,700.00		
111643	66,646.00		
111794	30,265.18		
113436	128,691.20		
113847	15,867.60		
114093	5,114.00		
117369	3,820.00		
117424	14,993.61		
	606,134.81	3,283.70	609,418.51
West Kent Partnership Total	**1,807,311.76**	**5,238.60**	**1,812,550.36**

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Item 07 – Capital Schemes Programme Update

The attached report was considered by the Improvement & Innovation Advisory Committee on 4 October 2022. The relevant Minute extract was not available prior to the printing of this agenda and will follow when available.

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CAPITAL SCHEMES PROGRAMME UPDATE REPORT

Cabinet – 13 October 2022

Report of: Detlev Munster – Strategic Head Property and Commercial

Status: For Consideration

Also considered by: Improvement & Innovation Advisory Committee – 4 October 2022

Key Decision: No

This report supports the Key Aim of:

Ensuring the District's communities have suitable homes to live in, within safe, healthy and protected environments and that the local economy is supported to provide jobs and services that are needed within the District (Council Plan).

Portfolio Holder: Cllr Peter Fleming

Contact Officer: Detlev Munster, x7099

Recommendation to Innovation and Improvement Committee:

To note the recommendation to Cabinet below.

Recommendation to Cabinet:

To note the Council's progress in establishing and delivering a 10 year capital schemes programme that will generate new homes, regenerate the District's town centres, improve the public realm and provide new civic amenities, which promote health and well-being, and support the District's economy.

Reason for recommendation:

The Council has an ambitious regeneration and development programme. Significant progress is being made by the Council in bringing associated projects to fruition. The projects are at various levels of maturity and this report provides an update on the projects and the processes and approaches that the Council has developed to deliver a capital schemes programme.

Background

1. In 2019 a new Council Plan was launched, which aims to ensure its communities have suitable homes to live in, within safe, healthy and protected environments, and that the local economy is supported to provide jobs and services that are needed within the District. The Council intends achieving these aims by ensuring what it does is built on excellence, value for money and innovation. The Council Plan promises to support high standards for new developments, improved connectivity, regeneration of its market towns, making better use of employment sites and previously used land, provide a choice of accommodation and affordable housing, and deliver first class well-being services to mention a few.

2. The Council's Financial Strategy also seeks for the Council to be self-sufficient, adopt a commercial approach where it is beneficial to the Council's budget and invest in property to generate income for the Council.

3. To deliver on the Council's Plan and its Financial Strategy, the Council has identified an ambitious regeneration and development programme for the next 10 years.

4. This report provides a brief overview of the arrangements established by the Council to deliver its regeneration and development objectives. It also highlights the project management protocol it has established, and finally it provides an update on current projects.

Delivery Structure

5. In 2020, the Council restructured its property related teams and the economic development team into a new Property and Commercial Service. The Service is responsible for Property Investments and Management, Asset Maintenance, Economic Development and Capital Project Delivery. These respective functions work collectively to define and deliver projects. The Service is a small team of 15 FTE, but has over 200 years of collective experience in professional disciplines covering surveying, finance, project management, housing, planning, construction, architecture, maintenance, regeneration, risk management, public consultation and law.

6. The Capital Project Delivery Team, under the guidance of the Head of Property and Commercial Services has two project managers, a development and investment surveyor, and a part-time project assistant. This team is supported more widely by colleagues in Finance, Legal Services and Communications, and where appropriate expertise are also drawn on an ad hoc basis from colleagues in Building Control, Highways, and Planning.

7. The Capital Delivery Project Team meets fortnightly to discuss respective projects and seek guidance from other property colleagues and acts collegiately in delivering projects.

8. Depending on the complexity of a project, resources are flexed to draw in external consultancy support. Each project has its own Project Team consisting of multidisciplinary consultants that also meet as required. Matters are accordingly escalated and project updates are discussed at the fortnightly Capital Delivery Project Team meeting.

9. The Capital Project Delivery Team reports to and submits highlight/status reports to the Corporate Programme Board, which acts as the Project Board for projects.

10. Exception and key decision reports are submitted to the Senior Management Team by exception only. The Capital Project Delivery Team also obtains informal strategic advice from the Strategic Programme Board.

11. In accordance with the Council's Standing Orders, approvals are sought from Cabinet and Council.

Financial Arrangements

12. Each project is funded on its own merits and different funding sources are used to delivery projects. Each project therefore undergoes intense financial scrutiny. Development and viability appraisals are prepared for each project by external financial, property, and cost consultants. Appraisals are also stress tested to determine viability parameters. These appraisals are in turn internally reviewed by Property and Finance and submitted to SMT, Cabinet and Council for approval.

13. The Council has established a project management protocol (see next section) which sets gateway budgets and approvals so that projects are monitored and controlled, with direction been provided by the Corporate/Strategic Programme Board, SMT and Cabinet.

14. At the beginning of each financial year the Capital Programme's Budget is set by Council and "seed funding" is available to undertake pre-feasibility studies for mandated concepts.

Project Management Protocol

15. The Council's project management protocol is outlined in Appendix A. The protocol establishes a series of Gateways, which all projects need to go through sequentially. This is to ensure risks, budgets and design quality are effectively managed and proposals are carefully scrutinised to ensure they are aligned with the Council's priorities, deliver against the objectives set, are viable, affordable, deliver value for money, and have the necessary approvals.

16. The protocol is adapted from Prince 2 methodologies, approaches and techniques.

Capital Programme Overview

17. In 2020/21 the Council reviewed its priorities and undertook a comprehensive asset review. While asset reviews are by their very nature on-going, the process to date has identified potential development sites. Rapid assessments for each site were undertaken to determine their viability and deliverability. There are currently over 20 sites which are being assessed to determine their development potential.

18. The Asset review has also identified potential sites that are surplus to the Council's need and these are considered as part of the Council's disposals programme. Since 2021, the Council has disposed of three sites, viz.: land at Oakhill Road (Sevenoaks); Alder Way (Swanley); and Russet Way (Swanley).

Update on Capital Projects

19. The following table provides an update on the Council's key capital projects and Appendix B provides emerging images of the respective schemes where available.

	Project	Status	Key Next Steps
1	Burlington Mews, Sevenoaks	Construction of 10 contemporary luxury residential units. Practical completion was achieved in August 2020. Units were disposed on the open market and all units were fully sold by August 2021. Management company of the freehold common parts was transferred in March 2022. The use of Quercus 7 to hold 3 units for letting on AST's which SDC is unable to do. This assisted a successful sales programme in a property market disrupted by Covid-19/lockdown.	Completed.
2	White Oak Leisure Centre, Swanley	Project involves the construction of a new c.£22m state of the art of leisure centre containing 4 multi-purpose sports studios, multipurpose sports hall, 6 lane 25m swimming pool with movable floor, learner pool, public event gallery, tag active, snack bar and kitchen, 200 station gym with spin-studio. Significant public consultation was undertaken to establish the facilities to be provided at the new leisure and a decision was made to ensure continuity of leisure services and minimise disruption to the local community. Planning permission was obtained in March 2020 and construction commenced in July 2020. Covid measures were put in place to ensure the effects of the pandemic could be mitigated where possible and these measures proved to be effective. Despite significant due diligence	• Completion of new car park and landscaping (Oct 2022). • Review of final accounts (Nov 2022). • Review of liabilities associated with undisclosed assets (Dec 2022).

	Project	Status	Key Next Steps
		and site investigations, undisclosed underground KCC drainage assets and abnormal ground conditions were discovered. This required foundations to be redesigned and re-piled and for a new surface water drainage system to be designed, agreed and implemented. These resulted in a three month delay to the construction programme and the centre opened in February 2022. Following the opening of the new leisure centre, demolition of the old leisure centre commenced. Additional asbestos was found during demolition works in the old Leisure Centre which together with Covid measures, the abnormal ground conditions encountered and the need for a new surface water drainage system resulted in the original project budget being exceeded by 10%. A new car park is currently being constructed and the project is due to fully complete in October 2022. The new leisure centre opened to much critical acclaim and membership targets and usage has been beyond expectation.	
3	27-37 High Street, Swanley	This is a mixed use project on a disused and surplus former community facility. The new build will contain 17 residential units and a new business (co-work space) hub. The hub will support current and emerging micro businesses/entrepreneurs. Planning permission was obtained in May 2020 and £1.49m grant funding was awarded to the project by the Getting Building Fund. This enabled construction to commence in July 2021. The project was on course for completion in August 2022, but due to energising issues (substation reinforcement works) experienced by UKPN, the project is now on course for completion in	• Practical Completion (Nov 2022) • Disposal of residential units (Dec 2022) • Soft launch for business hub (Dec 2022) • Formal launch of business hub (Feb 2023)

	Project	Status	Key Next Steps
		November 2022. The project is also on course to complete within the budget parameters of £6.1m.	
4	Stangrove Estate, Edenbridge	The Stangrove estate is experiencing significant parking congestion which is affecting the amenities of local residents and impacting open spaces and biodiversity. The project involves the provision of new dedicated parking lots and improved public open spaces across 7 sites and the provision of a new community shop and 13 residential units. Planning permission was obtained in January 2022, a contractor was appointed in April 2022 and construction is due to commence in September 2022. A new temporary community shop has been provided and a phased development is proposed so that certain parking lots can be commissioned as soon as possible.	• Start on site (Sept 2022) • Practical completion (Sept 2023)
5	Farmstead Drive, Edenbridge	The Spital Cross Estate is experiencing significant parking pressures and the existing community hall and community shop are no longer fit for purpose. A feasibility study undertaken in August 2021 noted that additional car parking, a new community hall and shop, and improved amenity space can be reprovided and cross-subsidised through the development of up to 33 new homes. Public consultation was undertaken in April 2022 to present emerging conceptual ideas and obtain feedback. Detailed feasibility and design work is currently being undertaken and due to complete in November 2022.	• Completion of detailed feasibility and RIBA Stage 3 (Nov 2022) • Stage 2 public consultation (Dec 2022) • Submission of planning application (Jan 2023) • Planning determination envisaged (May 2023) • Contract award (Jul 2023) • Start on site (Oct 2023) • PC (Mar 2025)
6	Bevan Place, Swanley	The former Swanley Working Men's Club was demolished in 2017 and together with the Bevan Place public car park, is a strategic regeneration site in the Swanley Town Centre. Numerous options appraisals were undertaken for the site and in Feb 2021, the Council decided to	• Planning determination (Sept 2022) • First draft completion of legal documents (Sept 2022) • Receipt of tenders (Oct 2022)

	Project	Status	Key Next Steps
		proceed with a feasibility study suggesting the site's redevelopment could be brought to fruition through a build to rent product. A multi-disciplinary consulting team was appointed and by May 2021, detailed feasibility work commenced. Public consultation was undertaken in November 2021 to outline emerging ideas and obtain public feedback. In December 2021, agreement was reached with WKHA to incorporate two existing residential blocks into the scheme and comprehensively redevelop the wider area. Detailed design work was completed in May 2022, a planning application was also submitted and the procurement process for a design and build contractor commenced. The planning application is due to be determined on 29 September 2022. The proposed scheme is of high quality, will set a new design standard for Swanley at this important landmark location and will be constructed to very high environmental standards. When completed it will provide 93 new homes (of which 22 will be affordable), significant road and public realm improvements to Bevan Place, Godsell Road, and the High Street, and a new public garden and retail unit. The scheme will constitute a further £34m investment by the Council in Swanley.	• Final Council approval (Dec 2022) • Contract award (Jan 2023) • Start on site (Mar 2023) • PC (Mar 2025)
7	White Oak Residential, Swanley	As part of the White Oak Leisure Centre planning application, outline planning permission was obtained for 41 residential units on surplus land arising from the old leisure centre's demolition. Following further feasibility work, it was noted that the scheme could be significantly improved to not only provide additional amenity space and parking and relate better to the new built	• Stage 1 procurement of contractor (Oct 2022) • RIBA Stage 3 design completed (Dec 2022) • Public consultation (January 2023) • Submission of planning application (Feb 2023) • Planning determination envisaged (June 2023)

	Project	Status	Key Next Steps
		environment, but much needed additional housing could be provided. In February 2021 the Council approved a new scheme to be considered on this site. A new multi-disciplinary project team was procured and design work commenced in February 2022. The opportunity to develop the site using MMC was noted and the design and procurement strategy was revised. An MMC design and build construction partner is currently being procured using a two stage process. Design work to date suggests that up to 62 new homes can be delivered on this site.	• Contract Award (June 2023) • Start on site (tbc) • PC (tbc)
8	Land East of High Street, Sevenoaks	The Council is a significant land owner of land to the east of the High Street in Sevenoaks. A concept masterplan/feasibility study is currently being prepared to consider options for the development of these land parcels, which also includes 96 High Street. The objectives include the need to improve the economic use of these sites and to improve the urban fabric of the town centre. Consideration is being given as to how development can sustain and enhance the town's economy, provide additional housing and improve the town's civic amenities. Consideration is also being given to repurposing 96 High Street into a vibrant centre that will allow local products and services to be promoted, catalyse additional footfall to the town centre and help revitalise the night-time economy. A multi-disciplinary consulting team has been appointed to assist with the feasibility/options study. It is also envisaged that the Council will seek a development partner to assist in delivering the scheme.	• Options report and feasibility study finalised (Oct 2022) • Public consultation on emerging proposals (Nov 2022) • Refinement of preferred option (Jan 2023) • Development Prospectus issued (Jan 2022) • Development Partner procured (June 2023) • Submission of planning applications (tbc)

	Project	Status	Key Next Steps
9	Hollybush Park, Sevenoaks	A strategic development plan is being prepared for the improvement of public spaces and recreational uses at Hollybush Park. Legal due diligence is being undertaken and initial plans to improve the children's play area have been prepared and funding to undertake these works were secured in March 2022. Works to the play area were to commence in May 2022 but due to supply chain issues works are to commence in September 2022. Future proposals that are currently being considered include improvements to the café and public toilets and change rooms, the provision of open air gym equipment and a sensory garden, parking improvements and regularisation, additional public open space with a woodland walk. Ideas are still being formulated and discussions with key stakeholders have commenced.	• Phase 1: New children's play area (Oct 2022) • Phase 2: Options currently being prepared (tbc)
10	Land at Otford Road	The Council is currently preparing plans to repurpose a depot at Otford Road. Initial studies and feedback from agents, Locate in Kent and Economic Development team suggest that employment use land is urgently needed. Emerging studies suggest that a business park providing small to medium size commercial units could be viable at this site.	• Prefeasibility study and masterplan (Oct 2022) • Council "gateway" approval to proceed (Dec 2022) • Procurement of consultants (January 2023) • Detailed feasibility study (May 2023) • Stage 1 public consultation (June 2023) • Submission of planning application (Aug 2023) • Planning determination, full council approval and receipt of tenders (Dec 2023)
11	Edenbridge Leisure Centre and adjacent land, Edenbridge	A condition survey of the current facility has been prepared and is under review. In addition, the Council considers that the site the leisure centre is occupying could	• Prefeasibility options study (Nov 2022)

	Project	Status	Key Next Steps
		be better optimised given its strategic location.	

20. In addition to the above projects and the assessment of other potential development sites, it is important to note that other strategic studies are also being undertaken.

21. As such, the Property Team has been/is involved in the following studies:

   - Condition survey reports
   - Net Zero Carbon assessment and strategy for the Council's corporate assets
   - Town Centre Strategy
   - Movement Strategy
   - Housing Strategy
   - Retail Strategy

22. The Property Team has, over the course of the last year also been involved in:

   - the delivery of 11-13 High Street (a 15 residential use scheme in Swanley which was acquired from a private developer while still under construction);
   - the preparation of design options and development appraisals for Abbeyfield and Abbey Court, two potential property acquisitions for Quercus Housing.
   - asset managed SDC's property companies, Quercus 7 and Quercus Housing, which make valuable contributions to SDC's revenues (SDC becoming more financially self-sufficient) and affordable housing.

Key Challenges

23. Development is inherently risky and this risk is confounded where there is market failure and each project presents unique challenges and opportunities. Risk assessments are undertaken for each project and risks are reviewed at least monthly or more frequently depending on the nature of the risks identified.

24. Key challenges that the Council is experiencing include:

   - increasing cost of materials and labour due to current prevailing global market conditions and geopolitical uncertainties, Brexit and Covid;
   - challenging property market conditions of low values and high costs;
   - a volatile property market and limited land availability;
   - a challenging and changing regulatory environment resulting in planning uncertainty and increased costs;
   - managing local community expectations;
   - changing financial markets resulting in higher cost of capital and financial uncertainty;
   - difficulties in securing staff/consultants/contractors due to skills shortages;

- unexpected ground conditions despite having undertaken appropriate site investigations and due diligence.

Other options Considered and/or rejected

Not applicable to this report

Key Implications

<u>Financial</u>

Not applicable to this report

<u>Legal Implications and Risk Assessment Statement</u>

Not applicable to this report

<u>Equality Assessment</u>

Not Applicable to this report

<u>Net Zero Implications</u>

Not Applicable to this report

Conclusion

25. The Council is achieving momentum with its capital schemes delivery programme. It has established a 10-year deliver pipeline of projects. This pipeline is under constant review and as projects progress, new projects are conceptualised and brought forward for consideration.

26. Given the Council's size, resources and financial capacity, it is appropriately geared to deliver the capital programme and resources are flexed as and when needed. The Council is also considering other delivery mechanisms to augment its capacity and capitalise on private sector expertise, resources and finance.

27. Should the current listed projects come to fruition as envisaged, they will not only contribute to the District's place making agenda by enhancing its townscape and public realm, but will also deliver up to 750 homes with development partners on major projects in a district that is 93% greenbelt and 60% AONB and where land supply is limited, costly and constrained.

Appendices

Appendix A: Project management protocol

Appendix B: Images of capital projects
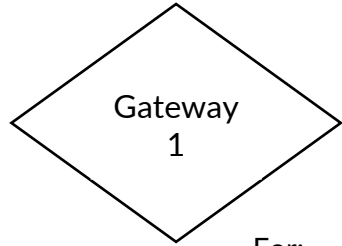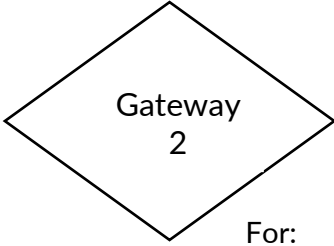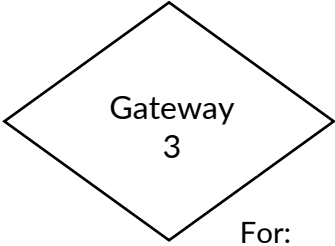
Background Papers

None

Detlev Munster

Strategic Head Property and Commercial

Appendix A: Project Management Approach and Overview

	Initiation	Feasibility	Planning & Design	Technical Design & Construction	Handover & Closure
RIBA	0, 1	1, 2	3, 4	4, 5	6, 7
Key Project Outputs	• Client requirements (outline) • Outline business case • Asset review	• Options appraisal/analysis • Project brief • Pre-feasibility study • Desktop site surveys • Report on title • Concept design • Procurement approach • Initial cost plan/financials	• Design studies/analysis • Outline specs • Cost plans • Consultant briefs/procurement • Detailed site investigations • Planning docs • Consultation material	• Final spec • Technical designs • Room data sheets • Building systems • Discharge planning conditions • Building contracts • Project performance • Building regs applications	• Building materials • Training • Snagging • Aftercare • Final certificates • Asset register updates • PC certs • Defects list • Fire risk assessment
Approvals	• CPB approval • SPB approval • SMT approval Gateway 1 For: • Feasibility only • Project team	• CPB/SPB approval • Cabinet Briefing • Cabinet approval Gateway 2 For: • Scheme • Budget • Planning permission • Procurement	• CPB/SPB approval • Cabinet Briefing • Cabinet/Council approval Gateway 3 For: • Final scheme • Budget confirmed • Inform tender returns	• Exception reporting only and update reports through highlight reports and Programme Dashboard	
Project Management Products					
Mandate	✓				
Project Initiation Document	High Level Outline	Update with PEP	Update		
Project Budget		✓	Detailed update	Monitoring	
Risk Register		Update	Update & monitor	Update & monitor	
Project Programme		Outline	Update	Monitor	
Change Control Procedures			✓	✓	
Highlight Reports		✓	✓	✓	
Comms Strat/Plan		✓			
Key Milestones	• PID • Outline business case • Project team (Internal)	• Project set-up • Cabinet approval • Concept designs • Procurement • Planning permission	• Contractor/Developer procured • Detailed scheme	• Start on site • Planning conditions discharged • P.C	• Operational • Manuals • Training • Occupation

Appendix A: Project Management Approach and Overview

Appendix B: Images of capital projects

Burlington Mews, Sevenoaks

White Oak Leisure Centre, Swanley

27-37 High Street, Swanley

Stangrove Estate, Edenbridge

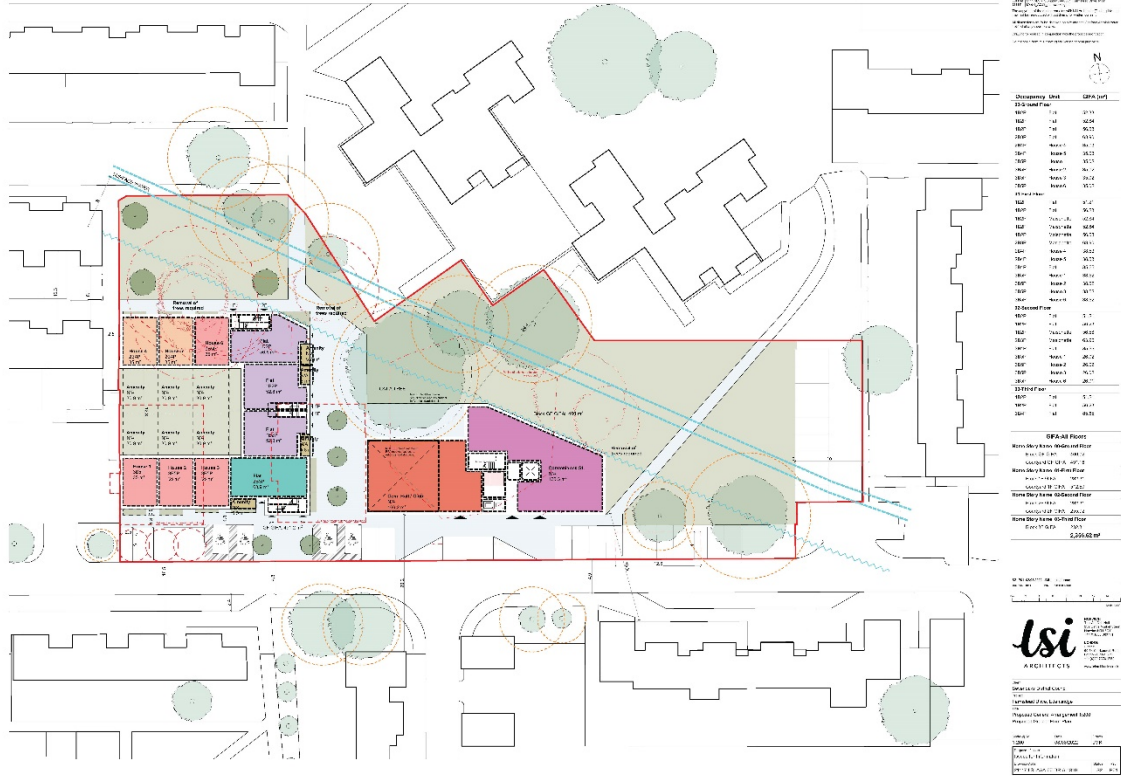Bevan Place, Swanley

Farmstead Drive

White Oak Residential

11-13 High Street

Before

After