

Appendix C – Summary of ADMP Main Modifications Consultation Responses

Comment ID	Respondent Name	Company / Organisation	Nature of representation	Summary
Summary of Main Modifications				
AMM4	Ladybird Studios (Keith Balderson)	Ladybird Studios	Observations	* Infrastructure should be improved/in place prior to any residential development commencing.
AMM27	Highways Agency (Tony Ferris)	Highways Agency	Observations	* No comment at this stage from the Highways Agency
AMM35	Kent Wildlife Trust (Vanessa Evans)	Kent Wildlife Trust	Observations	* No comment on MM1 to MM7 and MM9 to MM13
AMM38	Environment Agency (Jennifer Wilson)	Environment Agency	Observations	* No major concerns over the proposed modifications.
AMM45	Highways Agency (Kevin Bown)	Highways Agency	Observations	* No comment to make on proposals
AMM46	Kent County Council (Ms Liz Shier)	Kent County Council	Support	* Generally supportive of the modifications and the commitment to review the Core Strategy within the next five years
MM1 New Policy EN5 (Landscape)				
AMM6	Eynsford Parish Council (Holly Ivaldi)	Eynsford Parish Council	Support	* Supports the new policy EN5 (Landscape)
AMM18	Kent Downs AONB (Jennifer Bate)	Kent Downs AONB	Support	* The Kent Downs AONB supports this modification.
AMM39	CPRE Protect Kent (Sevenoaks Committee) (Brian Lloyd)	CPRE Protect Kent (Sevenoaks Committee)	Support with Conditions	* Supports the modification. * Believes the following additional wording should be added to the second paragraph and the delivery mechanism in reference to AONB guidance - "and any updates to them"
AMM47	Kent County Council (Ms Liz Shier)	Kent County Council	Support	* Supportive of the policy, yet more emphasis must be placed on all landscape, regardless on whether it lies within the AONB or not. * A detailed historic landscape characterisation of Sevenoaks would be beneficial to understanding development requirements in relation to Sevenoaks' landscape character. * Policy should include towns and villages - as per the Euro Landscape Convention.

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				* Clarity between the Countryside Assessment SPD and the AONB guidance would be beneficial when assessing development against these two documents.
MM2 Policy H1(c) Sevenoaks Gasholder Station, Cramptons Road				
AMM3	Ladybird Studios (Keith Balderson)	Ladybird Studios	Observations	* Believes a heat & power station could be incorporated into the development to improve amenity for future developments in Sevenoaks District
AMM51	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* No known archaeology
MM3 Policy H1(o) Warren Court, Halstead				
AMM33	Halstead Parish Council (Gillian King Scott)	Halstead Parish Council	Object	* Object to the number of dwellings proposed for Warren Court Farm * Cites Core Strategy Policy SP8 - retention of employment space * Believes that Warren Court Farm should remain for employment not residential
AMM40	CPRE Protect Kent (Sevenoaks Committee) (Brian Lloyd)	CPRE Protect Kent (Sevenoaks Committee)	Object	* Objects the modification. * Understands the need for housing, but proposal is only proportionate if the woodland buffer is removed. * Concerns that the size of the woodland buffer will be minimal, offering very little protection to Deerleap Wood. * Believes that the original woodland buffer annotated should be retained - density of housing should be 20 units at 30 units per hectare (as opposed to the current 22 units per hectare)
AMM52	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* No known archaeology
MM4 Policy H2(a) BT Exchange, South Park, Sevenoaks				
AMM2	Ladybird Studios (Keith Balderson)	Ladybird Studios	Observations	* Believes land could be used better with postal/telephone services provided for the ground floor of the development. * Support resident's car park needs to be considered for below the development.
AMM7	Eynsford Parish Council (Holly Ivaldi)	Eynsford Parish Council	Support	* Supports the retention of a post office counter facility but would like to see this strengthened to provide a "full crown" counter facility
AMM53	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* No known archaeology
MM5 Policy H2(f) Glaxo Smith Kline, Powder Mills, Leigh				
AMM28	Southern Water (Sarah Harrison)	Southern Water	Support	* Support the proposed modification and withdraw previous comments providing the changes are adopted.

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AMM30	Paul Dickinson & Associates (Paul Dickinson)	Paul Dickinson & Associates	Support	* Support the modification. * Text jointly produced and agreed between Ashill and SDC. * Other representation made showing concern with the lack of acknowledgement with the boundary.
AMM31	Paul Dickinson & Associates (Paul Dickinson)	Paul Dickinson & Associates	Observations	* Observations that the site boundary has not been addressed in the Main Modifications consultation * Boundary is important to making the Plan sound (Examining Local Plans - Procedural Guidance by PINS Dec. 2013) * Boundary issue was deemed by the Inspector as important and therefore should be considered in the Main Modification consultation
AMM37	Environment Agency (Jennifer Wilson)	Environment Agency	Support	* Support the proposed amendment for Policy H2(f) * Recommends that the previous operator of the site releases their right to abstract water from Powder Mill stream for firefighting purposes, allowing the EA to improve their operation of the Leigh Flood Storage Area. * Remediation of contamination should be considered as part of the development. * Any development should be compliant with the NPPF and EA guidance.
AMM54	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* Historic structural remains of early mill buildings located through formal archaeological works and detailed mitigation measures secured.
MM6 Policy H1 (p) Land West of Enterprise Way, Edenbridge				
AMM10	Ron Rogers		Object	* Access to the site via St. Johns Way unfeasible due to children playing and the access is narrow. * Construction vehicles will not be able to access the site via this road. * Any construction vehicle should access the site via Enterprise Way
AMM9	JAMES Rogers		Observations	* Observations regarding the allocation * Unclear regarding the affordable housing element and the amount that will be required * Affordable housing should be integrated * Supports two access roads yet would like to see one side double yellow lines in St Johns Way and improved calming measures. * More detail of the scheme would be interesting to look at.
AMM11	John Isherwood		Object	* The number of dwellings proposed is too much for the area. * Works out that the proposed net gain in houses will equate to 700 people in Edenbridge (a 10% increase in the population) * An increase in the population will have a knock on effect on the infrastructure, services and facilities. * The land acts as a reservoir for flooding and its seen as a "green lung" for the town. * Believes that

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				Edenbridge is being forced to take the additional housing instead of Sevenoaks and the surrounding area.
AMM12	Irvine		Object	* Concerns over the primary access being in St Johns Way * Increased traffic increases risk to road safety * Narrow entrance to the site * Flooding on the site has not been considered * Enterprise Way should be the primary access
AMM13	Irvine		Object	* Inherent flood risk to the existing housing
AMM15	R. A. Manville		Observations	* Concerns over the amount of traffic along the Main Road with the development of the new Sainsbury's on Faircroft Way. * Traffic congestion would be problematic for school runs from St. Johns Way. * Concerns over drainage and sewerage and whether Southern Water would cope with the additional capacity. * Potential development of a Premier Inn in Enterprise Way? Wondering if this is still the case?
AMM16	Vernon King		Object	* Edenbridge is getting unfair treatment over the distribution of development within the District - intensification. * The number of houses proposed is not reflective of Edenbridge's own needs / sustainability objectives. * SDC planning imperatives have no relation to Edenbridge's needs. * Concerns over the pressure on existing infrastructure, local services, facilities, schools, doctors, policing etc. * Concerns over the attendance to the Edenbridge consultation, coupled with the lack of publicity for the event.
AMM17	Alison Bull		Object	* Aware that development will occur on the site - land west of Enterprise Way * Concerns regarding the access to the site, with narrow access at St Johns Way (attachments illustrate resident's cars parked along both sides of St. Johns Way) * States that Enterprise Way should be the primary access to the site. * Increased traffic will pose a risk to road safety, especially for children playing in the amenity space at St Johns Way. * Increasing pressure on limited infrastructure, public transport and services within the Edenbridge area. * Concerns over the distribution of funds acquired from CIL - wants a reassurance that the money will be spent in the St Johns Way area as opposed to the remainder of the parish or beyond. * ATTACHMENTS: 3 photographs of St Johns Way showing narrow access and vehicles either side of the road

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AMM19	Edenbridge Town Council (Eaton)	Edenbridge Town Council	Observations	* Town Council are supportive of landscaping policy for MM6 Land West of Enterprise Way. * Supportive that the policy makes provision for open space, amenity space, children's play space & allotments.
AMM21	James Morgan		Object	* Development can not be supported from the existing infrastructure * Pressure on limited facilities and services. * Increased traffic poses increased road safety risks. * Pressure on educational needs (both primary and secondary) * The proposal must be stopped and only allow smaller developments on existing sites. * Edenbridge citizens should be included in the plan making process - SDC should make District development aspirations a lot clearer.
AMM22	Stephen Smith		Object	* St Johns Way not fit for purpose due to width of the road * Increased traffic flow will impact on sight lines * Road safety for children with increased traffic flow * Development will occur on a flood plain * Raising concerns over contamination with a culvert running past the BP garage (in the event of flooding) * Development will increase pressure on current limited facilities/services/infrastructure * Concerns on what developers will give to the town in the result of planning permission (CIL focus) * Why isn't the SDC consultation coinciding with the developer's consultation - SDC consultation should be made longer to accommodate this and allow residents to comment further
AMM23	Mr A.J. Sears		Observations	* Concerns over increased development will increase pressure on drainage systems. * Increased flooding risk to St Johns Way. * Increased traffic on a narrow road. * Increased road safety risk for children in the area of the Beeches & St Johns Way
AMM24	Hannah Leniston		Object	* Flood risk on site should not permit development * Orchard on the site is important to the residents of Sunnyside.
AMM25	Natural England (John Lister)	Natural England	Support	* Supportive of the development guidance for the policy
AMM29	Southern Water (Sarah Harrison)	Southern Water	Support with Conditions	* Support the Modification with conditions. * Unable to gauge the requirements for sewerage for the site, without the number of dwellings proposed. * No

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				objection to the allocation of the Land West of Enterprise Way. * Study carried out identifies insufficient capacity in the existing provision to accommodate the additional demand - yet deem this not as a constraint for development, as criterion should be in place to support the delivery (NPPF paras 17, 21 & 157) * Concern over the start of development prior to the commencement of improving capacity beforehand - this should be made clear in the development guidance. * Suggests additional criteria: The development should provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.
AMM49	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* KCC School Commissioning Plan shows that Edenbridge will exceed capacity in the short term. * CIL/S106 payments should contribute to the needs of extra provision and be met through the development; not through KCC itself. * Advises a review into SDC's CIL Charging Schedule to ensure that the collection of contributions is sufficient to mitigate the impacts of major developments. * No known archaeology
MM7 Employment Allocations Paragraph 4.6				
AMM8	Eynsford Parish Council (Holly Ivaldi)	Eynsford Parish Council	Support	* Supports the modifications to the Employment Allocations paragraph 4.6.
MM8 Fort Halstead Policy EMP3				
AMM1	Ladybird Studios (Keith Balderson)	Ladybird Studios	Observations	* Concerns over the visual impact of development
AMM14	Knockholt Society (Tony Slinn)	Knockholt Society	Object	* The scale of development is unfeasible and impractical for the area. * Pressure on local services, facilities and infrastructure. * Pressure on Star Hill Road with a proposed 1000 additional vehicles servicing 450 additional homes. * Kent AONB unit object to the proposal - described as "off the menu" * Quotes the examination of the Core Strategy in January 2011, where it was originally proposed to have 1000 homes on it. The Society believes the fact that the proposal has gone from 1000 to 450 homes does not negate the impact.
AMM20	Kent Downs AONB (Jennifer Bate)	Kent Downs AONB	Object	* KDAONBE considers MM8 for EMP3 to be unsound and unjustified. * Agrees that the Planning Inspector's request of the acceptable number of dwellings has

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				<p>been achieved, but the figure chosen is unacceptable and unjustified. * Smaller residential components for Fort Halstead haven't been considered and put forward to the Council for discussion. * Concerned that the proposal goes against employment-led approach - now more of a residential-led approach has been taken. * There has been an "abuse of process" in the options produced to LPEAC and Cabinet on the residential element for Fort Halstead redevelopment and in response to the Inspector's request. GREEN BALANCE REPORT RESPONSE TO MM8 * Concerns over the amount of employment land - 16ha employment to 25ha for residential use (making it residential-led as opposed to employment-led). * Viability concerns over the number of dwellings chosen for examination (450) with unjustified evidence. * Location of the site is within the AONB and Greenbelt. * Concerns over how the viability has been presented by officers to LPEAC and Cabinet. - i.e. no other scheme concerning less than 450 dwellings were put forward, to show that other options were available. * Recommends that the Inspector re-opens any hearing into the development of Fort Halstead as part of the ADMP examination to the Main Mods. * ATTACHMENTS: KDAONBE response in PDF format; Report & Recommendations on MM8 for KDAONBE by Green Balance</p>
AMM26	Natural England (John Lister)	Natural England	Support	* Supportive of the planning brief attached to the policy including mitigation to the AONB.
AMM32	Halstead Parish Council (Gillian King Scott)	Halstead Parish Council	Object	* Objects to the proposed 450 dwellings. * Quotes 380 rural units to be provided between 2014-2026 from the Core Strategy (Core Strategy - Housing Development Provision in Rural Settlements) * Not in keeping with Core Strategy Policy L07 * Infrastructure is limited for more development. * No evidence to support the reintroduction of employment on For Halstead to support the 450 new homes.
AMM34	Armstrong (Kent) LLP C/O CBRE (Alison Tero)	Armstrong (Kent) LLP C/O CBRE	Support with Conditions	* Supportive the amendments with conditions. * Consider the alteration of the wording from "[...] 450 units may be also be permitted [...]" to "[...] 450 units will be also be permitted [...]" to comply with NPPF para. 154 * Sufficient evidence and clarity yet the policy wording needs to be more robust i.e. changing the

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				wording of "may" to "will". * A development brief should only apply when "[...] a planning application has not been progressed in the near future" * Supports the conclusions of the SA.
AMM36	Kent Wildlife Trust (Vanessa Evans)	Kent Wildlife Trust	Support	* Supportive of the policy. * Stresses the importance of protection to the ancient woodland, and screening as the site sits in the AONB * Emphasis needs to be placed on protection, enhancement and future management of the ancient woodland and downland in its own right.
AMM41	CPRE Protect Kent (Sevenoaks Committee) (Brian Lloyd)	CPRE Protect Kent (Sevenoaks Committee)	Object	* Draws attention to Inspector's comments regarding SDCs response (PA020) to Matter 6 of ADMP examination - the wording of policy currently unsound and more work to be done over sustainability and viability. * CPRE accepts the Inspectors decision for a residential component at Fort Halstead yet objects to the number of units proposed (450). * Concerns over the site promoter and SDC wishing to progress development of the site in a planning application and Development Brief SPD as fait accompli. * Concerns that no further work has been produced to support the sustainability and viability of 450 dwellings, as per the Inspectors requests - the ADMP SA seems to be the only valid piece of additional work conducted. * Concerns over other options for viability were not brought forward to Members by Officers i.e. 450 dwellings was the only option. * Concerns that the SA prepared was not done with an open mind; notes that 8 of 13 SA objectives have been changed in a positive direction, but SA fails to demonstrate alternative scales of residential development and viability as they were screened out or not tested. * Concerns over Objective 9 conclusions in the SA addendum as it conflicts with Objective 5 conclusions. * Unclear from the wording how infrastructure and community services will be supported, both existing and new. * Concerns that the development is becoming residential-led, as opposed to being employment-led as stated in the Plan, with more land designated for residential-use, and 450 new dwellings makes up 14% of the total SDC housing target. * Concerns over the appropriateness of development within the Greenbelt & AONB. * Delivery mechanism has not changed and it is unclear how an SPD will work, in line with a Planning Performance Agreement (PPA) and

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				expected planning application to be submitted late 2014 - shows disregard to the Plan-making process.
AMM44	Toby Kearns		Object	* Concerns over the increases in road traffic if Fort Halstead goes ahead. * Concerns over road safety. * Little/no provision for cyclists or pedestrians along Star Hill Road.
AMM48	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* Agrees that some residential component should be applied but this should be balanced against the site's sensitivities. This can only be provided by a balanced evidence base. * Welcomes the opportunity to aid in the shaping of the planning brief, but has concerns that a planning application will be prior to the Brief's completion * KCC will have to re-evaluate its position on school places in the surrounding area and review its need for new school places to meet the demands of the development. * Special measures will need to be in place to protect heritage assets. * Advises a review into SDC's CIL Charging Schedule to ensure that the collection of contributions is sufficient to mitigate the impacts of major developments. * Policy needs to state that the site contains a Scheduled Monument – Fort Halstead (1004214) and 4 Grade II Listed Buildings and 2 locally listed historic buildings.
MM9 EMP4 Land at Broom Hill, Swanley				
AMM55	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* Ring ditches recorded to the north as cropmarks.
MM10&MM11 Implementation and Monitoring: Performance Indicators and Targets				
AMM42	CPRE Protect Kent (Sevenoaks Committee) (Brian Lloyd)	CPRE Protect Kent (Sevenoaks Committee)	Object	* Generally supportive of MM10 & MM11, yet oppose the 2nd proposed target ("Proportion of completed housing in Urban Confines") under "the Greenbelt (p.83)". * Appreciates that 100% development can not be achieved within urban confines (aspiration that development should be restricted to urban confirms as per Para. 4.1.9 of the Core Strategy). * Assumes that the 80% performance target includes the allocation of 450 units at Fort Halstead - if this is the case and previous comments on MM8 are taken into account, then this performance target should be reduced.

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MM12 Implementation and Monitoring: Core Strategy Performance Indicators and Targets				
AMM50	Kent County Council (Ms Liz Shier)	Kent County Council	Observations	* Considers "Environment pg. 26 – Change in the number of Heritage Assets" unrealistic. * Difficult to register the number of heritage assets in the County - a number are found after planning permissions are granted and are often lost. * Suggests the approach of identifying and measuring the lost of heritage assets, especially those worthy of protection. * Suggests the use of a Local List of Heritage Assets (like TWBC)
MM13 Commitment to review Core Strategy				
AMM5	Pro Vision Planning & Design (Robin Buchanan)	Pro Vision Planning & Design	Observations	* Commenting on the examination of the ADMP * Concerns over a perceived "lack of commitment" regarding a new SHMA and reviewing of the housing target for the CS * Notes ADMP P.I. didn't make a precondition of the CS review to include a new SHMAA * Unsure about the level of clarity between SDC and the ADMP P.I. over the conditions for CS review
AMM43	CPRE Protect Kent (Sevenoaks Committee) (Brian Lloyd)	CPRE Protect Kent (Sevenoaks Committee)	Support with Conditions	* Supports the modification, yet concerned that this is conditional on the outcome of the new SHMA - believe this does not meet the expectations of the Inspector (PA023). * Believe that this conditionality should be removed, to provide more robustness to the modification.