





Sevenoaks
DISTRICT COUNCIL
Despatched: 28.01.15

CABINET
05 February 2015 at 7.00 pm
Conference Room, Argyle Road, Sevenoaks

AGENDA

Membership:


Chairman: Cllr. Fleming Vice-Chairman: Cllr. Ms. Lowe
Cllrs. Hogarth, Piper and Ramsay

	<u>Pages</u>	<u>Contact</u>
Apologies for Absence		
1. Minutes To agree the Minutes of the meeting of the Committee held on 15 January 2015, as a correct record	(Pages 1 - 6)	
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 or Cabinet Advisory Committees		
5. Revenue Budget and Council Tax 2015/16 	(Pages 7 - 54)	Adrian Rowbotham Tel: 01732 227153
6. Discretionary Rate Relief	(Pages 55 - 74)	Sue Cressall, Adrian Rowbotham Tel: 01732 227041, Tel: 01732 227153
7. Annual Review of Parking Charges for 2015/16 - Results of Public Consultation 	(Pages 75 - 114)	Richard Wilson, Gary Connor Tel: 01732 227262, Tel: 01732 227310

REPORTS AND RECOMMENDATIONS FROM THE CABINET ADVISORY COMMITTEES

- | | | | |
|-----|--|-------------------|---|
| 8. | Capital Programme & Asset Maintenance 2015/18 | (Pages 115 - 132) | Helen Martin,
Adrian
Rowbotham
Tel: 01732
227483, Tel:
01732
227153 |
| 9. | Treasury Management Strategy 2015/16 | (Pages 133 - 168) | Roy Parsons,
Adrian
Rowbotham
Tel: 01732
227204, Tel:
01732
227153 |
| 11. | Adoption of the Allocations and Development Management Plan (ADMP) | (Pages 237 - 300) | Richard Morris
Tel: 01732
227430 |
| |  | | |
| 12. | Adoption of the Development in the Green Belt Supplementary Planning Document (SPD) | (Pages 301 - 354) | Richard Morris
Tel: 01732
227430 |

 Indicates a Key Decision

 indicates a matter to be referred to Council

EXEMPT ITEMS

(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.)

To assist in the speedy and efficient despatch of business, Members wishing to obtain factual information on items included on the Agenda are asked to enquire of the appropriate Contact Officer named on a report prior to the day of the meeting.

Should you require a copy of this agenda or any of the reports listed on it in another format please do not hesitate to contact the Democratic Services Team as set out below.

For any other queries concerning this agenda or the meeting please contact:

The Democratic Services Team (01732 227241)

CABINET

Minutes of the meeting held on 15 January 2015 commencing at 7.00 pm

Present: Cllr. Fleming (Chairman)

Cllrs. Hogarth, Ms. Lowe, Piper and Ramsay

Cllrs. Ayres, Mrs. Ayres and Scholey were also present.

61. Minutes

Resolved: That the minutes of the meeting of the Cabinet held on 11 December 2014, be approved and signed as a correct record.

62. Declarations of interest

There were no additional declarations of interest.

63. Questions from Members (maximum 15 minutes)

There were none.

64. Matters referred from Council, Audit Committee, Scrutiny Committee or Cabinet Advisory Committees

There were none.

65. Draft Budget 2015/16 - Update

The Portfolio Holder for Finance & Resources introduced a report setting out the progress made in preparing the 2015/16 budget. The overall emphasis was on building on the strong framework provided by the 10-year budget, whilst taking into account any new financial burdens and changes in the economy that had an impact on budget assumptions. The Portfolio Holder for Finance & Resources reported that the 10 year budget was currently showing a surplus of £2m.

The Chief Finance Officer reported that Local Government Finance Settlement had been received on 18 December 2014 and contained minor changes to the previous assumptions. As expected the Revenue Support Grant for 2015/16 had been reduced by 32%. It also confirmed that the Council Tax Referendum limit would remain at 2% and there was no specific mention of an amount to be passed to town and parish councils for Council Tax Support.

Taking the settlement together with the other small changes since the December Cabinet report the 10- year surplus had increased by £130,000 from £1.910m to £2.040m.

The Council Tax assumptions currently contained in the 10-year budget were:

- 1.95% in 2015/16
- 3% in 2016/17 onwards

The Portfolio Holder for Finance & Resources proposed the following recommendation:

Members have given consideration to the current budget position and instructed officers to reduce the Council Tax assumption for 2016/17 to 2018/19 from 3% to 2%.

This will result in a budget gap over the 10 years of £571,000 or £57,000 per annum. Officers will make the required saving by initially looking at back office functions noting that this may have staffing implications.

Members discussed the implication of the New Homes Bonus ceasing to exist. The Chief Finance Officer reported that a 40% reduction in the New Homes Bonus had been built into the budget from 2017/18 to help compensate for any changes.

A Member asked for details of the impact of lower inflation on the budget assumptions. The Chief Executive highlighted that inflation had been reduced on a number of budget lines which meant that any impact would be relatively minimal. The Chief Finance Officer agreed to provide the information requested to Members.

Public Sector Equality Duty

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

Resolved: That the current budget position be noted and Officers be instructed to reduce the Council Tax assumption for 2016/17 to 2018/19 from 3% to 2%. This will result in a budget gap over the 10 years of £571,000 or £57,000 per annum. Officers will make the required savings by initially looking at back office functions noting that this may have staffing implications.

66. Calculation of council tax base and other tax setting issues

The Portfolio Holder for Finance & Resources introduced a report setting out details of the District's tax base for council tax setting purposes. As part of the budget cycle the Council was required to calculate the council tax base of the district for tax setting purposes for the coming financial year and the calculation had to be approved by Cabinet and Full Council. The tax base was determined by converting all property and occupancy data to the equivalent number of band D properties and this figure was used to calculate the band D charge.

This report showed that the tax base for 2014/15 was 47,629 and the tax base for 2015/16 would be 48,209. The number of dwellings on the Valuation List had increased from 48,811 to 49,082.

A collection rate of 99.3% had been included, the same as used in 2014/15.

A new parish for Badgers Mount had been created as from 1st April 2015 and the tax base for Shoreham had been adjusted accordingly.

Cabinet - 15 January 2015

Members noted that the timetable leading up to setting the council tax for 2015/16 was also included in the report.

Public Sector Equality Duty

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

Resolved: That it be recommended to Council that

- (a) the report of the Chief Finance Officer for the calculation of the Council's tax base for the year 2015/16 be approved;
- (b) pursuant to the report of the Chief Finance Officer and in accordance with the Local Authorities (Calculation of Council Tax Base) Regulations 1992 (as amended) the amount calculated by the Sevenoaks District Council as its council tax base for the whole area for the year 2015/16 shall be 48,209.05;
- (c) pursuant to the report of the Chief Finance Officer and in accordance with the Local Authorities (Calculation of Council Tax Base) Regulations 1992 (as amended) the amount calculated by the Sevenoaks District Council as the council tax base for 2015/16 for the calculation of local precepts shall be:

<u>Parish</u>	<u>Tax Base</u>
Ash-cum-Ridley	2,381.61
Badgers Mount	329.08
Brasted	765.50
Chevening	1,433.69
Chiddingstone	586.47
Cowden	406.93
Crockenhill	632.84
Dunton Green	901.64
Edenbridge	3,446.21
Eynsford	910.78
Farningham	610.40
Fawkham	280.52
Halstead	748.62
Hartley	2,477.44
Hever	593.81
Hextable	1,634.97
Horton Kirby & South Darent	1,255.25

Agenda Item 1

Cabinet - 15 January 2015

Kemsing	1,798.82
Knockholt	616.16
Leigh	809.10
Otford	1,664.07
Penshurst	823.30
Riverhead	1,218.41
Seal	1,165.48
Sevenoaks Town	9,055.46
Sevenoaks Weald	609.80
Shoreham	661.34
Sundridge	910.48
Swanley	5,255.55
Westerham	1,952.44
West Kingsdown	2,272.88

- (d) any expenses incurred by the Council in performing in part of its area a function performed elsewhere in its area by a parish or community council or the chairman of a parish meeting shall not be treated as special expenses for the purposes of section 35 of the Local Government Finance Act 1992.

67. Local Government Transparency Code 2014

The Head of Transformation and Strategy presented a report which set out the requirements of the Local Government (Transparency Requirements) (England) Regulations 2014 which came into effect on 31 October 2014. These Regulations made it a legal requirement for local authorities to publish a range of data as specified in Part 2 of the Local Government Transparency Code 2014.

It was noted that the report had been considered by the Strategy & Performance Advisory Committee on 2 December 2014.

Members noted that Part 3 of the Code set out a further 7 data sets of enhanced information which it was recommended be published but where there was no legal requirement to do so. Members agreed that the additional information should be published if it were readily available but that resources should not be invested in non-statutory requirements.

A Member queried whether this requirement would lead to a reduction in the number of Freedom of Information (FOI) Requests that was received by the Council. In response the Chairman expressed some concern that this new requirement could in fact lead to an increase in the number of FOI Requests that were received as members of the public sought more in depth information as a result of the data sets that were published.

Public Sector Equality Duty

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

Resolved: That

- (a) The requirements of the Local Government Transparency Code 2014 be noted; and
- (b) The further data as recommended by the Code be published if it were readily available.

THE MEETING WAS CONCLUDED AT 7.25 PM

CHAIRMAN

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REVENUE BUDGET AND COUNCIL TAX 2015/16

Cabinet – 5 February 2015

Report of Chief Finance Officer

Status: For Decision

Also considered by: Council – 17 February 2015

Key Decision: No

Executive Summary: The Council has an excellent track record in identifying, planning for and addressing financial challenges. In light of the challenging financial position facing all authorities four years ago, for 2011/12 the Council produced a 10-year budget together with a savings plan for the first time. This will be the fifth year this method has been used and provides the Council with a stable basis for future years.

This report sets out the proposed budget and required level of Council Tax for 2015/16. The report details changes to the draft budget since the Cabinet meeting on 15 January 2015.

The report proposes a net expenditure budget of £14.253m in 2015/16 (£14.136m in 2014/15). Subject to any further changes this would result in a Council Tax increase of 1.95% in 2015/16, with the District’s Council Tax being £192.87 for a Band D property for the year (£189.18 in 2014/15).

Portfolio Holder Cllr. Ramsay

Contact Officer(s) Adrian Rowbotham Ext. 7153
Helen Martin Ext. 7483

Recommendation to Cabinet:

That the recommendations set out below be recommended to Council.

Recommendation to Council:

- (a) The Summary of Council Expenditure and Council Tax set out in Appendix E be approved.
- (b) Approve the 10-year budget 2015/16 to 2024/25 which is the guiding framework for the detailed approval of future years’ budgets set out in Appendix B to the report, including the growth and savings proposals set out in Appendix C-D to the report, and that where possible any variations during and between years be met from the Budget Stabilisation Reserve: and

Agenda Item 5

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- (c) The changes to reserves set out in Appendix H be approved.
- (d) Members' views are sought on the issue of Council Tax Support funding for Town and Parish Councils and one of the following options be approved:
- i. An amount of funding is passed to Town and Parish Councils for Council Tax Support in 2015/16 equivalent to the amount passed on in 2013/14 less 48% (the Council's reduction in Revenue Support Grant);
 - ii. A different amount is passed to Town and Parish Councils for Council Tax Support in 2015/16;
 - iii. No funding is passed to Town and Parish Councils for Council Tax Support in 2015/16.
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Introduction and Background

- 1 The Council's financial strategy over the past ten years has worked towards increasing financial sustainability and it has been successful through the use of a number of strategies including:
 - implementing efficiency initiatives;
 - significantly reducing the back office function;
 - improving value for money;
 - maximising external income;
 - the movement of resources away from low priority services; and
 - an emphasis on statutory rather than non-statutory services.
- 2 Over this period the Council has focused on delivering high quality services based on Members' priorities and consultation with residents and stakeholders. In financial terms, the adoption of this strategy has to date allowed the Council to move away from its reliance on general fund reserves which has ensured that the general fund reserves have remained largely unchanged.
- 3 In setting its budget for 2011/12 onwards, the Council recognised the need to address both the short-term reduction in Government funding as well as the longer-term need to reduce its reliance on reserves. The outcome was a 10-year budget, together with a four-year savings plan, that ensured the Council's finances were placed on a stable footing but that also allowed for flexibility between budget years.
- 4 With the amount of Revenue Support Grant provided by Government continuing to reduce at a significant rate it is important that the council aims to become more self-sufficient by having a balanced economy with local solutions. These solutions include:
 - continuing savings;

- below inflation increases;
 - council tax; and
 - increased income.
- 5 Local Government generally appears to be feeling the impacts of the Government funding reductions and the recession. However, productivity and morale within this Council remain high which has a positive impact on the financial bottom line.
- 6 At the Cabinet meeting on 11 September 2014, Members considered a report setting out the Council's financial prospects for 2015/16 and beyond. That report set out the major financial pressures the Council is likely to face, together with a proposed strategy for setting a balanced and sustainable budget for 2015/16 and beyond.
- 7 As part of the budget process officers put forward their Service Overviews to the Advisory Committees in October and November, which set out a summary of current and future issues or pressures. The Advisory Committees recommended new growth and savings items which were considered at the Cabinet meeting on 11 December 2014.
- 8 The report to Cabinet on 11 December 2014 also contained updates to the Financial Prospects report. An update report was presented to Cabinet on 15 January 2015 following the announcement of the Local Government Finance Settlement.
- 9 The adoption of the 10-year budget over the last four years has resulted in a much more stable budget position than had previously been achieved.
- 10 This report includes a number of attachments:
- Appendix A – Budget timetable
 - Appendix B – 10-year budget;
 - Appendix C – Summary of the Council's agreed savings and growth items;
 - Appendix D – Summary of new growth and savings items proposed during the current budget process;
 - Appendix E – Summary of Council Expenditure and Council Tax;
 - Appendix F – Summary of service analysis in budget book format;
 - Appendix G – Analysis of pay costs;
 - Appendix H - Reserves
 - Appendix I – Risk analysis;

Agenda Item 5

Current Budget Position

- 11 The Government has made no further announcements since the last Cabinet meeting on 15 January to affect the 10-year budget position.
- 12 The only changes to the budget since 15 January 2015 were the two requested by Cabinet at that meeting. These were to reduce the Council Tax increase assumption for 2016/17 – 2018/19 from 3% to 2% which resulted in a budget gap over the 10 years of £571,000 (or £57,000 per annum), and for officers to make the required saving by initially looking at back office functions noting that this may have staffing implications.
- 13 These changes result in a balanced 10-year budget.
- 14 A summary of these changes is shown below:

10-Year Budget	£m
Previous 10-year budget gap/(surplus) at 15/01/15	(2.0)
Changes:	
Council Tax 2016/17–18/19 assumption reduced from 3% to 2%	2.6
SCIA21 savings	(0.6)
Revised 10-year budget gap/(surplus)	(0.0)

2015/16 Budget and Council Tax

- 15 After allowing for the growth and savings agreed and the key changes made during this budget process, the resulting net expenditure for 2015/16 is £14.253m. As shown in Appendix E this results in Council Tax income of £9.298m, meaning that the District element of the Band D charge will be £192.87.
- 16 The other preceptors are yet to announce their increases. Members will be updated at the meeting with the latest information.

Integration with other budget reports on the Cabinet Agenda

- 17 Separate reports on this Agenda set out the Asset Maintenance and Capital Programme Budget proposals, and Treasury Management Strategy. The attached revenue budgets take into account the recommendations and revenue implications set out in those reports.

Looking Ahead

- 18 The 10-year budget strategy and the current position explained above put this council in a strong position going forward. However, with Parliamentary and local elections due to take place on 7 May 2015, officers intend to carry out a review

shortly afterwards to take account of any changes being suggested that may have an impact on the financial position of this council.

Adequacy of Reserves

- 19 Ensuring the adequacy and sustainability of the Council's reserves continues to be a key part of the budget process. Individual balances have been reviewed as part of writing this report and the detailed work is set out in Appendix H. This review should ensure that all provisions and earmarked reserves are adequate for their purposes.
- 20 It is recommended that the Council hold a minimum General Fund reserve balance of 10% of its net Revenue Budget, for emergencies.

Council Tax Support Funding for Town and Parish Councils

- 21 The Government introduced a change from Council Tax Benefit (CTB) to Council Tax Support (CTS) from 1 April 2013. CTB was fully reimbursed by Government but CTS is a Council Tax Discount (similar to the Single Person Discount) and local authorities now only receive the amount of Council Tax they collect.
- 22 To partly offset this, the Government gave a grant to Major Precepting Authorities (i.e. Sevenoaks District Council, Kent County Council, Fire and Police) in 2013/14 amounting to 90% of the CTB they had received in 2012/13. Town and Parish Councils were initially excluded from this but the Government later changed their minds and allocated an additional identifiable grant to billing authorities to pass on to Town and Parish Councils.
- 23 When allocating this additional grant for 2013/14, the Government pointed out that this may not continue in future years. Officers advised Town and Parish Councils that in view of the information published by Government it could not be certain that this additional funding would be paid in future years. This resulted in many Town and Parish Councils increasing their Council Tax Precept (as Town and Parish Councils do not have a referendum limit like Major Precepting Authorities) to offset the future likely loss of this funding stream.
- 24 When the Government announce the funding settlement each year they can show funding in the following three ways:
 - a. Ring-fence an amount so that it has to be spent on a specific purpose or it has to be returned.
 - b. Highlight an amount for a specific purpose using a separate formula (e.g. Homelessness in 2015/16); this does not have to be spent on the specific purpose.
 - c. Revenue Support Grant – a formula based grant that can be used for any legal purpose.
- 25 In 2013/14 the additional funding for Town and Parish Councils was shown as a (b), in 2014/15 and 2015/16 it is within (c) and no specific amount for this purpose is shown.

Agenda Item 5

- 26 Governments have treated other funding in a similar way in the past, e.g. Concessionary Fares, when funding was initially separately identified but was later included within the Revenue Support Grant.
- 27 As the additional funding for Town and Parish Councils was clearly identified in 2013/14, Sevenoaks District Council was early to commit to pay the full amount.
- 28 Officers have continued to inform Town and Parish Councils that if this additional funding could not be clearly identified in the grant settlement, it is likely that nothing would be passed on to Town and Parish Councils.
- 29 Westerham Town Council sent a pre action protocol letter to the Council on 10 March 2014 which is an initial step towards seeking a Judicial Review of the decision made by Council on 18 February 2014.
- 30 Officers obtained the advice of a leading Queens Counsel who confirmed that Sevenoaks District Council has discretion whether to pass any funding on to Town and Parish Councils. Counsel also advised that the Council should make a fresh decision whether to pass on any funding on the basis that some funding has been included regardless of the Council's view that no funding was included in the Government Grant Settlement.
- 31 A report was presented to Council on 13 May 2014 requesting that members approve one of three options for 2014/15. Members decided not to pass on any funding to Town and Parish Councils for Council Tax Support in 2014/15. The same options are included in the recommendations of this report for 2015/16.
- 32 The amount of Revenue Support Grant given by Government to Sevenoaks District Council has reduced by 32% in 2015/16 (48% since 2013/14) and will continue to reduce in future years. If a proportion of the grant is passed on to Town and Parish Councils, further savings would be required to continue to have a balanced 10-year budget.

Key Implications

Financial

All financial implications are covered elsewhere in this report.

Legal Implications and Risk Assessment Statement.

There are no legal implications.

For the effective management of our resources and in order to achieve a sustainable budget it is essential that all service cost changes and risks are identified and considered.

Current and future pressures were included in the Service Overviews presented to the Advisory Committees and each Service Change Impact Assessment (SCIA) includes the likely impacts including a risk analysis.

An effective integrated policy and priority driven long-term financial and business process is required for the Council to deliver on its priorities and maintain a sustainable budget. It

is also essential that continuous improvements are identified and implemented in order to take account of the changing climate within which the Council operates and to meet the expectations of both Government and the public on the quality of service demanded from this Council.

The risks associated with the 10-year budget approach include uncertainty around the level of shortfall and the timing of key announcements such as future grant settlements. The risk will be mitigated by continuing to review assumptions and estimates and by updating Members throughout the process.

Equality Assessment

Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users. The impact has been analysed and does not vary between groups of people. The results of this analysis are set out immediately below.

Individual equalities assessments have been completed for all Service Change Impact Assessments (SCIAs) to ensure the decision making process is fair and transparent. These were included in the Draft Budget 2015/16 report to Cabinet on 11 December 2014.

Community Impact and Outcomes

In making any budget proposals, Members need to consider the impact on customers, service quality and staff well-being, to ensure that the budget supports the Council's aspirations for customer-focused services.

Conclusions

The budget process has once again been a major financial challenge for a council that already provides value for money services to a high standard. The 10-year budget shows a balanced position over the whole period which keeps this council in a strong position going forward.

The future financial prospects for the public sector are increasingly difficult, with the added uncertainty of the pending elections. However, this budget ensures the Council is in a financially sustainable position but it will be reviewed when changes resulting from the elections are known.

Appendices

Appendix A – Budget timetable

Appendix B - 10-year budget

Appendix C – Summary of the Council's agreed

Agenda Item 5

savings and growth items

Appendix D – Summary of new growth and savings items proposed during the current budget process

Appendix E – Summary of Council Expenditure and Council Tax

Appendix F – Summary of service analysis in budget book format

Appendix G – Analysis of pay costs

Appendix H – Reserves

Appendix I – Risk analysis

Background Papers:

Report to Council 18 February 2014 – Budget and Council Tax Setting 2014/15

Report to Cabinet 11 September 2014 – Financial Prospects and Budget Strategy 2015/16 and Beyond

Report to Strategy and Performance Advisory Committee 7 October 2014, Housing and Community Safety Advisory Committee 8 October 2014, Economic and Community Development Advisory Committee 21 October 2014, Local Planning and Environment Advisory Committee 23 October 2014, Finance and Resources Advisory Committee 11 November 2014 – Budget 2015/16: Service Reviews and Service Plan Impact Assessments (SCIAs)

Report to Cabinet 11 December 2014 – Draft Budget 2015/16.

Report to Cabinet 15 January 2015 – Draft Budget 2015/16 – Update.

Adrian Rowbotham
Chief Finance Officer

2015/16 Budget Setting Timetable

	Date	Committee
Stage 1		
Financial Prospects and Budget Strategy 2015/16 and Beyond	2 September	Finance & Resources AC
	11 September	Cabinet
↓		
Stage 2		
Review of Service Overviews and Service Change Impact Assessments (SCIAs)	7 October	Strategy & Performance AC
	8 October	Housing & Comm. Safety AC
	21 October	Economic & Comm. Dev. AC
	23 October	Local Planning & Env. AC
	11 November	Finance & Resources AC
↓		
Stage 3		
Budget Update (incl. Service Change Impact Assessments (SCIAs), feedback from Advisory Committees)	11 December	Cabinet
↓		
Stage 4		
Budget Update (incl. Government Support information)	15 January	Cabinet
↓		
Stage 5		
Budget Update and further review of Service Change Impact Assessments (if required)	January	Advisory Committees
↓		
Stage 6		
Budget Setting Meeting (Recommendations to Council)	5 February	Cabinet
↓		
Stage 7		
Budget Setting Meeting (incl. Council Tax setting)	17 February	Council

Note: The Scrutiny Committee may 'call in' items concerning the budget setting process.

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Ten Year Budget - Revenue

	Budget 2014/15	Plan 2015/16	Plan 2016/17	Plan 2017/18	Plan 2018/19	Plan 2019/20	Plan 2020/21	Plan 2021/22	Plan 2022/23	Plan 2023/24	Plan 2024/25
	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000	£000
Expenditure											
Net Service Expenditure c/f	13,800	14,136	14,253	14,779	15,653	16,094	16,443	17,239	17,646	18,053	18,462
Inflation	488	473	539	516	712	565	593	407	407	409	406
Superannuation Fund deficit: actuarial increase	0	0	0	520	0	0	390	0	0	0	0
Net savings (approved in previous years)	(152)	(154)	(323)	(162)	(301)	(216)	(187)	0	0	0	0
New growth	0	177	200	0	0	0	0	0	0	0	0
New savings	0	(379)	110	0	30	0	0	0	0	0	0
Net Service Expenditure b/f	14,136	14,253	14,779	15,653	16,094	16,443	17,239	17,646	18,053	18,462	18,868
Financing Sources											
Government Support											
: Revenue Support Grant	(2,225)	(1,516)	(1,355)	(1,211)	(1,081)	(964)	(859)	(764)	(679)	(602)	(533)
: Retained Business Rates	(1,898)	(1,934)	(1,973)	(2,012)	(2,052)	(2,093)	(2,135)	(2,178)	(2,222)	(2,266)	(2,311)
New Homes Bonus	(1,389)	(1,818)	(2,247)	(1,348)	(1,348)	(1,348)	(1,348)	(1,348)	(1,348)	(1,348)	(1,348)
Council Tax	(9,011)	(9,298)	(9,539)	(9,785)	(10,038)	(10,398)	(10,770)	(11,155)	(11,554)	(11,967)	(12,394)
Interest Receipts	(244)	(301)	(509)	(655)	(661)	(629)	(591)	(546)	(499)	(451)	(405)
Contributions to/(from) Reserves	(192)	(233)	(233)	(353)	(353)	(353)	(353)	(353)	(179)	(179)	(635)
Total Financing	(14,959)	(15,100)	(15,856)	(15,364)	(15,533)	(15,785)	(16,056)	(16,344)	(16,481)	(16,813)	(17,626)
Budget Gap (surplus)/deficit	(823)	(847)	(1,077)	289	561	658	1,183	1,302	1,572	1,649	1,242
Contribution to/(from) Stabilisation Reserve	823	847	1,077	(289)	(561)	(658)	(1,183)	(1,302)	(1,572)	(1,649)	(1,242)
Unfunded Budget Gap (surplus)/deficit	0	0	0	0	0	0	0	0	0	0	0

Remaining balance / (shortfall) in Budget

Stabilisation reserve: 6,291 7,258 8,455 8,166 7,605 6,947 5,764 4,462 2,890 1,241 (1)

Assumptions

Revenue Support Grant:	-32% in 15/16, -10% later years
Retained Business Rates:	2% all years
Council Tax:	1.95% in 15/16, 2% in 16/17 - 18/19, 3% later years
Interest Receipts:	0.85% in 15/16, 1.35% in 16/17, 1.75% in 17/18 1.85% later years
Pay award:	2.2% in Jan 15, 1.5% in 16/17 - 17/18, 2% later years
Other costs:	1.3% in 15/16, 2.25% in later years
Income:	3.5% in all years

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SCIA		Description	2011/12 £000	2012/13 £000	2013/14 £000	2014/15 £000	2015/16 £000	Later Years £000	Total £000
Year	No.								
		Economic and Community Development							
2014/15	2	Broadband and business growth (reversal of temporary growth item)						(80)	
2014/15	20	Building Control: Shared working with Tonbridge & Malling BC					(9)		
		Finance and Resources							
2011/12	62,63	Staff terms and conditions - savings agreed by Council 18/10/11					(117)	(979)	
2014/15	18	Corporate Projects (reversal of temporary growth item)						(60)	
2014/15	21	Customer Services: Channel shift programme						(20)	
		Housing and Community Safety							
2014/15	13	Housing efficiency review - Housing Initiatives (reversal of temporary savings item)					7		
		Local Planning and Environment							
2014/15	15	Planning: Use CIL funds for monitoring						(50)	
2014/15	16	Planning: Efficiency review					(35)		
		Total Savings	(2,984)	(841)	(314)	(479)	(154)	(1,049)	(4,618)
		Total Growth	371	45	50	327		(140)	793
		Net Savings	(2,613)	(796)	(264)	(152)	(154)	(1,189)	(3,825)

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New Growth and Savings Items

Appendix D

Growth		Description	Year	Ongoing	Annual Impact £000	10-year Budget Impact £000
SCIA Year	No.					
Economic and Community Development						
none						
Finance and Resources						
2015/16	1	Staffing: Employers National Insurance increase from April 2016 - implications due to change in legislation	2016/17	yes	200	1,800
2015/16	2	Estates Management: loss of income following previous sale of assets	2015/16	yes	48	480
2015/17	3	Estates Management: STAG - loss of maintenance income	2015/16	yes	14	140
2015/16	4	IT: Microsoft licence price increase	2015/16	yes	45	450
2015/16	5	IT: 'COCO' compliance additional costs	2015/16	yes	32	320
2015/16	7	Treasury Management: debit and credit card fees	2015/16	yes	10	100
Housing and Community Safety						
none						
Local Planning and Environment						
2015/16	8	Parks Rural: Timberden Farm - loss of rent when sold	2015/16	yes	28	280
Strategy and Performance						
none						
Total					377	3,570

Savings		Description	Year	Ongoing	£000	£000
SCIA Year	No.					
Economic and Community Development						
none						
Finance and Resources						
2015/16	9	Finance: Business Rates Discretionary Relief	2015/16	yes	(106)	(1,060)
2015/16	10	Finance: External audit fee reduction	2015/16	3 years	(30)	(90)
2015/16	11	Dartford BC partnerships: revised split of costs	2015/16	no	(90)	(90)
2015/16	13	Property: additional income from Argyle Road office rent	2015/16	yes	(18)	(180)
2015/16	14	Revenues: Council Tax court costs	2015/16	yes	(25)	(250)
2015/16	21	Savings to be identified: Officers will initially look at back office functions noting that this may have staffing implications	2015/16	yes	(57)	(570)
Housing and Community Safety						
2015/16	15	Youth: Youth Development efficiency savings	2015/16	yes	(10)	(100)
2015/16	16	Community Safety: Project costs to be matched by ext. funding	2015/16	yes	(5)	(50)
2015/16	17	Housing Advice: Bed and breakfast reduction	2015/16	no	(10)	(10)
2015/16	19	Housing Standards: Disabled Facility Grants *				
2015/16	18	Housing Advice: Private Sector Letting scheme	2015/16	no	(10)	(10)
2015/16	20a	Environmental Health: Air Quality Monitoring	2015/16	yes	(18)	(180)
Local Planning and Environment						
none						
Strategy and Performance						
none						
Total					(379)	(2,590)

*SCIA19 Housing Standards: Disabled Facility Grants £50,000 ongoing saving - this item is not included above as the impact of this saving is included in the 'Contribution to/from Reserves' line on the 10-year Budget.

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Summary of Council Expenditure & Council Tax

	2014/15 Budget Net Expenditure £000	2015/16 Budget Net Expenditure £000
Service expenditure before Support Services and Capital Charges including trading accounts (see Appendix F)	14,316	14,485
Capital Charges and Support Services charged outside the General Fund	(180)	(232)
Sub Total	14,136	14,253
Non allocated expenditure:		
Collection Fund adjustment	0	0
Net Service Expenditure excluding Capital Charges	<u>14,136</u>	<u>14,253</u>
Revenue Support Grant inc CTS	(2,225)	(1,516)
Retained Business Rates	(1,898)	(1,934)
New Homes Bonus	(1,389)	(1,818)
Council Tax Requirement - Sevenoaks DC	(9,010)	(9,298)
Grant & Council Tax income	<u>(14,522)</u>	<u>(14,566)</u>
Net Expenditure after Grant & Council Tax, before interest	(387)	(313)
Less: Interest and Investment income	(244)	(301)
Amount to be met from Reserves	<u>(631)</u>	<u>(614)</u>
Contributions (to) / from reserves		
Earmarked Reserves		
Capital	(198)	(148)
Budget Stabilisation	(1,006)	(847)
New Homes Bonus	0	(120)
Financial Plan	573	501
Planned contribution from General Fund Reserve	0	0
	<u>(631)</u>	<u>(614)</u>

	2013/14	2014/15	2015/16
Taxbase	47,053	47,629	48,209
	£	£	£
Council Tax @ Band D	185.49	189.18	192.87

Council Tax Summary

Band D charge

			%	%
Kent County	1,047.78	1,068.66	69.2	
Kent Fire	67.95	69.30	4.5	
Kent Police	141.47	144.28	9.3	
	<hr/>	<hr/>	<hr/>	<hr/>
Sevenoaks District	185.49	189.18	12.2	0
Average Town/Parish	70.61	73.41	4.8	
	<hr/>	<hr/>	<hr/>	<hr/>
	1,513.30	1,544.83	100.0	0

Interest Receipts Summary

Investment interest		268		328
Mortgage and other interest		2		0
Allocations to Provisions		-26		-27
Net Revenue contribution		<hr/>		<hr/>
		244		301

Net Service Expenditure analysed by Head of Service

	Actuals	Budget	Proposed
	13/14	14/15	Budget
	£'000	£'000	15/16
			£'000
Communities and Business	989	997	1,054
Corporate Support	3,199	3,208	3,325
Environmental and Operational Services	2,788	2,523	2,513
Financial Services	4,312	5,022	4,997
Housing	778	722	730
Legal and Governance	548	608	634
Planning Services	1,315	1,300	1,295
Total Service Expenditure	13,929	14,380	14,549
Direct Services		-64	-64
Items outside General Fund		-180	-232
		14,136	14,253

	Actuals	Budget	Proposed
	13/14	14/15	Budget
	£'000	£'000	15/16
			£'000
Pay Costs (see Note 1)	9,306	10,095	10,887
Pay Costs Externally Funded	29	0	0
Premises and Grounds	1,866	1,639	1,557
Transport	72	62	64
Supplies & Services	2,147	2,235	2,184
Supplies & Services IT	866	700	832
Agency & Contracted	4,085	4,147	4,221
Agency & Contracted - Partnerships	3,535	3,174	2,968
Agency & Contracted - Direct Services	3,560	3,690	3,746
Transfer Payments - Benefits	28,055	27,590	29,090
Transfer Payments - Other	66	37	27
Staff Costs - Other Chief Officers	415	456	0
Support Services	114	50	50
Funds drawn to/from Reserves	696	-133	-204
Capital Charges	0	0	0
Income - Other	-31,083	-29,918	-31,442
Income - Fees and Charges	-6,124	-5,786	-5,991
Recharges	-275	-298	-281
Recharges - Partnerships	-3,399	-3,360	-3,159
	13,929	14,380	14,549
Service expenditure before re-allocation of Support Services and Capital charges			
Direct Services (net)		-64	-64
Items outside General Fund		-180	-232
		<u>14,136</u>	<u>14,253</u>

Analysis of budget changes between 14/15 and 15/16

Base Budget 2014/15	14,136
Inflation	473
Planned Savings agreed previous years	-154
SCIAS 2015/16	
Growth	177
Savings	-379
Other adjustments	0
Proposed Budget 2015/16	<u>14,253</u>

Note 1 15/16 includes costs previously shown as Staff Costs - Other Chief Officers

Net Service Expenditure analysed by Chief Officer

	Actuals 13/14	Budget 14/15	Proposed Budget 15/16
	£'000	£'000	£'000
Communities and Business			
Arts Development	0	0	0
All Weather Pitch	-2	-2	-2
Big Community Fund	0	0	0
Community Safety	210	179	173
Community Development Service Provisions	-5	-5	-5
The Community Plan	63	45	49
Economic Development Property	47	149	291
Grants to Organisations	183	181	184
Health Improvements	43	45	34
Leisure Contract	273	295	227
Leisure Development	20	20	20
Local Strategic Partnership	0	0	0
Partnership - Home Office	0	0	0
Administrative Expenses - Communities & Business	8	14	14
STAG Community Arts Centre	75	0	0
Sustainability	0	0	0
Tourism	28	29	31
Choosing Health WK PCT	0	0	0
Community Sports Activation Fund	0	0	0
Falls Prevention	0	0	0
Business Flood Support Scheme	0	0	0
Repair & Renew Flood Support Scheme	0	0	0
General Grants Other Organisations	0	0	0
PCT Health Checks	0	0	0
New Ash Green	0	0	0
PCT Initiatives	0	0	0
Troubled Families Project	0	0	0
West Kent Partnership	0	0	0
West Kent Partnership Business Support	0	0	0
Youth	49	48	38
Total Service Expenditure	989	997	1,054

	Actuals 13/14	Budget 14/15	Proposed Budget 15/16
	£'000	£'000	£'000
Communities and Business			
Pay Costs	475	507	764
Pay Costs Externally Funded	29	0	0
Premises and Grounds	80	73	0
Transport	6	7	7
Supplies & Services	146	128	127
Supplies & Services IT	2	0	0
Agency & Contracted	572	537	471
Staff Costs - Other Chief Officers	14	-0	0
Funds drawn to/from Reserves	148	-20	-38
Income - Other	-410	-187	-198
Income - Fees and Charges	-74	-49	-78
Recharges	0	0	0
<hr/>			
Service expenditure before re-allocation of Support Services and Capital charges	989	997	1,054
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Analysis of budget changes between 13/14 and 14/15

Base Budget 2014/15	997
Inflation	31
Planned Savings agreed previous years	0
SCIAS 2015/16	
SCIA 9 (2015/16) Business Rates Discretionary Relief	-73
SCIA 15 (2015/16) Youth Development Efficiency Savings	-10
SCIA 16 (2015/16) Project Costs to match with External Funding	-5
Other Adjustments between Chief Officers	
Economic Development Staff (previously Corporate)	89
Economic Development (previously Corporate)	25
Proposed Budget 2015/16	1,054
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Net Service Expenditure analysed by Chief Officer

	Actuals		Proposed Budget
	13/14	Budget 14/15	15/16
	£'000	£'000	£'000
Corporate Support			
Asset Maintenance Argyle Road	45	59	69
Asset Maintenance Other Corporate Properties	22	30	30
Asset Maintenance Hever Road	2	6	6
Asset Maintenance IT	290	260	263
Asset Maintenance Leisure	162	165	167
Asset Maintenance Support & Salaries	99	94	92
Asset Maintenance Sewage Treatment Plants	7	8	8
Bus Station	13	14	15
Corporate Projects	0	60	0
Estates Management - Buildings	15	-66	-37
Housing Premises	-9	-8	-1
Administrative Expenses - Corporate Support	29	26	27
Administrative Expenses - Human Resources	6	14	14
Administrative Expenses - Property	2	4	4
Support - Central Offices	417	449	430
Support - Contact Centre	404	417	441
Support - Central Offices - Facilities	236	257	247
Support - General Admin	215	254	276
Support - IT	862	764	906
Support - Local Offices	53	56	56
Pay Costs (see Note 1)	3	0	0
Support - Human Resources	248	288	272
Support - Property Function	77	57	39
Total Service Expenditure	3,199	3,208	3,325

	Actuals		Proposed Budget
	13/14	Budget 14/15	15/16
	£'000	£'000	£'000
Corporate Support			
Pay Costs	1,459	1,745	1,717
Premises and Grounds	1,009	924	936
Transport	19	8	6
Supplies & Services	386	375	379
Supplies & Services IT	737	587	712
Agency & Contracted	160	130	113
Agency & Contracted - Direct Services	55	10	10
Transfer Payments - Other	3	0	0
Staff Costs - Other Chief Officers	60	0	0
Support Services	39	39	39
Funds drawn to/from Reserves	-8	0	0
Capital Charges	0	0	0
Income - Other	-147	-176	-145
Income - Fees and Charges	-362	-279	-304
Recharges	-79	-86	-69
Recharges - Partnerships	-132	-68	-69
Service expenditure before re-allocation of Support Services and Capital charges	3,199	3,208	3,325

Analysis of budget changes between 14/15 and 15/16

Base Budget 2014/15	3,208
Inflation	78
Planned Savings agreed previous years	
SCIAS 2015/16	
SCIA 2 (2015/16) Loss of Rental Income due to Disposal of Assets	48
SCIA 3 (2015/16) STAG Loss of Maintenance Income	14
SCIA 4 (2015/16) Increase in IT Microsoft Licence	45
SCIA 5 (2015/16) 'COCO' Compliance Additional Costs	32
SCIA 13 (2015/16) Additional Income for Argyle Road	-18
Other Adjustments between Chief Officers	
Economic Development Staff (to Communities & Business)	-89
Economic Development (to Communities & Business)	-25
Non domestic Rates	5
Internal Print Reduction	24
Software Maintenance	3
Proposed Budget 2015/16	3,325

Net Service Expenditure analysed by Chief Officer

	Actuals 13/14	Budget 14/15	Proposed Budget 15/16
	£'000	£'000	£'000
Environmental and Operational Services			
Asset Maintenance Car Parks	76	19	19
Asset Maintenance CCTV	11	16	16
Asset Maintenance Countryside	3	8	8
Asset Maintenance Direct Services	28	36	37
Asset Maintenance Playgrounds	3	14	14
Asset Maintenance Public Toilets	0	14	14
Building Control Discretionary Work	4	-1	-9
Building Control Partnership Members	0	0	0
Building Control Partnership Hub (SDC Costs)	0	0	0
Building Control	-85	-162	-159
Car Parks	-1,576	-1,731	-1,797
Car Parking - On Street	-372	-430	-442
CCTV	263	234	238
Civil Protection	29	33	34
Dangerous Structures	21	23	10
Dartford Environmental Hub (SDC Costs)	0	0	0
EH Commercial	274	255	260
Pay Costs (see Note 1)	34	1	1
EH Environmental Protection	383	382	368
Emergency	60	63	64
Estates Management - Grounds	94	97	98
Land Charges	-111	-93	-98
Licensing Partnership Hub (Trading)	0	0	0
Licensing Regime	15	-5	0
Markets	-189	-192	-190
Parks and Recreation Grounds	143	97	98
Parks - Rural	56	74	103
Building Control Partnership Implementation & Project Co	0	0	0
Environmental Health Partnership	0	0	0
Public Transport Support	1	0	0
Refuse Collection	2,288	2,378	2,415
Administrative Expenses - Building Control	15	9	9
Administrative Expenses - Direct Services	0	0	0
Administrative Expenses - Health	12	26	26
Administrative Expenses - Transport	7	10	10
Street Naming	5	14	15
Street Cleansing	1,207	1,240	1,255
Support - Health and Safety	14	18	18
Support - Direct Services	41	54	54
Taxis	-23	-20	-18
Public Conveniences	54	43	43
Air Quality (Ext Funded)	0	0	0
Total Service Expenditure	2,788	2,523	2,514

	Actuals	Budget	Proposed
	13/14	14/15	Budget 15/16
	£'000	£'000	£'000
Environmental and Operational Services			
Pay Costs	2,150	2,272	2,343
Premises and Grounds	690	561	567
Transport	34	33	33
Supplies & Services	551	571	558
Supplies & Services IT	18	0	0
Agency & Contracted	488	403	373
Agency & Contracted - Partnerships	758	706	1,018
Agency & Contracted - Direct Services	3,505	3,681	3,736
Transfer Payments - Other	3	0	0
Staff Costs - Other Chief Officers	11	24	0
Support Services	11	11	11
Funds drawn to/from Reserves	1	0	0
Capital Charges	0	0	0
Income - Other	-673	-667	-623
Income - Fees and Charges	-4,344	-4,322	-4,440
Recharges	0	0	0
Recharges - Partnerships	-415	-749	-1,063
	<hr/>		
Service expenditure before re-allocation of Support Services and Capital charges	2,788	2,523	2,513
	<hr/> <hr/>		

Analysis of budget changes between 13/14 and 14/15

Base Budget 2014/15	2,523	
Inflation	-6	
Planned Savings agreed previous years		
SCIA 20 (2014/15) Building Control - Joint Working TMBC	-9	
SCIAS 2015/16		
SCIA 8 (2015/16) Loss of Rent on Timberden Farm due to Disposal	28	
SCIA 20 (2015/16) Air Quality Monitoring	-18	
Other Adjustments between Chief Officers		
Non Domestic Rates	-5	
	<hr/>	
Proposed Budget 2015/16	2,513	
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Net Service Expenditure analysed by Chief Officer

	Actuals 13/14	Budget 14/15	Proposed Budget 15/16
	£'000	£'000	£'000
Financial Services			
Action and Development	18	7	7
Benefits Admin	951	824	794
Benefits Grants	-659	-659	-659
Consultation and Surveys	3	3	4
Corporate Grants	0	0	0
Corporate Management	726	937	929
Dartford Partnership Hub (SDC costs)	0	-0	-0
Equalities Legislation	14	18	18
External Communications	139	176	150
Housing Advances	2	2	2
Local Tax	28	179	120
Members	380	412	418
Misc. Finance	2,236	2,327	2,410
Dartford Partnership Implementation & Project Costs	-200	-30	-30
Performance Improvement	-9	6	6
Administrative Expenses - Corporate Director	8	0	0
Administrative Expenses - Community Director	4	0	0
Administrative Expenses - Chief Executive	7	35	36
Administrative Expenses - Financial Services	25	44	35
Administrative Expenses - Transformation and Strategy	3	11	6
Support - Audit Function	147	144	146
Support - Exchequer and Procurement	131	134	135
Support - Finance Function	138	209	213
Support - General Admin	119	142	145
Treasury Management	100	101	112
Total Service Expenditure	4,312	5,022	4,997

	Actuals	Budget	Proposed
	13/14	14/15	Budget 15/16
	£'000	£'000	£'000
Financial Services			
Pay Costs	2,380	2,552	3,013
Premises and Grounds	45	48	16
Transport	6	6	6
Supplies & Services	827	894	830
Supplies & Services IT	89	101	107
Agency & Contracted	2,277	2,710	2,867
Agency & Contracted - Partnerships	2,777	2,468	1,950
Agency & Contracted - Direct Services	0	0	0
Transfer Payments - Benefits	28,055	27,590	29,090
Transfer Payments - Other	0	0	0
Staff Costs - Other Chief Officers	268	411	0
Support Services	64	0	0
Funds drawn to/from Reserves	485	-138	-180
Income - Other	-29,523	-28,568	-30,139
Income - Fees and Charges	-397	-317	-344
Recharges	-189	-192	-192
Recharges - Partnerships	-2,852	-2,543	-2,026
	<hr/>	<hr/>	<hr/>
Service expenditure before re-allocation of Support Services and Capital charges	4,312	5,022	4,997
	<hr/> <hr/>	<hr/> <hr/>	<hr/> <hr/>
Analysis of budget changes between 14/15 and 15/16			
Base Budget 2014/15			5,022
Inflation			214
Planned Savings agreed previous years			0
SCIAs 2015/16 and Funding adjustments			
SCIA 7 (2015/16) Debit and Credit Card Fees for Treasury Management			10
SCIA 9 (2015/16) Business Rates Discretionary Relief			-33
SCIA 10 (2015/16) External Audit Fees Reduction			-30
SCIA 11 (2015/16) Dartford BC Revised Split of Costs			-90
SCIA 14 (2015/16) Council Tax Court Income			-25
SCIA 21 (2015/16) Back Office Savings			-57
Other Adjustments between Chief Officers			
Internal Print Reduction			-14
Proposed Budget 2015/16			<hr/> <hr/> 4,997

Net Service Expenditure analysed by Chief Officer

	Actuals		Proposed Budget
	13/14	Budget 14/15	15/16
	£'000	£'000	£'000
Housing			
Home Improvement Agency	0	0	0
Energy Efficiency	31	23	25
Gypsy Sites	-20	-31	-30
Homeless	106	96	79
Disabled Facilities Grant Administration	2	0	0
Housing	454	447	438
Housing Initiatives	7	6	13
Homelessness Prevention	0	0	0
Needs and Stock Surveys	13	-2	0
Housing Option - Trailblazer	3	0	0
KCC Loan Scheme	0	0	0
Private Sector Housing	148	155	178
Administrative Expenses - Housing	25	18	18
Sevenoaks Switch and Save	0	0	0
Homelessness Funding	0	0	0
Leader Programme	9	10	10
Total Service Expenditure	778	722	730

	Actuals		Proposed Budget
	13/14	Budget 14/15	15/16
	£'000	£'000	£'000
Housing			
Pay Costs	673	726	757
Premises and Grounds	22	11	11
Transport	0	0	0
Supplies & Services	22	21	22
Supplies & Services IT	8	0	0
Agency & Contracted	228	153	158
Agency & Contracted - Direct Services	0	0	0
Transfer Payments - Benefits	0	0	0
Transfer Payments - Other	6	37	27
Staff Costs - Other Chief Officers	11	5	0
Funds drawn to/from Reserves	44	20	13
Income - Other	-176	-183	-188
Income - Fees and Charges	-62	-69	-70
Recharges	3	0	0
	<hr/>		
Service expenditure before re-allocation of Support Services and Capital charges	778	722	730
	<hr/> <hr/>		

Analysis of budget changes between 13/14 and 14/15

Base Budget 2014/15	722
Inflation	21
Planned Savings agreed previous years	
SCIA 13 (2014/15) Efficiency Review Housing Initiatives	7
SCIAS 2015/16	
SCIA 17 (2015/16) Bed and Breakfast Reduction	-10
SCIA 18 (2015/16) Increase in Private Sector Letting Scheme	-10
Other Adjustments between Chief Officers	0
	<hr/>
Proposed Budget 2015/16	730
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Net Service Expenditure analysed by Chief Officer

	Actuals 13/14	Budget 14/15	Proposed Budget 15/16
	£'000	£'000	£'000
Legal and Governance			
Civic Expenses	14	15	15
Democratic Services	105	117	139
Elections	71	72	73
Register of Electors	112	140	139
Administrative Expenses - Legal and Governance	53	74	65
Support - Legal Function	192	190	202
Total Service Expenditure	548	608	634

	Actuals	Budget	Proposed
	13/14	14/15	Budget 15/16
	£'000	£'000	£'000
Legal and Governance			
Pay Costs	430	437	473
Premises and Grounds	20	20	25
Transport	6	7	11
Supplies & Services	151	179	206
Supplies & Services IT	4	10	10
Agency & Contracted	76	128	155
Staff Costs - Other Chief Officers	27	0	0
Funds drawn to/from Reserves	17	0	-60
Income - Other	-131	-137	-148
Income - Fees and Charges	-52	-38	-40
	<hr/>		
Service expenditure before re-allocation of Support Services and Capital charges	548	608	634
	<hr/> <hr/>		

Analysis of budget changes between 13/14 and 14/15

Base Budget 2014/15	608
Inflation	39
Planned Savings agreed previous years	0
SCIAS 2015/16	0
Other Adjustments between Chief Officers	
Internal Print Reduction	-10
Software Maintenance	-3
	<hr/>
Proposed Budget 2015/16	634
	<hr/> <hr/>

Net Service Expenditure analysed by Chief Officer

	Actuals 13/14	Budget 14/15	Proposed Budget 15/16
	£'000	£'000	£'000
Planning Services			
Affordable Housing	0	0	0
Bridleways / Footpath Diversions	0	0	0
Conservation	48	46	46
Planning Policy	448	416	389
LDF Expenditure	0	0	0
Neighbourhood Plan	0	0	0
Planning - Appeals	262	194	196
Planning - CIL Administration	5	0	0
Planning - Counter	-1	0	0
Planning - Development Management	260	328	352
Planning - Enforcement	261	278	279
Fort Halstead	0	0	0
Administrative Expenses - Planning Services	32	39	34
Total Service Expenditure	1,315	1,301	1,296

	Actuals 13/14 £'000	Budget 14/15 £'000	Proposed Budget 15/16 £'000
Planning Services			
Pay Costs	1,738	1,855	1,820
Premises and Grounds	0	1	1
Transport	1	0	0
Supplies & Services	64	67	63
Supplies & Services IT	8	2	2
Agency & Contracted	285	86	84
Transfer Payments - Other	6	0	0
Staff Costs - Other Chief Officers	23	17	0
Funds drawn to/from Reserves	8	5	61
Income - Other	-23	0	0
Income - Fees and Charges	-784	-713	-716
Recharges	-11	-20	-20
	<hr/>		
Service expenditure before re-allocation of Support Services and Capital charges	1,315	1,300	1,295
	<hr/> <hr/>		

Analysis of budget changes between 13/14 and 14/15

Base Budget 2014/15	1,300
Inflation	30
Planned Savings agreed previous years	
SCIA 16 (2014/15) Planning: Efficiency Review	-35
SCIAS 2015/16	0
Other Adjustments between Chief Officers	0
	<hr/>
Proposed Budget 2015/16	1,295
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PAY COST ESTIMATES SUMMARY 2015/2016

Line No.		2014/15 BUDGET	2015/16 BUDGET	2014/15 FTE	2015/16 FTE
1	Communities and Business	389,458	618,119	8.73	13.73
2	Corporate Support	1,980,046	1,948,120	60.56	60.23
3a	Building Control	432,209	434,418	9.61	10.61
3b	Environmental Health	604,506	613,910	12.57	12.57
3c	Licensing	278,933	288,563	8.61	8.62
3d	Operational Services	562,417	583,244	13.80	13.99
3e	Operational Services (TASK)	2,745,377	2,821,290	91.97	91.02
3f	Parking & Amenity Services	420,983	428,563	12.00	12.00
4	Finance	2,504,138	2,563,854	64.72	64.72
5	Housing	586,142	602,973	12.35	12.35
6	Legal & Governance	546,616	576,674	11.92	12.31
7	Planning	1,881,704	1,839,584	46.19	45.80
		12,932,529	13,319,312	353.03	357.95
	Other Salary Costs				
8	Vacancy Savings	-100,000	-100,000	-	-
	SUB-TOTAL	12,832,529	13,219,312	353.03	357.95
9	Community Development (Ext Funded)	146,258	165,393	3.81	5.23
10	Operational Services (Ext Funded)	-	-	-	-
11	Operational Services TASK (Ext Funded)	-	-	-	-
12	Development Services (Ext Funded)	-	-	-	-
13	Housing (Ext Funded)	215,887	221,719	6.09	6.09
	GRAND TOTAL	13,194,674	13,606,424	362.93	369.27

NOTES

1) Externally funded posts (lines 9 to 13) have been excluded from earlier lines. The income will show elsewhere in the 2015/16 budget

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Statement of Reserves and Provisions

1. This appendix sets out details of the reserves and provisions held by the council. These balances have been subject to a detailed review as part of the budget process. **The items in bold show the changes that are being recommended.**

2. One of the requirements of the Financial Planning Strategy is to have flexible use of the Budget Stabilisation Reserve. The fund incorporates any annual under-spends and absorb any annual over-spends. **It is recommended that any favourable variance achieved in the 2014/15 budget is put into this reserve.**

3. The annual contribution from revenue to the Capital Reserve is currently £198,000. SCIA19 explained that the Government has increased their contribution to the total cost of Disabled Facilities Grants which results in a lower contribution being required from this Council of £50,000 per annum. Therefore the requirement to fund part of the capital programme from the Capital Reserve reduces by the same amount. **It is recommended that the annual contribution from revenue to the Capital Reserve be reduced by £50,000 to £148,000.**

4. **An On-Street Parking Reserve be established.** To comply with the requirements of the Traffic Management Act 2004 and our on-street parking agency agreement with KCC. Surpluses on the on-street parking account may only be used for permitted purposes outlined in the Act and approved by the County Council. It is prudent to set aside any surpluses above budget to offset any future deficits or to apply to permitted purposes in later years.

5. A Property Investment Reserve be established. On 22 July 2014 Council approved a Property Investment Strategy and agreed to set aside up to £5m from a review of reserves for the purposes of the proposals outlined in the strategy. £1,219,000 will be funded from Capital Receipts. **It is recommended that £3,781,000 be transferred into the Property Investment Reserve from the changes recommended below following a review of reserves.**
 - a. **General Fund Reserve £2,213,000** – this reserve acts as a working balance and it is recommended that the balance is a minimum of 10% of Net Revenue Expenditure. This transfer would leave £1,500,000 in the reserve.

 - b. **First Time Sewerage Reserve £349,000.**

 - c. **Pension Fund Valuation Adjustment Reserve £509,000.**

 - d. **Rent Deposit Guarantee £50,000.**

- e. Homelessness Prevention £97,000.
- f. Housing Benefit Subsidy £400,000.
- g. Community and Business £112,000.
- h. Others £51,000.

6. The following table set out the reserves and provisions held by the Council at 1st April 2014.

	01/04/14	Purpose (some further details are included in the Statement of Accounts 2013/14)
Provisions	£000	
Business Rates Appeals	907	The change to the Business Rates Retention scheme means that the Council has to provide for its share of the costs arising from successful appeals.
Accumulated Absences	152	Absorbs the difference that would otherwise arise on the General Fund Balance from accruing for compensated absences (e.g. annual leave) earned but not taken in the year. Opposite entry in Unusable Reserves.
Municipal Mutual Insurance	257	A solvent run-off of MMI is now unlikely which may result in Councils being liable to clawback of monies paid out.
Other	34	To cover potential restitutionary claims in respect of personal search fees of the land register.
Sub Total	1,350	
Capital Receipts		
Capital Receipts	4,568	Balance from previous asset sales and mortgage repayments. Can be used to fund future capital expenditure.
Earmarked Reserves		
Action and Development	395	To fund ad hoc and unplanned expenditure (including emergencies and flooding).
Asset Maintenance	1,000	To fund emergency works to assets.
Budget Stabilisation	5,348	To support decisions required to continue to produce a balanced budget in future years.
Capital Financing	153	Annual contributions from revenue to fund some capital projects.
Carry Forward Items	177	For specific items agreed by Cabinet, e.g. if a project has slipped between years.
Community and Business	450	External funding received for ongoing and future projects.
Corporate Project Support	200	To fund external expertise required to investigate proposed projects.
Financial Plan	4,644	Funds moved from the Asset Maintenance and Employer's Superannuation Reserves to support the 10-year budget.
First Time Sewerage	715	Transferred from a provision for potential liabilities relating to earlier sewerage installations.
Flood Support	173	To give grants to businesses that have suffered flooding and make claims under the Business Flood Support Scheme.
Homelessness Prevention	197	For preventing homelessness.
Housing Benefit Subsidy	1,082	Provides a cushion against large movements in reclaimable sums in any year.
IT Asset Maintenance	403	To fund future IT asset maintenance costs.

Local Plan/LDF	528	To help support the Local Plan and Local Development Framework.
NDR Safety Net	595	To meet current accounting regulations for deficits in the initial year of the business rates retention scheme.
New Homes Bonus	379	Due to the uncertainty of future Government funding an element of NHB is being kept separate.
Pension Fund Valuation	1,318	To contribute towards downturns in future pension fund actuarial valuations.
Rent Deposit Guarantees	102	To support the homeless etc, by providing their initial deposit and guarantee for a property.
Re-organisation	465	To fund actions taken to achieve annual budget savings.
Vehicle Insurance	284	Own vehicle damage for the commercial vehicle fleet. Contributions are made from the trading accounts.
Vehicle Renewal	304	Vehicle replacement for the commercial vehicle fleet. Contributions are made from the revenue trading accounts each year
Others (under £100,000)	725	Includes District Elections, Housing Benefit, Big Community Fund.
Sub Total	19,637	
General Fund	3,713	Acts as a working balance to meet unexpected issues during the year, for which a minimum of 10% of net service expenditure recommended. It also meets any planned deficits on the revenue account.
TOTAL	29,268	

Definitions:

Provisions – funds set aside for liabilities or losses which are known obligations, but are uncertain as to amounts or dates. Expenditure can be charged direct against the Provision without being reflected in the Revenue Account.

Capital Receipts – money received from the sale of assets (normally land and buildings) and the repayment of grants and advances (e.g. mortgage repayments). Such receipts can only be used to repay debt, or to finance capital investment.

Earmarked Reserve – amounts set aside for purposes falling outside the definition of Provisions. Expenditure should not be charged direct to reserves, but shown in the Revenue Account with the transfer to or from the reserve distinguished from service expenditure. For each reserve the purpose, usage and basis of transactions should be clearly identified.

Unallocated Reserve – the General Fund balance. Amounts not set-aside for a specific purpose. The only transaction should be the surplus or deficit on the General Fund each year.

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Risk Factors 2015/16

Issue	£ Scale	Likelihood 1 (low) – 5 (high)	Impact 1 (low) – 5 (high)	Total Score	Potential Annual Impact and Sensitivity Analysis	Risk Areas	Controls and Actions in place
Pay Costs	£13m total costs	1	4	4	1% pay increase = £130k. Budget assumptions: 1.5% pay award from 2016/17.	Largest single item of cost. Complex drivers across the organisation.	Pay settlement agreed for 2015/16. Strict monitoring of both financials and staff numbers. New salary bands introduced from 1 April 2012 which reduced the costs of annual increments. Formal sickness & overtime monitoring. Separate control on agency staff. Part of National Agreement.
Pensions Funding	£25m deficit	1	3	3	1% change in employers contribs = £150k.	Deficit on County Fund. Future actuarial results. Government review.	£520,000 included in 10-year budget in 2017/18 to contribute towards any increase at the next triennial revaluation.
Major Service Income areas					See below by income type	Income subject to local economic conditions. Some very large single-source income targets (see below).	Strict monitoring, with trend analysis.

Appendix I

Issue	£ Scale	Likelihood 1 (low) – 5 (high)	Impact 1 (low) – 5 (high)	Total Score	Potential Annual Impact and Sensitivity Analysis	Risk Areas	Controls and Actions in place
- Land Charges	£0.2m	4	1	4	20% reduction would be £33k.	Volatile activity levels in the housing market. National legal action now underway in relation to Personal Search companies recouping monies expended under the previous legislation.	A provision of £34k is held for the national legal action. Continue to monitor.
- Development Control	£0.7m	3	3	9	20% reduction would be £143k.	Volatile activity levels in the housing market and general economic conditions.	Current year income is above target. Continue to monitor.
- Building Control	£0.5m	4	3	12	20% reduction would be £90k	Volatile activity levels in the housing market and general economic conditions. Competition from commercial organisations	Current year income is below target. Continue to monitor.
- Car Parks	£2.1m	2	4	8	20% reduction would be £420k	General economic conditions; central government directives	Current year income is below target. Continue to monitor.
- On-Street Parking	£0.7m	3	3	9	20% reduction would be £143k	General economic conditions. Legislative constraints on	Current year is above target. Continue to monitor and review.

Agenda Item 5

Appendix I

Issue	£ Scale	Likelihood 1 (low) – 5 (high)	Impact 1 (low) – 5 (high)	Total Score	Potential Annual Impact and Sensitivity Analysis	Risk Areas	Controls and Actions in place
						spending surpluses. Reverts to KCC control	
- Car Parking – Enforcement income	£0.2m	2	2	4	20% reduction would be £31k	General economic conditions; central government directives	Current year is below target. Continue to monitor and review
Partnership working and partner contributions		3	2	6	Impact on individual projects is high.	Partner actions delayed. Agreed funding not received by SDC. Partnerships ending.	Separate accounting arrangements. Active liaison with partners on service arrangements Written partnership agreements.
External Funding Awards	£0.5m	3	2	6	Up to £400k Impact on individual projects is high	Time limited.	Exit strategies in place.
Changes in service demand		3	3	9	Impacts will vary depending on service.		Service planning in place Continue to lobby Government where changes are due to new Gov't requirements.
Interest Rates	£0.244m 14/15 budget	2	4	8	£177k per 0.5%.	Large cash variance from small rate changes. Reducing availability of suitable counter parties	Use of professional advisers

Appendix I

Issue	£ Scale	Likelihood 1 (low) – 5 (high)	Impact 1 (low) – 5 (high)	Total Score	Potential Annual Impact and Sensitivity Analysis	Risk Areas	Controls and Actions in place
Investments	£45m balance at Nov 2014	1	5	5		Financial institutions going into administration.	Investment strategy regularly reviewed by FRAC.
Asset base maintenance	£1.0m	1	2	2	Annual budget is based on 30% of assessed maintenance.	Unexpected problems occurring with financial implications. Reducing budget levels.	Reserve funds set aside. 10 year maintenance planning carried out. Policy of reducing asset liabilities wherever possible.
Capital Investment resources	£4.6m balance at March 2014	2	2	4	Risks taken into account in the Capital Programme report.	Capital receipt levels modest.	External funding sought wherever possible. Capital Investment priorities in place. Property Review being pursued to secure asset sales.
Disposal of surplus assets	£1.6m budget in plan (15/16)	2	2	4	Risks taken into account in the Capital Programme and Asset Maintenance report.	Planning conflict. Resources required to bring sites forward.	Land Owner/Planning protocols in place. In-house property team. Planned Property Review disposal programme.
Government Support: Revenue Support Grant	£2.2m in 2014/15	5	4	20	£22k per 1% change.	Government continues to reduce grant. Only short term settlements provided.	10-year budget strategy gives ability to gradually adjust for changes. Adequate level of General Reserve held.

Agenda Item 5

Appendix I

Issue	£ Scale	Likelihood 1 (low) – 5 (high)	Impact 1 (low) – 5 (high)	Total Score	Potential Annual Impact and Sensitivity Analysis	Risk Areas	Controls and Actions in place
Government Support: Retained Business Rates	£1.9m in 2014/15	4	4	16	£19k per 1% change	Government changing safety net levels. High volume of successful valuation appeals.	10-year budget strategy gives ability to gradually adjust for changes. Adequate level of General Reserve held.
Council tax capping	£9.0m CTAX income in 14/15	4	3	12	£90k per 1% capping reduction	Council tax freeze offers from Govt. Council tax increases limited to 2% Impact on council tax base from Local CTAX schemes.	Draft 10-year budget includes council tax increase assumptions for future years.
Future Service Changes by Government		4	4	16		Additional services without consequent resources, e.g. Maint. of trees on common land. Government directives on income charging e.g. Personal searches	Monitor proposals. Respond to consultation with local view.
Fuel cost increases for Direct Services	£0.5m	5	2	10	10% increase would be £50k	Changes in global oil prices.	Continue to monitor fuel usage and efficiency. Vehicle replacement programme
Changes to Audit Arrangements		2	2	4		Abolition of Audit Commission in March 2015; change of	Plan responses to new initiatives well in advance. <i>(appointment of external auditors transfers to</i>

Appendix I

Issue	£ Scale	Likelihood 1 (low) - 5 (high)	Impact 1 (low) - 5 (high)	Total Score	Potential Annual Impact and Sensitivity Analysis	Risk Areas	Controls and Actions in place
						external auditors	<i>Public Sector Audit Appointments Ltd),</i> Ensure Council organisation design can meet challenges.

Agenda Item 5

DISCRETIONARY RATE RELIEF

Cabinet – 5 February 2015

Report of the: Chief Finance Officer

Status: For Decision

Key Decision: No

Executive Summary: The Council requires potential recipients of discretionary rate relief to submit a formal application every two years. However, in view of the changes brought about by business rate retention, the proposals for awarding relief are to be reported annually. This report follows the formal biennial review and sets out the proposals for awarding discretionary rate relief for 2015/16.

This report supports the Key Aims of: Supporting and developing the local economy and providing value for money

Portfolio Holder Cllr. Ramsay

Contact Officer(s) Adrian Rowbotham Ext. 7153

Sue Cressall Ext. 7041

Paula Porter Ext. 7277

Recommendation to Cabinet: members are asked to approve the proposals for granting relief from business rates for 2015/16 set out in Appendix B

Reason for recommendation: Relief from business rates provides organisations with valuable support and contributes to the Council's commitment to supporting and developing the local economy.

Background

- 1 Charities and sports organisations that have charitable status currently receive 80% mandatory relief. In order to qualify for the mandatory relief the organisation must be established for charitable purposes only and the premises must be wholly or mainly used for charitable purposes. Sports clubs registered with HMRC as community amateur sports clubs are also entitled to 80% mandatory relief.

Certain types of business in rural villages may qualify for 50% mandatory rate relief subject to the rateable value of the property being under specified limits.

Agenda Item 6

- 2 Section 47 of the Local Government Finance Act 1988 (as amended by s69 of the Localism Act 2011) provides local authorities with powers to grant discretionary rate relief of up to 100% to any ratepayer.
- 3 Discretionary rate relief can be awarded in isolation or given to ‘top-up’ a mandatory award.
- 4 However, unless one of the following apply, authorities may only grant discretionary rate relief if satisfied that it would be reasonable to do so, having regard to the interests of the council tax payers:
 - The ratepayer is a charity or trustees for a charity, and the property is wholly or mainly used for charitable purposes; or
 - The ratepayer is a community amateur sports club and the property is wholly or mainly used for the purpose of the club and other such clubs; or
 - The ratepayer is entitled to mandatory rural rate relief; or
 - All or part of the property is occupied by non-profit making organisations whose main objects are charitable or are otherwise philanthropic or religious or concerned with education, social welfare, science, literature or the fine arts; or
 - The property is occupied by a club, society or other non-profit making organisation and it is wholly or mainly used for purposes of recreation.
- 5 Authorities should have easily understood guidelines for deciding whether or not to grant relief and for determining the amount of relief which should be based on the consideration of the merits of each individual case. However, as the range of bodies that may be eligible for discretionary rate relief is wide, not all the suggested criteria will be applicable in each case.

Introduction

- 6 The Council currently grants discretionary rate relief over the following categories:
 - Discretionary rate relief up to 100% of rates bill (but usual award is 80%);
 - Village Shop rate relief at 50% of rates bill;
 - Hardship relief up to 80% of rates bill; and
 - Discretionary ‘top-up’ relief to take total relief up to 100% of the rates bill.
- 7 Members reviewed the criteria for granting discretionary rate relief to charities, not for profit organisations, discretionary rural rate relief and hardship relief in February 2013 and this is attached at Appendix A.
- 8 Applications from ratepayers falling outside of these criteria will be considered on their merits and individual recommendations will be made having regard to the interests of the District’s council tax payers.

Approach taken to reviewing applications

- 9 The full list of applications, together with officer recommendations, is attached at Appendix B. Each application has been considered on its own merits, however in reviewing applications against the criteria, similar organisations were considered together, to ensure consistency of approach.
- 10 The criteria was applied as follows for discretionary rate relief and discretionary top-up relief:
- Links to Council priorities – the extent to which the activities supported the Council’s priorities was assessed, including support/activities for vulnerable or socially excluded groups.
 - Evidence of financial need including reserve levels and assets – all organisations were requested to provide financial information and reserve levels were compared to annual expenditure, to assess financial need. The ability to generate income was also considered. In addition, for sports clubs, consideration was given to whether they had applied to become community amateur sports clubs (CASCs).
 - Membership within the District – where it appeared that a substantial proportion of the membership was from outside the District, this was taken into account in putting forward a recommendation.
 - Membership open to all – where membership is restricted to a particular group or locations, or is dependent on recommendations from existing members this has been taken into account, as not all residents would be able to benefit from the relief granted.
 - Membership fee levels – fee levels were assessed to consider whether they were so high that they could exclude some in the local community.
 - Bar activity and profits – if the bar is the main activity an organisation was unlikely to be recommended for relief. Any profits are expected to be used to fund club expenses.
- 11 For discretionary village shop relief, officers considered the benefits of the shop/business to the local community when compared with the cost of the relief. It is recommended that the village shops receive relief due to the benefit they provide to local communities.
- 12 Where a ratepayer receives 100% small business rate relief the recommendation is for no discretionary rate relief or village shop relief to be granted, since the businesses already receive maximum support.
- 13 There is no formal appeals process against the Council’s decisions on the discretionary reliefs referred to in this report. The current approach is however to re-consider decisions in the light of any representations made by the ratepayers.

Agenda Item 6

Applications for 2015/2016

- 14 Appendix B contains the details of each applicant to be considered for relief for 2015/2016 and detailed recommendations of the level of relief to be applied.
- 15 All applicants fall to be considered under the criteria set out in Appendix A.
- 16 The level of relief is based upon the provisional multipliers announced on 4 December 2014 which are subject to confirmation. In the unlikely event that the multipliers change, a further report setting out the revised relief awards will be submitted.
- 17 If applications are approved, the total gross relief granted would be £158,609.

Four existing recipients of 'top-up' discretionary rate relief have yet to submit a valid application for 2015/16. If applications are received subsequent to this report, there is potential for a further award of discretionary rate relief amounting to £6,946.
- 18 Members should be aware that the requirement for relief can change during the financial year as a result of rateable value changes, vacations etc. Therefore, some of these awards may not ultimately require full funding.

Key Implications

Financial

- 19 Since 1 April 2013 all discretionary relief granted has come under the provisions of the business rate retention scheme. The cost of relief is effectively shared between Central Government (50%), and local authorities (50%). Of this Sevenoaks District Council is required to fund 40%.
- 20 When setting the business rates baseline for 2013/14, the Government broadly used the existing levels of discretionary relief. Because of the operation of the levy and safety net on the business rate retention scheme it is not possible to say exactly what the actual effect of granting the relief will be and it may vary between years. For example if the Council was already at the safety net then granting additional relief would have no direct impact for that year, but would as soon as the Council moved out of the safety net.
- 21 Therefore Appendix B only refers to the projected gross discretionary rate relief.

Legal Implications and Risk Assessment Statement.

- 22 There are no legal issues.

Equality Impacts

23

Consideration of impacts under the Public Sector Equality Duty:		
Question	Answer	Explanation / Evidence
a. Does the decision being made or recommended through this paper have potential to disadvantage or discriminate against different groups in the community?	No	This approach provides equality of access to discretionary relief, due to clear criteria for the award of relief and consideration of all applications at the same time.
b. Does the decision being made or recommended through this paper have the potential to promote equality of opportunity?	Yes	
c. What steps can be taken to mitigate, reduce, avoid or minimise the impacts identified above?		

Risk Assessment Statement

- 24 New organisations may request relief after the deadline for receipt of applications and so would not be able to receive discretionary relief until the next annual review. In order to address urgent cases it is proposed that the Chief Finance Officer determines any relief to be awarded under delegated authority. These organisations would then apply in the usual way for the next round.
- 25 A biennial application process may seem to be an additional burden for businesses, many of whom are small. Officers have taken account of this in designing the application process so as to minimise the administrative burden on applicants.

Appendices

Appendix A – Policy for considering applications for Discretionary Rate Relief

Appendix B – List of organisations proposed to receive relief

Background Papers:

None

**Mr Adrian Rowbotham
Chief Finance Officer**

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Policy for considering applications for Discretionary Rate Relief

Charitable and not for profit organisations

Under National Non-Domestic Rate (NNDR) legislation the Council has the power to award discretionary rate relief to certain charitable or not for profit organisations where the following conditions are satisfied.

All or part of the property is occupied by one or more institutions or organisations which are:

- Not established for profit, and
- Whose main objects are charitable or are otherwise philanthropic or religious or concerned with education, social welfare, science, literature or the fine arts; or
- Used wholly or mainly for recreation by a not-for-profit club or society.

Discretionary rate relief cannot be awarded if the ratepayer is a billing or precepting authority.

The process for considering applications is as follows:

- Not-for-profit organisations are asked to apply for discretionary rate relief (in isolation or as ‘top-up’ every two years, all applications to be considered at the same time.
- Cabinet to decide annually which organisations are to receive relief based on criteria including how the organisation assists the Council to achieve its priorities (see below). This includes deciding the level of relief to be granted in each case.

Criteria	Explanation
Links to Council priorities	The extent to which the activities of the organisation support the Council’s priorities as set out in the Corporate Plan, and specifically supporting and developing the local economy and providing good value for money through a balanced budget.
Evidence of financial need including reserve levels and assets	Organisations with high levels of reserves (covering more than 12 months’ expenditure) or who cannot demonstrate a financial need would not be a priority for rate relief.
Membership within District	As 40% of the relief is funded by SDC taxpayers priority will be given to those organisations with a high proportion of members from within the District.

Membership open to all	To give all residents an opportunity to benefit from the rate relief, priority should be given to organisations where membership is open to all.
Membership fee levels	Where membership fees are charged they should not be so high as to exclude any of the community.
Extent to which activity is based around Bar and use of profits from it	Priority would not be given to those organisations where the bar is the main activity. It would be expected that any profits from the bar would be put back to fund club expenses.

Discretionary rural rate relief

Certain types of business in rural villages, with a population below 3,000, may qualify for rate relief of 50%. Businesses that qualify for this relief are the sole general store and the sole post office in the village, provided it has a rateable value of up to £8,500, any food shop with a rateable value of up to £8,500 and the sole pub and the sole petrol station in the village provided it has a rateable value of up to £12,500. The Council has discretion to give further relief on the remaining bill on such property.

The Council may decide to give up to 100% relief to any other business in such a rural village, with a rateable value of up to £16,500, if it is satisfied that the business is of benefit to the community and having regard to the interests of its council tax payers.

Hardship Relief

Hardship relief is granted in exceptional circumstances, any business can apply for hardship relief if they can show the following:

- The business would suffer hardship if relief was not granted; and
- It is in the interests of council tax payers for relief to be granted.

An application needs to be supported by current trading figures as well as previous audited accounts or accounts accepted by HMRC. In assessing an application regard will be had to employment issues for the company or any related business and the impact that the loss of business would have on the local area. The current approval process is that the Finance Team carries out a review of the business's accounts and the Chief Finance Officer decides whether hardship relief is appropriate based on each case's merits. In practice hardship relief has been granted in only exceptional cases to date.

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
	DISCRETIONARY RELIEF				
30559572	Army Cadet Force Hall Argyle Road, Sevenoaks	Sevenoaks	80	£4,608.00	Recommended
30561773	Army Cadet Force Hall Swanley Lane, Swanley	Swanley	80	£2,188.80	Recommended
30562325	Army Cadet Force Hall 8 High Street, Westerham	Westerham	80	£2,304.00	Recommended
30549735	Edenbridge Forge Singers Hall 72 High Street, Edenbridge	Edenbridge	80	£0.00	Recommended
30558326	Hartley & District Social Club Ltd Club Ash Road, Hartley	Hartley	40	£577.34	Recommended Facility used by non-members including youth karate, fitness pilates local Masons, Hartley & District Active Retirement Association, Wellfield Horticultural Group
30567870	Manor Forstal Residents Society Ltd Garage 97-98 Manor Forstal	Ash Cum Ridley	80	£0.00	Recommended
30578788	New Ash Green Village Association Ltd Offices Centre Road, New Ash Green	Ash Cum Ridley	80	£5,856.00	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30553475	New Ash Green Village Association Ltd Workshop Ash Road, New Ash Green	Ash Cum Ridley	80	£5,280.00	Recommended
30570319	New Ash Green Village Association Ltd Hall Ash Road, New Ash Green	Ash Cum Ridley	80	£2,841.60	Recommended
30557491	New Ash Green Village Association Ltd Sports Ground Punch Croft, New Ash Green	Ash Cum Ridley	80	£5,952.00	Recommended
30584363	Royal British Legion Club (Leigh Kent) Ltd Club High Street, Leigh	Leigh	80	£0.00	Recommended
30553253	Gamecock Meadow Management Committee Club House R/O Gamecock Meadow, London Rd, West Kingsdown	West Kingsdown	80	£0.00	Recommended Used for recreational sports, pavillion, library. Rents facilities to local football clubs, boules club, tennis clubs and skateboard park
30573806	Royal British Legion (Westerham) Club Ltd Club Mill Lane, Westerham	Westerham	80	£1,290.24	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
	TOP-UP RELIEF				
30550568	10th Sevenoaks (Weald's own) Scout Group Hall Glebe Road, Sevenoaks	Sevenoaks Weald	20	£281.01	Recommended
30562165	15th Sevenoaks (Otford) Scouts Hall Station Road, Otford	Otford	20	£266.22	Recommended
30565195	17th Sevenoaks (Westerham) Scout Group Hall Hortons Way, Westerham	Westerham	20	£199.67	Recommended
30557095	1st Crockenhill Scouts Group Hall Stones Cross Road, Swanley	Swanley	20	£157.76	Recommended
30561414	Edenbridge Scout Group Hall Station Road, Edenbridge	Edenbridge	20	£202.13	Recommended
30558593	1st Eynsford & Farningham Scout Group Hall Priory Lane, Eynsford	Eynsford	20	£219.39	Recommended
30565812	1st Horton Kirby Scout Group Hall Horton Road, Horton Kirby	Horton Kirby	20	£219.39	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30558555	1st Sevenoaks Scout Group Hall 57 Oakhill Road, Sevenoaks	Sevenoaks	20	£325.38	Recommended
30562080	3rd Sevenoaks (Riverhead & Dunton Green) Scouts Hall Bradbourne Vale Road	Sevenoaks	20	£290.87	Recommended
30573417	6th Sevenoaks (Kemsing) Scout Group Hall Heaverham Road, Kemsing	Kemsing	20	£175.02	Recommended
30566792	7th Sevenoaks (Halstead) Scout Group Hall Shoreham Lane, Halstead	Halstead	20	£101.07	Recommended
30556245	7th Tonbridge (Eden Valley) Scout Group Hall Kiln Lane, Leigh	Leigh	20	£236.64	Recommended
30631306	Rural Age Concern Darent Valley Community Centre Scratchers Lane, Fawkham	West Kingsdown	20	£246.50	Recommended
30638543	Age Concern Sevenoaks & District Offices St John's Road, Sevenoaks	Sevenoaks	20	£1,503.65	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30642788	Age Concern Sevenoaks & District Shop London Road, Sevenoaks	Sevenoaks	20	£1,207.85	Recommended
30612176	Badgers Mount Memorial Hall Hall Highlands Rd, Badgers Mount	Shoreham	20	£359.89	Recommended
30558715	British Red Cross Society Hall 47 Bradbourne Vale Road	Sevenoaks	20	£374.68	Recommended
30574069	Sevenoaks Citizens Advice Bureau Offices Buckhurst Lane, Sevenoaks	Sevenoaks	20	£700.06	Recommended
30569890	Farningham Village Hall Hall High Street, Farningham	Farningham	20	£359.89	Recommended
30604373	Eden Valley Museum Trust Museum High Street, Edenbridge	Edenbridge	20	£680.34	Recommended
30673591	Edenbridge & District Community Link Shop High Street, Edenbridge	Edenbridge	20	£438.77	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30693953	Edenbridge & Westerham Citizens Advice Bureau Office The Eden Centre, Edenbridge	Edenbridge	20	£1,380.40	Recommended
30558982	Fawkham Village Hall Hall Valley Road, Fawkham	Fawkham	20	£552.16	Recommended
30675078	Hartley Village Hall Hall Ash Road, Hartley	Hartley	20	£261.29	Recommended
30555785	Ide Hill Village Hall Management Committee Store Ide Hill Village Hall	Sundridge	20	£219.39	Recommended
30570296	Ide Hill Village Hall Management Committee Hall Ide Hill Village Hall	Sundridge	20	£246.50	Recommended
30658332	Longfield & Hartley Scout Grp Club House Larkwell Lane, Hartley	Hartley	20	£453.56	Recommended
30676033	Relate West & Mid Kent Store 12-14 Wealden Place,Sevenoaks	Sevenoaks	20	£340.17	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30643088	Riverside Players Store Furlong Farm, Eynsford	Eynsford	20	£224.32	Recommended
30554812	Sevenoaks Area Mind Day Centre St John's Road, Sevenoaks	Sevenoaks	20	£433.84	Recommended
30569944	Ide Hill Scout Group Hall Ide Hill	Sundridge	20	£113.39	Recommended
30575161	Sevenoaks District Scout Council Hall School Lane, Seal	Seal	20	£251.43	Recommended
30607563	Sevenoaks Leisure Ltd Leisure Centre Edenbridge Leisure Centre	Edenbridge	20	£22,283.60	Recommended
30605970	Sevenoaks Leisure Ltd Leisure Centre White Oak Leisure Centre	Swanley	20	£44,616.50	Recommended
30607556	Sevenoaks Leisure Ltd Swimming Pool Sevenoaks Leisure Centre	Sevenoaks	20	£25,882.50	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30607570	Sevenoaks Leisure Ltd Shop Lullingstone Golf Club	Crockenhill	20	£719.78	Recommended
30687859	Sevenoaks Leisure Ltd Sports Centre Wilderness Sports Centre	Sevenoaks	20	£3,253.80	Recommended
30556474	St John Ambulance Hall Chatham Hill Road, Sevenoaks	Sevenoaks	20	£179.95	Recommended
30671342	Stag Community Arts Centre Theatre & Cinema London Road, Sevenoaks	Sevenoaks	20	£4,141.20	Recommended
30568910	Swanley Youth & Community Centre Hall St Mary's Road, Swanley	Swanley	20	£1,207.85	Recommended
30567641	4th Sevenoaks (St John's) Scout Group Hall Mill Lane, Sevenoaks	Sevenoaks	20	£670.48	Recommended
30569487	Ash Village Hall Hall The Street, Ash	Ash Cum Ridley	20	£244.04	Recommended

Ref	Organisation name and property description/address	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30672130	YMCA Workshop Warsop Trading Estate, Edenbridge	Edenbridge	20	£1,848.75	Recommended Property used as warehouse/distribution centre for donated goods
30702369	Kingsdown Village Hall Hall London Road, West Kingsdown	West Kingsdown	20	£1,602.25	Recommended

	RURAL RATE RELIEF OFFICER RECOMMENDED	Parish	% for 2015/16	Relief for 2015/16	Recommendation/comments
30575154	BD & CB Patel Convenience Store 6 East Hill, South Darenth	Horton Kirby	50	£0.00	Recommended
30583360	Mr M Patel Retail and post office 4-5 The Broadway, Crockenhill	Crockenhill	50	£2,232.00	Recommended
30671168	Senthilkumar Thangavelu General store 19-21 West End, Kemsing	Kemsing	50	£2,580.00	Recommended
30602841	Seal Supermarket Ltd General Store 21 High Street, Seal	Seal	50	£3,000.00	Recommended
30697481	Ide Hill Community Shop CIC Post Office & Community Shop Ide Hill	Ide Hill	6.54	£225.50	Recommended

Discretionary Rate Relief	Number		Relief 2015/16
Total Officer Recommended	13		£30,897.98
Total Officer Rejected	0		
Top-Up Relief	Number		Amount
Total Officer Recommended	44		£119,673.33
Total Officer Rejected	0		
Rural Rate Relief	Number		Amount
Total Officer Recommended	5		£8,037.50
Total Officer Rejected	0		

ANNUAL REVIEW OF PARKING CHARGES FOR 2015/16 – RESULTS OF PUBLIC CONSULTATION

Cabinet – 5 February 2015

Report of: Chief Officer Environmental and Operational Services

Status: For decision

Key Decision: Yes

Executive Summary: This report informs Members of the outcome of the public consultation for the proposed increases to car park charges and proposed changes to on-street operational times for 2015/16.

This report supports the Key Aim of the effective management of Council resources.

Portfolio Holder Cllr. R Hogarth

Contact Officer(s) Gary Connor x7310

Recommendation to Cabinet: It be RESOLVED that:

Members confirm whether any of the proposed car park charges or changes to operational times for car parks and on-street parking approved by Cabinet on 13 November 2014 should be amended in light of consultation responses, with a view to implementing the proposals on or as soon after 1 April 2015.

Reason for recommendation: to meet the Council's budgets for parking for 2015/16.

Introduction and Background

- 1 On 13 November 2014, Members of Cabinet considered and approved proposals for increasing certain parking charges to contribute to the Council's overall budget target for 2015/16.
- 2 A proposal to remove the £1.00 evening charge, which applies from 6.30pm to 8.30pm in the Sevenoaks town centre car parks, replacing it by extending the daytime charges through to 8.30pm was included, along with a proposal to amend the time of operation for on-street pay and display parking areas in Sevenoaks town centre to finish at 8.30pm to suit.
- 3 This report concerns objections and comments received in respect to the proposals following public consultation to amend the Council's Car Parks Order and on-street Traffic Regulation Order.
- 4 For Members' information, a summary of the car park charge proposals approved for consultation by Cabinet on 13 November is attached as Appendix A.

Agenda Item 7

- 5 For information, in relation to parking in the vicinity of rail stations, the charges for parking in the car parks operated on behalf of Southeastern Trains have been revised since the report to Cabinet last November. The day charges are now as follows: £6.80 at Sevenoaks, £6.10 at Swanley and £3.60 at Knockholt station. Annual season ticket charges at Sevenoaks are now £1,193.50 for Car Park 4 (off Morewood Close) and £1,503.50 for Car Park 1 (adjacent the station).

Consultation Responses

- 6 The public consultation period ended on 21 January 2015, although a week's extension to 28 January was given to Consultees to address late notification. In addition to the advertisement of the Public Notice in the local newspaper and in the car parks and on-street areas, letters were sent to all season ticket holders advising them of the proposals.
- 7 At the time of preparing this report, 94 emails have been received in response to the consultation. These include a response from the Sevenoaks Town Partnership (see comment 93 in Appendix C) and from the Sevenoaks Town Council (see comment 94). A summary of consultation responses received is attached as Appendix B. The comments received are attached in full, i.e. in verbatim, in Appendix C for Members' perusal and consideration.
- 8 Should any further responses be received from the Consultees between the time of preparing this report and the deadline of 28 January, these will be reported at the time of the meeting.
- 9 Where responses have contained comments relating to more than one of the subject areas, these have been recorded separately against each area and, hence, the total comments in the table below will total more than the number of emails received.

Subject	Number of Comments
Parking charges – Sevenoaks town	74
Evening parking charge – general areas	49
Evening parking charge – re: the Stag Theatre	19
Parking charges – Sevenoaks station	1
Season ticket charge – Sevenoaks station	2
Lack of long stay parking – Sevenoaks	2
On-street parking times of operation – Sevenoaks town	1

Other Changes to the Car Park Order

- 10 On the 17 December 2014, the Portfolio Holder for Economic & Community Development approved the inclusion of other changes to the Car Park Order. These related to the removal of the Pembroke Road car park from the Order; the inclusion of a parking area in Orchard Close, Sevenoaks to enable enforcement activities; the inclusion of additional clauses to clarify the use and enforcement of delivery areas and loading and unloading activities; and the inclusion of a new clause to clarify the enforcement of contraventions which occur over more than one day. The report to the Portfolio Holder is attached as Appendix D for further information.
- 11 No comments or objections have been received in respect to these proposals and, therefore, the changes will be implemented as part of the Order change for the car park charges.

Changes to the On-Street Road Traffic Order

- 12 Should the operational times for the car park charges in Sevenoaks town centre be amended from 9.30pm, Members are advised that consideration should be given to amending the operational time of the on-street pay and display areas in the town centre to suit. Such proposals were advertised for public consultation as a proposed amendment to the Traffic Regulation Order to coincide with the proposed changes to the Car Park Order.
- 13 At the time of drafting this report, no objections have been received in relation to the on-street change. However, a request for a change to the times of operation was received from the Sevenoaks Town Council (see comment 94 in Appendix C) .
- 14 Members of the Sevenoaks Joint Transportation Board will be informed of the change, should it go ahead, by way on an information item to the next meeting of the Board.

Key Implications

Financial

- 15 The proposals contribute to the budget provisions for parking for 2015/16.

Legal Implications and Risk Assessment Statement.

- 16 There are set legal processes in respect to amending or implementing new parking charges and these are being followed.
- 17 Once the parking charges to be adopted for 2015/16 are confirmed, the Order making process can be completed with a view to implementation on, or soon after, 1 April 2015.
- 18 By not adopting the charging proposals approved, or by failing to provide alternatives, the budget expectations for parking income for 2015/16 might not be realised.

Agenda Item 7

Equality Impacts

- 19 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.

Community Impact and Outcomes

- 20 The introduction of increased parking charge is likely to have an impact to varying degree upon those people from the local community and visitors from outside the district who use the parking facilities, although it is impossible to quantify any likely resultant effect. Rather than pay any higher charges, people may instead decide to park for shorter periods, may lessen the frequency of their visits or may choose to go elsewhere.

Appendices

- Appendix A Car Park and On-Street charges approved for consultation.
- Appendix B Consultation responses summary.
- Appendix C Consultation responses.
- Appendix D Report on Amendments to the Car Park Order dated 17 December 2014 to the Portfolio Holder for Economic & Community Development.

Background Papers:

The proposed Sevenoaks District Council (Off-Street Parking Places) (Amendment 4) Order 2010.

The proposed Kent County Council (Various Roads in the District of Sevenoaks) (Prohibition and Restriction of Waiting and Loading & Unloading and On-Street Parking Places) (Amendment 11) Order.

Mr Richard Wilson
Chief Officer Environmental and Operations Services

CAR PARK TARIFFS				Proposed Increases		Proposed Charge
Item No.	Description	Charge Period	Current Charge		Option 1-3	
1.0	SEVENOAKS TOWN CENTRE - Blighs					
1.1	Short stay	30 minutes	70p			
1.2	" "	1 hour	£1.30			
1.3	" "	2 hours	£2.70		30p	£3.00
1.4	" "	3 hours	£4.50		30p	£4.80
	Buckhurst 1, South Park, Suffolk Way					
1.5	Short stay	1 hour	£1.00			
1.6	" "	2 hours	£1.80			
1.7	" "	3 hours	£2.50		50p	£3.00
1.8	" "	4 hours	£3.50		50p	£4.00
	Buckhurst 2					
1.9	Long stay	all day	£4.40		20p	£4.60
1.10	Season tickets	year	£839		£20	£859
2.0	SEVENOAKS STATION					
2.1	Long stay	all day	£6.80		20p	£7.00
	Season tickets:					
2.2	Bradbourne	year	£1,090		£20	£1,110
2.3	Sennocke	year	£1,130		£20	£1,150
3.0	SEVENOAKS ST JOHNS HILL					
3.1	Short stay	30 minutes	20p			
3.2	" "	1 hour	40p			
3.3	" "	2 hours	60p			
3.4	" "	3-4 hours	£1.00			
3.5	Long stay	all day	£3.10			
4.0	SWANLEY					
4.1	Short stay	30 minutes	20p		10p	30p
4.2	" "	1 hour	40p		10p	50p
4.3	" "	2 hours	60p		10p	70p
4.4	" "	3-4 hours	£1.00		10p	£1.10
4.5	Long stay	all day	£3.90		10p	£4.00
5.0	WESTERHAM - Darent					
5.1	Short stay	1 hour	free			
5.2	" "	2 hours	free			
5.3	" "	3 hours	free			
5.4	" "	4 hours	£1.20			
5.5	Long stay	all day	£3.10			
	WESTERHAM - Quebec Avenue					
5.6	Short stay	15 minutes	10p			
5.7	" "	30 minutes	20p			
5.8	" "	1 hour	50p			
5.9	" "	2 hours	70p			
5.10	" "	4 hours	£1.20			
5.11	Long stay	all day	£3.10			
	WESTERHAM - Vicarage Hill					
5.12	Short stay	15 minutes	10p			
5.13	" "	30 minutes	20p			
5.14	" "	1 hour	60p			
5.15	" "	2 hours	£1.50			

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Appendix B - Consultation Responses Summary

Response	Parking charges Sevenoaks town	Evening charge re: general areas	Evening charge re: Stag Theatre	Parking charges Sevenoaks station	Season tickets Sevenoaks station	Lack of long stay parking	On-street parking times
1			✓				
2			✓				
3	✓						
4	✓						
5		✓					
6	✓		✓				
7	✓	✓					
8	✓						
9	✓						
10	✓						
11	✓						
12	✓	✓	✓				
13	✓						
14	✓	✓	✓				
15	✓						
16	✓	✓					
17	✓						
18	✓						
19	✓						
20	✓	✓					
21	✓						
22	✓						
23	✓						
24	✓						
25	✓						
26	✓						
27	✓						
28	✓						
29	✓	✓					
30	✓						
31	✓						
32	✓						
33	✓	✓					
34						✓	
35	✓	✓					
36	✓						
37	✓	✓					
38	✓					✓	
39	✓						
40	✓	✓					

Agenda Item 7

Appendix B - Consultation Responses Summary

Response	Parking charges Sevenoaks town	Evening charge re: general areas	Evening charge re: Stag Theatre	Parking charges Sevenoaks station	Season tickets Sevenoaks station	Lack of long stay parking	On-street parking times
41		✓					
42	✓						
43	✓	✓					
44		✓	✓				
45	✓	✓					
46	✓						
47		✓					
48		✓	✓				
49	✓	✓					
50	✓				✓		
51	✓						
52	✓	✓					
53	✓						
54		✓	✓				
55	✓	✓					
56	✓						
57	✓	✓		✓			
58	✓	✓	✓				
59	✓	✓					
60	✓	✓	✓				
61	✓						
62	✓						
63		✓					
64	✓	✓	✓				
65		✓	✓				
66					✓		
67	✓						
68		✓	✓				
69	✓	✓	✓				
70	✓						
71	✓						
72	✓						
73		✓					
74	✓	✓					
75		✓	✓				
76	✓	✓					
77		✓	✓				
78	✓	✓					
79	✓	✓					
80	✓	✓					

Appendix B - Consultation Responses Summary

Response	Parking charges Sevenoaks town	Evening charge re: general areas	Evening charge re: Stag Theatre	Parking charges Sevenoaks station	Season tickets Sevenoaks station	Lack of long stay parking	On-street parking times
81	✓	✓					
82	✓	✓	✓				
83	✓	✓	✓				
84		✓					
85	✓	✓					
86	✓						
87	✓						
88	✓						
89	✓	✓					
90		✓	✓				
91		✓					
92		✓					
93 Sevenoaks Town Partnership	✓	✓					
94 Sevenoaks Town Council	✓	✓					✓
Totals:	74	49	19	1	2	2	1

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CONSULTATION RESPONSES

COMMENT 1

I wish to object to the proposed changes to evening car parking in Sevenoaks town council. This will make it much more expensive to park for people arriving before 7.30pm and will have an adverse effect on the town's economy. It will put people off going to restaurants until later in the evening and will make visiting the Stag more expensive for many people as they will have no choice about when they need to arrive and many events and films will mean they need to be parked before 7.30. Local arts groups which use the Stag are concerned that their members will face increased costs for rehearsals, as well as for performances.

As the council has said the evening parking charge changes will have little impact on the total money collected, I can't see why the council is pressing ahead with this. It makes eating out or visiting the Stag look expensive in comparison to visiting Bluewater or Tunbridge Wells.

COMMENT 2

I would welcome a comment on the effect that the withdrawal of the post-6.30pm £1 charge and the extension of the daily parking rates will have on those amateur groups who hire the Stag Theatre for performances.

I am a member of the Sevenoaks Symphony Orchestra, and note that we are not immediately affected by the change, as most of our concerts take place on Sundays so are exempt from parking charges. However, we hold an annual concert on a Wednesday evening in January at 8.30pm, with a rehearsal from 6.45pm, and after April 1st this would mean a noticeable increase both to the players' subscriptions and to the audience's ticket price. This might be enough to reduce our audience to the point where the concert would not be financially viable, and the Stag Theatre would lose a booking..

In the case of an amateur dramatic company hiring the Stag Theatre for several days, the added cost might cause the company to change the venue, with the Stag Theatre again losing income as a result.

Would it be possible to consider issuing parking charge exemptions to local amateur organisations hiring the Stag Theatre?

COMMENT 3

I just wanted to register my disagreement with the proposal of increased parking prices in Sevenoaks.

It feels like we are just starting to see a real revival in the high street with new shops and restaurants, there is such a positive vibe amongst other mums about what Sevenoaks has to offer now. The most frequent gripe is the cost of parking which for some people is prohibitive already.

Would it be too much to hold off parking increases until the high street is really booming again? So many of my friends, and me included, still opt to go to Bluewater or west malling instead. (Free parking). I think the range of shops in Sevenoaks has dramatically improved which is evidenced by the difficulty of parking before Christmas, I think there is a chance that increasing parking charges as per the proposal could kill that revival dead, or at least dampen the positivity about the town that there currently is...

COMMENT 4

I would like to register my opinion with you about the proposed car parking increases. I think the car parking charges are already too high and increasing them even more is counter productive. You will just put people off coming into the town centre. Bluewater is only a 15 or 20 minute drive away and car parking there is free. I for one will start to avoid Sevenoaks town centre and local businesses will suffer as will council run enterprises like the leisure centre. When you factor in car parking to the cost of attending the leisure centre it will make it almost as cost effective to go to somewhere private where the facilities will be much nicer as lets face it the Sevenoaks leisure centre, especially the pool and changing rooms are in dire need of refurbishment.

I want to support local businesses and have the convenience of having great shops in our town but not to be ripped off just to get to them and they won't survive if car parking charges put off their customers from coming into town.

COMMENT 5 (Sevenoaks)

I object most strongly to the proposals to increase the evening car park charges in Sevenoaks. I do not see the need to have a charge at all after 6.30pm as there has always seemed to me to be plenty of space in the central car parks in the evening but I can see even less justification for a 200% increase in this charge. This proposed move can only discourage evening visitors to Sevenoaks and do much harm to the Stag and the many restaurants in the town.

I ask the Council to abandon their proposal.

COMMENT 6

I object to the Order because it will be detrimental to the users of the High Street and will affect the "footfall".

Why not make the first 30 minutes free in all the car parks except the "Long Term" ones. You will find that the annual revenue will not be less than the existing.

The "Evening Charge" is already detrimental to the Stag Theatre (whose main competition comes from the complex at the North Farm Estate in Tunbridge Wells). This should not be increased from the current level.

COMMENT 7 (Sevenoaks)

I have just read the parking proposal and would like to strongly object to the increase in parking charges proposed.

Parking charges in Sevenoaks are already too high, people simply cannot afford to continue paying inflated prices and this will in turn drive people away from using the town. As for the changes to times, have you considered the families that want to use the car parks for a quick meal with their children, is it fair to expect them to pay more just to park for a couple of hours. You are not providing any additional parking facilities, there appears to be no justification for an increase in charges apart from greed.

I STRONGLY OBJECT TO ANY INCREASE IN PARKING CHARGES.

COMMENT 8 (Riverhead)

I vehemently object to another increase in parking charges made by the council in Sevenoaks.

The charges are already completely out of line with other areas and all that a further increase will do is lessen the business that is conducted in the town as the general public will vote with their feet and will chose to shop/eat in places such as Bluewater where parking is free.

Please refrain from being shortsighted and greedy and encourage businesses and consumers to the town; inordinate charges are already driving them away.

COMMENT 9 (Sevenoaks)

I write with particular reference to point (a) of the proposed amendment.

I object to the proposed increase in parking charges in and around Sevenoaks. I believe parking to be expensive enough as it currently stands and the proposed hike will impact upon business with less willing to pay the charges. One has to consider all members of society, those on low income such as the elderly and people with young families who will find it most difficult in terms of access to amenities if they cannot afford to park close by.

May I ask the reasoning behind the proposed increase?

COMMENT 10

I am writing with reference to the above proposal to increase car parking charges in sevenoaks and to formally object to the proposal. As a family we try to shop locally and support local businesses however the cost of parking in Sevenoaks is already high; increasing the cost still further will certainly make me find other places to shop or socialise where parking is not so expensive. There are many alternatives that are not too far away.

We are losing enough businesses in Sevenoaks and should be encouraging trade and a sense of local community but this will do the exact opposite as it forces people to shop or socialise elsewhere.

I urge the council to reconsider.

COMMENT 11

I have a Sevenoaks residence and I use the town a lot. I support the local shops, sports centre, cafes, doctor surgeries, restaurants and theatre. Therefore it make me very sad and angry to see that you are increasing the parking charges. Please think about the people who love this town before putting up the price of parking. I am against the rise.

COMMENT 12

I was very surprised and disappointed by the proposal to increase parking charges in Sevenoaks and write now to object in the strongest terms to their implementation.

The evening charges in particular are a disgrace. The businesses in Sevenoaks are already suffering without having to compete with parking charges now too. In addition, those working at the Stag Theatre will be unfairly hit and this in turn may cause show prices to rise. Unless we make going out in Sevenoaks attractive, people will stop using the local facilities, restaurants and evening venues.

Shops are currently closing in Sevenoaks and leaving the town (for example: Dorothy Perkins, Russell & Bromley) and we now have a high street filled with estate agents and charity shops. We are in danger of driving yet more business to other local towns such as Tunbridge Wells.

Higher parking charges will just make the town empty.

Don't do our community, which has the potential to be great, the disservice of incentivising them elsewhere.

COMMENT 13 (Hildenborough)

I am writing to object to the huge increase in proposed parking charges. Sevenoaks council appears to have put costs up on a regular basis recently.

As a Hildenborough resident I will be frequenting Tonbridge more than Sevenoaks if these increases are put in place.

COMMENT 14

I have read about your proposed car park price hikes for Sevenoaks with absolute horror. Are you trying to close the town down for once and for all? Finish off our local businesses? Send us all off to Bluewater, where the spacious parking is free (and the range of shops much better)?

3 hours in Blighs to cost £4.80?? Who on earth thought that one up? Adding a £3 parking charge to dinner out, or a trip to the Stag (which REALLY needs the support of us locals)??

We have a pretty town, with some nice shops, so why undermine it and put people off coming here? We don't want to see boarded-up empty premises and empty car parks (like the outrageously over-priced new M&S indoor car park - always spaces in there funnily enough, as we all avoid it like the plague!)

Oxted, another pretty town nearby, has free parking. Westerham is more than reasonable. These charges are beginning to feel like extortion, a sad nod to Rip-off Britain.

Please think again, and save our town.

COMMENT 15

I absolutely object to the raise in parking charges. This increase will force people to out of town shopping centres such as bluewater which will be detrimental to local trade. What a shame. The parking charges are already too high - my 92 year old grandfather walks miles to avoid the pay for car parks as he simply can't afford it.

COMMENT 16 (Sevenoaks)

I am writing to object to the increase in parking charges in Sevenoaks. In particular the evening charges. Parking in Sevenoaks is expense enough already! Friends from out of the area cannot believe there is an evening charge in the first place and to increase it will certainly damage the local businesses.

COMMENT 17 (Sevenoaks)

I am writing to object about the proposal to increase the parking charges in and around Sevenoaks. The high parking charges already discourage people from shopping locally and this increase will only encourage people to use more convenient towns. I personally have already changed dry cleaners and drive to a different post office to avoid the ridiculously high minimum charge to pop in a shop for 5 minutes. You are driving local businesses & shoppers out of our town.

COMMENT 18

Having just been alerted to this proposal that the parking charges in Sevenoaks are to be going up AGAIN, I am writing to strongly object to these proposals. In order to shop in Sevenoaks it seems we now have to pay extortionate prices to park the car. Not everybody that lives or shops in Sevenoaks has huge bank balances and can regularly spend huge amounts on simply parking their car. This will most definitely stop me from shopping in Sevenoaks and I find this a great

shame having grown up here, you are simply pushing people away from the town centre and they will find alternative places to go.

COMMENT 19 (Riverhead)

I wish to object to the proposed increase in parking services detailed in the above Order. My basis is that the charges in Sevenoaks are already high and the proposals make it more likely for people to travel out of town to e.g bluewater or Longfield Road, thereby not supporting local businesses.

COMMENT 20

I used to shop in Sevenoaks - I do not shop there any longer. I refuse to pay a parking charge of £3 to be able to potter around my High Street. And now you want to charge the same rate for evenings as well? Bye bye restaurants - as we said bye bye to Ginseng.

It's a shame as you are going to kill Sevenoaks and there will have to be a huge big plan to try and re-generate dead Sevenoaks in the future.

You are only increasing charging in Sevenoaks because apparently we are all 'rolling in money' and can easily afford it. I'm sure the cost of parking in other areas of Kent is nowhere near as high as Sevenoaks. You would be too frightened to do it as there would be uproar! In fact I'm sure Sevenoaks is the highest. Please let me know if I am right or wrong. It's another form of tax and I'm just not paying it. Enough is enough!

So another vote from me to go to Bluewater / Tesco / Sainsburys / Lidl / online to do my shopping. Alternatively I will walk / cycle to Sevenoaks - or are you going to charge me for that too?

When the tumble weed hits Sevenoaks - just remember I warned you!

Looking forward to your comments.

COMMENT 21

It is very shortsighted to increase charges in times of austerity when wages are not keeping up with inflation.

The High Street is dying in Sevenoaks and increased charges will force potential customers to seek shopping precincts that are either free of charge or lower charges than those proposed.

COMMENT 22

The proposed parking charges for Sevenoaks are too high I'm afraid. I wouldn't mind so much if you bothered to invest in local public transport, but let's face it the local buses are RUBBISH (I get the bus to and from the station every day, so please believe me). If you could demonstrate that additional money was going to be invested in buses and cycle lanes then that would at least offer some viable alternatives, but so far you seem to have shown little interest in either.

COMMENT 23

I am writing to object to the proposed price increases for parking in Sevenoaks town centre.

I do like to visit our town centre, despite too many estate agents, coffee shops and restaurants.

Increasing parking fees is another reason for the decline in the use of the "high street", it certainly puts me off shopping there. Attracting businesses to the high street is very important (other than more of those mentioned above), yet with increasing parking fees, there is less people visiting and if they do visit they do not stay for as long as they may like to.

COMMENT 24 (Sevenoaks)

I am writing to oppose to the proposed increase in car park charges in and around Sevenoaks. The current charges are quite high as they are and further increase would result in driving people away from the town which then would have decremental effect on the local business.

I would wish this proposal to be scrapped.

COMMENT 25 (Sevenoaks)

I am writing to express my objection to the proposed car park charging rises for the Sevenoaks car parks described in the order. In my view these proposed charges represent an unnecessary, ill-advised attempt to place a financial burden on the residents of Sevenoaks who already face high Council tax charges, an incompetent and irregular bus service, increased costs for children commuting from/to the town and increased commuting costs to London. I am also concerned at the financial burden they will impose on those who work in Sevenoaks and have limited parking facilities, who are integral to the success of the town. No doubt it will also mean that potential users of the retail, restaurants and other service outlets in Sevenoaks will also be put off by the disproportionate charges meaning a reduction in trade for the area.

With no rationale for the increased charges, I can only assume they are motivated by greed and wish to strongly register my objections.

COMMENT 26

I object to the increase in parking charges in sevenoaks, as the parking charges are already damaging local business. People are going to go to bluewater instead of local businesses

I'd like to understand what the proposed usages are for the revenue from this? Further, what study has been done to evaluate the impact of this proposal?

COMMENT 27

I think the proposed parking charge increase will adversely affect Sevenoaks. I think the cinema/theatre and restaurants will suffer from loss of customers. Why go into Sevenoaks when other places provide free parking?

Please, please think again, we all want to see a thriving town.

COMMENT 28

I am writing to object to the proposed increase in parking fees in Sevenoaks. I live in Riverhead so it is not feasible to walk into town, particularly with children, but I do drive in on a regular basis to use the shops in Sevenoaks. I particularly like to support the independent shops such as the Chinaman, Sevenoaks Bookshop, Devine and Lady Butterworths. However at a cost of around £3 just to spend a bit of time browsing I will have to seriously think about how often I can do this - just to pop into town three times a week will be costing me £9 a week, so £36 a month which is unfeasible. My mother lives in Oxted where there is free parking in the centre, and many independent shops are thriving in the high street, but unfortunately I can see the demise of many of the fabulous shops we have just because people will not pay to park in town.

There are many other options to using Sevenoaks town centre now - online shopping, Bluewater, the larger supermarkets on the outskirts of town, and unfortunately I believe that people will use these facilities in preference.

I really hope you will reconsider this proposal for the sake of a town that I lived in for many years and would love to see prosper.

COMMENT 29

I am extremely disappointed to read your proposal for the increase in parking charges.

Sevenoaks town is already suffering and the cost of parking is simply putting people off visiting. By only increasing the charge will add to the situation.

I often use to visit Sevenoaks to meet with friends for a coffee, but now Meet at alternative coffee shop due to the ridiculous charges. The same goes for evening meals, there are plenty of places for meeting friends outside the Sevenoaks high street area. Great for those businesses but I do feel very sorry for the businesses who will lose out due to your increases.

This is pure greed! I look forward to hearing from you

COMMENT 30

I would like to voice my objection to the parking charges in Sevenoaks being increased again. As it is, I rarely go up to the town to shop because of the high charges - or if I do, I rarely get time to pop into more than one shop. These charges are killing our town as I know of so many people that feel the same. I live on a pension so need to budget. I am amazed that the retailers in the town are not banging your doors down to object as you are surely killing their trade.

COMMENT 31

I wholly oppose the proposal to increase car parking charges in Sevenoaks. I am a local Mum and drive into Sevenoaks 3 times a week on average.

I already find the parking very expensive and I run around town trying to get all my shopping done so I can keep my parking to the minimum hour. I certainly don't browse or stay for that extra time. The shops and businesses don't get anything other than my briefest custom.

If the prices increase again I will cut back even more and will go elsewhere. As the road improvements on the a21 make penury more accessible and offer free parking - I will go there.

Sevenoaks town seems to have come through the last few years in better shape than other places and the new M&S and other new stores have come to town giving lots of reasons to go to town but people need time to also go to the other places - a coffee at Nonnas, a browse through one of the many independent boutiques, a snoop in one of the book shops. I won't be hanging around town to do any of this - I will buy 30 mins run to m&s, smiths and boots and run back to the car.....

Stop with your plans to increase the parking costs - invite people to the town to support the business and help the town prosper.

COMMENT 32

I wish to object to the proposed car parking charges in Sevenoaks. I will certainly think twice as to whether I continue to shop in Sevenoaks. As an Otford resident, it will make more sense for me to travel to Bromley by train or drive to Bluewater. Both of which have a greater shopping choice. What does Sevenoaks have to offer to afford these increases?

I have a love local life card but I won't remain loyal if these proposed charges come into force.

COMMENT 33 (Chipstead)

I am writing to object to the overall increases in parking fees around Sevenoaks town centre. It is a lovely place to shop, have a meal or see a film, but to have to pay almost £5 to see a film

and get a quick bite to eat, that is really pushing the limit and will deter people from using the town centre.

Also, I strongly object to the changes in evening rates. The hourly rates are too high already in town and only having of pay £1 after 630pm is sensible and should be retained.

For the record, I think it is cheeky that parking spaces were eliminated to make way for the M&S car park, which has even higher fees! No wonder that car park is normally empty when Blighs is full. It makes no sense that they do not have a scheme like Waitrose where the hourly rate is very reasonable AND you can get one or two hours free if you make purchases in the store.

Reference: Sevenoaks: to increase the 2 hour charge to £3 and the 3 hour charge to £4.80, to remove the evening charge for parking between 6.30pm and 9.30pm, and apply all parking charges from 8.30am to 8.30pm;

COMMENT 34 (Kemsing)

I work in Sevenoaks Town centre and every day, I have trouble parking. I am happy to pay but by the time I reach the long term car park, all the places are gone, so I then have to spend time driving around looking for a meter. More often than not, they are also full, which leaves me no choice to park down in Bayham Road and walk up. This all adds time to my day, but time I am not able to get paid for. I have had to adjust my hours and work 30 minutes less each day, just because I have to allow 15 minutes each way to walk to/from my car.

I feel that the long term parking in Sevenoaks really needs to be addressed, as the residents in Bayham and Serpentine are not happy with the parking situation and colleagues of mine, have had notes placed on their wind screens and rubbish stuffed up their exhaust pipes, despite them having every right to park there!

I am fortunate enough to have a job, which fits in with the school run, as I need to be able to make it back to school in Kemsing by 3.15 to collect my children, but the parking is making it very difficult for me. I have looked into getting a parking permit but I only work three or four days a week and the days change each week, so despite offering pro-rata permits this would not work for me.

The amendments to the Car Parking prices are not justified for the service you are providing to Sevenoaks employees, the lack of parking is what really needs to be addressed before prices are increased! Businesses will be forced out of our town, if their staff can't park easily.

COMMENT 35

I am writing to object to the above. It will simply drive away trade from already struggling businesses. Especially in the evening. Parking in Sevenoaks can no longer be seen as a never ending cash cow. The prices are already higher than surrounding towns or the many free shopping areas.

COMMENT 36 (Sevenoaks)

Are you people, absolutely mad? How can you increase parking fees yet again?

This is a travesty for local business and you will drive people out of your town into the big shopping centres turning sevenoaks into a ghost town.

It is nothing but greed and poor management. I suggest you think this through and seriously consider what you are doing to this town before you have a public backlash on your hands.

Unbelievable!

COMMENT 37

I write to you to strongly object to the proposed parking charge amendments as stated on your website. I have lived in Sevenoaks all of my life (35 years) and really do enjoy living here however you are making it very difficult for middle class residents like myself to continue to enjoy the town centre and its facilities. Having worked in London and now at home looking after my children I am frequenting the town centre a great deal more - but for me to use the facilities such as the swimming pool, cinema, Pup cafe, cafes and restaurants you are asking me to spend nearly £5 on parking before I've even walked through the door and paid for my activities. It makes it much more appealing to visit other areas where the parking is free or a fraction of the costs. This also applies to the shops. I am a big believer of supporting my high street but how can I when again it's cheaper for me to go to the supermarkets, Bluewater or shop online than pop into town to get what I need and browse. In particular I find the evening charges absolutely ridiculous. I really think you will see a damaging knock on affect to the support of the local bars and restaurants not to mention the cinema if people have to pay such extortionate rates. A few years ago you could pop to the pub to see some friends and have a diet coke for £2 ... Now you are looking at charging £3 before one has even got to the pub!!

I really hope you do listen to the people of this town as you are going to start squeezing more and more local people out and the independent pubs, restaurants, cafes and activities will not survive.

COMMENT 38

I write to object to the proposals to increase car park charges in Sevenoaks.

1. Central Sevenoaks suffers from a shortage of car parking spaces compared to the number of people who need to use the town for business and shopping. The shortage of spaces is the responsibility of Sevenoaks Council. Sevenoaks also suffers from appallingly unreliable (often never arriving) and infrequent buses which are of little use to most outlying properties. Charging more for the parking spaces is immoral in circumstances where the Council has failed in its obligations to provide sufficient parking and efficient public transport.

2. It is unlikely that increased charges will significantly reduce the number of users of the car parks as most users are there by necessity rather than choice. However should people decide to stay at home, this will have a serious negative impact on local business, particularly at the most useful, cheaper, end. For example I regularly attend the baby play centre behind the Stag theatre (Pup). Entrance costs £3.50. However the current parking charges effectively double the price of attending except for those rich enough to afford to live in central Sevenoaks. If charges are increased further I will not be able to afford for my child to attend Pup play as often, and this would be relevant to all of their customers and also for all other local businesses serving the less affluent parts of the surrounding villages. For example it would disincentivise families living in the poorer outlying areas from taking children swimming, and so on.

3. The proposed increases are considerably higher than inflation and do not appear to reflect any proposed improvement to the service, thus they are entirely unjustified.

COMMENT 39 (Riverhead)

Having lived in Sevenoaks all my life I have never before felt the need to object to something but this proposed parking charge hike is totally outrageous.

Once upon a time I used to do all my shopping in the town but sadly these days due to the cost of parking along with the decline in independent shops who have not been able to keep up with the business rates etc I now find it cheaper and easier to go to Bluewater and shop online. I do

try to support my local shops but the ever rising parking costs are simply making it financially unviable to continue to do so.

Please stop killing my home town and pricing both shoppers and shop owners out of the town. People who are lucky enough to have a job working in Sevenoaks are finding it increasingly difficult to afford to park there and are having to look at working elsewhere or not working at all thus adding to the burden on the welfare state. The true impact of these proposed price increases are both vast and complex but the outcome is certain so I beg you to rethink this money grabbing attitude and leave the parking charges alone long enough for the town to survive and even longer in the hope that it may even start to thrive again.

Just because Sevenoaks is considered an affluent area does not give you the right to milk it dry. Those that can afford to pay the parking aren't the ones who actually use it so you're barking up the wrong tree. Please consider all of those who ultimately pay your wages who would still like to enjoy the wonderful town in which they live, a town that was once a lovely market town until the council allowed that to be killed off leaving just a once pleasant mainly independent shopping town but now just a restaurant and estate agent filled town but with a beautiful parkland at its heart, a heart that people will no longer be able to afford to park near to visit.

COMMENT 40

On a recent visit to Westerham I was reminded of how expensive parking in Sevenoaks has become. Westerham has now made their largest carpark free for the first 2 hours (throughout the day) which is certainly enticing me to use its restaurants and shops more and I duly did this Christmas for example. It's a shame that Sevenoaks is going the other way on parking charges and is sure to drive people away from the town. I certainly won't pay £3 to park in the evening when it's free elsewhere.

COMMENT 41

I would be grateful if you would reconsider the evening charge times finishing at 8.30pm and to reduce that to 7pm so that those going to The Stag or local restaurants are not penalised. This will also help the businesses themselves - the busier they are, the more chance they are likely to be able to afford to stay in the town and therefore contribute through Business rates to the your coffers. This should apply to all car parks under your jurisdiction.

COMMENT 42

The parking charges will effect both business and entertainment facilities in our town. It is our town, you are merely its guardians. If the aim is to turn Sevenoaks into a ghost town you are well on the way. At least we have a pointer which way to go in the local elections.

COMMENT 43

I am writing to object to both of the above proposals with regard to the extension of the parking charging period to 8:30pm, having removed the £1 evening charge, in Sevenoaks car parks. I believe that such a move is detrimental to the local economy and further, once administration/enforcement costs are taken into account may not be cost effective.

In my view SDC should look to remove evening parking charges from 6:30pm, both on-street and off-street, in Sevenoaks and should also look hard at the difference in car parking charges endured by Sevenoaks compared to other locations within the SDC area. I am of the view that a disproportionate amount is obtained by SDC through parking charges in Sevenoaks, both in absolute and relative terms. This in turn has a detrimental effect on the town's vitality and sustainability.

COMMENT 44

Putting up the evening car parking charges will have a detrimental effect on the community life of Sevenoaks. People, who like us, do not live in the centre of Sevenoaks, have to drive in and park to attend any of the performances at the Stag. I thought your job was to keep Sevenoaks alive and to encourage people to attend the Stag and frequent the many restaurants the town has to offer.

The councillors seem to think that anybody who lives in Sevenoaks or its environs has plenty of disposable income and that is a very arrogant assumption. Many of us live on fixed incomes and extra car parking charges will inevitably mean that our evening visits to Sevenoaks will become less frequent. It seems so often that the consequences of your actions are not properly thought through. You may find in the end that your attempts to raise extra revenue through higher parking charges will be counter-productive; in the meantime, the Stag and others will have suffered a drop in attendance, and the people who you are in office to serve will be deprived of part of the enrichment of their lives.

COMMENT 45 (Hildenborough)

I'm gobsmacked that you can even consider raising your parking charges again. They are already way above what I pay to go to Tunbridge Wells or Tonbridge. I will be voting with my wheels, as it were, and shopping on those locations instead in future if your charges go up - they are a very strong disincentive to visit the local Sevenoaks shopping area no matter how charming it is.

As for your plan to increase the charge from 6.30pm onwards I think this is hideous. The reason it is lower is to prevent people from using the local parking as long term commuter parking. It allows people with families to pop out to the shops once their partner comes home to mind the kids, and has been a life-saver for us as a family. I will continue to take advantage of the FREE parking after 6pm in Tonbridge instead.

I understand that you're strapped for cash and have been feeling the pinch. But this is ludicrous. It's not like you have a decent public transport system we can use instead.

Having invested in new shops you think you would want to make them more attractive to the surrounding areas by charging competitively for parking instead of charging nearly double.

Bad idea. Lower them instead.

COMMENT 46 (Sevenoaks)

Good morning ! I object to another yearly augmentation of parking in Sevenoaks . Just WHY? Everything is getting more expensive! WHY, you are not looking after the carpark better, they are dirty and look terrible, my wages is not going up every year! So I OBJECT to yet another blood sucking idea, why don't you use our money and your energy to make Sevenoaks (our and your small bubble world) a better place? Have a good day anyway!

COMMENT 47

I am writing to object to the proposed increase in evening parking charges in Sevenoaks. It will certainly deter me and my teenage children from going out to local restaurants etc. in the evenings and to the Stag Theatre. The current £1 is a nominal cost, £3 represents a 200 percent increase and is not.

If the proposed charges are implemented it will be up to local businesses to consider whether they can afford to offer a refund of parking fees to their customers but I would like the council to

consider refunding parking fees to people attending an event at the Stag, especially as many productions are put on by local voluntary groups which have charitable status.

COMMENT 48 (Otford)

I am writing to object to the proposed increase in the car parking charges in Sevenoaks car parks during evenings (i.e from 1830 hrs onwards).

Are the Council hell bent on destroying the Sevenoaks community? The parking costs are already prohibitive during the day with huge profits made and hair-brain proposals for a multi storey car park which will be a white elephant because no one will come to Sevenoaks. The new proposals should finally destroy the pubs, cafes, restaurants and worst of all the Stag. So yet more empty premises.

As I live in Otford and wish to go into Sevenoaks of an evening, because there are no buses, I am forced to use the car, or get the train and walk up and down the hill. How about putting some of the excess car park profit into subsidising late evening public transport to the villages.

At least Waitrose have it right - so I might still use their store, spend £20 and get my £2 parking back and a free coffee!

Bluewater must be rubbing their hands with glee.

COMMENT49 (Sevenoaks)

This email is to lodge my objection to the proposed car parking amendments proposed under Car Park Amendment 4 Order 2010 – MY REASON IS AS FOLLOWS, I OBJECT TO THE INCREASE IN THESE CHARGES AND REMOVAL OR CHEAPER EVENING RATES– THE PRICES ARE EXPENSIVE ALREADY

COMMENT 50 (Underriver)

I would like to register my objection to the proposed increase in car parking charges.

As a season ticket holder of the Bradbourne car park I find the cost already to be disproportionate to the service provided. Spaces are too tight and my car has been damaged by another user. The decision to reduce street lighting also means that the car park is unsafe for lone women (or men for that matter) returning to vehicles in the evening, and potentially increases the risk of theft from the car park. I currently don't feel that I am getting value and therefore object to having to pay an increased cost for an already inadequate facility. Given however that I need to commute to London for work the council rather has me over the proverbial barrel.

In relation to car parking charges for town centre car parks, I wonder is it the explicit intention of the council to try and dissuade residents from using the amenities of our local town centre? It is surely a consequence of ever-increasing car parking charges; if parking costs are increased much further it will be more cost effective to drive to Bluewater. Provision of adequate, reasonably priced car parking is arguably a necessity if the council wishes to encourage a vibrant town centre.

Should anyone wish to respond to my concerns I can be contacted using the details below:

COMMENT 51

I am shocked that parking charges are going up yet again! Are you not worried about the effect it will have on local business? I support local shops but if parking increases I don't think I'd be able to afford to park or shop in Sevenoaks.... We use the local PUP cafe once twice a month and that cost nearly £8 for 4 hour (both visits!!) Please rethink!!

COMMENT 52 (Oxford)

I would like to object to the proposed increase in car parking charges throughout Sevenoaks.

It already costs a significant amount of money to park in Sevenoaks car parks, and to hike the charges considerably, whilst most people's wages are not increasing in line with inflation, seems crazy. The Council should be doing what it can to support local businesses, not making it more likely that customers will go elsewhere e.g. Bluewater so that they do not have to pay the higher charges. Given the lowering cost of fuel, it will soon be more expensive to shop in Sevenoaks than to drive to Bluewater where visitors don't have to pay. If you increase the prices, this is exactly what will happen.

Also, I strenuously object to changing the evening parking tariffs to the new scheme. All this will do is cause visitors to park on nearby roads, thus preventing people who live on these roads from being able to park anywhere near their houses when they return from work in the evenings.

I for one already park on nearby roads to avoid paying parking charges. It will be chaos if you force everybody to do that.

COMMENT 53

I have just read the document regarding the new parking fees in sevenoaks! I am shocked by how much they are due to go up. I already avoid sevenoak because of the excessive charges and many restrictions. Sevenoaks is my nearest large town and I'm sure I am not the only one going else where, which can only serve to effect local businesses. Please consider carefully before you confirm the new charges!

COMMENT 54 (Sevenoaks)

I write to object to the increase in evening charges for parking in Sevenoaks Town proposed in "Car Park Amendment 4 Order 2010". This will have an adverse impact particularly on audiences for films and events at the Stag Theatre but also on custom at restaurants. The present £1 evening charge (free on Sundays) seems reasonable but any more will, I feel, be detrimental to the economic life of the town centre and could even be counter-productive.

COMMENT 55

The increases are ridiculous and will negatively impact on shops etc... Everyone will go to Tunbridge Wells or Bluewater... The evening charge is particularly crazy....

COMMENT 56

Object.. To whom it might concern, Putting up the parking fees yet again is ridiculous. I used to come into sevenoaks quite a bit but since you have put the fees up I don't go in as much. If you put them up again it will be rare and not just me many others. We are losing businesses and shops all over the place, it will get worse putting the fees up, less people more shops suffering. I think sevenoaks is such a lovely town, please help keep it like it.

COMMENT 57

Hereby I object to the parking increases for the town centre parking and station parking. The town centre has suffered over the last few years and many of the small locally owned shops have closed down. Instead of trying to raise more money the council should encourage short visits to the town centre whilst discouraging all day parking. This can be done by charging less for any stay under 2 hrs and significantly increase the charges for stays over 2 hrs. I ask you to please reconsider.

The evening charge of 3 pounds for parking in the centre is excessive. The restaurants, pubs and the Stag will suffer because of this change. I don't see how this increase in tariff is going to do anything beneficial for the town centre. It will just mean less visitors and the increase in parking revenue will be limited. I ask you to please reconsider.

The parking charges near the station are very high as it stands. Sevenoaks became popular as a commuter town. However with the train fares as they stand plus parking costs it is becoming too expensive for people to work or visit London. More options should be offered for people to park or travel to London. Instead nothing is being done to add capacity. I would like to see the Council support its hard working residents instead of punishing them with an increase in fares.

It is easy to raise fares but the Council should explain what it is trying to achieve with this other than just trying to take in more money. The council is here to help residents and improve the quality of living in the Sevenoaks area. I fail to see how these parking tariff changes are beneficial to residents, shop owners, restaurateurs, the Stag and the leisure centre.

COMMENT 58

I cannot understand why you are increasing the evening parking charge in Sevenoaks. You say you will not make much money out of the increase so that prompts the question - why?

I used to visit Sevenoaks most days - I live in Riverhead - now I rarely go into Sevenoaks - mainly because of the cost of parking. We have just changed dentists - one of the reasons was the cost of parking in Sevenoaks - one never knows exactly how long one will be.

I generally shop on-line or in Bluewater these days - as no parking to pay.

I think Sevenoaks Council is crazy with their charges. You are just going to put all these small businesses out of business and we will have no independent shops anymore just coffee shops, Italian restaurants, opticians and charity shops!

The stag Cinema is also going to suffer - personally I would prefer to drive to Tunbridge Wells to the Odeon with free parking then pay your new evening charge.

I sincerely hope you do not put up the parking charges in Sevenoaks - I think you are spoiling a lovely town.

COMMENT 59

I am writing to object to the parking charge amendments proposed for later this year.

Local businesses, especially restaurants, in Sevenoaks are struggling to survive. These parking charges will not help. The £3 evening charge is especially concerning given that there is no demand/ supply problem to manage.

I urge you to reconsider.

COMMENT 60

I am writing to express my opposition to your proposed increases to parking charges throughout Sevenoaks. My reasons are the following:

1. You have made no effort to justify the increases, which come on top of charges which are already higher than nearby towns and shopping centres. What exactly will be the additional benefit we enjoy for the privilege of paying ever more to park?

2. You offer no evidence of the impact you expect the increased expense of parking in the town centre to have on the businesses, shops, restaurants and Stag Theatre. But common sense

suggests the impact will be detrimental, perhaps especially to the Stag given your proposal to triple the cost of parking in the evenings.

3. Government is supposed to simplify and streamline the provision of services to minimise the costs to hard-pressed taxpayers. Instead you propose to complicate the scheme. Your proposal to extend the evening hours for which we would pay is a good example. Instead of a simple flat rate after shopping hours, enabling security of mind for an evening out (NB spending money in the town), you now want half the evening to be hugely expensive and the rest free. People won't delay their arrival into Sevenoaks to avoid the charges; they'll just go elsewhere.

4. Before Christmas there was talk of you holding other charges down to "compensate" for the new evening increase. I don't see that now. But I wouldn't trust it if it were there, and I fully expect you to try to make swingeing increases year on year as soon as we've all got used to having to pay up to 8.30pm instead of 6.30pm. If you think this will raise more money think again; it'll just be fewer people each paying more and businesses dying in the town centre.

5. Have you not noticed that most people lucky enough to be in a job have seen their pay cut in real terms every year since 2008? Have you not noticed historically low levels of inflation for the last several years? How can you justify inflation-busting increases to parking charges year on year in these circumstances? Perhaps we should all go and work in parking enforcement, which has clearly been enjoying a positive golden age.

6. I object to your description of the proposals as "revisions" when not one single one is for anything other than an increase. You should show enough respect to the taxpayers who fund you to be honest and straightforward with us.

I look forward to you thinking again and withdrawing these proposals.

COMMENT 61

Parking in Sevenoaks is very expensive already. Without a decent public transport service to bring local people into Sevenoaks town centre we don't have a choice but drive. Increasing the cost will only encourage all to drive to bluewater or other large out of town shopping areas where parking is free.

COMMENT 62

I would like to strongly object to 'Car Park Amendment 4 Order 2010'.

I believe these changes are completely counterproductive and detrimental to the Sevenoaks community. As a mother with a young baby, being able to park in town is often a necessity. Increasing the charges will make parking unaffordable and affect young families. It will discourage mothers from shopping in town, affecting local shops, closing independent stores and make them more likely to travel to more convenient places like Bluewater. Local trade and commerce will be severely affected particularly to the restaurants if the evening charge is increased. There is also likely to be considerable congestion in the Waitrose car park.

Current parking charges are already excessive and exceed most other town car parks and I think these proposed changes are outrageous.

COMMENT 63 (Riverhead)

Please leave the Sevenoaks evening parking charges as they are.

I really don't see what is so complicated about paying £1 to park for the evening; I don't think that needs to be 'simplified' to paying £2 for a shorter period.

Surely only a politician could invent such a transparent subterfuge and think that the proles would not notice.

I notice that the SDC Economic Development Committee recommended retaining the £1 evening charge and on this occasion I agree with them.

COMMENT 64

I am writing to strongly object to the proposed revision of charges in particular with regard to the increase in evening charges.

One can almost smell a hidden agenda to make The Stag even more unviable: perhaps the Council have a cunning plan on the back burner (which did exist some years ago) for that site.

Hopefully citizens will either get out their bus passes (although the limited evening public transport makes this nigh on impossible), walking shoes or steer their car in a different direction. The unintended consequences of this wrong-headed policy may result in either reduced car parking income or reduced business rates or both.

Only next years accounts will tell, but it must be good news for our neighbouring towns and businesses.

COMMENT 65

I wish to voice my concern over the proposed changes to car park charges for evening use.

As a frequent user of the Stag car park whilst attending performances the increase from the current £1.00 charge would cause me considerable concern. Also at least twice a year I attend every evening for a whole week at a time to perform in various productions and as this means being there from approx 6pm to 10.30 pm this would cost me considerably more. Which as a pensioner is important.

Also I have regarded the current £1.00 charge as both fair and understandable.

Lastly I feel increased charges would affect users of restaurants and pubs and reduce further the opinion of locals regarding the Councils approach to residents and visitors over evening parking.

COMMENT 66

I have a Season Ticket in the Bradbourne Car Park, Bay 159, and I strongly object to an increase in the cost of this due to the increasing number of occasions on which I am unable to park because every space is already taken.

COMMENT 67

I have just read the proposed changes to parking charges in Sevenoaks town centre and am appalled. Sevenoaks has the potential to be a thriving shopping and leisure hub but not if parking charges keep going up like this. I am a mother of two small children who regularly uses the town centre car parks to shop or swim. Stop pricing people out of the town!!!

COMMENT 68 (Sevenoaks)

I oppose the proposed rise in the £1 evening charge, not because I shall be affected (I can walk or cycle to the town centre), but because it will have a serious effect on local businesses such as pubs and restaurants and discourage visitors to the Stag. This proposal shows that SDC has set the wrong objectives for its parking management policy. The primary goal of parking management should be to ration a scarce public resource when potential demand for spaces

exceeds supply, which is the situation that applies during the day. The second goal should be to encourage turnover of spaces and help local businesses. The third objective should be to ensure that off-street parking covers its costs and is not subsidised by council tax payers.

By setting a 3.5% annual growth in parking revenue as its main objective, SDC is distorting these outcomes. I do not object in principle to increases in short-stay daytime charges, though there is a point at which these will discourage visitors and shoppers. Morning charges could be raised and afternoon charges lowered to better manage demand through the day. Long stay charges could be increased to limit demand.

But there is no reason to charge even £1 for parking anywhere on-street or off-street in the town centre after 6.30 pm when spaces are plentiful and do not need to be rationed. The cabinet decision to triple the £1 charge, ignoring the recommendation of the SDC committee which examined this issue, shows that the council puts its revenue needs above the interests of local businesses. Cinema, restaurant and pub customers who use their cars in the evening can, and probably will, choose to drive elsewhere. Very few will arrive after 8.30 when parking will be free. The explanation that the change is 'easier to understand' is patronising and dishonest.

Sevenoaks has to compete with other destinations in West Kent. In Tonbridge off-street parking is free after 6 pm, as it is in Tunbridge Wells, though there is an overnight charge of £1. Maidstone charges £1.50 from 6.30 pm.

Local amateur groups in Sevenoaks who currently use the Stag theatre have a choice of alternative venues for evening events, and will choose to take their business elsewhere if this proposal goes ahead.

I am on the committee of the Sevenoaks Literary Celebration, which is planning its 2015 programme. We are considering using the Stag's Plaza Suite, but we now also have excellent facilities open to us in local schools where parking is free. We are concerned about how our audience will react if we ask them to pay £5-£8 for a ticket to a 7.30 pm event, and then tell them that leaving their cars in South Park will cost them an additional £2.50.

In past years the council has ignored public objections to parking charge increases. On this occasion a serious rethink is advisable.

COMMENT 69 (Stone Street)

I wish to register my opposition to the proposal to raise evening parking charges in Sevenoaks to £2.50. I oppose it chiefly on the grounds of the serious injury it will cause to the businesses and facilities which cater for evening customers in Sevenoaks. Such a disproportionate increase will seriously compromise, in particular, the Stag Cinema and Theatre as well as pubs and restaurants. Most out of town customers will choose to go elsewhere for their entertainment, to towns and venues where parking is either free or capped at a much lower level. By implementing such a steep rise the Council would be doing a serious disservice to the town.

COMMENT 70 (Sevenoaks)

I have received details of the proposed changes in town centre parking charges and wish to record my strong opposition. My reasons:-

A blatant attempt to disguise revenue raising despite council protests to the contrary. The limited consultation period presumably intended to stifle objection. Another demonstration of the total incompetence of the Council to address the dire parking problems in the town and the consequences for traders who already are voting with their feet – hence the number of business closures.

If the proposals are accepted I for one (and along with other civic minded members of my Residents' Association) will be pressing for publication of the names of those supporting the resolutions so that electors can reflect their exact their revenge via the ballot box.

COMMENT 71 (Riverhead)

I am very disappointed to hear a plan to increase parking charges. I have seen no improvements occur and paying for parking in advance is rather a pain already as you have to guess how long you will be.

There are already very few high street shops in Central Sevenoaks and I fear that increasing charges will cause more to close as shoppers choose to rather go to Bluewater where parking is free and they have a huge choice of clothing, food, electronic and department stores. Please do not increase parking charges and cause our town centre to become a ghost town.

COMMENT 72 (Larkfield)

I have today visited Sevenoaks to look around at the Centre, my first impression on entering the Car Park was the lack of Mother and Child spaces. Do Sevenoaks not welcome children or is it the powers that be clearly have never tried to get a baby out of the car from a normal space. My annoyance continued when I arrived at the pay station your charges are astronomical clearly confirming not only do you not make children welcome shoppers are also discouraged .£2.70 for a visit of 1 - 2 hours daylight robbery if you are unfortunate enough not to have the right money your change is also stolen from you! the fact that you mention this in your very small print does not excuse this practice. Your restaurants must also be fed up with you not only do they pay the taxes to you if you wish to go for lunch you then have to add on £4.50 for parking. Is it any wonder town centres are becoming ghost towns. Next time I will avoid trying to support the local shops

Go straight to Bluewater park easily for free and not have to clock watch or risk being mugged, get your act together or become a council with no shopping centre.

COMMENT 73 (Chipstead)

In recent years, Sevenoaks has successfully managed to attract a number well known dining establishments to the town.

Coupled with a reasonable parking charge, it has been an extremely popular venue for those wishing a relaxing night out and a pleasant meal.

We feel that tripling the parking charge will have a detrimental effect on the restaurant business and that many will now look to move outside of the town centre for their evenings out.

We would strongly encourage the proposal to effectively triple the cost of parking after 630pm to be rejected.

COMMENT 74 (Bessels Green)

As a resident of Sevenoaks I cannot agree with the ever increasing car parking charges. I particularly object to the charges being increased from £1 to £3 for evening parking in Sevenoaks. Such an increase will deter people from visiting the town for a night out, affecting both restaurants and pubs. Surely you want people to enjoy the town, however, these constant increases dissuade people.

COMMENT 75 (Bessels Green)

I am writing to object very strongly against the proposed increase for the evening car park charges which are proposed. I consider the £1 charge to be fair, and the proposed increase to be unreasonable. It will deter me from using the restaurants in Sevenoaks and also my support of the cinema at the Stag. It will be cheaper to go to Tunbridge Wells.

COMMENT 76

Sevenoaks is a delightful town in a beautiful part of Kent. There are numerous shops, businesses, restaurants and pubs, not to mention a theatre. Many of these are run by Sole Operators and people who have taken financial and personal risks in order to provide a service to the community, whether it be in the form of goods for sale, services, food and drink, or entertainment. In these difficult times it is a credit to those individuals who have got off their backsides, worked hard, made investments and offer something unique to the many people in the area who like to visit the town, as well as those visitors to the town and surrounding areas.

I appreciate that parking is precious in the town, but do not understand how, in a period of low inflation, low wage increases (if at all), reducing costs in fuel and other supplies, how you can justify the increase in parking charges, which are already high. Those people working in the town who need to travel by private car, are already forking out the value of almost an hourly wage to park, and that is if they are able to get in to the one long stay carpark in the town centre. Others have to move their cars at lunchtime in order to avoid penalties by the end of the day.

As for the evening charges, I cannot comprehend the lack of thought and consideration given to the many eating establishments, pubs, and theatre that are there for the pleasure of our local people and visitors alike. As I have said, we should be applauding the entrepreneurs who have opened up in the town, supporting their efforts and affording them the maximum opportunity to make a go of their business, not making life difficult for them by increasing the cost of evening parking. Indeed in my opinion, and that of many friends and colleagues, parking should be free after 6.30pm. Not only would this encourage more customers into the town, but would alleviate the cost of paying for traffic wardens from 6.30 onwards, which must be a factor in the proposed increase.

I urge you to reconsider the proposal and look forward to your rationale behind this proposed increase.

COMMENT 77 (Seal)

I am writing to register my opposition to the proposal to raise the after 6.30pm car parking charges in the town's car parks and would urge that this is kept at £1 (or even made free of charge) from 6.30 until midnight and on Sundays.

My observation is that the car parks are quite lightly used in the evenings and I can't imagine that the cost of additional attendant/enforcement staff required would be covered by the additional revenue collected.

I fully understand that the Council is in a difficult position and that revenue has to be generated and usage managed somehow. Of course, I fully expect to pay to abandon my ton of metal on council property but I do feel that there has to be a proper and balanced cost-benefit analysis.

From a personal perspective I am a Friend of the Stag and am particularly worried about the effect the proposals may have on attendances at this venue, which has been hard fought for and is a great asset to the town.

I'm sure that the imposition of additional evening charges would also have detrimental effect on other businesses such as restaurants and pubs and only serve to keep people away from town in the evenings.

Please help to encourage people into the town in the evenings to enjoy all it has to offer!

COMMENT 78 (Sevenoaks)

I wish to record my objections to the proposed car park charges in central Sevenoaks.

In particular I wish to object to the changed format of evening charges and the consequent increase arising from that change. The statement attributed to Cllr Hogarth that these changes to evening charges are to make fees "easier to understand" not to make money has been received by residents with derision. The existing system is very easy to understand and makes eating in the town restaurants in the evening a relaxed affair in that one does not have to keep an anxious eye on the clock to ensure that one does not overrun one's time. Using the town's facilities in the evening will become measurably more expensive and more complicated!

It is ironic that the general increase in charges is to be introduced at the same time that travelling to places like Bluewater - which offers serious competition for Sevenoaks traders - has become measurably cheaper with the current 25% drop in petrol prices. Surely this has not gone unnoticed?

Hitchen Hatch Lane Residents Association

COMMENT 79

I wish to object to any increase in parking charges as this would effect the shops and any evening entertainments and the increase is much too high. Parking charges are far too high and if they need to go up should have a pay on leaving system so that you pay for what time you have actually used.

COMMENT 80

I would strongly oppose the proposed new charges which are unlikely to lead to any significant, or indeed any, increased revenue for the council.

Moreover, the charges are likely to drive shoppers away from the town centre, at a time when town centres, Sevenoaks included, are struggling to compete and attract customers. How is the town centre supposed to compete with the out of town centres and supermarkets who almost all offer free parking. The nighttime charges will drive away custom for the restaurants in the town centre which are the only real lifeblood of the evening economy of the town.

For years the locals who are rightly proud of their town supported the town centre to try and keep it alive, paying more to park and often shop than in other locations. In an economic environment that has seen to rise of discount supermarkets the number of people prepared to pay that bit more for anything, including shopping locally, is a shrinking resource. The proposed increases are simply out of step with the current stage in the economic cycle.

I can not overstate how significant and potentially disastrous these proposals are. Put simply, more pensive parking means less people shopping and dining, which in turn means less income for local businesses, and therefore less businesses paying rates to the council.

Is the council not aware of the countless studies which have shown the major reason for town centre collapse has been parking costs and lack of parking, with legion reports suggestion free parking in town centres is the only way to maximise the number of people using local stores? I would strongly urge the council to reverse the proposals (whose timing and consultation period

are more than a little suspect) or to at least carry out a detailed impact analysis including market research with shoppers and how much they are prepared to pay. Failing that please post this email somewhere prominent in the council offices so that within a few years when we are looking at the sorry state of affairs of empty units and shuttered stores it won't be possible to say no-one warned the council the plans were simply not the right idea at the right time.

COMMENT 81 (Sevenoaks)

I am writing to object to the proposals to increase the parking charges in the Sevenoaks town centre car parks and in particular the plan to replace the £1 evening parking charge with the standard day time charges. (I note that the charges will apply until 8:30pm rather than 9:30pm but believe this is insufficient compensation).

The current day time parking charges in Sevenoaks town centre are already high enough to actively discourage many people from using them and from shopping in Sevenoaks. I fear that increasing the early evening charges will have a significant negative affect on restaurant trade in the town centre. The council should be doing everything it can to make it easier for residents to spend money locally and help local businesses. At a time when high streets are struggling to compete with the enormous rise in online shopping, in addition to the more established threat from out of town shopping centres such as Bluewater, these changes threaten to push some businesses over the edge and to make life harder for all of them. That will only lead to more empty shops and to Sevenoaks becoming a less pleasant place for all of us to live and/or work in.

My suggestion would be to remove all parking charges from 6:30pm. This would make Sevenoaks a more popular evening destination and increase the vitality and profitability of the town centre.

COMMENT 82

I am writing to object to the proposed increase in parking charges to the Sevenoaks off street parking. Not only do I think the parking charges extremely excessive, I especially **STRONGLY OBJECT** to increasing/extending the evening charges. The proposal states this is to make the charges clearer, however it seems to charge more for evening parking is purely to increase revenue.

I do not see ANY reason to charge for parking after 6.30pm. In fact the town would benefit from not charging as this will encourage people to go into town and use the theatre and restaurants more.

I also note that the initial announcement states that the public has until 21st Jan to raise their objections, however it appears the discussion is tonight, the 19th! I would like clarification on this too please!

COMMENT 83 (Sevenoaks)

I would like to raise an objection to items 1-4 of the proposed increase in parking tariffs under the Car Park Amendment 4 Order 2010.

My principal objection is that raising the parking charges will discourage users from parking, and therefore shopping / spending in our local shops and cafes.

The economic climate is difficult enough already, with shoppers watching their wallets; if we compounds this with higher parking charges, shoppers are more likely defer smaller local purchases until their larger weekly shopping trips to out of town super stores.

The change in the evening charges will likewise potentially put people off visiting the stag theater, our local bars and restaurants.

Thank you for your consideration,

COMMENT 84

The proposed increases in Sevenoaks parking charges are more bad news for local traders and residents, but clearly aimed at increasing revenue. However, the proposed changes to the evening parking arrangements make no sense, and are without credible justification.

You say that the change is not to increase revenue, but is just to make it simpler for people from outside the area. In order to help these poor souls, you propose making a change which is clearly going to be detrimental to the evening life of the residents of the Sevenoaks area, who make up the majority of those coming to the town in the evening.

There are many places to eat and drink in Sevenoaks, and there is the Stag; all of these rely heavily on evening business, and probably none of them would claim to be financially resilient. Most people using these places in the evening will park well before the proposed 8.30pm charging cut-off, and they will have to pay more. This is bound to be detrimental to the town's businesses. Going elsewhere is becoming increasingly attractive, and if you push the changes through you will be disadvantaging people who otherwise would like to use Sevenoaks in the evening – and all this apparently to appease a few visitors! Do you think that the proposed change to the evening parking regime is going to increase the number of visitors? Of course not, and certainly not enough to compensate the local residents and businesses – your own constituents – who you are increasingly alienating.

COMMENT 85 (Seal)

I am writing to strongly object to the proposed increased car parking charges in Sevenoaks. As a resident of Seal, my wife, children and I use the shops and amenities in Sevenoaks Town centre on a daily basis.

The distance to the town centre from Seal is too far to walk; there is no safe route to cycle, so taking the car is the only practical option.

My wife works part-time in the Chocolate Shop in London Road. I commute from Sevenoaks station and teach martial arts at the Leisure Centre.

The current car parking charges already affect our decisions on when to visit the town centre and, on occasions, decide not to visit the centre due to the car parking charges.

My wife is now weighing up her options on whether or not to continue her employment with the Chocolate Shop. The salary is basic and has to work an hour to pay for her parking!

Having grown up in Sevenoaks, the centre always had a vibrant evening atmosphere in the restaurants, pubs and theatre.

On our recent visits, this is no longer the case and the increased evening tariff would only worsen this situation.

Part of the appeal of the large out-of-town supermarkets and large shopping centre's such as Bluewater, is the free parking.

Sevenoaks town centre is a much nicer place to shop than the aforementioned and your suspension of the car parking charges before Christmas was a success I hope.

I certainly did more of my Christmas shopping in the town as a result of the free parking.

Please consider the affect raising the already significant car park charges will have on the town centre and the families such as ours who enjoy using the centre but may be forced to go elsewhere.

COMMENT 86

I wish to object to the above car parking amendment. To be frank, the changes that you are proposing to charge will end up resulting in the death of some local businesses. They are utterly unreasonable and I do wonder if anyone proposing them has any grip on reality whatsoever.

I am surprised to see that your chief executive "is passionate about delivering value for money" and that, according to him, "the customer is at the heart of everything the Council does to ensure that Sevenoaks District remains a great place to live, work and visit", yet is happy to propose the changes that are listed.

COMMENT 87

I deeply disagree with this increase in parking charges and changes that are being brought in

Talk about the fastest way to kill a town centre. I shall be spending my money driving to Blue water and shopping around there for free with a bigger shopping variety. The charges for parking are astronomical already in Sevenoaks !

I love Sevenoaks town centre to walk around and shop with my child, but the parking cost now just makes this impossible to consider (Busses at £2 each way are also not an option) CHEAPER IN LONDON

Kind regards and hoping that the money grabbing ideas will be rained in and more strategical long term ideas will be addressed to continue the growth and success of this beautiful town Sevenoaks not just increase parking fares.

COMMENT 88

I already use the town and its businesses far less than I would like. I used to potter around and spend money in town almost every day. As it is, I often go elsewhere, to the big supermarkets or retail parks because parking is so expensive - with the proposed increases, I cannot see myself shopping or eating in Sevenoaks at all.

COMMENT 89

I would like to object to two aspects of the plans:

1) The planned evening charges to apply from 6.30-8.30pm in Sevenoaks town centre car parks: these will deter people from coming into the town to visit the restaurants, cinema and theatre in the evening. Sevenoaks town centre has managed to avoid the decline experienced by so many other towns of this size because people do come in and use local facilities in the evenings - it has a good mix of restaurants as well as shops. People will go elsewhere if they are forced to pay the high charges proposed as most people in Sevenoaks go out before 8.30pm, more restaurants will close and become empty premises and the town will become a ghost town after dark.

2) The proposed charges relating to parking to use the leisure centre: it is already extremely expensive to park and take a family to use the leisure centre, the proposals will make it even more extortionate. It already stops us from making as much use of the leisure centre as we would like - you should be encouraging people to be healthy not putting barriers in the way. (And no, the bus isn't an option - that is even more expensive and too infrequent.)

I appreciate you need to generate extra money but deterring people from coming into Sevenoaks in the evening and from using the leisure centre is not in the town's interests.

COMMENT 90 (Bessels Green)

Please my note my objection to your proposal to amend the evening car parking charges.

Although I realise that SDC has to raise additional monies from somewhere to cover extra costs this year I do not think it prudent to increase the nightly charges (as well as the daytime ones) as this will harm the town, discourage residents from going in during the evening for meals and the theatre/cinema and will eventually lead to the town becoming a 'no go area' at night. The straightforward £1 per evening is a bearable and commonsense amount - any extra is not.

Sevenoaks is a wonderful town and has a very valuable community asset in the Stag Theatre, supported by both SDC and staffed to a large extent by volunteers who give not only their time but also (very often) the use of their cars when they drive in to do their volunteering hours outside the public transport times. I am one of those volunteers and am rarely able to find one of the very few free parking spaces available for use on the South Park Car Park. I invariably have to pay to park in order to carry out my volunteering duties and I do not bother to reclaim this money as I consider that I am supporting the Stag and £1 is not a bad price to pay.

If I have to start paying evening parking costs at the same rate as the daytime charges then I shall either stop the volunteering there or make sure that I claim back the charges so that I am not out of pocket. Likewise, I am sure that many others will, sadly, follow suit.

I hope that the proposed hike in evening charges, disguised as they are, will not be accepted.

COMMENT 91 (Sevenoaks)

Thank you for the opportunity to respond to this consultation.

Although I understand the need for local authorities to raise revenue due to the cuts they have been forced to implement, I don't think that increasing the amount that drivers pay in the evenings is the best way of doing so.

Sevenoaks isn't busy at night and increasing the charges for drivers well into the evening discourages people from coming to enjoy the restaurants & pubs, bringing money into the town.

I support shortening the time that charges are applied but would go further and stop charging by 7pm to encourage nighttime business. If you do continue to charge until 8:30pm, then the £1 fee should remain and not be increased.

COMMENT 92

The decision to increase the 6:30pm plus, parking charges from their current level is folly.

After 6:30pm there is a surplus of car parking spaces all around the town.

I happen to have studied Economics, but everyone understands that if there is an over-supply of a good or service, the price will naturally tend lower, not higher.

I'm lucky enough to be going to eat at the Spice Club this evening at 7:00pm. If in future I will have to pay a high price to park in an empty car park, for the privilege, I am likely to spend this wasted money on petrol and travel further afield for variety - Tunbridge Wells car parks will be free at this time.

That's how you encourage business in a town.

I would hazard a guess that a good source of evening revenue is currently generated from fines imposed on people who would not have guessed that Sevenoaks would charge anything at all in the evening.

Think again. I suggest free parking after 6:30pm, not an increase.

COMMENT – THE SEVENOAKS TOWN PARTNERSHIP

Sevenoaks Town Partnership would like to express its gratitude to Cllr Peter Fleming for attending its meeting on 21st January 2015 to provide information relating to Sevenoaks District Council’s proposed new parking charges for the town and for the opportunity to reply to the consultation bearing in mind the closing date of the same date.

Representatives from the following organisations attended the Sevenoaks Town Partnership meeting

- Sevenoaks Town Council
- Stag Community Arts Centre
- Knole House, National Trust
- St John’s Resident Association
- Senior Actions Forum
- Bligh’s Meadow
- St Botolph’s Road Residents Association
- Sevenoaks District Council
- Sevenoaks Chronicle
- Sevenoaks Chamber of Commerce
- Go Coaches
- Sevenoaks Society
- Local Retailers

Following a discussion it was unanimously agreed not to support Sevenoaks District Council’s proposals for any increase to car parking charges in Sevenoaks town and that they should remain the same as at present.

Town Partnership Administrator
Sevenoaks Town Partnership

COMMENT – THE SEVENOAKS TOWN COUNCIL

Please could it be noted that Sevenoaks Town Council’s comments on consultations are as follows:

THE KENT COUNTY COUNCIL (VARIOUS ROADS IN THE DISTRICT OF SEVENOAKS) (PROHIBITION AND RESTRICTION OF WAITING AND LOADING AND UNLOADING AND ON STREET PARKING PLACES) (AMENDMENT 11) ORDER 2013

Sevenoaks Town Council requests that the amendment be from ‘8:30am – 6:30pm’ rather than ‘8:30am – 8:30pm’

THE SEVENOAKS DISTRICT COUNCIL (OFF-STREET PARKING PLACES) (AMENDMENT 4) ORDER 2010

Sevenoaks Town Council objects to the proposed modification to the charging schedule and requests that:

- (a) There be no evening charges after 6:30pm on all days of the week
- (b) There be no charge on Sundays.

The Town Council objects strongly to the premise of any increase in car parking charges at the current time and request at least a 1yr freeze is implemented, noting that while the economy is

in the initial stages of recovery, this should not be seen as an opportunity for the District Council to raise further revenue from hard pressed tax payers.

Assistant Town Clerk
Sevenoaks Town Council

END

AMENDMENTS TO THE COUNCIL'S OFF-STREET PARKING PLACES ORDER

REPORT TO THE PORTFOLIO HOLDER FOR ECONOMIC & COMMUNITY DEVELOPMENT

17 DECEMBER 2014

Report of: Chief Officer Environmental and Operational Services

Status: For Decision

This report supports the Key Aim of safer communities and the effective and efficient use of resources.

Portfolio Holder: Cllr. Roddy Hogarth

Head of Service: Chief Officer Environmental and Operational Services

Mr Richard Wilson

Recommendation: that the following changes be included in the next Off-Street Parking Order Amendment proposed as part of the formal consultation process in respect to parking charges for 2015/16:

- (a) the removal of Pembroke Road car park;
- (b) the inclusion of the parking area in Orchard Close, Sevenoaks;
- (c) the inclusion of additional clauses to clarify the use and enforcement of delivery areas and loading and unloading activities; and
- (d) the inclusion of a new clause to clarify the enforcement of contraventions which occur over more than one day.

Reason for recommendation: this report requests approval to undertake formal public consultation in respect to a number of proposed amendments to the Off-Street Parking Places Order to enable and improve parking enforcement.

1. The Council's Off-Street Parking Places Order is the means by which the Council's public car parks are managed, controlled and enforced.
2. Approval is sought to make the following changes to either update the Order, to enable the introduction of new controls and to improve the controls within the Order.

Pembroke Road Car Park

3. The Pembroke car park no longer exists as the land has been given over to development. Therefore, the entry needs to be removed from the Order.

Orchard Close, Sevenoaks

4. A request has been received from the Greatness Residents' Association for parking controls to be introduced to prevent the parking of heavy goods vehicles. The area in question is a paved central island owned by the Council and is situated within the public highway between numbers 20 and 40 Orchard Close, as shown in Appendix A attached. The only means of introducing parking controls is to include the area in the Council's Off-Street Parking Order.
5. The proposal has the full support of the Councillor Dickins, the Local Member who has been liaising with the Residents' Association. At the time of preparing this report communication has not been received from Councillor Towell.

Delivery Areas and Loading and Unloading

6. Amendments are proposed to existing clauses within the Order to make the controls in respect to the designation and use of delivery areas and for loading and unloading activities more robust. This addresses comments received from the independent parking adjudication service, the Traffic Penalty Tribunal, in relation to parking appeals.

On-Going Contraventions

7. It is proposed that an additional clause be included to clarify the enforcement of contraventions where vehicles have not been moved from a car park in accordance with the conditions within the Order.
8. Essentially, where a vehicle remains parked for more than one day, it shall be deemed to commit a new contravention for each day it remains parked and further Penalty Charge Notices may be issued.
9. This inclusion of this clause has been agreed with the Council's legal team.
10. This will serve to enhance our enforcement capabilities.

Draft Order

11. The draft Amendment Order detailing the proposed changes is attached as Appendix B.
12. Any objections or comments received as a result of the public consultation will need to be brought back to either the Portfolio Holder or to Cabinet for consideration and a decision as to whether the proposals should be implemented.

Key ImplicationsFinancial

13. There will be only minor costs involved for new signing that will be required for the Orchard Close parking area. These will be met from the car parks account.

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Item 8 – Capital Programme & Asset Maintenance 2015/18

The attached report was considered by the Finance & Resources Advisory Committee relevant minute extract below:

Finance & Resources Advisory Committee – 20 January 2015 (Minute 42)

The Head of Finance presented a report which set out the proposed 2015/18 Capital Programme including projected capital receipts, indicating the proposed financing of the Programme. The schemes included the annual schemes for commercial vehicles and for Disabled Facilities work, works to the Dunbrik Vehicle workshop, a contract to design and build elevated car decks on the Buckhurst 2 car park and the Property Investment Strategy. The asset maintenance budget was also set out.

The Head of Finance drew Members' attention to the scheme bid documents and that the figure of £4 million for the decking of the car park was based on a feasibility carried out in November 2013 and that the actual cost would be greater due to modifications and there would be construction uplifts depending on the actual construction date.

Public Sector Equality Duty

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

Resolved: That it be recommended to Cabinet that

- a) the Capital Programme 2015/18 and funding method set out in Appendix B be approved, and
- b) the proposed Asset Maintenance budget of £479k be agreed for 2015/16.

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CAPITAL PROGRAMME & ASSET MAINTENANCE 2015/18

Cabinet – 5 February 2015

Report of Chief Finance Officer

Status: For Decision

Also considered by: Finance and Resources Advisory Committee – 20 January 2015

Key Decision: No

Executive Summary: This report sets out the proposed 2015/18 Capital Programme, with supporting documentation in a standard format for individual scheme bids. Projected capital receipts are included, indicating the proposed financing of the Programme. A proposed overall provision limit for Asset Maintenance is also made.

This report supports the Key Aim of effective management of Council resources

Portfolio Holder Cllr. Ramsey

Contact Officer(s) Helen Martin Ext. 7483

Recommendation to Cabinet

- (a) the Capital Programme 2015/18 and funding method set out in Appendix B be approved, and
- (b) the proposed Asset Maintenance budget of £479k be agreed for 2015/16.

Reason for recommendation: To comply with the Councils Procedure Rules and sound financial management principles.

Introduction and Background

- 1 A copy of the existing 2014/17 three year programme is attached at Appendix A. The 2014/15 column includes budgets brought forward from 2013/14. Forecast outturn figures for the current year and estimated carry forward figures are shown.
- 2 The Council's previous policy in relation to capital expenditure was as follows: "no new schemes to be added to the programme except mandatory improvement grants, information technology and vehicle replacements". As agreed by Council last year, schemes have been added to help the Council achieve its aims to become more self sufficient.

Agenda Item 8

- 3 This policy has previously been revised and updated as part of the Best Value review of Asset Management and Capital Investment, including the development of a formal options appraisal process.

Capital Bids

- 4 Scheme Bid Documents are attached at Appendix C for all on-going items referred to at paragraph 2 above which require additional capital resources. These documents identify any external funding available and indicate the funding source.
- 5 Appendix B summarises the position if all schemes are approved, and indicates the funding methods proposed.
- 6 Unspent schemes in the current year's programme (2014/15) may be carried forward to 2015/16, subject to Cabinet approval, when the outturn is known.

Capital Receipts

- 7 Capital Receipts are a major funding source for the capital programme. New receipts expected over the programme period are as follows:

	2014/15 £000	2015/16 £000	2016/17 £000	2017/18 £000
Shared Ownership Staircasing	60	30	15	10
Mortgage repayments (net of pooling)	1	0	0	0
Land Sales	0	2,430	1,130	1,750
	61	2,460	1,145	1,760

The Land Sales receipts arise from the Property Review process which plans and monitors actions to dispose of surplus sites as part of the asset management plan.

- 8 It must be emphasised that the scale and timing of the land sales is very unpredictable and subject to market conditions and planning risks. For this reason, only 75% of the above figures for 2015/16 onwards have been included in Appendix B.
- 9 Up until 2008/09, the Council used its capital receipts to fund its capital programme. However, due to a combination of reducing assets and a period of recession impacting asset values, the level of reliance on capital receipts could not be sustained. Therefore, Members made the decision to fund the capital programme through the revenue budget at an annual cost of £330,000. This was reduced to £198,000 in 2014/15 following a reduction in the gross capital scheme costs for Improvement Grants. SCIA 19 of 2015/16 will further reduce the revenue contribution to capital budgets to £148,000.

- 10 Appendix B takes these projections, together with the actual balance of such receipts at 1 April 2014.

Asset Maintenance

- 11 Up until 2010/11 asset maintenance was funded from a separate revenue earmarked reserve.
- 12 One of the principles adopted as part of the Business and Financial Planning Strategy was to make more effective use of remaining earmarked reserves. It was agreed that from 2011/12, allowing for an emergency asset maintenance reserve of £1m, the remainder be used over the ten-year budget period equally to smooth the rundown of these reserves.
- 13 The allocation of budgets to individual areas and schemes is made in accordance with the asset management plan and service requirements, reflecting backlog maintenance, health & safety and income generation as priorities.
- 14 The budget figures are based on an average of 30% of the existing 10 year maintenance assessment. This would then give the following programme :

	2014/15 £000	2015/16 £000	2016/17 £000	2017/18 £000
Budget	469	479	488	497

Key Implications

Financial

All financial implications are covered elsewhere in this report.

Legal Implications and Risk Assessment Statement.

There are no legal or human rights issues. The Council must agree a Capital Programme as part of its financial plan and ensure that resources are available to fund it.

Equality Assessment

Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users. The impact has been analysed and varies between groups of people. The results of this analysis are set out immediately below.

Agenda Item 8

It is a statutory duty to provide Disabled Facility Grants to the older and or disabled residents in the district.

Conclusions

Members are asked to review the scheme bids submitted at Appendix C, and approve the programme and funding at Appendix B.

Appendices

Appendix A – Existing 2014/17 capital programme
(to follow)

Appendix B – Proposed 2015/18 capital programme
(to follow)

Appendix C – Scheme bid documents (to follow)

Background Papers:

none

Adrian Rowbotham
Chief Finance Officer

Capital Programme and Asset Maintenance

Capital Programme 2014-17 (Agreed by Cabinet 6 February 2014)

Appendix A

Chief Officer/Scheme	Funding Source	2013/14			2014/15 £000	2015/16 £000	2016/17 £000
		Budget £000	Forecast £000	Likely C/F £000			
		Corporate Support	Capital Receipts	-			
Communities and Business	Capital Receipts	61	0	61	-	-	-
Environmental and Operational Services	Vehicle Renewal Fund	650	650	-	489	515	594
Housing	net from cap reserve	603	603	-	517	584	584
	Gross cost	-396	-396	-	-410	-477	-477
	Government DFG Subsidy						
TOTAL		918	857	61	736	622	701

The 2013/14 budget includes amounts carried forward from 2012/13.

Funding Sources

Vehicle Renewal Fund (Reserve)	489	515	594
Capital Financing Reserve	107	107	107
Capital Receipts	140	-	-
External Borrowing	-	-	-
	<u>736</u>	<u>622</u>	<u>701</u>

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Capital Programme and Asset Maintenance

Capital Programme 2015-18

Appendix B

Chief Officer/Scheme	Funding Source	2014/15			2015/16 £000	2016/17 £000	2017/18 £000
		Budget £000	Forecast £000	Likely C/F £000			
		Corporate Support					
Back-up generator	Capital Receipts	140	-	140	-	-	-
Communities and Business							
Parish projects	Capital Receipts	61	-	61	-	-	-
Environmental and Operational Services							
Commercial vehicle replacements	Vehicle Renewal Res.	489	489	-	498	514	501
Dunbrik Vehicle Workshop	Capital Receipts	-	-	-	234	-	-
Car Park	External Borrowing	-	-	-	4,000	-	-
Housing							
Improvement Grants (gross)	Gov Grant/ cap reserve	517	603	-	534	534	534
Finance							
Property Investment Strategy	Prop. Inv. Reserve	-	-	-	5,000	-	-
TOTAL		1,207	1,092	201	10,266	1,048	1,035

Funding Sources

Capital Receipts	234	-	-
Capital Financing Reserve	57	57	57
Vehicle Renewal Reserve	498	514	501
Property Investment Strategy Reserve ***	5,000	-	-
Government Disabled Facilities Subsidy	477	477	477
External Borrowing	4,000	-	-
	<u>10,266</u>	<u>1,048</u>	<u>1,035</u>

*** Part will be funded from Capital Receipts

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Capital Programme 2015/18

Scheme Bid Document - Scheme: Vehicle Replacement Programme

Description: Purchase of replacement commercial fleet vehicles that have reached the end of their fully depreciated operational life.

Service : Environmental and Operational Services

Portfolio Holder/Chief Officer : Cllr. Robert Piper/Richard Wilson

Financials :

CAPITAL COSTS	TOTAL	2015/16	2016/17	2017/18
	£000	£000	£000	£000
Gross scheme cost	1513	498	514	501
External Contributions (list)				

Net scheme cost	1513	498	514	501
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ONGOING REVENUE IMPLICATIONS

(excluding loss of interest)

Running costs

Income streams

Net cost	0	0	0
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Funding source: Funding is via the vehicle replacement fund which is financed by depreciation charges for all fleet vehicles and from the sale of any old vehicles. Depreciation charges are made on all vehicles over predetermined periods and met from fixed transport charges to relevant trading account or relevant service budget.

Other Resource Implications :	
Staffing	Managed by fleet management overhead account by existing employees
Asset Values	Approximately £3 M

Justification: (Statutory Duty / Community Plan Aims / Key Infrastructure / Additional Savings / Other)

To maintain services, mainly statutory. Supports all the Council's priorities

Capital Programme 2015/18

Scheme Bid Document - Scheme: Building works - Dunbrik Depot Vehicle Workshop

Description: Essential building works 1) To either demolish and rebuild substantially or alternatively remove and reconstruct the building roof line to provide sufficient door opening height for all current freighter designs to gain entry and 2) To replace outdated MOT testing facilities to realise increased income generation in accordance with Council aspirations.

Service: Environmental and Operational Services

Portfolio Holder/Chief Officer: Cllr. Robert Piper/Richard Wilson

Financials:

CAPITAL COSTS	TOTAL	2015/16	2016/17	2017/18
	£000	£000	£000	£000
Gross scheme cost	234	234	0	0
External Contributions (list)				
Net scheme cost	234	234	0	0

ONGOING REVENUE IMPLICATIONS

(excluding loss of interest)

Running costs – outsourced vehicle maintenance during building works.	25			
Income streams – Add. MOT income.		-15	-38	-38
Net cost		10	-38	-38

Funding source: From reserves or borrowed at fixed interest rate subject to business case.

Other Resource Implications :	Short term closure of workshop and MOT Test station during construction works.
Staffing	Managed by existing employees
Asset Values	Approximately £0.5 M

Justification: (Statutory Duty / Community Plan Aims / Key Infrastructure / Additional Savings / Other)

- 1) To have effective infrastructure to maintain vehicles essential in providing mainly statutory services.
- 2) Supports the Council's priorities.
- 3) Additional MOT income generation by offering Class V tests.
- 4) Current replacement freighter purchases dictated by vehicle height limitations and may cease to offer best overall value.

Capital Programme 2015/18

Scheme Bid Document - Scheme: Sevenoaks Town Centre Car Park

Description: To award a contract to design and build elevated car decks on the existing Buckhurst 2 car park in accordance with Minute 46 of Council 1 April 2014.

Service : Environmental and Operations

Portfolio Holder/Chief Officer : Cllr R Hogarth/Richard Wilson

Financials :

CAPITAL COSTS	TOTAL	2015/16	2016/17	2017/18
	£000	£000	£000	£000
Gross scheme cost	4,000	4,000	-	-
External Contributions (list)				

Net scheme cost	4,000	4,000	-	-
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ONGOING REVENUE IMPLICATIONS
(excluding loss of interest)

Running costs				
Income streams	see note below		-267	-273
Net cost		x	-267	-273

Funding Source : The sum be financed from Borrowing from the Public Works Loans Board. (Council Minute 46 1 April 2014)

Income Streams: These were reported to Council in April 2014 in a breakdown of potential parking income based on a design of 300 spaces

Other Resource Implications :	
Staffing	Internal client management but project management, architectural, engineering, planning, transport and other consultancy all out sourced

<p>Asset Values</p>	<p>The above figure was approved at Council in April 2014 and was based on a feasibility carried out in November 2013; the actual cost will be greater because the preferred design has changed considerably from the original feasibility study; modifications are currently being worked on to mitigate the impact on the adjacent heritage asset and there will be construction cost uplifts depending on the actual construction date which, at the moment is uncertain.</p>
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Justification: (Statutory Duty / Community Plan Aims / Key Infrastructure / Additional Savings / Other)

This project supports the key aim in the Council's vision, as detailed in the approved Corporate Plan, to either borrow or utilise existing financial resources, to generate on-going revenue income.

Capital Programme 2015/18

Scheme Bid Document - Scheme: Improvement Grants

Description: Statutory Disabled Facility Grants (DFGs) including large scale voluntary transfer (LSVT) registered social landlords (RSL) aids and adaptations and cost of processing applications

Service: Housing Standards

Portfolio Holder/Chief Officer: Cllr Michele Lowe and Pat Smith

Financials:

CAPITAL COSTS	TOTAL	2015/16	2016/17	2017/18
	£000	£000	£000	£000
Gross scheme cost	1,602	534	534	534
External Contributions (list)	(1,431)	(477)	(477)	(477)
Net scheme cost	171	57	57	57

ONGOING REVENUE IMPLICATIONS

(excluding loss of interest)

Running costs

Income streams

Net cost	0	0	0
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Funding Source : Government Grant (DCLG) and Council budgets

Other Resource Implications :	
Staffing	Staff costs have been removed from the capital budget over a 5 year period
Asset Values	Assets not in Council ownership

Justification: (Statutory Duty / Community Plan Aims / Key Infrastructure / Additional Savings / Other)

It is a statutory duty to provide DFG's to older and or disabled residents. £250,000 is ring fenced for aids and adaptations for West Kent Housing Association (WKHA) tenants and both this and the Council's DFG service are eligible for DCLG funding.

The Council is running the DFG process in house as a pilot until June 2015 when it will be reviewed and Members provided with an update. The Home improvement Agency (HIA) still manages the larger DFG applications.

From 2015 the DCLG total budget for Kent will be administered by KCC (ring fenced for each Council so should not be an issue) However it is assumed it will not be less than last year's allocation.

A corporate saving of £50,000 per annum has been made from SDC budget from 1st April 2015 onwards

Capital Programme 2015/18

Scheme Bid Document - Scheme: Property Investment Strategy

Description: A sum of £5m is set aside for the purposes of building a diversified and balanced portfolio of investment assets.

Service: Finance

Portfolio Holder/Chief Officer: Cllr B Ramsey/Adrian Rowbotham

Financials:

CAPITAL COSTS	TOTAL	2015/16	2016/17	2017/18
	£000	£000	£000	£000
Gross scheme cost	5,000	5,000	-	-
External Contributions (list)				

Net scheme cost	5,000	5,000	-	-
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ONGOING REVENUE IMPLICATIONS

(excluding loss of interest)

Running costs

Income streams

see note below

Net cost		x	x	x
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Funding Source: The sum is set aside from a review of reserves as decision of Council 22 July 2014.

Income Streams: These were outlined on Gold Pages at Council on 22 July 2014 (and previously at Cabinet (10 April 2014) and FRAC (26 March 2014). Details are withheld as Exempt Information by virtue of Para. 3 of Part 1 of Schedule 12A LGA 1972.

Other Resource Implications :	
Staffing	Resource would be required from the Legal Section (or possible external legal advisors) to undertake legal pre purchase due diligence. There is also likely to be an increase in the level of Landlord and Tenant related legal work. The Investment Strategy proposal will require an element of financial management, which will include billing rents, service charge and insurance. It is proposed that this work

	will initially be undertaken by the Council's Finance Team. This will be subject to regular review and should a service charge administration role be required, it may necessitate external agents delivering the role, to enable compliance with the RICS Service Charge code of Practice.
Asset Values	n/a

Justification: (Statutory Duty / Community Plan Aims / Key Infrastructure / Additional Savings / Other)

This project is one of the steps being taken in the overall strategy to contribute to the aim of the Council becoming more financially self-sufficient as articulated in the approved Corporate Plan. As minute at Council (Minute 23 22 July 2014), a trading company is being investigated and further legal advice is being sought.

Item 9 – Treasury Management Strategy 2015/16

The attached report was considered by the Finance & Resources Advisory Committee relevant minute extract below:

Finance & Resources Advisory Committee – 20 January 2015 (Minute 43)

The Principal Accountant presented a report which explained that the Local Government Act 2003 (the Act) and supporting regulations required the Council to “have regard to” the Prudential Code and to set Prudential Indicators for the next three years to ensure that the Council’s capital investment plans were affordable, prudent and sustainable. The Act therefore required the Council to set out its treasury strategy for borrowing and to prepare an Annual Investment Strategy which set out the Council’s policies for managing its investments and for giving priority to the security and liquidity of those investments.

Members’ attention was drawn to paragraph 61 of the report, which provided further details on Enhanced Money Market Funds (EMMFs). These funds had not been utilised because of concerns from some Members that they carried more risk than other permitted investments, but it was proposed they would be utilised from 2015/16. Alternatively he suggested that the limit for lending to any of the top five Building Societies not meeting minimum credit rating requirements be increased from £2 million to £4 million each and the limit for lending to Handelsbanken be increased from £3 million to £5 million to give options rather than lending to the Government at 0.25%.

A Member highlighted that investing in a regular MMF carried a risk as well in that the spending power of the investment would be eroded by inflation. The Principal Accountant advised that regular MMFs would generally have a return of between 0.4 to 0.5% whereas EMMFs had 0.7 to 0.9%. However EMMFs would require one or two days’ notice for settlement of an withdrawal requests and, because their returns varied month to month, it was expected investments would usually be kept in for three or six months to even out returns. Some of the funds fell below AAA rating, most were based in Ireland but were regulated by the FCA and they were sterling funds. In response to a suggestion that the proposed £5 million be spread across different EMMFs, the Principal Accountant warned that it would increase work in monitoring the funds and a Member noted it would increase management costs.

Members asked whether it would assist Officers to have the amendment to investment criteria for Building Societies and Handelsbanken in addition to EMMFs. The Principal Accountant confirmed that it would.

Public Sector Equality Duty

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

Agenda Item 9

Resolved: That it be recommended to Cabinet that

- a) investments in AAA rated Enhanced Money Market Funds be commenced with an overall limit of £5 million which may be in a single fund or split between different funds;
- b) the limit for investments in any of the top five Building Societies not meeting minimum credit rating requirements be increased from £2 million to £4 million each;
- c) the limit for lending to Handelsbanken be increased from £3 million to £5 million; and
- d) subject to those comments, Cabinet recommend that Council approve the Treasury Management Strategy for 2015/16.

TREASURY MANAGEMENT STRATEGY 2015/16

Cabinet – 5 February 2015

Report of the: Chief Finance Officer

Status: For Consideration

Also considered by: Finance and Resources Advisory Committee – 20 January 2015

Council – 17 February 2015

Key Decision: No

Executive Summary: The Local Government Act 2003 (the Act) and supporting regulations requires the Council to ‘have regard to’ the Prudential Code and to set Prudential Indicators for the next three years to ensure that the Council’s capital investment plans are affordable, prudent and sustainable.

The Act therefore requires the Council to set out its treasury strategy for borrowing and to prepare an Annual Investment Strategy (as required by investment guidance issued subsequent to the Act). This sets out the Council’s policies for managing its investments and for giving priority to the security and liquidity of those investments.

Members’ particular attention is drawn to paragraph 61 of the report, which discusses an investment option in the current strategy not at present being utilised.

This report supports the Key Aim of Effective Management of Council Resources.

Portfolio Holder Cllr. Ramsay

Contact Officer Roy Parsons, Principal Accountant - Ext 7204

Recommendations to Finance and Resources Advisory Committee:

- a) That consideration is given to utilising Enhanced Money Market Funds as an investment option; and
- b) That the Treasury Management Strategy for 2015/16 be approved.

Recommendation to Cabinet: That, subject to the views of the Finance and Resources Advisory Committee, Cabinet recommends Council to approve the Treasury Management Strategy for 2015/16.

Recommendation to Council: That the Treasury Management Strategy for 2015/16 be approved.

Reason for recommendations: To ensure that an appropriate and effective annual Treasury Management Strategy is drawn up in advance of the forthcoming financial year, which meets both legislative and best practice requirements.

Background

- 1 The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.
- 2 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

- 3 The Chartered Institute of Public Finance and Accountancy (CIPFA) defines treasury management as:

"The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

Introduction

Reporting requirements

- 4 The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals. These reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Finance and Resources Advisory Committee.
- 5 Prudential and Treasury Indicators and Treasury Strategy (This report) - The first, and most important report covers:
 - the capital plans (including prudential indicators);
 - a Minimum Revenue Provision (MRP) Policy (how residual capital expenditure is charged to revenue over time);
 - the Treasury Management Strategy (how the investments and borrowings are to be organised) including treasury indicators; and

- an investment strategy (the parameters on how investments are to be managed).
- 6 A Mid Year Treasury Management Report – This will update members with the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision.
- 7 An Annual Treasury Report – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

Treasury Management Strategy for 2015/16

- 8 The strategy for 2015/16 covers two main areas:

Capital Issues

- the capital plans and the prudential indicators;
- the minimum revenue provision (MRP) strategy.

Treasury management Issues

- the current treasury position;
 - treasury indicators which will limit the treasury risk and activities of the Council;
 - prospects for interest rates;
 - the borrowing strategy;
 - the investment strategy;
 - creditworthiness policy; and
 - policy on the use of external service providers.
- 9 These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, the Department of Communities and Local Government (CLG) MRP Guidance, the CIPFA Treasury Management Code and the CLG Investment Guidance.

Training

- 10 The CIPFA Code requires the responsible officer to ensure that Members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny. Training was last undertaken in 2010 and further training will be arranged as required.
- 11 The training needs of treasury management officers are reviewed periodically.

Agenda Item 9

Treasury management consultants

- 12 The Council uses Capita Asset Services, Treasury Solutions as its external treasury management advisors.
- 13 The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.
- 14 It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and subjected to review.

Capital Issues

The Capital Prudential Indicators 2015/16 – 2017/18

- 15 The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in prudential indicators, which are designed to assist Members' overview and confirm capital expenditure plans.

Capital Expenditure

- 16 This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts:

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
Capital Expenditure	2,114	1,207	10,266	1,048	1,035

- 17 Other long term liabilities. The above financing need excludes other long term liabilities, such as PFI and leasing arrangements which already include borrowing instruments.
- 18 The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding need (borrowing).

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000

Capital Expenditure	2,114	1,207	10,266	1,048	1,035
Financed by:					
Capital receipts	0	201	234	0	0
Capital grants	1,290	410	477	477	477
Capital reserves	185	107	5,057	57	57
Revenue	639	489	498	514	501
Net financing need for the year	0	0	4,000	0	0

The Council's Borrowing Need (the Capital Financing Requirement)

- 19 The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR.
- 20 The CFR does not increase indefinitely, as the minimum revenue position (MRP) is a statutory annual revenue charge which broadly reduces the borrowing need in line with each asset's life.
- 21 The CFR includes any other long term liabilities (e.g. finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility and so the Council is not required to separately borrow for these schemes. The Council currently has £0.1m of such schemes within the CFR.
- 22 The Council is asked to approve the CFR projections below:

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
Capital Financing Requirement					
Total CFR	143	122	4,101	3,880	3,659
Movement in CFR	-21	-21	3,979	-221	-221

Movement in CFR represented by:					
Net financing need for the year (above)			4,000		
Less MRP/VRP and other financing movements	-21	-21	-21	-221	-221
Movement in CFR	-21	-21	3,979	-221	-221

Note:- The MRP / VRP includes finance lease annual principal payments

Minimum Revenue Provision (MRP) Policy Statement

- 23 The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP).
- 24 CLG Regulations have been issued which require the full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement:
- 25 For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP policy will be based on CFR.
- 26 These options provide for an approximate 4% reduction in the borrowing need (CFR) each year.
- 27 From 1 April 2008 for all unsupported borrowing (including PFI and finance leases), the MRP policy will be the Depreciation method – MRP will follow standard depreciation accounting procedures. This provides for a reduction in the borrowing need over approximately the asset’s life. Repayments included in annual PFI or finance leases are applied as MRP.

Core Funds and Expected Investment Balances

- 28 The application of resources (capital receipts, reserves etc.) to either finance capital expenditure or other budget decisions to support the revenue budget will have an on-going impact on investments unless resources are supplemented each year from new sources (asset sales etc.). Detailed below are estimates of the year end balances for each resource and anticipated day to day cash flow balances.

Year End Resources	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000	£000
Fund balances / reserves	23,350	22,019	21,674	22,066	20,367
Capital receipts	4,568	7,233	7,255	7,255	7,255
Provisions	409	409	409	409	409
Other	0	0	0	0	0
Total core funds	28,327	29,661	29,338	29,730	28,031
Working capital*	4,979	1,032	1,061	1,090	1,119
Under/over borrowing	0	0	0	0	0
Expected investments	33,306	30,693	30,399	30,820	29,150

*Working capital balances shown are estimated year end; these may be higher mid year

Affordability Prudential Indicators

29 The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council’s overall finances. The Council is asked to approve the following indicators:

Ratio of Financing Costs to Net Revenue Stream

30 This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs, net of investment income) against the net revenue stream.

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Estimate	Estimate	Estimate	Estimate
	-3.00%	-2.00%	-2.00%	-3.00%	-4.00%

The estimates of financing costs include current commitments and the proposals in the budget report.

Agenda Item 9

Incremental Impact of Capital Investment Decisions on Council Tax.

- 31 This indicator identifies the revenue costs associated with proposed changes to the three year capital programme recommended in this budget report compared to the Council's existing approved commitments and current plans. The assumptions are based on the budget, but will invariably include some estimates, such as the level of Government support, which are not published over a three year period.

	2013/14	2014/15	2015/16	2016/17	2017/18
	Actual	Estimate	Estimate	Estimate	Estimate
Council tax band D	-£0.01	£0.00	£0.04	-£0.03	-£0.04

Treasury Management Issues

- 32 The capital expenditure plans set out above provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the the relevant professional codes, so that sufficient cash is available to meet this service activity. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

Current Portfolio Position

- 33 The Council's treasury portfolio position at 31 December 2014 appears in Appendix A.

Borrowing

- 34 The above mentioned portfolio position shows that, at present, this authority does not borrow. This has been the position for a number of years. However, this may change in future and hence the strategy needs to deal with such a situation, should it arise.
- 35 Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2015/16 and the following two financial years. This allows for some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes.

Treasury Indicators: Limits to Borrowing Activity

The Operational Boundary

36 This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt.

Operational boundary	2014/15	2015/16	2016/17	2017/18
	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000
Debt	5,000	5,000	5,000	5,000
Other long term liabilities	0	0	0	0
Total	5,000	5,000	5,000	5,000

The Authorised Limit for external debt

37 A further key prudential indicator represents a control on the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

38 This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

39 The Council is asked to approve the following Authorised Limit:

Authorised limit	2014/15	2015/16	2016/17	2017/18
	Estimate	Estimate	Estimate	Estimate
	£000	£000	£000	£000
Debt	5,000	5,000	5,000	5,000
Other long term liabilities	0	0	0	0
Total	5,000	5,000	5,000	5,000

Agenda Item 9

Prospects for Interest Rates

- 40 The Council has appointed Capita Asset Services as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. Appendix B draws together a number of current City forecasts for short term and longer fixed interest rates. Appendix C contains Capita Asset Services' latest economic background report.

Borrowing Strategy

- 41 At present, there are no capital borrowings. However, should this change during 2015/16, the Council would look to maintain an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement or "CFR") has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is considered a prudent one as investment returns are low and counterparty risk is relatively high.

Treasury Management Limits on Activity

- 42 There are three debt related treasury activity limits. The purpose of these are to restrain the activity of the treasury function within certain limits, thereby managing risk and reducing the impact of any adverse movement in interest rates. However, if these are set to be too restrictive, they will impair the opportunities to reduce costs and/or improve performance. The indicators are:
- Upper limits on variable interest rate exposure. This identifies a maximum limit for variable interest rates based upon the debt position, net of investments.
 - Upper limits on fixed interest rate exposure. This is similar to the previous indicator and covers a maximum limit on fixed interest rates.
 - Maturity structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.
- 43 The council is asked to approve the following treasury indicators and limits:

Interest rate exposures	2015/16	2016/17	2017/18
	%	%	%
Upper limit for variable interest rate exposure	50%	50%	50%
Upper limit for fixed interest rate exposure	100%	100%	100%

Maturity structure for borrowings:			
Upper limit for under 12 months	100%	100%	100%
Lower limit for under 12 months	0%	0%	0%
Upper limit for over 12 months	100%	100%	100%
Lower limit for over 12 months	0%	0%	0%

Policy on borrowing in advance of need

- 44 The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.
- 45 Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

Municipal Bonds Agency

- 46 It is likely that the Municipal Bonds Agency, currently in the process of being set up, will be offering loans to local authorities in the near future. It is also hoped that the borrowing rates will be lower than those offered by the Public Works Loan Board (PWLb). If the Council does borrow in the future it intends to make use of this new source of funding as and when appropriate.

Annual Investment Strategy

Investment Policy

- 47 The Council’s investment policy has regard to the Department of Communities and Local Government (CLG) Guidance on Local Government Investments (“the Guidance”) and the 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes (“the CIPFA TM Code”). The Council’s investment priorities will be security first, liquidity second, then return.
- 48 In accordance with the above guidance, and in order to minimise the risk to investments, the Council applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk.
- 49 Continuing regulatory changes in the banking sector are designed to see greater stability, lower risk and the removal of expectations of Government financial support should an institution fail. This withdrawal of implied sovereign support is

Agenda Item 9

anticipated to have an effect on ratings applied to institutions. This will result in the key ratings used to monitor counterparties being the Short Term and Long Term ratings only. Viability, Financial Strength and Support Ratings previously applied will effectively become redundant. This change does not reflect deterioration in the credit environment but rather a change of method in response to regulatory changes.

- 50 As with previous practice, ratings will not be the sole determinant of the quality of an institution and that it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the Council will engage with its advisors to maintain a monitor on market pricing such as “credit default swaps” and overlay that information on top of the credit ratings.
- 51 Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.
- 52 Investment instruments identified for use in the financial year are listed in Appendix D under the ‘Specified’ and ‘Non-Specified’ Investments categories. Counterparty limits will be as set below.

Creditworthiness Policy

- 53 This Council applies the creditworthiness service provided by Capita Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moodys and Standard and Poors. The credit ratings of counterparties are supplemented with the following overlays:
- credit watches and credit outlooks from credit rating agencies;
 - CDS spreads to give early warning of likely changes in credit ratings;
 - sovereign ratings to select counterparties from only the most creditworthy countries.
- 54 This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the duration for investments. The Council will therefore use counterparties within the following durational bands:
- Purple 2 years
 - Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
 - Orange 1 year
 - Red 6 months

- Green 100 days
 - No Colour as individually specified in the Strategy
- 55 The Capita Asset Services creditworthiness service uses a wider array of information than just primary ratings and by using a risk weighted scoring system, does not give undue preponderance to just one agency's ratings.
- 56 Typically the minimum credit ratings criteria the Council use will be a short term rating (Fitch or equivalents) of short term rating F1 and a long term rating A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances consideration will be given to the whole range of ratings available, or other topical market information, to support their use.
- 57 All credit ratings will be monitored regularly. The Council is alerted to changes to ratings of all three agencies through its use of the Capita Asset Services creditworthiness service.
- if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.
 - in addition to the use of credit ratings the Council will be advised of information in movements in Credit Default Swap against the iTraxx benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.
- 58 Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on government support for banks and the credit ratings of that supporting government.

Country limits

- 59 The Council has determined that it will only use approved counterparties from countries that have a minimum sovereign credit rating of AA- from Fitch and where those countries have been approved by the Finance and Resources Advisory Committee. The list of countries that qualify using this credit criteria as at the date of this report are shown in Appendix E. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.

Other Creditworthiness Issues

- 60 The Council's current investment policy further limits the one proposed by Capita Asset Services as follows:-
- a. Maximum investment period of two years.
 - b. Investments in any single institution or institutions within a group of companies are limited to 25% of the total fund, at the time the investment is

Agenda Item 9

placed, except for Lloyds Banking Group plc and Royal Bank of Scotland Group plc where the limit is 30%.

- c. Total investments in any one foreign country are limited to 15% of the total fund, but UK-based institutions to be used as first preference. The only country, other than the UK, approved for investment is Sweden.
 - d. Investments are limited to £6m per counterparty excluding call accounts and £7m including call accounts except for Lloyds Banking Group plc and Royal Bank of Scotland Group plc, where the limits are £10m for each with no distinction between fixed deposits and call accounts.
 - e. If the Council's own banker, Barclays, falls below Capita Asset Services' minimum credit rating requirements, it will nevertheless continue to be used, although balances will be minimised in both monetary size and duration.
 - f. Building Societies with assets in excess of £9bn are included in the lending list with a maximum investment limit of £2m each and a maximum duration of 100 days. If a Building Society meets Capita Asset Services' minimum credit rating requirements, the investment limit is increased to £5m with a maximum investment duration of two years.
 - g. Investments in Money Market Funds (MMFs) and Enhanced Money Market Funds (EMMFs) are limited to a combined maximum of £5m per provider.
- 61 No changes are proposed for 2015/16. EMMFs were not utilised in 2014/15 as some Members expressed concern that they carried more risk. EMMFs differ from MMFs because there tends to be a greater proportion of longer dated investments within the fund making returns more volatile. It is recommended that an investment in an EMMF is held for a minimum of 3 to 6 months so that returns are smoothed out. It is true to say that they do not have a constant net annual value (NAV) as is the case with MMFs. This means that there is a risk that the value may fall below par. However, this has not yet happened to any EMMF and their use is widespread within local authorities.

Investment Strategy

- 62 Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).
- 63 Bank Rate is forecast to remain unchanged at 0.5% before starting to rise from quarter 2 of 2015. Bank Rate forecasts for financial year ends (March) are:
- 2015/16 1.00%
 - 2016/17 1.50%
 - 2017/18 2.50%
- 64 There are downside risks to these forecasts (i.e. start of increases in Bank Rate occurs later) if economic growth weakens. However, should the pace of growth quicken, there could be an upside risk.

65 The suggested budgeted investment earnings rates for returns on investments placed for periods up to 100 days during each financial year for the next eight years are as follows:

- 2015/16 0.90%
- 2016/17 1.50%
- 2017/18 2.00%
- 2018/19 2.50%
- 2019/20 3.00%
- 2020/21 3.00%
- 2021/22 3.25%
- 2022/23 3.25%
- Later years 3.50%

66 The Council is asked to approve the following treasury indicator limit. These limits are set with regard to the Council's liquidity requirements and to reduce the need for an early sale of an investment. They are based on the availability of funds after each year-end.

Maximum principal sums invested > 364 days	2015/16	2016/17	2017/18
	£000	£000	£000
Principal sums invested > 364 days	10,000	10,000	10,000

67 For its cash flow generated balances, the Council will seek to utilise its business reserve instant access and notice accounts, money market funds and short-dated deposits (overnight to 100 days) in order to benefit from the compounding of interest.

Icelandic Bank Investment

68 The Council had an investment of £1m frozen in Landsbanki Islands hf (later renamed as LBI). The investment was placed on 25 June 2007 at 6.32%, to mature on 25 June 2009.

69 The Council has sold its claim against the insolvent estate of LBI. The claim was sold through a sales process brokered by Deutsche Bank. The price at which the claim was sold was based on a reserve price set by the Council on the basis of legal advice received from Bevan Brittan, Solicitors and financial advice procured by the Local Government Association. The proceeds of the sale were paid in cash in Pounds Sterling. The sale means that the Council has recovered 95.9% of the amount that was originally deposited with LBI in 2007. The Council is now no longer a creditor of LBI.

70 After taking into account interest received prior to the insolvency, the full amount of the original investment has now been recovered.

Agenda Item 9

- 71 In addition, a small repayment in Icelandic Krona remains in an escrow account in Iceland awaiting the lifting of capital controls before it can be repatriated. The GBP equivalent is approximately £7,000. It is attracting interest at a rate of around 3% or 4%.

End of Year Investment Report

- 72 At the end of the financial year, the Council will receive a report on its investment activity as part of the Annual Treasury Report.

Scheme of delegation

- 73 The guidance notes accompanying the revised Code also require that a statement of the Council's scheme of delegation in relation to treasury management is produced as part of the Annual Investment Strategy. This appears at Appendix F.

Role of the Section 151 officer

- 74 As with the scheme of delegation mentioned in the previous paragraph, a statement of the role of the Section 151 officer is also required. This appears at Appendix G.

Key Implications

Financial

- 75 The management of the Council's investment portfolio and cash-flow generated balances plays an important part in the financial planning of the authority. The security of its capital and liquidity of its investments is of paramount importance.

Legal Implications and Risk Assessment Statement

- 76 Under Section 151 of the Local Government Act 1972, the Section 151 Officer has statutory duties in relation to the financial administration and stewardship of the authority, including securing effective arrangements for treasury management.
- 77 This annual investment strategy report fulfils the requirements of The Chartered Institute of Public Finance & Accountancy's Code of Practice on Treasury Management 2009.
- 78 Treasury management has two main risks :
- Fluctuations in interest rates can result in a reduction in income from investments; and
 - A counterparty to which the Council has lent money fails to repay the loan at the required time.

Consideration of risk is integral in our approach to treasury management.

- 79 The movement in previous years towards having a restricted lending list of better quality institutions but higher individual limits with those institutions has reduced

the chances of a default. But if a default did occur, the potential loss would be greater. The proposal in this report does create additional risk.

- 80 These risks are mitigated by the annual investment strategy which has been prepared on the basis of achieving the optimum return on investments commensurate with proper levels of security and liquidity. However, Members should recognise that in the current economic climate, these remain significant risks and that the strategy needs to be constantly monitored.

Equality Assessment

- 81 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.

Conclusions

- 82 The effect of the proposals set out in this report is to allow the Council to effectively and efficiently manage cash balances.
- 83 In line with the revised CIPFA Code of Practice on Treasury Management, the Annual Treasury Strategy must be considered by Council and this is planned for its meeting on 17 February 2015. Given the current uncertainties in the banking sector and financial markets, the Council may need to consider amending its strategy during the year.

Appendices:

Appendix A – Investment portfolio at 31 December 2014

Appendix B – Prospects for interest rates

Appendix C – Economic background report

Appendix D – Specified and non-specified investments

Appendix E – Approved countries for investments

Appendix F – Treasury management scheme of delegation

Appendix G – The treasury management role of the S151 officer

Background Papers:

None

Adrian Rowbotham
Chief Finance Officer

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APPENDIX A: CURRENT PORTFOLIO POSITION

List of Investments as at:- 31-Dec-14

Reference	Name	Rating	Country	Group	Amount	Start Date	Comm Rate	End Date	Curr Rate	Terms
	Santander UK plc (Business Reserve A/C)	A	U.K.	Santander	0	01-Apr-99			0.40000%	Variable
	Santander UK plc (Money Market A/C)	A	U.K.	Santander	0	09-Oct-06			0.40000%	Variable
	Clydesdale Bank plc (Base Tracker Plus - 15 Day)	A	U.K.	NAB	0	10-Sep-10			0.30000%	Variable
	Barclays Bank plc (Business Premium A/C)	A	U.K.		2,712,000	01-Oct-11			0.35000%	Variable
	Barclays Bank plc (Flexible IBCA)	A	U.K.		2,000,000	01-Jun-14			0.45000%	Variable
	National Westminster Bank plc (Liquidity Select)	A	U.K.	RBS	1,000,000	07-Oct-11			0.25000%	Variable
	National Westminster Bank plc (95 Day Notice)	A	U.K.	RBS	0	24-May-13			0.35000%	Variable
	Svenska Handelsbanken AB (Deposit A/C)	AA-	Sweden		3,000,000	23-Jul-14			0.40000%	Variable
	Ignis Liquidity Fund (Money Market Fund)	AAA	U.K.		5,000,000	11-May-12				Variable
	Insight Liquidity Fund (Money Market Fund)	AAA	U.K.		5,000,000	11-May-12				Variable
IP1155	Bank of Scotland plc	A	U.K.	Lloyds/HBOS	1,000,000	11-Feb-14	0.95000%	10-Feb-15		1 Year
IP1156	Bank of Scotland plc	A	U.K.	Lloyds/HBOS	1,000,000	21-Feb-14	0.95000%	20-Feb-15		1 Year
IP1194	Coventry Building Society	A	U.K.		1,000,000	15-Oct-14	0.45000%	15-Jan-15		3 Months
IP1205	Coventry Building Society	A	U.K.		1,000,000	28-Nov-14	0.45000%	27-Feb-15		3 Months
IP1208	Kirklees Council		U.K.		3,000,000	15-Dec-14	0.45000%	15-Jan-15		1 Month
IP1210	Leeds Building Society	A-	U.K.		2,000,000	15-Dec-14	0.47000%	25-Mar-15		100 Days
IP1160	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	1,000,000	08-Apr-14	0.95000%	07-Apr-15		1 Year
IP1165	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	1,000,000	29-Apr-14	0.95000%	28-Apr-15		1 Year
IP1167	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	1,000,000	06-May-14	0.95000%	05-May-15		1 Year
IP1174	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	1,000,000	03-Jul-14	0.95000%	03-Jul-15		1 Year
IP1191	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	2,000,000	07-Oct-14	1.00000%	06-Oct-15		1 Year
IP1198	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	1,000,000	03-Nov-14	1.00000%	02-Nov-15		1 Year
IP1204	Lloyds Bank plc	A	U.K.	Lloyds/HBOS	1,000,000	28-Nov-14	1.00000%	27-Nov-15		1 Year
IP1176	Nationwide Building Society	A	U.K.		1,000,000	09-Jul-14	0.64000%	09-Jan-15		6 Months
IP1182	Nationwide Building Society	A	U.K.		1,000,000	06-Aug-14	0.64000%	06-Feb-15		6 Months
IP1185	Nationwide Building Society	A	U.K.		1,000,000	29-Aug-14	0.64000%	27-Feb-15		6 Months
IP1189	Nationwide Building Society	A	U.K.		2,000,000	23-Sep-14	0.66000%	23-Mar-15		6 Months
IP1195	Skipton Building Society	BBB-	U.K.		1,000,000	22-Oct-14	0.43000%	22-Jan-15		3 Months
IP1206	Skipton Building Society	BBB-	U.K.		1,000,000	01-Dec-14	0.43000%	02-Mar-15		3 Months
IP1212	UK Debt Management Office		U.K.		1,000,000	23-Dec-14	0.25000%	19-Jan-15		4 Weeks
IP1151	Ulster Bank Ltd	A-	U.K.	RBS	1,000,000	29-Jan-14	0.85000%	28-Jan-15		1 Year
IP1196	Yorkshire Building Society	BBB+	U.K.		1,000,000	22-Oct-14	0.40000%	22-Jan-15		3 Months
Total Invested					<u>45,712,000</u>					
Other Loan										
	Sevenoaks Leisure Limited				250,000	29-Apr-08	7.00000%	31-Mar-18		10 Years

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APPENDIX B: Interest Rate Forecasts 2014 – 2018

PWLB rates and forecast shown below have taken into account the 20 basis point certainty rate reduction effective as of the 1st November 2012.

Capita Asset Services Interest Rate View														
	Dec-14	Mar-15	Jun-15	Sep-15	Dec-15	Mar-16	Jun-16	Sep-16	Dec-16	Mar-17	Jun-17	Sep-17	Dec-17	Mar-18
Bank Rate View	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	1.50%	1.75%	2.00%	2.25%	2.50%
3 Month LIBID	0.50%	0.60%	0.80%	0.90%	1.10%	1.30%	1.40%	1.60%	1.90%	2.10%	2.10%	2.30%	2.40%	2.60%
6 Month LIBID	0.70%	0.80%	1.00%	1.10%	1.20%	1.40%	1.50%	1.80%	2.00%	2.20%	2.30%	2.50%	2.70%	2.80%
12 Month LIBID	0.90%	1.00%	1.20%	1.30%	1.40%	1.70%	1.80%	2.10%	2.20%	2.30%	2.40%	2.60%	2.80%	3.00%
5yrPW IB Rate	2.50%	2.70%	2.70%	2.80%	2.90%	3.00%	3.10%	3.20%	3.30%	3.40%	3.50%	3.50%	3.50%	3.50%
10yrPW IB Rate	3.20%	3.40%	3.50%	3.60%	3.70%	3.80%	3.90%	4.00%	4.10%	4.10%	4.20%	4.20%	4.30%	4.30%
25yrPW IB Rate	3.90%	4.00%	4.10%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%	4.80%	4.90%	4.90%	5.00%
50yrPW IB Rate	3.90%	4.00%	4.10%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%	4.80%	4.90%	4.90%	5.00%
Bank Rate														
Capita Asset Services	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	1.50%	1.75%	2.00%	2.25%	2.50%
Capital Economics	0.50%	0.50%	0.75%	0.75%	1.00%	1.00%	1.25%	1.25%	1.50%	-	-	-	-	-
5yrPW IB Rate														
Capita Asset Services	2.50%	2.70%	2.70%	2.80%	2.90%	3.00%	3.10%	3.20%	3.30%	3.40%	3.50%	3.50%	3.50%	3.50%
Capital Economics	2.30%	2.60%	2.80%	3.00%	3.20%	3.40%	3.50%	3.60%	3.70%	-	-	-	-	-
10yrPW IB Rate														
Capita Asset Services	3.20%	3.40%	3.50%	3.60%	3.70%	3.80%	3.90%	4.00%	4.10%	4.10%	4.20%	4.20%	4.30%	4.30%
Capital Economics	3.05%	3.25%	3.45%	3.60%	3.80%	3.85%	3.90%	3.95%	4.05%	-	-	-	-	-
25yrPW IB Rate														
Capita Asset Services	3.90%	4.00%	4.10%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%	4.80%	4.90%	4.90%	5.00%
Capital Economics	3.70%	3.95%	4.05%	4.15%	4.25%	4.35%	4.45%	4.55%	4.60%	-	-	-	-	-
50yrPW IB Rate														
Capita Asset Services	3.90%	4.00%	4.10%	4.30%	4.40%	4.50%	4.60%	4.70%	4.70%	4.80%	4.80%	4.90%	4.90%	5.00%
Capital Economics	3.80%	4.10%	4.20%	4.30%	4.40%	4.50%	4.60%	4.70%	4.80%	-	-	-	-	-

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APPENDIX C: Economic Background

UK. Strong UK GDP quarterly growth of 0.7%, 0.8% and 0.7% in quarters 2, 3 and 4 respectively in 2013, (2013 annual rate 2.7%), and 0.7% in Q1, 0.9% in Q2 and a first estimate of 0.7% in Q3 2014 (annual rate 3.1% in Q3), means that the UK will have the strongest rate of growth of any G7 country in 2014. It also appears very likely that strong growth will continue through the second half of 2014 and into 2015 as forward surveys for the services and construction sectors are very encouraging and business investment is also strongly recovering. The manufacturing sector has also been encouraging though recent figures indicate a weakening in the future trend rate of growth. However, for this recovery to become more balanced and sustainable in the longer term, the recovery needs to move away from dependence on consumer expenditure and the housing market to exporting, and particularly of manufactured goods, both of which need to substantially improve on their recent lacklustre performance.

This overall strong growth has resulted in unemployment falling much faster through the initial threshold of 7%, set by the Monetary Policy Committee (MPC) last August, before it said it would consider any increases in Bank Rate. The MPC has, therefore, subsequently broadened its forward guidance by adopting five qualitative principles and looking at a much wider range of about eighteen indicators in order to form a view on how much slack there is in the economy and how quickly slack is being used up. The MPC is particularly concerned that the current squeeze on the disposable incomes of consumers should be reversed by wage inflation rising back above the level of inflation in order to ensure that the recovery will be sustainable. There also needs to be a major improvement in labour productivity, which has languished at dismal levels since 2008, to support increases in pay rates. Most economic forecasters are expecting growth to peak in 2014 and then to ease off a little, though still remaining strong, in 2015 and 2016. Unemployment is therefore expected to keep on its downward trend and this is likely to eventually feed through into a return to significant increases in pay rates at some point during the next three years. However, just how much those future increases in pay rates will counteract the depressive effect of increases in Bank Rate on consumer confidence, the rate of growth in consumer expenditure and the buoyancy of the housing market, are areas that will need to be kept under regular review.

Also encouraging has been the sharp fall in inflation (CPI) during 2014 after being consistently above the MPC's 2% target between December 2009 and December 2013. Inflation fell to 1.2% in September, a five year low. Forward indications are that inflation is likely to fall further in 2014 to possibly near to 1% and then to remain near to, or under, the 2% target level over the MPC's two year ahead time horizon. Overall, markets are expecting that the MPC will be cautious in raising Bank Rate as it will want to protect heavily indebted consumers from too early an increase in Bank Rate at a time when inflationary pressures are also weak. A first increase in Bank Rate is therefore expected in Q2 2015 and they expect increases after that to be at a slow pace to lower levels than prevailed before 2008 as increases in Bank Rate will have a much bigger effect on heavily indebted consumers than they did before 2008.

The return to strong growth has also helped lower forecasts for the increase in Government debt by £73bn over the next five years, as announced in the 2013 Autumn Statement, and by an additional £24bn, as announced in the March 2014 Budget - which also forecast a return to a significant budget surplus, (of £5bn), in 2018-19. However, monthly public sector deficit figures have disappointed so far in 2014/15.

Agenda Item 9

The Eurozone (EZ). The Eurozone is facing an increasing threat from weak or negative growth and from deflation. In September, the inflation rate fell further, to reach a low of 0.3%. However, this is an average for all EZ countries and includes some countries with negative rates of inflation. Accordingly, the European Central Bank (ECB) took some rather limited action in June to loosen monetary policy in order to promote growth. In September it took further action to cut its benchmark rate to only 0.05%, its deposit rate to -0.2% and to start a programme of purchases of corporate debt. However, it has not embarked yet on full quantitative easing (purchase of sovereign debt).

Concern in financial markets for the Eurozone subsided considerably during 2013. However, sovereign debt difficulties have not gone away and major issues could return in respect of any countries that do not dynamically address fundamental issues of low growth, international uncompetitiveness and the need for overdue reforms of the economy, (as Ireland has done). It is, therefore, possible over the next few years that levels of government debt to GDP ratios could continue to rise for some countries. This could mean that sovereign debt concerns have not disappeared but, rather, have only been postponed. The ECB's pledge in 2012 to buy unlimited amounts of bonds of countries which ask for a bailout has provided heavily indebted countries with a strong defence against market forces. This has bought them time to make progress with their economies to return to growth or to reduce the degree of recession. However, debt to GDP ratios (2013 figures) of Greece 180%, Italy 133%, Portugal 129%, Ireland 124% and Cyprus 112%, remain a cause of concern, especially as some of these countries are experiencing continuing rates of increase in debt in excess of their rate of economic growth i.e. these debt ratios are likely to continue to deteriorate. Any sharp downturn in economic growth would make these countries particularly vulnerable to a new bout of sovereign debt crisis. It should also be noted that Italy has the third biggest debt mountain in the world behind Japan and the US. Greece remains particularly vulnerable but has made good progress in reducing its annual budget deficit and in returning, at last, to marginal economic growth. Whilst a Greek exit from the Euro is now improbable in the short term, some commentators still view the inevitable end game as either being another major write off of debt or an eventual exit.

There are also particular concerns as to whether democratically elected governments will lose the support of electorates suffering under EZ imposed austerity programmes, especially in countries like Greece and Spain which have unemployment rates of over 24% and unemployment among younger people of over 50 – 60%. There are also major concerns as to whether the governments of France and Italy will effectively implement austerity programmes and undertake overdue reforms to improve national competitiveness. Any loss of market confidence in the two largest Eurozone economies after Germany would present a huge challenge to the resources of the ECB to defend their debt.

USA. The Federal Reserve (Fed) started to reduce its monthly asset purchases of \$85bn in December 2013 by \$10bn per month; these ended in October 2014, signalling confidence the US economic recovery would remain on track. First quarter GDP figures for the US were depressed by exceptionally bad winter weather, but growth rebounded very strongly in Q2 to 4.6% (annualised). The first estimate of Q3 showed growth of 3.5% (annualised). Annual growth during 2014 is likely to be just over 2%.

The US faces similar debt problems to those of the UK, but thanks to reasonable growth, cuts in government expenditure and tax rises, the annual government deficit has been halved

from its peak without appearing to do too much damage to growth, although the weak labour force participation rate remains a matter of key concern for the Federal Reserve when considering the amount of slack in the economy and monetary policy decisions. It is currently expected that the Fed will start increasing rates in mid 2015.

China. Government action in 2014 to stimulate the economy appeared to be putting the target of 7.5% growth within achievable reach but recent data has been mixed. There are also concerns that the Chinese leadership have only started to address an unbalanced economy which is heavily dependent on new investment expenditure, and for a potential bubble in the property sector to burst, as it did in Japan in the 1990s, with its consequent impact on the financial health of the banking sector. There are also concerns around the potential size, and dubious creditworthiness, of some bank lending to local government organisations and major corporates. This primarily occurred during the government promoted expansion of credit, which was aimed at protecting the overall rate of growth in the economy after the Lehmans crisis.

Japan. Japan is causing considerable concern as the increase in sales tax in April 2014 has suppressed consumer expenditure and growth. In Q2 growth was -1.8% q/q and -7.1% over the previous year. The Government is hoping that this is a temporary blip.

CAPITA ASSET SERVICES FORWARD VIEW

Economic forecasting remains difficult with so many external influences weighing on the UK. Major volatility in bond yields is likely to endure as investor fears and confidence ebb and flow between favouring more risky assets i.e. equities, or the safe haven of bonds.

The overall longer run trend is for gilt yields and Public Works Loan Board (PWLB) rates to rise, due to the high volume of gilt issuance in the UK, and of bond issuance in other major western countries. Over time, an increase in investor confidence in world economic recovery is also likely to compound this effect as recovery will further encourage investors to switch from bonds to equities.

The overall balance of risks to economic recovery in the UK is currently evenly weighted. However, only time will tell just how long this period of strong economic growth will last; it also remains exposed to vulnerabilities in a number of key areas.

The interest rate forecasts in this report are based on an initial assumption that there will not be a major resurgence of the EZ debt crisis, or a break-up of the EZ, but rather that there will be a managed, albeit painful and tortuous, resolution of the debt crisis where EZ institutions and governments eventually do what is necessary - but only when all else has been tried and failed. Under this assumed scenario, growth within the EZ will be tepid for the next couple of years and some EZ countries experiencing low or negative growth, will, over that time period, see an increase in total government debt to GDP ratios. There is a significant danger that these ratios could rise to the point where markets lose confidence in the financial viability of one, or more, countries, especially if growth disappoints and / or efforts to reduce government deficits fail to deliver the necessary reductions. However, it is impossible to forecast whether any individual country will lose such confidence, or when, and so precipitate a sharp resurgence of the EZ debt crisis. While the ECB has adequate resources to manage a debt crisis in a small EZ country, if one, or more, of the large countries were to experience a

Agenda Item 9

major crisis of market confidence, this would present a serious challenge to the ECB and to EZ politicians.

Downside risks currently include:

- The situation over Ukraine poses a major threat to EZ and world growth if it was to deteriorate into economic warfare between the West and Russia where Russia resorted to using its control over gas supplies to Europe.
- Fears generated by the potential impact of Ebola around the world
- UK strong economic growth is currently mainly dependent on consumer spending and the potentially unsustainable boom in the housing market. The boost from these sources is likely to fade after 2014.
- A weak rebalancing of UK growth to exporting and business investment causing a weakening of overall economic growth beyond 2014.
- Weak growth or recession in the UK's main trading partner - the EU, inhibiting economic recovery in the UK.
- A return to weak economic growth in the US, UK and China causing major disappointment in investor and market expectations.
- A resurgence of the Eurozone sovereign debt crisis caused by ongoing deterioration in government debt to GDP ratios to the point where financial markets lose confidence in the financial viability of one or more countries and in the ability of the ECB and Eurozone governments to deal with the potential size of the crisis.
- Recapitalisation of European banks requiring considerable government financial support.
- Lack of support by populaces in Eurozone countries for austerity programmes, especially in countries with very high unemployment rates e.g. Greece and Spain, which face huge challenges in engineering economic growth to correct their budget deficits on a sustainable basis.
- Italy: the political situation has improved but it remains to be seen whether the new government is able to deliver the austerity programme required and a programme of overdue reforms. Italy has the third highest government debt mountain in the world.
- France: after being elected on an anti austerity platform, President Hollande has embraced a €50bn programme of public sector cuts over the next three years. However, there could be major obstacles in implementing this programme. Major overdue reforms of employment practices and an increase in competitiveness are also urgently required to lift the economy out of stagnation.
- Monetary policy action failing to stimulate sustainable growth in western economies, especially the Eurozone and Japan.
- Heightened political risks in the Middle East and East Asia could trigger safe haven flows back into bonds.
- There are also increasing concerns at the reluctance of western central banks to raise interest rates significantly for some years, plus the huge QE measures which remain in place (and may be added to by the ECB in the near future). This has created potentially unstable flows of liquidity searching for yield and, therefore, heightened the potential for an increase in risks in order to get higher returns. This is a return to a similar environment to the one which led to the 2008 financial crisis.

The potential for upside risks to UK gilt yields and PWLB rates, especially for longer term PWLB rates include: -

- A further surge in investor confidence that robust world economic growth is firmly expected, causing a flow of funds out of bonds into equities.
- UK inflation returning to significantly higher levels than in the wider EU and US, causing an increase in the inflation premium inherent to gilt yields.

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APPENDIX D - SPECIFIED AND NON-SPECIFIED INVESTMENTS

SPECIFIED INVESTMENTS

All such investments will be sterling denominated, with maturities up to maximum of 1 year, meeting the minimum 'high' rating criteria where applicable

NON-SPECIFIED INVESTMENTS

These are any investments which do not meet the specified investment criteria. A maximum of 50% will be held in aggregate in non-specified investments.

A variety of investment instruments will be used, subject to the credit quality of the institution. Depending on the type of investment made it will fall into one of the above two categories.

The criteria, time limits and monetary limits applying to institutions or investment vehicles are:

Agenda Item 9

	Minimum Credit Criteria (i.e. Colour Band)	Max % of total investments / £ limit per institution	Max. maturity period	Specified (S) / Non-Specified (N)
Debt Management Agency Deposit Facility (DMADY) – UK Government	N/A	100%	6 Months	S
UK Government gilts	UK sovereign rating AA- or better	100%	1 Year	S
UK Government treasury bills	UK sovereign rating AA- or better	100%	6 Months	S
Bonds issued by multilateral development banks	UK sovereign rating AA- or better	100%	6 Months	S
Money market funds	AAA	25% / £5m	Liquid	S
Enhanced money market funds	AAA	25% / £5m	Liquid	S
Local authorities (up to one year)	N/A	25% / £5m	1 Year	S
Local authorities (over one year)	N/A	25% / £5m	2 Years	N
Term deposits with Lloyds Bank Group / RBS Group (up to one year)	Blue	30% / £10m	1 Year	S
Term deposits with Lloyds Bank Group / RBS Group (over one year)	Blue	30% / £10m	2 Years	N
Term deposits with other banks (up to one year)	Green	25% / £6m	1 Year	S
Term deposits with other banks (over one year)	Green	25% / £6m	2 Years	N
Term deposits with building societies	No colour	25% / £2m	3 Months	N
CDs or corporate bonds with banks or building societies	Green	25% / £5m	1 Year	S
Gilt funds	UK sovereign rating AA- or better	25% / £5m	1 Year	S
Property funds	N/A	25% / £2m	Semi-liquid	N

The criteria in this appendix are intended to be the operational criteria in normal times. At times of heightened volatility, risk and concern in the financial markets, this strategy may be amended by temporary operational criteria further limiting investments to counterparties of a higher creditworthiness and/or restricted time limits.

APPENDIX E - Approved countries for investments

Based on lowest available rating

AAA

- Australia
- Canada
- Denmark
- Germany
- Luxembourg
- Norway
- Singapore
- Sweden
- Switzerland

AA+

- Finland
- Hong Kong
- Netherlands
- U.K.
- U.S.A.

AA

- Abu Dhabi (UAE)
- France
- Qatar

AA-

- Belgium
- Saudi Arabia

Agenda Item 9

APPENDIX F - Treasury management scheme of delegation

Full Council

- receiving and reviewing reports on treasury management policies, practices and activities;
- approval of annual strategy.

Cabinet

- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices;
- budget consideration and approval;
- approval of the division of responsibilities;
- receiving and reviewing regular monitoring reports and acting on recommendations;
- approving the selection of external service providers and agreeing terms of appointment.

Finance and Resources Advisory Committee

- reviewing the treasury management policy and procedures and making recommendations to Cabinet.

APPENDIX G - The treasury management role of the section 151 officer

The S151 (responsible) officer is responsible for:

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance;
- submitting regular treasury management policy reports;
- submitting budgets and budget variations;
- receiving and reviewing management information reports;
- reviewing the performance of the treasury management function;
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function;
- ensuring the adequacy of internal audit, and liaising with external audit;
- recommending the appointment of external service providers.

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Item 11 – Adoption of the Allocations and Development Management Plan

The attached report will be considered by the Local Planning and Environment Advisory Committee on 27 January 2015, a Minute extract is therefore not yet available.

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ADOPTION OF THE ALLOCATIONS AND DEVELOPMENT MANAGEMENT PLAN (ADMP)

CABINET – 5 FEBRUARY 2015

Report of Chief Planning Officer

Status: For Decision

Also considered by: Local Planning and Environment Advisory Committee – 27 January 2015
Full Council – 17 February 2015

Key Decision: No

Executive Summary:

The Allocations and Development Management Plan (ADMP) supplements the Core Strategy by identifying housing allocations, areas of employment and important areas of open space. The ADMP also sets out new development management policies, which are consistent with the National Planning Policy Framework (NPPF).

The ADMP was examined by the Planning Inspectorate in March 2014 and a consultation on the Inspector's Main Modifications was held 21 August – 2 October 2014. The Inspector's final report has now been issued. The report finds the Plan sound, subject to the incorporation of the Main Modifications previously consulted upon.

Portfolio Holder Cllr. Piper

Contact Officer(s) Hannah Gooden Ext. 7178 Helen French Ext. 7357

Recommendation to Local Planning and Environment Advisory Committee

That the recommendation to Full Council is endorsed.

Recommendation to Cabinet

That the recommendation to Full Council is endorsed.

Recommendation to Full Council

That the Allocations and Development Management Plan, incorporating the Inspector's main modifications, is adopted.

Reason for recommendation:

To progress the ADMP in accordance with the Local Development Scheme.

Introduction and Background

Agenda Item 11

- 1 Following agreement of the draft Allocations and Development Management Plan (ADMP) by Full Council in February 2013, it was:
 - submitted for examination (November 2013)
 - examined through hearings (March 2014)
 - published for consultation on the Main Modifications (21 August – 2 October 2014) – see Appendix B & C
 - Found ‘sound’ by the Planning Inspector, subject to the incorporation of the Main Modifications (December 2014)

Inspector’s Report on the ADMP

- 2 The final ADMP Inspector’s Report has now been published. It concludes that the plan provides an appropriate basis for the planning of the District, subject to the incorporation of the thirteen Main Modifications.
- 3 The Main Modifications are summarised as follows:
 - The inclusion of a landscape protection policy;
 - The allocation of the reserve housing site at Edenbridge;
 - The amendment of the boundary of the Gas Holders Site, Sevenoaks;
 - The amendment of the allocation at Warren Court, Halstead;
 - The amendment of the boundary of the BT Exchange site, Sevenoaks;
 - The introduction of flexibility into the proposals for the Powder Mills site, Leigh;
 - The inclusion of advice in para 4.6 regarding marketing requirements in relation to the change of use of employment land;
 - The deletion of the open space designation at Broom Hill, Swanley;
 - The allocation of housing (up to 450 dwellings) and employment land at Fort Halstead;
 - The inclusion of more detail regarding monitoring and review (3 modifications); and
 - The commitment to an early review of the Core Strategy.
- 4 The report concludes that the Council has complied with the Duty to Co-operate during the plan preparation and that it is positively prepared, justified, effective and consistent with national policy, and therefore meets the criteria for soundness.

- 5 The Inspector notes that the ADMP does not seek to reassess strategic issues considered by the Core Strategy, such as housing or employment targets. He concludes that the appropriate way to reconsider these issues is to undertake a review of the Core Strategy (or prepare a complete Local Plan) if the new Strategic Housing Market Assessment shows a need to do so (as is now required by one of the modifications). The Inspector has attached significant weight to the Broom Hill appeal decisions and has, through his modifications, taken what opportunities exist to address the 'substantial shortfall' referred to in the appeal decisions. The report states that:

This does not mean that there should be a relaxation in terms of meeting employment needs or protecting the Green Belt and AONB, rather it is a way of increasing housing supply within the Development Plan framework as it currently exists.

- 6 The Inspector's approach, therefore, has been to consider opportunities that exist to increase the number of dwellings that can be accommodated on proposed allocations and to identify additional allocations, where residential development would not be contrary to policies on Green Belt protection and employment land retention, for example. This explains a number of the Inspector's modifications, such as the allocation of the reserve land in Edenbridge and housing as part of an employment-led development at Fort Halstead. The Council's existing policies on density and design of development in the Core Strategy, for example, are unaffected by the Inspector's conclusions on the ADMP.
- 7 The Council is able to decide whether to adopt the plan with the Inspector's change or to not adopt it. Under planning law, it is not able to make substantive changes to the ADMP, following the examination, and it is not able to reject the Inspector's changes.

Next Steps

- 8 The proposal to adopt the ADMP will be reported to Advisory Committee on 27 January, Cabinet on 5 February and Full Council on 17 February.
- 9 Assuming the Council agrees to adopt the Plan, its adoption will be advertised as specified by Regulations, it will be distributed widely, and all of those who participated in the Plan formulation process will be informed of this milestone. The Plan will also be published with an updated Proposals Map.

Conclusions

- 10 This report seeks approval for the adoption of the ADMP.

Other Options Considered and/or Rejected

The Council could choose not to adopt the ADMP. However, this would leave the Council without a Plan for the strategic land use allocation of sites and without up-to-date development management policies and would not represent the best use of resources.

Agenda Item 11

Key Implications

Financial

None – the costs of preparing the ADMP are part of planning policy budget.

Legal Implications and Risk Assessment Statement

None – the Council is required to consult on the Inspector's main modifications.

Equality Impacts

Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different groups. The decisions recommended through this paper directly impact on end users. The impact has been analysed through an EQIA, which has been carried out on the preparation of the ADMP and also the impacts of the main modifications have been assessed via the SA process.

Appendices

Appendix A – [Inspector's Report on the ADMP](#)

Appendix B – [Inspector's letter to the Council regarding 'main modifications'](#)

Appendix C – [ADMP Main Modifications consultation document](#)

Background Papers

[Inspector's Report on the ADMP](#)

[Inspector's letter to the Council regarding 'main modifications'](#)

[ADMP Main Modifications consultation document](#)

[ADMP Draft for Submission](#)

Richard Morris

Chief Planning Officer

Report to Sevenoaks District Council

by David Hogger BA MSc MRTPI MCIHT

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 19th December 2014

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE SEVENOAKS DISTRICT ALLOCATIONS AND DEVELOPMENT MANAGEMENT PLAN

Document submitted for examination on 27 November 2013

Examination hearings held between 11 March and 20 March 2014

File Ref: PINS/G2245/429/6

Abbreviations Used in this Report

ADMP	Allocations and Development Management Plan
AMR	Authority Monitoring Report
AONB	Area of Outstanding Natural Beauty
CD	Core Document (in the Examination)
CS	Core Strategy
ELR	Employment Land Review
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHMA	Strategic Housing Market Assessment

Non-Technical Summary

This report concludes that the Sevenoaks District Allocations and Development Management Plan provides an appropriate basis for the planning of the District, providing a number of modifications are made to the plan. Sevenoaks District Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All the modifications were proposed by the Council and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- The inclusion of a landscape protection policy (EN5);
- The allocation of the reserve housing site at Edenbridge (H1p);
- The amendment of the boundary of the Gas Holders Site, Sevenoaks (H1c);
- The amendment of the allocation at Warren Court, Halstead (H1o);
- The amendment of the boundary of the BT Exchange site, Sevenoaks (H2a);
- The introduction of flexibility into the proposals for the Powder Mills site, Leigh (H2f);
- The inclusion of advice in para 4.6 regarding marketing requirements in relation to the change of use of employment land;
- The deletion of the open space designation at Broom Hill, Swanley;
- The allocation of housing and employment land at Fort Halstead (EMP3);
- The inclusion of more detail regarding monitoring and review; and
- The commitment to an early review of the Core Strategy.

For the avoidance of doubt I have used the same references for the Main Modifications as used by the Council.

Footnote document numbers refer to references from the Examination library, which can be found on the following link:

<http://planningconsult.sevenoaks.gov.uk/consult.ti/ADMPExamlist/consultationHome>

Introduction

1. This report contains my assessment of the Sevenoaks District Allocations and Development Management Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft plan dated November 2013.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These Main Modifications are set out in the Appendix.
4. The Main Modifications that are necessary for soundness all relate to matters that were discussed at the Examination hearings. Following these discussions, the Council prepared a schedule of proposed Main Modifications (and an addendum to the Sustainability Appraisal Report) and these documents have been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Assessment of Duty to Co-operate (the Duty)

5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. It is clear that the ADMP has been prepared within the existing framework provided by the adopted Core Strategy (CS) and therefore matters of a strategic nature (which are subject to the Duty) are very limited. Nevertheless CD115¹ sets out the co-operation undertaken to-date and it is clear that the two large sites which are proposed for development at Leigh and Fort Halstead, which sit close to the District boundary, have been the subject of consultation with neighbouring local planning authorities and other interested parties.
6. Comments were made at the hearing session that there had been no co-operation regarding the identification of up-to-date housing needs within the housing market area. However, as I explain in the following paragraphs, research into housing needs will be a pre-requisite of the review of the CS and is not an issue to be addressed in detail in the ADMP. I conclude that no significant cross-boundary issues have been raised and I am satisfied that the evidence demonstrates that the Council has complied with the Duty.

¹ Duty to Co-operate Topic Paper (CD 115)

Assessment of Soundness

Preamble

7. The Plan establishes in the Foreword, that it must be consistent with the CS which was adopted in February 2011. Paragraph 1.3 provides a summary of the approach advocated in the CS and paragraph 3.2 summarises the housing objectives of the CS. It is clear that the ADMP has been prepared within the framework provided by the CS and that it has not sought to reassess strategic issues such as overall housing or employment needs.
8. The CS was adopted just over a year before the NPPF was published and work on the ADMP had already commenced with a number of public consultation exercises having been undertaken. Although it may be preferable to have a single Local Plan (LP) for a District, there is nothing to prevent an LP being progressed in separate parts at different times and had the Council decided to produce a single all-encompassing Plan at this stage it would have added to the complexity of the process and caused further delay. I acknowledge that the adoption of this plan will not mean that the Council's overall planning framework will fully accord with the NPPF because there are elements in the CS which may not be fully compliant. However, it was not the purpose of this Examination to review strategic matters which are outside the scope of the submitted plan and I believe it is in the public interest for the Council's approach to allocations and development management to be made clear now. There is no robust justification for the Council to have taken a different approach at this late stage in the plan preparation process.
9. In any event the Council is aware of the need to have an up-to-date planning framework in place and the Council's Local Planning and Environment Advisory Committee and Cabinet considered a Report on the Local Development Scheme (LDS) in July 2014. The Committee and Cabinet agreed to undertake a new Strategic Housing Market Assessment (SHMA) to aid the identification of objectively assessed housing need in the District and also to further review the Local Development Scheme² (a further Report is scheduled to be taken to the Committee in January 2015). The Council has confirmed that the assessment of housing need will be carried out once the latest household projections are known, at which time co-operation with other nearby local planning authorities can also be sought. In these circumstances I consider it to be a justified approach.
10. It was argued by some representors that the review of the local plan should not be dependent on the outcome of the SHMA work. To some degree the argument is academic because the Council already acknowledges that the initial indications suggest that the District's housing target will need to be changed³ and if that is the case I interpret MM13 as a commitment to undertake the necessary review. There is logic in the Council's desire to take it one step at a time, starting with evidence gathering to demonstrate that a review is required and there is no reason why this approach would significantly slow down the process. I am satisfied that the Council's current approach is reasonable and that it does not threaten the soundness of the ADMP.

² CD 259

³ Council's response to consultation on MM13 (HDC 67)

11. The Council proposes to refer to its commitment to commence the review process (starting with an up-date of the SHMA) in chapter 1 of the ADMP and I agree that it is important that the Council's commitment is made clear and therefore **MM13** is recommended.
12. Although it is against this background that I have considered the ADMP I have attached significant weight to the conclusions of the Inspector for four recent appeal decisions at Broom Hill, Swanley⁴. He confirmed that it is common ground 'that the need for housing as assessed will not nearly be met by the adopted housing targets arrived at in the CS, which is greatly reduced from the need actually identified because of the constraint represented by the district's Green Belt' and he went on to state that 'the substantial difference between that assessed (i.e. housing need) and that included in the CS will not be made up in other nearby areas'.
13. There are therefore two competing considerations in this regard – the 'very substantial'⁵ shortfall in terms of identifying land to meet objectively assessed housing need; and the fact that the function of the document before me is not to re-assess that need but to allocate land to accommodate the need already identified in the CS.
14. Taking into account:
 - the advice in the NPPF that the supply of housing land should be boosted and that there is a presumption in favour of sustainable development;
 - the Council's commitment to review the CS;
 - the significant constraints to development in the District, for example the Green Belt and the AONB; and
 - the need to balance housing and employment needs;

then I consider that the most pragmatic way forward at this stage is to ensure that any appropriate opportunity to enable the delivery of sustainable housing is taken, in order (at least in part) to address the substantial shortfall referred to in the aforementioned appeal decisions. This does not mean that there should be a relaxation in terms of meeting employment needs or protecting the Green Belt and AONB, rather it is a way of increasing housing supply within the Development Plan framework as it currently exists. In that way this plan will boost housing supply in the District and will provide choice and flexibility in the housing market, whilst ensuring that there is no significant threat to the character and appearance of the District. In these circumstances the most reasonable opportunity available to boost the supply of housing may lie in the allocation of the reserve housing site at Edenbridge (CS policy LO 6) and this opportunity is further discussed under Issue 2.

15. Although not a core element of the discussion, the issue of the 5 year housing land supply was referred to at the hearing sessions and in a small number of written representations. The Council has concluded that the 5 year supply can

⁴ Appeals 2197478, 2197479, 2195874 and 2195875

⁵ Paragraph 15 of appeal decision

be met⁶ but this is based on the housing figures in the adopted CS and therefore the supply will have to be re-assessed as part of the LP review referred to above. In any event the allocation of housing at Edenbridge and the proposed residential development at Broom Hill, Swanley, are likely to boost supply in the shorter term.

16. Concerns were raised regarding the inadequacy of the public consultation undertaken. However, I am satisfied that the Council's approach has been in accordance with the adopted Statement of Community Involvement (SCI) and that no party has been unduly disadvantaged⁷.

Main Issues

17. Taking into account all the representations, written evidence and the discussions that took place at the examination hearings I have identified eight main issues upon which the soundness of the Plan depends.

Issue 1 – The Protection of the Landscape

18. Concerns were expressed regarding the lack of protection for the District's landscape and in particular the Kent Downs and High Weald Areas of Outstanding Natural Beauty (AONB). Paragraph 109 of the NPPF advises that valued landscapes should be protected and enhanced and paragraph 115 confirms that great weight should be attached to conserving landscape and scenic beauty in AONBs.
19. Policy LO8 of the Core Strategy (CS), entitled 'The Countryside and the Rural Economy', does provide a level of protection for the landscape of the area, including AONBs, but it does not meet the advice in paragraph 113 of the NPPF regarding criteria based policies. It is therefore recommended that in order for the Plan to be consistent with national policy, a new policy 'EN5 Landscape', together with appropriate supporting text, is included in the ADMP (**MM1**). The proposed policy would also confirm that areas of tranquillity should be respected, in accordance with NPPF paragraph 123.

Issue 2 – Whether or not the Residential Development Allocations are Sound

Enterprise Way, Edenbridge

20. The ADMP, in paragraph 3.2, refers to the need for its policies to be consistent with the adopted CS policies and in paragraph 3.9 it is stated that 'the Council can meet its Core Strategy housing target without the need to release land in the Green Belt'. In order to provide flexibility policy LO 6 of the CS identifies land at Enterprise Way, Edenbridge as a reserve site for housing. This site has already been subject to public consultation and debate as part of the CS process.

⁶ CD108 and CD113

⁷ See Council's response to Inspector's Question 2 (HDC 02)

Agenda Item 11

Sevenoaks District Allocations and Development Management Plan, Inspector's Report December 2014

21. As referred to in the Preamble above, it is clear that the housing targets in the CS were not formulated in line with current NPPF advice and it has been confirmed by the Council that the need for housing in the District (as identified in the 2008 SHMA) will not be met by the adopted housing figures in the CS⁸. The NPPF advises that, in principle, full objectively assessed needs for housing should be met and the objective should be to significantly boost the supply of housing. On the evidence available I consider that the Council has not taken a sufficiently pro-active approach to considering ways, within the parameters provided by the CS and the ADMP, to meeting current housing need.
22. I refer in the Preamble to considering whether or not there are any opportunities available within the existing planning context for the supply of housing to be increased. One such opportunity is the re-consideration of the CS Reserve Housing Site at Edenbridge⁹ which is not in the Green Belt or the AONB.
23. The Council originally stated that it would be reconsidering the status of the Edenbridge site as part of the Authority Monitoring Report (AMR) at the end of 2014. However, having considered the matter further the Council concluded that 'since both options (i.e. allocate now or release the site following the review of the AMR) would result in the release of the reserve land it seems reasonable that the site should be allocated in the ADMP rather than delaying the allocation until the publication of the AMR in December 2014'¹⁰ and I agree.
24. Concerns were raised by local residents with regard to access, flood risk, infrastructure provision and increased pressure on local services. However, no substantive evidence was presented to demonstrate that those concerns could not be satisfactorily addressed. The Council concludes that access could be satisfactorily provided via St Johns Way and Enterprise Way and it is clear that residential development within the area at risk of flooding would not be supported. In any event a Transport Assessment and a Flood Risk Assessment would be required to accompany any planning application and similarly the developer would be expected to contribute towards any justified improvements in terms of infrastructure and local services. I note that there was no objection to the proposal from either the Highway Authority or the Environment Agency. Following consultation on the MMs, the Council is proposing a minor amendment to MM6 in order to clarify that the development should provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water, and this is appropriate.
25. Bearing in mind the objective of boosting significantly the supply of housing (but also having regard to the need to attach significant weight to the protection of the Green Belt and AONB within the District), and having read and heard the evidence on this matter, I conclude that there is sufficient justification to release this reserve site and formally allocate it in the ADMP. This is the pragmatic way forward. The release of the reserve site at Edenbridge (which is not subject to any significant constraints that cannot be adequately addressed) is justified, would be consistent with national policy and

⁸ Council's Statement on Matter 1 (para 1.6.1) (HDC 35)

⁹ CS policy LO 6

¹⁰ Core document HDC48

would result in a Plan that has been positively prepared. Therefore it is recommended that 'Land west of Enterprise Way, Edenbridge' be added to the list of housing allocations under policy H1 and that explanatory supporting text be included in the Plan (**MM6**).

Sevenoaks Gasholder Station (H1c)

26. It has been confirmed by the landowner that the property at 107 Cramptons Road (which is within the same ownership but adjacent to the identified site) may become available for re-development. In order to ensure that the potential of the site is optimised¹¹ it is appropriate that all the land within the one ownership is identified. To that end it is recommended that the boundary of site H1(c) is extended to include No 107, reflecting the most appropriate strategy for the site (**MM2**).

Warren Court, Halstead (H1o)

27. The site is currently in the Green Belt with part of it having been allocated as an employment site in the adopted Local Plan (saved policy EP1(I)). The Council proposes, through the ADMP, to remove the site from the Green Belt and allocate it for residential development. The Council considers that exceptional circumstances exist because part of the site is allocated for employment use; the existing commercial development is of a poor visual quality; and the proposed development would not have an adverse impact on the openness and visual amenity of the Green Belt, and I agree. It can therefore be concluded that the Council's overall approach to this site is appropriate and sound. No substantive evidence was submitted to demonstrate that the loss of the employment land would have any significant economic consequences.
28. A significant woodland buffer is proposed on part of the site, between the potential development area and the adjacent Deerleap Wood, which I am told is ancient woodland. Although it is important that the impact of any new development on the Green Belt setting of the site is minimised and thus the provision of a buffer would be appropriate, the justification for such a significant area of new woodland is not robust. Consequently it is recommended that the woodland buffer notation is removed from the plan that accompanies the development guidance for the site but that the text continues to refer to the provision of an appropriate buffer. Consequential changes to the net area and the approximate net capacity are also required and consequently recommended (**MM3**). Detailed consideration of the elements of any redevelopment proposal, including the buffer, can be addressed at the planning application stage. This change ensures that the most appropriate strategy for the site is being pursued and that the ADMP is sound in this respect.

Other Housing Allocations

29. Concerns were expressed regarding the deliverability of residential development at School House and Johnsons, Oak Lane, Sevenoaks (H1d and H1e) but the evidence provided by the Council demonstrates that there is no significant impediment to their implementation. Similarly the loss of open

¹¹ NPPF paragraph 58

space was raised in relation to a small number of sites but the Council has provided evidence to demonstrate that in all cases the open space is surplus to requirements or will be replaced elsewhere¹² and thus the requirements of NPPF paragraph 74 are met. No evidence was submitted that would indicate that any of the other Housing Allocations could not be delivered and I am satisfied that with the proposed MMs, policy H1 is sound.

Gypsies and Travellers

30. The Council is currently preparing the 'Gypsy and Traveller Development Plan Document' and the consultation draft on site options was published in May, with adoption scheduled by the end of next year. Until that time CS policy SP 6 which sets out the criteria against which any such proposal would be assessed, provides sufficient guidance. In these circumstances there is no reason for the ADMP to include policies related to gypsies, travellers and travelling showpeople.

Issue 3 – Whether or not the Mixed Use Development Allocations are Sound

BT Exchange, South Park, Sevenoaks (H2a)

31. The land owner of the Sevenoaks Delivery Office (Royal Mail), which is adjacent to the allocated site, has requested that the Delivery Office be re-included within this site allocation (it was included in earlier versions of the Plan). This request is supported by the Council primarily because it would enable a comprehensive redevelopment scheme for the larger area to be achieved. I agree that this is the most appropriate strategy and therefore recommend that policy H2a and the associated development guidance be amended accordingly (**MM4**). It is noted that following consultation on the MMs the Council is proposing a minor amendment to MM4 in order to clarify that the retained Post Office counter facility should provide the same range of services as currently exist and this is an appropriate aspiration.

United House, Goldsel Road, Swanley (H2b)

32. Although the site is occupied by business uses, it is allocated for residential, business and open space uses. CS policy SP 8 seeks to support the sustainable development of the District's economy and specifically refers to the retention, intensification and regeneration of existing business areas. Reference is made in the policy to new provision for business uses in Swanley town centre (which lies very close to the site). The policy goes on to seek the retention of business uses unless there are exceptional circumstances.
33. Against this background the main issues to be addressed (as identified in the Statement of Common Ground¹³) are firstly whether or not the proposed office space is justified and secondly whether or not the identification of two areas of open space, one to the north-west and one to the north-east of the main site, is appropriate.
34. In order to strengthen and update existing evidence an Employment Land

¹² HDC 03

¹³ HDC 32

Review¹⁴ (ELR) was commissioned by the Council which concludes that most of the site should be redeveloped for housing with office space provided on the existing car park close to Goldsel Road.

35. I have attached weight to the Market Review¹⁵ undertaken by Michael Rogers for the United House Group in August 2012. It states that the main office development of any significance within the town centre is White Oak Square which was developed in the 1980's. In August 2012 two units had been on the market since February 2011. However, no substantive evidence was submitted regarding the design, layout or quality of the floorspace on offer. Also referred to is Media House but this is described as being of basic quality and in very dated condition. There is insufficient indication that there is no demand for purpose built up-to-date office accommodation, particularly bearing in mind the economy has continued to improve since 2012.
36. In the conclusion to the Market Review it is not clear if any consideration had been given to the provision of office accommodation on only a relatively small part of this site, as is being proposed by the Council. The reference is to the 'redevelopment of the United House site for offices and warehousing' and while this may be an unviable proposition, there is insufficient evidence to enable a conclusion to be drawn that the provision of about 2,000 sqm of offices on the western car park area would not be viable. Indeed the land owner, in response to my question 4.12, confirms that there is no substantive evidence that the use of part of the site for employment purposes would not be viable or sustainable¹⁶.
37. Having taken into account:
 - the advice in the NPPF that significant weight should be attached to supporting sustainable economic growth;
 - the fact that the policies of the adopted CS reflect that advice;
 - all the employment evidence submitted (including the ELR and the Market Review);and
 - my assessment of the situation having visited the site and its surroundings;

I am satisfied that the Council's approach is sound and that the allocation of office floorspace on the western car park area is justified.

38. In terms of open space the Council has calculated¹⁷ that 0.7 ha would be required in order to meet the relevant standards and it has identified land to the north-west of the proposed residential development to fulfil this need. I saw that the quality of the adjoining built environment is not high – large factory buildings very close to the proposed boundary. NPPF paragraph 56 confirms that great importance should be attached to the design of the built

¹⁴ CD 222

¹⁵ CD 618

¹⁶ United House Group – response to Issues and Questions Matter 4 (HDR United House (Planning Potential) 01

¹⁷ HDC 38 Matter 4

environment. High quality design should be achieved and new development should be visually attractive with appropriate landscaping and public spaces. A good standard of amenity for future residents should be sought and guidance should be provided on layout in relation to neighbouring buildings. Taking into account the relationship between the site and the adjacent factory it can be concluded that the location and delineation of the proposed open space/buffer, as identified in Appendix 5 of the ADMP, is justified and necessary in order to ensure that occupiers of the proposed development would enjoy satisfactory living conditions, including in terms of open space provision and outlook.

39. With regard to nuisance I was told that the adjacent factory is a significant source of noise. However, the Council does not specifically refer to the matter in the Development Guidance, although there is a reference to the need to protect the operational requirements of the adjacent employment site. I am satisfied that the impacts of noise can be addressed through the provision of appropriate mitigation measures such as enhanced glazing and unit design and layout – matters to be addressed at the planning application stage.
40. Turning to the north-east corner of the site I saw that, due primarily to changes in level and its proximity to neighbouring dwellings its development potential is likely to be limited. There is also the risk of surface water flooding. The Council's guidance states that this area 'is likely to remain as open space'. This is a reasonable conclusion for the Council to reach but should a proposal be submitted for an alternative use which is justified and which can satisfactorily be accommodated on this constrained area in all respects, then there is an element of flexibility in the guidance which would not prevent the consideration of such an alternative.
41. In terms of density the Council has based the calculations on a net density of 75 dwellings per hectare which is the figure for Swanley Town Centre as set out in CS policy SP 7. Although not within the defined town centre the site is very close to the boundary and is also within walking distance of the railway station. On this basis the Council's approach to density can be justified.

Powder Mills (former GSK site) Leigh (H2f)

42. The boundary of the site has been drawn to follow the secure employment area formerly occupied by GSK and does not include other small parcels of land (including two dwellings and a small parking area) that are in the same ownership. The site is listed in the CS as a Major Developed Site (in the Green Belt)¹⁸ but national policy has changed since that designation was made and it is appropriate for the Council to have reconsidered the policy and the area to which it would apply. Following my consideration of the representations that were submitted, I identified the route of the boundary as an issue of importance to the soundness of the ADMP (i.e. is it justified?).
43. Just because the land is in the same ownership does not justify its inclusion within what I consider to be a clear site boundary on the ground which relates to the former use of the site. I was told that the dwellings were used by visitors to the site and/or placement students and on that basis I do not

¹⁸ Para 4.5.16

consider them to be an integral part of the employment function of the land, primarily because they are a different use and could reasonably have been located elsewhere. The policies and advice in chapter 7 of the ADMP on the Green Belt would apply to these smaller parcels of land and there is no robust justification for making an exception to those policies in this case. Having taken into account the written submissions, the discussion at the hearing session, my visits to the site and the responses to the proposed MMs (and bearing in mind the location of the site within the Green Belt), I conclude that the Council's approach is justified and in all other respects sound. It has been suggested that I asked the Council to reconsider the delineation of the boundary at the hearing session but neither the Council nor I have any record of such a request.

44. The Development Guide requires the retention of 'Building 12' on the site for employment use. Although of interesting construction the building is not listed, it appears to require significant maintenance and having seen inside, it is clear that substantial work would be required to make it suitable for other business uses. The provision of some employment floorspace on the site is justified but it is not reasonable to require that 'Building 12' must be retained. In order to ensure that this element of the ADMP is justified and effective it is therefore recommended that the reference to retaining 'Building 12' is loosened by the inclusion of the alternative of providing the equivalent floorspace elsewhere on the site (**MM5**). Other requirements for the site as set out in the Development Guide are appropriate and justified.

Other Mixed Use Development Allocations

45. No evidence was submitted that would indicate that any of the other Mixed Use Development Allocations could not be delivered and I am satisfied that with the proposed MMs, policy H2 is sound.

Issue 4 – Whether or not the Employment Allocations are Sound

Relationship between the ADMP and CS policy SP 8

46. CS policy SP 8 advises that 'sites used for business purposes will be retained in business use unless it can be demonstrated that there is no reasonable prospect of their take up or continued use for business purposes during the Core Strategy period'. The submitted ADMP does not provide any further advice on how the Council would interpret this part of the CS policy. Therefore it would not be sufficiently clear to a decision maker how to react to such a proposal¹⁹. It is therefore recommended that additional explanatory text be included in the Economy and Employment chapter to summarise the evidence that may be expected to accompany a proposal for an allocated employment site to be redeveloped for other uses (**MM7**).

Permitted Change of Use

47. The change of use of a building from B1a (office) to C3 (dwelling) is allowed (for a temporary period up to 30 May 2016) subject to consideration of specific land designations and prior notification to the local planning authority. The only exceptions that I was made aware of are the former BT building,

¹⁹ NPPF paragraph 154

Sevenoaks; a number of premises in London Road, Sevenoaks; and The Crown, London Road, Westerham. A number of land owners have indicated that they intend to take advantage of this situation, including in relation to Horizon House, Swanley and Tubs Hill House, Sevenoaks. Although I have taken this into account I do not consider that it justifies a more comprehensive relaxation of the Council's policies, regarding the protection of employment floorspace, which are intended to cover the period up to 2026.

Horizon House, Swanley

48. The representor states that because of the condition of Horizon House, the only viable way to deliver modern office space is through a comprehensive mixed use redevelopment of the site, especially as office growth 'will be flat' over the lifetime of the ADMP.
49. I have attached weight to the Condition Assessment undertaken on behalf of the owner and I have seen no evidence to dispute the total figure of £3,940,000 required to regenerate the building in the long-term (£2,890,000 in the short-term). However, no substantive evidence was submitted to demonstrate that such figures would render the refurbishment not viable. That may well be the case but I have seen no evidence to confirm it. In any event CS policy SP 8, which primarily seeks the retention, intensification and regeneration of existing business uses (for example in Swanley town centre), would allow for a mixed use redevelopment (as an exception) subject to a number of provisos, including where such a proposal would be sustainable. There is therefore sufficient flexibility in the policy and on the evidence submitted I consider that the Council's approach is sound.

Other Land for Business Use

50. No evidence was submitted that would indicate that any of the proposals for the other identified Employment Sites (policy EMP1) should be changed or that their boundaries should be amended. For a number of sites (for example London Road and Lime Tree Walk, Sevenoaks) it was suggested that a mixed use development should be proposed by the Council and that the long-term protection of employment land should be avoided. However, no substantive evidence was provided to demonstrate that the allocation of these sites for employment use was not sound and in the case of London Road, this is one of three sites on which the Council has secured an exemption from the permitted development rights that would, in principle, allow a change of use from office to residential. The exemption was granted because the loss of the site would result in substantial adverse economic consequences.
51. I consider that CS policy SP 8 already provides sufficient flexibility by allowing a change of use on such sites if exceptional circumstances prevail. I am satisfied that with the proposed MMs, policy EMP1 (Land for Business) is sound.

Broom Hill, Swanley

52. Policy EMP4 allocates land at Broom Hill for employment development. The accompanying plan in Appendix 4 to the ADMP identifies land to the west of the allocated site as being 'maintained as open space'. Recent appeal decisions, however, have resulted in permission being granted for the

development of that land²⁰. Consequently it is recommended that the safeguarding of the land for open space be deleted from the plan in Appendix 4 as referred to above (**MM9**).

Issue 5 – Whether or not the Proposals for the Major Developed Employment Site at Fort Halstead are Sound

53. Fort Halstead is a major developed employment site within the Green Belt and the Kent Downs AONB. CS policy SP 8 supports the retention, intensification and regeneration of the site, subject to Green Belt policy. The boundary of the site is drawn relatively tightly around the developed area and excludes the scheduled Fort, the bunkers to the west and the entrance at Star Hill.
54. The first matter to address is whether or not there is sufficient justification to include an element of residential development within the proposal, as set out in policy EMP3. The CS, in the section on major developed sites²¹, refers to former PPGs to which no weight can be attached. However, paragraph 4.5.21 of the CS acknowledges that the requirements of the occupiers of Fort Halstead may change and that the implications of a decline in occupancy will be considered in light of the existing policy framework. That framework has changed and it is therefore reasonable to consider the issues in relation to current policies and NPPF paragraph 89 supports the complete redevelopment of previously developed sites in the Green Belt, whether redundant or in continuing use provided any proposal would not have a greater impact on the openness of the Green Belt and the purpose of including land within it. There is no requirement in the sixth bullet point of paragraph 89 for any such redevelopment to be for the same use as the existing/former use of the site. The important factor is the effect of any redevelopment on the visual qualities of the area.
55. This leads me to the consideration of the impact of the site's redevelopment on the Kent Downs AONB and the Green Belt. I attach great weight to conserving the landscape and scenic beauty of the AONB and retaining the openness of the Green Belt but CS policy SP 8 (and implicitly paragraph 89 of the NPPF) supports the retention, intensification and regeneration of a Major Developed Site such as this, subject to the retention of visual quality. The issue therefore becomes one of ensuring that the impact of any redevelopment would not be greater than already exists. This objective is encapsulated within policy EMP3 and can be further achieved through the development management process and more specifically through the requirements that will be set out in the proposed Development Brief for the site.
56. The use of the site only for employment purposes may be the ideal way forward but the Council's recently commissioned Viability Review²² supports the conclusion that there is unlikely to be demand for the business floorspace that would be forthcoming if the whole site was redeveloped for that use. It also confirms that re-development only for business use is unlikely to be financially viable and that any scheme would need to include more profitable uses to make it viable. Other evidence, including in relation to the sustainability credentials of the site, indicates that the future use of the land

²⁰ Appeals 2197478, 2197479, 2195874 and 2195875

²¹ Page 55 of CS

²² CD 613

solely for employment purposes would not be viable. No substantive evidence to the contrary was submitted and the Statement of Common Ground confirms that the Council accepts that this is the case²³. That said, the Council's position at the hearings was that policy EMP3 should not include a housing figure in order that flexibility would be retained to identify the appropriate level of residential development nearer to the point that the Defence Science and Technology Laboratory plans to vacate the site in 2018.

57. Policy EMP3 refers to widening the mix of uses on the site 'such as including an element of residential development' and bearing in mind the viability evidence relating to this site and the wider issue of housing need (referred to in paragraph 12 above), I consider this is a pragmatic opportunity to contribute to significantly boosting the supply of housing in the District.
58. Bearing in mind the existing policy framework in relation to this site, my conclusion on the first matter is therefore that the allocation of part of the site for residential development is justified in principle but that more detail is required, particularly with regard to dwelling numbers, in order that a decision maker would have a clear indication of how to re-act to a development proposal on the site. Only through the provision of additional detail can it be demonstrated that this element of the ADMP would be justified, effective and consistent with national policy.
59. The second matter to consider, therefore, is the quantity of residential development that would be appropriate. In this regard the Council has undertaken further work on policy EMP3²⁴ as a result of concerns that I expressed about the submitted policy (including a Viability Review and the preparation of a supplement to the SA). It has concluded that the site could satisfactorily accommodate up to 450 dwellings, provided it forms part of an employment-led mixed use scheme. There was some criticism regarding the robustness of the Viability Review, including the fact that inadequate consideration has been given to allocating a lower housing figure and I agree that not all the information upon which the Review is based has been made publically available, on the basis that it is considered to be commercially sensitive. I cannot therefore afford it full weight. However, to some degree that is immaterial because the NPPF makes it clear that the objective should be to boost significantly the supply of housing, whilst also supporting the redevelopment of brownfield land. The presumption is in favour of sustainable development which includes the need to conserve and enhance the natural environment and in particular conserving the landscape and scenic beauty of the AONB and the openness of the Green Belt and I am satisfied that those objectives would be achieved. Although a figure lower than 450 dwellings was not specifically tested, it is clear that even the 450 figure poses some risks in terms of viability and therefore the risks associated with an even lower housing figure would be greater. In any event the Council has retained an appropriate level of flexibility by including the words '**up to 450**' dwellings (my emphasis) in the amended policy.
60. In terms of visual impact (and having walked around the whole site) I am satisfied that the relevant components of policy EMP3 will ensure that the

²³ CD HDC 53

²⁴ CDs HDC66a to HDC66e

development would not compromise the objectives of the AONB or Green Belt. They include the requirement to conserve and enhance the AONB and to ensure that any development would have no greater impact on the openness of the Green Belt than already exists. In terms of protecting the living conditions of existing nearby residents, the policies in the ADMP provide sufficient safeguards.

61. One of the Council's objectives is to secure the retention of QinetiQ (one of the current occupiers of the site), who the Council consider to be a valued employer in the District and who have expressed the desire to remain on the site if it is redeveloped. This is an appropriate aspiration for the Council, to which some weight can be attached. I am also satisfied that although the policy includes flexibility with regard to the exact areas intended for each land use, it nevertheless remains based on the employment-led objectives for the site and continues to seek the provision of 1,200 jobs.
62. Issues relating to the provision of infrastructure (for example transport) have been raised but the policy makes it clear what is expected and there is no reason to doubt that the requirements will be up-dated and strengthened at the time the Planning Brief is prepared and/or during the planning application process. Meanwhile sufficient guidance is provided in the policy. No objections were received from agencies involved in the provision of infrastructure.
63. Other issues raised include the wording of the first sentence of the policy ('will' versus 'may'); the relationship between the proposal and policy LO7 of the CS (development in rural settlements); and the protection of ancient woodland. However, I am satisfied that the level of flexibility is appropriate; the relationship between the policies of the CS and the ADMP is satisfactory bearing in mind changes in circumstances since the CS was adopted; and that sufficient protection would be afforded to the ecological and landscape contributions made by the downland and woodland.
64. On the second matter it can be concluded that the Council has achieved the correct balance. A viable and largely sustainable proposal is being promoted which regenerates a substantial brownfield site without significant detriment to the surrounding countryside, AONB or Green Belt. No substantive or persuasive evidence to the contrary was submitted and I am satisfied that the Council's approach is proportionate and justified and that there are no flaws of such significance that invalidate the overall assessment.
65. In conclusion on Issue 5, I am satisfied that with the changes being proposed by the Council, it would be clear to a decision maker how to react to a development proposal at Fort Halstead. Consequently **MM8** is recommended.

Issue 6 – Whether or not the Green Belt Policies and Boundary are Sound

66. The Green Belt policies (GB1 to GB9) set out the criteria for a range of development types and uses (for example extensions, basements and the re-use of a building) and they are broadly justified and sound.
67. In terms of the Green Belt boundary the CS states that there is no need to amend the boundary but that the case for any small scale adjustments would

be considered through the ADMP²⁵. Consequently the opportunity was given to Town and Parish Councils and land owners/agents to identify any anomalies in the existing boundary. Consideration was given by the Council to the 5 purposes of the Green Belt and to openness – one of the essential characteristics of Green Belts²⁶. As a consequence of the Council's deliberations, three minor amendments to the boundary are proposed in the ADMP (policy GB10). Having visited those sites I agree that the Council has correctly interpreted national policy.

68. Objections were submitted relating to a small number of other Green Belt sites in the District which I also visited. Land at **Deer Leap Stud Farm** (as identified on the plan submitted with the representation) includes an open field which contributes towards safeguarding the countryside from encroachment. The site is currently not well defined along its north-west boundary and could not accurately be described as small-scale. There are no exceptional circumstances to justify removing this site from the Green Belt, or indeed a smaller site just encompassing existing buildings, as was suggested at the Hearing.
69. The site at **The Bungalow, West Kingsdown** appears to be part of the caravan site and includes a derelict single storey building. The proposed western boundary would run through an area of trees/scrub and although I understand that this is the route of the AONB boundary, there is no requirement for boundaries of different designations to follow the same line. This land assists in safeguarding the countryside from encroachment and there are no exceptional circumstances to justify a change in the boundary at this location.
70. **Bartram Farm, Sevenoaks** does include a number of buildings, including a dwelling and business uses but there are also areas of land that are open. The appearance of the site provides an area of transition between the built-up area of Sevenoaks and the countryside to the north. Any significant intensification of development on this land would not assist in checking the unrestricted sprawl of the large built-up area and the retention of the site within the Green Belt contributes to preventing Sevenoaks and Otford from merging and safeguards the countryside from encroachment. The site cannot be described as small-scale and no exceptional circumstances exist to warrant a change in the Green Belt boundary at Bartram Farm.
71. The site at **Main Road, Knockholt** is open in character and includes no buildings. Although it may not be widely visible from the public domain the site nevertheless assists in safeguarding the countryside from encroachment and a change in the boundary would not be justified by exceptional circumstances.
72. Land at **Park Lane, Kemsing** includes a number of trees and scrub but there are no buildings on the site and it is intrinsically open in nature. My attention was drawn to some relatively new development to the east of the site but I was told by the Council that no parallel could be drawn with the site before me because the developed site is not within the Green Belt. I also saw the

²⁵ Para 4.1.17

²⁶ NPPF paragraphs 79 and 80

proximity of the motorway but that is not an exceptional circumstance and there is no justification for removing the land from the Green Belt, especially as the site assists in safeguarding the countryside from encroachment.

73. The entrance to **Greatness Cemetery** (Sevenoaks) makes a significant contribution to the character of the street scene in this part of the settlement. It was argued that if the cemetery had not been located here it is likely that the existing residential frontage development would have continued across the site. This may be the case but I must base my conclusions on the situation as it is today and I consider that the generally open nature of the area helps to check the unrestricted sprawl of Sevenoaks, helps to preserve the setting of the town and assists in safeguarding the countryside from encroachment. There are no exceptional circumstances that would justify the removal of this land from the Green Belt.
74. The area sought for removal from the Green Belt at **Sundridge Place** is extensive in size, open in character and relatively detached from the main settlement. The area assists in safeguarding the countryside from encroachment and there is no justification for removing the land from the Green Belt.
75. The site at the **Former Egerton Nursery, Hextable** is not small scale and although there are a number of structures on the land it is generally open in character. The site contributes to preventing Hextable and Swanley from merging and also assists in safeguarding the countryside from encroachment. The prospect of including a new doctor's surgery on the site was raised but insufficient evidence was submitted to demonstrate that such provision could successfully be achieved or that this site would be the most appropriate location for such a facility. On the basis of the information before me I conclude that there are currently no exceptional circumstances that would justify releasing this site from the Green Belt.

Issue 7 – Whether or not the Other Development Management Policies are Sound

76. The ADMP includes a range of management policies, for example on issues related to design, the town and local centres, green infrastructure, leisure and tourism, community facilities and travel and transport. I consider that they all satisfactorily meet the relevant advice in the NPPF and are sound. Concerns were expressed regarding infrastructure provision, for example in relation to waste water disposal and education but I am satisfied that there are no significant impediments to development which cannot be satisfactorily overcome.

Issue 8 – Whether or not the Council's Approach to Monitoring and Review is Sound

77. To be found sound the ADMP must be effective and to be effective it must be deliverable. In order to measure deliverability a robust monitoring framework is required. The Council rely on the Authority Monitoring Report to undertake the necessary assessment of the effectiveness of the policies in the CS. However, there is no reference to monitoring the ADMP or to any targets that the Council is hoping to achieve. It is therefore recommended that the

performance indicators are strengthened and that specific Targets are introduced (**MM10**, **MM11** and **MM12**). In this way the Plan will be effective.

Assessment of Legal Compliance

78. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Sevenoaks District Allocations and Development Management Plan is identified within the approved LDS ²⁷ (Jan 2012) and in the draft LDS ²⁸ (Dec 2013) which sets out an expected adoption date of August 2014. The Plan's content and timing are broadly compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in February 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	HRA has been carried out and is adequate.
National Policy	The Allocations and Development Management Plan complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Allocations and Development Management Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

79. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

80. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that

²⁷ CD 241

²⁸ CD 241a

with the recommended main modifications set out in the Appendix the Sevenoaks District Allocations and Development Management Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Hogger

Inspector

This report is accompanied by the Appendix containing the Main Modifications

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SEVENOAKS ALLOCATIONS AND DEVELOPMENT MANAGEMENT PLAN: MAIN MODIFICATIONS

INSPECTOR'S PRELIMINARY FINDINGS

This note is without prejudice to any final Report that I may prepare but based on the evidence that I have read and heard I consider there are a small number of shortcomings in the document, relating to soundness, which the Council should address through the agreement of Main Modifications (MMs). They all relate to issues that were discussed at the Hearings and are summarised in the table below:

		Modification	Soundness reason
MM1	New policy	New policy EN5 - Landscape (see HDC49)	Consistent with national policy
MM2	Policy H1(c)	Change Gasholders Site boundary (para 4.2.4 of Council's Statement on Matter 4)	Justified
MM3	Policy H1(o)	Warren Court buffer and amended housing area/figures (see HDC58)	Justified
MM4	Policy H2(a)	Include Sevenoaks Delivery Office within boundary of H2(a) and up-date guidance (see para 4.27.1 of Council's Statement on Matter 4)	Justified
MM5	Policy H2(f)	Powder Mills - introduction of flexibility regarding the retention of Building 12 (see HDC62)	Justified and effective
MM6	See CS policy LO 6	Release of land at Edenbridge (see para 4.13.14 of Council's Statement on Matter 4 and HDC48)	Positively prepared, justified and effective
MM7	Paragraph 4.6	Clarification regarding the relationship between ADMP and CS policy SP8 (see HDC 52a)	Justified
MM8	Policy EMP3	Clarify policy on Fort Halstead	Positively prepared, justified and effective
MM9	Policy EMP4	Removal of open space designation at Broom Hill, Swanley (see HDC34)	Justified
MM10	Implementation and Monitoring	Performance indicators (see para 11.1.2 of Council's Statement on Matter 11)	Effective
MM11	Implementation	Proposed targets (see para 11.1.5 of	Effective

Agenda Item 11

	and Monitoring	Council's Statement on Matter 11)	
MM12	Implementation and Monitoring	CS targets added (see para 11.2.3 of Council's Statement on Matter 11)	Effective

The Council is currently undertaking further work with regards to MM8 and as soon as that work is completed arrangements will be made to publish the detailed MMs on the Examination web site.

On this basis I am therefore inviting the Council to make a formal request under section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended) for me to recommend Modifications to the plan that would make it sound.

Following consultation on the MMs the Council should send me a copy of the submissions received; a brief response to those submissions and a short commentary on any implications of the MMs in terms of the sustainability appraisal.

David Hogger

Inspector

24th April 2014

Allocations and Development Management Plan

Main Modifications Consultation

August 2014



Local Plan



Table of Contents

About the Main Modifications to the Allocations and Development Management Plan	4
Proposed Main Modifications	4
How to view the consultation documents	4
How to comment	4
Summary of Main Modifications	5
Main Modification Details	6
MM1 New Policy EN5 (Landscape)	7
MM2 Policy H1(c) Sevenoaks Gasholder Station, Cramptons Road	9
MM3 Policy H1(o) Warren Court, Halstead	11
MM4 Policy H2(a) BT Exchange, South Park, Sevenoaks	13
MM5 Policy H2(f) Glaxo Smith Kline, Powder Mills, Leigh	15
MM6 Policy H1 (p) Land West of Enterprise Way, Edenbridge	16
MM7 Employment Allocations Paragraph 4.6	20
MM8 Fort Halstead Policy EMP3	21
MM9 EMP4 Land at Broom Hill, Swanley	26
MM10&MM11 Implementation and Monitoring: Performance Indicators and Targets	28
MM12 Implementation and Monitoring: Core Strategy Performance Indicators and Targets	31
MM13 Commitment to review Core Strategy	33

About the Main Modifications to the Allocations and Development Management Plan

Proposed Main Modifications

The Allocations and Development Management Plan was submitted to the Secretary of State for examination by the Planning Inspectorate in November 2013.

Public hearings were held at the Council Offices in March 2014.

Following the public hearings, the Inspector wrote to the Council setting out proposed 'main modifications' to the ADMP that he considers need to be made to make the Plan sound following the public hearings.

All proposed modifications have been subject to Sustainability Appraisal and the findings presented in the Addendum to the ADMP Sustainability Appraisal Report.

These modifications are now subject to a 6 week consultation period.

Following the consultation, submitted comments will be sent to the Inspector along with a brief response to the submissions and a short commentary on any implications of the Modifications in terms of the sustainability appraisal.

The consultation runs from 9am on 21st August to 5pm 2nd October 2014.

How to view the consultation documents

The consultation documents including supporting documents are available to view on the Council's consultation portal at planningconsult.sevenoaks.gov.uk.

Hard copies of the documents can be viewed at the Sevenoaks District Council offices and public libraries throughout the district (see www.sevenoaks.gov.uk for opening hours) during the consultation period.

The Council will also be holding public drop-in sessions, the details of which are available on the consultation portal.

How to comment

You can make comments using several methods:

- By entering your comments through the online portal at planningconsult.sevenoaks.gov.uk
- By completing and returning the consultation form found on the consultation portal to: planning.policy@sevenoaks.gov.uk or Planning Policy, Sevenoaks District Council, Argyle Road, Sevenoaks, TN13 1HG

Comments should be received no later than 5pm on 2nd October 2014.

Summary of Main Modifications

The table below sets out a summary of the main modifications recommended by the Inspector. Details of each Modification can be found in Section 3 and in the examination documents referred to below (for example HDC 49)

Table 1: Sevenoaks Allocations and Development Management Plan Main Modifications

Ref		Modification	Soundness reason
MM1	New policy	New policy EN5 - Landscape (see HDC49)	Consistent with national policy
MM2	Policy H1(c)	Change Gasholders Site boundary (para 4.2.4 of Council's Statement on Matter 4)	Justified
MM3	Policy H1(o)	Warren Court buffer and amended housing area/figures (see HDC58)	Justified
MM4	Policy H2(a)	Include Sevenoaks Delivery Office within boundary of H2(a) and up-date guidance (see para 4.27.1 of Council's Statement on Matter 4)	Justified
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MM9	Policy EMP4	Removal of open space designation at Broom Hill, Swanley (see HDC34)	Justified
MM10	Implementation and Monitoring	Performance indicators (see para 11.1.2 of Council's Statement on Matter 11)	Effective
MM11	Implementation and Monitoring	Proposed targets (see para 11.1.5 of Council's Statement on Matter 11)	Effective
MM12	Implementation and Monitoring	CS targets added (see para 11.2.3 of Council's Statement on Matter 11)	Effective
MM13	Paragraph 1.3	Commitment to review Core Strategy	Consistent with national policy

Main Modification Details

The modifications below are expressed in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text. Changes to the maps are also included.

The page numbers and paragraph numbering refer to the submission ADMP which can be found as a supporting document to this consultation on the consultation portal planningconsult.sevenoaks.gov.uk .

MM1 New Policy EN5 (Landscape)

Ref	Page	Policy/ Paragraph	Main Modification
MM1	P.23	New Policy EN5 (Landscape)	<p><u>Landscape</u> The extensive area of landscape outside the towns and villages contributes significantly to the character of the District. The NPPF outlines the importance of protecting and enhancing valued landscapes and Policy LO8 of the Core Strategy ensures that the distinctive features that contribute to the special character of the landscape will be protected and, where possible, enhanced.</p> <p>61% of the District is located within the Kent Downs or High Weald Areas of Outstanding Natural Beauty (AONB). The NPPF gives great weight to conserving and enhancing landscape and scenic beauty of Areas of Outstanding Natural Beauty, and their setting, giving them the highest status of protection. The distinctive character of the AONBs plays an important part in defining the overall character of Sevenoaks District. Proposals in AONBs will be assessed against Core Strategy Policy LO8, ADMP Policy EN5 and other relevant policies. The AONB Management Plans and associated guidance set out a range of measures to conserve and enhance the distinctive features of each AONB. Any proposal within the AONB must take into account the guidance set out in the appropriate AONB Management Plan and any relevant more specific AONB guidance for example the Kent Downs AONB Landscape Design Handbook (2006), Kent Downs AONB Farmstead Guidance (2012) and Managing Land for Horses (2011).</p> <p>The character of the AONBs and the remainder of the countryside within the District is defined in the adopted Sevenoaks Countryside Assessment SPD. The SPD identifies a number of different character areas and will be used to assess the impact of proposals on landscape character. Tranquillity forms part of the character of certain parts of the landscape within the district as identified by the SPD. Proposals should respect the local landscape character and the specific features identified in the SPD. In addition, proposals should also enhance the character of the countryside by helping secure the landscape actions within the SPD where this would be feasible in relation to the proposal.</p> <div style="border: 1px solid black; background-color: #e6e6fa; padding: 5px; margin-top: 10px;"> <p><u>New Policy EN5: Landscape</u></p> <p>The Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection in relation to landscape and scenic beauty. Proposals within the AONB will be permitted where the form, scale, materials and design would conserve and enhance the character of the landscape and have regard</p> </div>

		<p><u>to the relevant Management Plan and associated guidance.</u></p> <p><u>Proposals that affect the landscape throughout the District will be permitted where they would</u></p> <p><u>a) conserve the character of the landscape, including areas of tranquillity, and</u></p> <p><u>b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD.</u></p> <p><u>Delivery Mechanisms:</u></p> <p><u>The Kent Downs and High Weald Management Plans</u></p> <p><u>The Kent Downs AONB Landscape Design Handbook (2006), Kent Downs AONB Farmstead Guidance (2012) and Managing Land for Horses (2011) and associated guidance</u></p> <p><u>The Sevenoaks Countryside Assessment SPD</u></p> <p><u>Parish Plans</u></p> <p><u>The Residential Extensions SPD</u></p>
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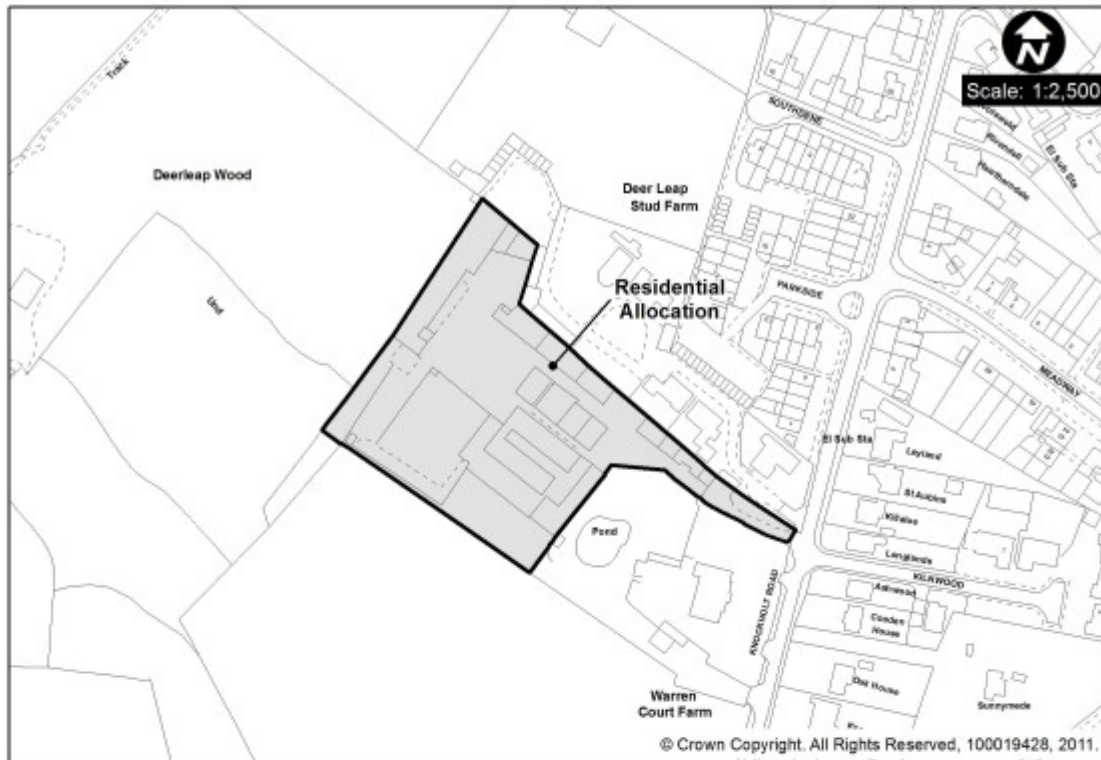
MM2 Policy H1(c) Sevenoaks Gasholder Station, Cramptons Road

Ref	Page	Policy/Paragraph	Main Modification
MM2	Appendix 3	H1(c) Sevenoaks Gasholder Station, Cramptons Road	Gross Area (Ha): 0.88 <u>0.98</u> Net Area (Ha): 0.88 <u>0.98</u> Approximate Net Capacity: 35 <u>39</u> <i>See Map Below</i> (for note only: 107 Cramptons Road is now included in the site boundary)



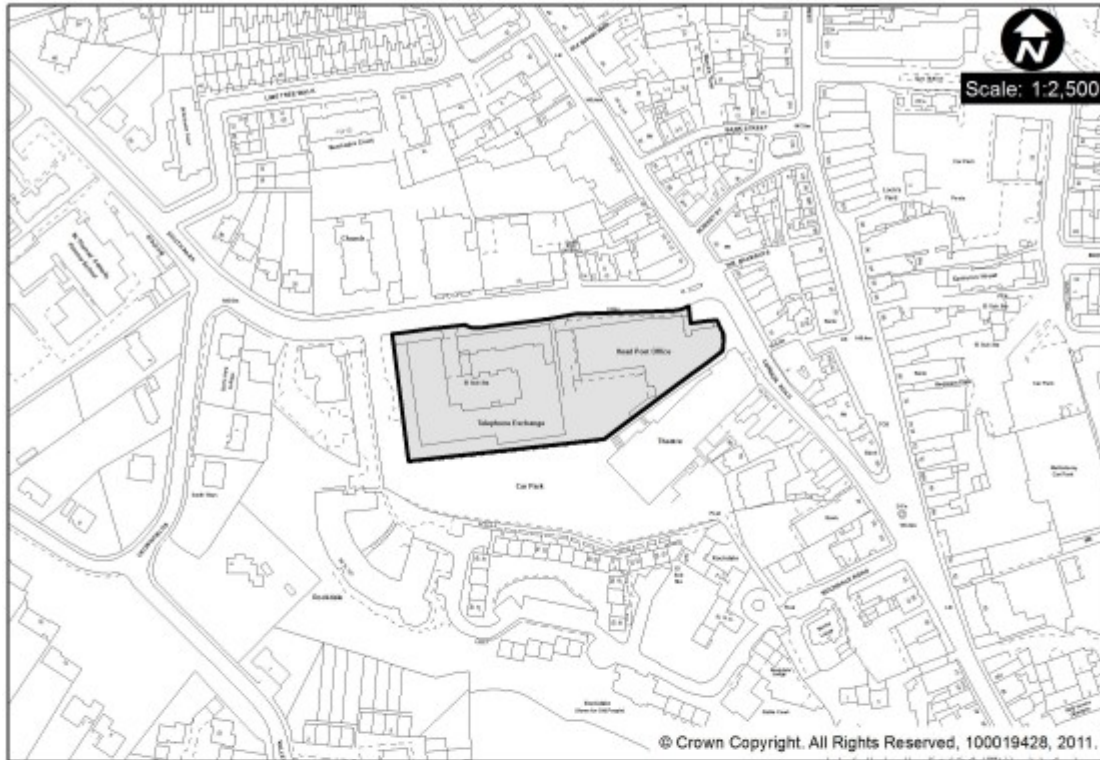
MM3 Policy H1(o) Warren Court, Halstead

Ref	Page	Policy/ Paragraph	Main Modification
MM3	Appendix 3	H1(o) Warren Court, Halstead	<p>Landscape</p> <p>A buffer of woodland is required to protect and extend Deerleap wood to the rear of the site as shown on the accompanying map.</p> <p>Gross Areas (Ha): 1.1</p> <p>Net Area (Ha): 0.69 <u>1.0</u> (to reflect narrow access route)</p> <p>Approximate Net Capacity: 15 <u>25</u></p> <p>(for note only: the hashed area of woodland buffer has been deleted from the plan)</p>



MM4 Policy H2(a) BT Exchange, South Park, Sevenoaks

Ref	Page	Policy/ Paragraph	Main Modification
MM4	Appendix 5	Policy H2(a) BT Exchange, South Park, Sevenoaks	<p>Site Address: <u>Delivery & Post Office / BT Exchange, South Park, Sevenoaks</u></p> <p>Current Use: <u>Post Office / Delivery Office / Telephone Exchange</u></p> <p>Gross Area (Ha): 0.36 <u>0.6</u></p> <p>Net Area (Ha): 0.36 <u>0.6</u></p> <p>Approximate Net Housing Capacity: 25 <u>42</u></p> <p>Design and Layout</p> <p><u>If one element of the site is available for redevelopment in advance of the other, the development should be designed in such a way so as not to preclude the future integration of development, or the operation of the existing functions.</u></p> <p><u>The retention of the Post Office counter facility in a prominent location in the town centre will be required.</u></p> <p>(for note only: the post/delivery office area has been included in the site allocation)</p>



MM5 Policy H2(f) Glaxo Smith Kline, Powder Mills, Leigh

Ref	Page	Policy/Paragraph	Main Modification
MM5	Appendix 5	Policy H2(f) Glaxo Smith Kline, Powder Mills, Leigh	<p>Site Address: Glaxo Smith Kline, Powder Mills, Leigh</p> <p>Development Guide:</p> <p>Design and Layout</p> <p><u>The site is allocated for residential-led mixed use development, including an element of employment space. 'Building 12' shown on the accompanying map should be retained for employment use, or equivalent B1 floorspace (1582sqm) should be provided within the site,</u> with the remainder of the site laid out as residential development in a mix of unit types. Any proposal for residential development that does not include the retention of 'Building 12' <u>or equivalent B1 floorspace</u> would need to justify the loss of employment in line with Policy SP8 of the Sevenoaks Core Strategy.</p> <p>Infrastructure <u>Unless it is confirmed that the proposed foul flow will be no greater than the existing contributing flows from existing premises, the development must provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water. The development should also ensure future access to the existing sewerage infrastructure, if required, for maintenance and upgrading purposes</u></p>

MM6 Policy H1 (p) Land West of Enterprise Way, Edenbridge

Ref	Page	Policy/ Paragraph	Main Modification
MM6	P.28	Reserve Land Paragraph 3.10	<p>3.10 In order to ensure that housing supply remains flexible the Core Strategy (through L06) identifies land at Enterprise Way Edenbridge as a reserve site for housing. The policy states that the site cannot be brought before 2015 and should only be developed in the plan period if the Council cannot identify an adequate five year housing supply would be brought forward for development after 2015 only if required to maintain a five year supply of housing land in the District.</p> <p><u>However, following publication of the NPPF, it is considered that there is a need to bring forward the reserve site now to boost the supply of housing in the District where this would not conflict with strategic objectives (such as protection of the Green Belt and AONB) and the site is included in the residential development allocations in Policy H1. The site has scope for a mix of different types of affordable and market housing. This could include accommodation contributing to housing supply for those with particular needs including a care home facility.</u></p>
MM6 cont.	Appendix 3	Policy H1 (p) Land West of Enterprise Way, Edenbridge	(See following site allocation development guidance)

H1(p) Land West of Enterprise Way, Edenbridge



Site Address:	Land west of St Johns Way and Enterprise Way, Edenbridge	Settlement:	Edenbridge
Ward:	Edenbridge North and East	Proposed Allocation:	Residential and Open Space
Current Use / PP	Greenfield and residential		
Development Guidance:			
Design and Layout			
<p>The site is dissected by an area of flood zone 3a and 3b as shown on the accompanying map. No residential development should be located within this area and sustainable drainage systems (SUDS) will be required as part of any scheme, together with a flood risk assessment. This river corridor should form a feature of the site, and should be managed and enhanced for biodiversity and recreation, in addition to its primary purpose as functional flood plain. Residential development should be located north and south of the constrained flood area.</p> <p>The development will need to be designed to minimise its impact on the Green Belt/ open farmland to the west and scheme design, including building heights and density, should reflect the edge of settlement location of this site. The relationship of the development to the railway lines to the north and south and to the residential and industrial estate to the east will need to be carefully addressed. Proposals should not prejudice the operation of the existing industrial estate, or compromise the amenity of existing and future residents.</p> <p>The size and context of the site make it suitable for a range of housing types, sizes and tenures, including affordable housing in accordance with Council policy. This site is also considered suitable for housing designed for older people (including those with special needs), as it is close to a range of services that would provide for the needs of future occupants.</p>			
Landscape			
<p>The TPO trees within and adjacent to the site should be preserved and form an integral part of the scheme. Landscaping and planting should be integrated into the development and will be required to screen the site from the adjacent countryside, and to provide a buffer between the railway lines, industrial estate, existing residential and the development site. These buffers will also provide biodiversity corridors which will enhance the green infrastructure network and make connections beyond the site. The river corridor should also include biodiversity enhancements. Site biodiversity surveys will be required to ensure any biodiversity concerns are adequately mitigated.</p> <p>Provision of public open space will be required to support the development. The type and layout of open space will be a matter for consultation with the local community, but could include amenity greenspace, children's playspace and allotments, as outlined in the Council's Open Space Study.</p>			
Access			
<p>The primary access to the site should be from St John's Way, with secondary access from Enterprise Way. The existence of the flood zone in centre of the site reinforces the need for multiple accesses.</p> <p>A Transport Assessment will be required to support any future application for the development of the site. Walking / cycling routes into Edenbridge town centre and to Edenbridge / Edenbridge Town station should be improved.</p>			
Infrastructure			
<p>Contributions to CIL will be required. This should facilitate contributions to mitigate impacts of the development on infrastructure, including education.</p>			

Delivery - Principal site owner promoting site for development. The site could come forward in phases, provided no one phase of development would prejudice the development of the area as a whole.			
Gross Area (Ha):	11.8	Net Area (Ha):	9.2(2.6ha flood zone)
Approximate Density (DPH):	30	Approximate Net Capacity:	276
Estimated Development Period:	0-5 years (2012-2016) and 6-10 years (2017-2021)	Source / Evidence Base:	Core Strategy Reserve Land

MM7 Employment Allocations Paragraph 4.6

Ref	Page	Policy/ Paragraph	Main Modification
MM7	P.37	Employment Allocations Paragraph 4.6	<p>Employment Allocations</p> <p>4.6 Core Strategy Policy SP8 is the overarching strategic policy that provides for the retention and creation of employment and business facilities and opportunities throughout the District. <u>It is founded on an evidence base that identifies that employment land supply and demands are broadly in balance over the Core Strategy period (to 2026) (URS Long Term Employment Space Projections, 2011).</u></p> <p><u>Core Strategy Policy SP8 allows for allocated employment sites to be redeveloped for other uses if it can be demonstrated that there is 'no reasonable prospect of their take up or continued use for business purposes during the Core Strategy period'. The Council will expect an applicant seeking a release under Policy SP8 to provide information to show that the site has been unsuccessfully marketed, for use of the existing buildings or partial or comprehensive redevelopment, for a period of at least one year, at a time when the site is available or will be available shortly. The Council will expect marketing to have been proactively carried out for uses potentially suitable for the site and at the appropriate price. In addition, the Council will expect the applicant to demonstrate that forecast changes in market conditions will not result in take up of all or part of the site. In considering this forecasting assessment, the Council will, where relevant and amongst other potentially relevant site-specific issues, have regard to the extent to which the evidence from the applicant suggests that:</u></p> <ul style="list-style-type: none"> • <u>there is insufficient forecast demand for the specific land uses currently on the site;</u> • <u>the location and accessibility of the site prevents it from being attractive for business uses, including any specific types of provision (including business start up units or serviced offices) that may be most appropriate for the location;</u> • <u>the quality of existing buildings and infrastructure requires refurbishment or redevelopment which evidence suggests would not be viable, if necessary;</u> <u>and</u> • <u>the redevelopment for alternative uses would provide non-business use (Use Class B) jobs.</u> <p>‡ <u>Core Strategy Policy SP8 promotes a flexible approach to the use of land for business and employment purposes and as such it is the role of this document to formally identify the sites to which Policy SP8 of the Core Strategy applies.</u></p>

MM8 Fort Halstead Policy EMP3

Ref	Page	Policy/ Paragraph	Main Modification
MM8	P.41-43	Fort Halstead Policy EMP3	<p>Fort Halstead</p> <p>4.13 Fort Halstead is a previously developed site within the Green Belt and the Kent Downs AONB that was originally a Ministry of Defence research establishment and is still occupied by defence related industries. It remains a major employer in the District.</p> <p>4.14 Proposals for a major residential-led mixed use redevelopment of the site were considered and rejected through the Core Strategy process. However the Core Strategy states (para 4.5.21) that the main requirements of the current occupiers of Fort Halstead, QinetiQ and the Defence Science and Technology Laboratory (DSTL), may vary during the Plan period. It adds that the implications of a future decline in occupancy of the site will be considered within the policy framework of the Core Strategy and relevant national planning policy</p> <p>4.15 Since the adoption of the Core Strategy, DSTL, the largest employer, has announced its intention to withdraw from the site by 20162017/8. The Council is working with DSTL, QinetiQ and the site owners to assess and mitigate the impact on the local economy of the planned withdrawal. It will also be working with the owners and other interested parties to develop achievable proposals for the future use and redevelopment of the site. <u>The landowners have stated their intention to bring forward a planning application to redevelop the site for a mix of uses including commercial and residential.</u></p> <p>4.16 Any proposals will be tested against the policy framework provided by the Core Strategy and relevant national policy. The Green Belt status of the site constrains the scale of development that can acceptably be accommodated, while its AONB status provides a further constraint on future development. However, there is substantial development on the site at present, as set out in the CLUED granted by SE/03/02897/LDCEX, and it remains an important employment site subject to Core Strategy Policy SP8 on the protection and regeneration of such sites. The Council will therefore expect future redevelopment to be employment-led, though it recognises that in view of the size of the site and the specialist nature of some of the buildings that there may be some scope for widening the mix of uses if required to support the employment-led regeneration, subject to policy considerations. The size of the site makes it feasible to accommodate a range of housing types and tenures. Policy considerations include the requirement for the resultant development to comply with sustainability principles, including conserving and enhancing the Kent Downs AONB, and sustainable transport proposals for accessing the site. The District Council will expect redevelopment</p>

proposals to provide for approximately 1200 jobs which were provided on site prior to the announced withdrawal of DSTL. The departure of DSTL creates an opportunity to redevelop the site to meet modern business needs. Any redevelopment should meet the following broad objectives:

1. It should be employment-led and should maintain the site's role as an important employment site in the District. Provision should be made for a range of employment uses sufficient to provide for approximately 1,200 jobs, equivalent to the level of employment on site prior to the announced withdrawal of DSTL. There should be flexibility to accommodate types of business with different space needs. Employment-uses should include provision for the retention of Qinetiq in premises to meet their needs and opportunities to attract and accommodate similarly high skilled jobs should be fully explored and planned for. Although not an essential requirement there would be some benefit in including a hotel which could complement other development on the site and assist in improving hotel provision in the District.

2. It should be deliverable. The Council recognizes that delivery of employment-led redevelopment is dependent on the development being viable. It has reviewed the viability of options for redevelopment in the light of the landowner's emerging proposals. This review shows that redevelopment for employment use alone would not be viable and therefore unlikely to come forward in a period that would enable the jobs lost by the departure of DSTL to be replaced in a timely manner. However, with the inclusion of residential development alongside the employment uses, there is the prospect of making the whole development viable. There is substantial development on the site at present, and a CLUED has been granted by the Council (SE/03/02897/LDCEX). The existing employment density of the site is relatively low which means there is scope to replace the existing jobs in a redevelopment on only part of the site creating space for significant residential development as part of a comprehensive development while still keeping within the existing developed area. Evidence produced on behalf of the landowner and reviewed by the Council shows that a development providing replacement employment provision and incorporating approximately 450 dwellings could potentially be accommodated within the existing built confines and without adverse impact on the AONB or an increase in development in the Green Belt. Such a development represents a useful addition to the Council's housing land supply and should enable a range of housing types and tenures to be included.

3. It should be comprehensive. Fort Halstead is a large site and the departure of DSTL could effectively render the whole site redundant unless redevelopment is undertaken. Redevelopment needs to be comprehensive and integrated to ensure a high quality outcome for the whole site and secure a viable future for QinetiQ on the site. A development agreement and phasing plan will be needed to ensure that the development is delivered as a whole in a timely way and in a way that is truly employment-led.

4. It should comply with sustainable development principles. This should include provision of appropriate community facilities on site proportionate to the scale of the development, sustainable transport proposals for accessing the site, sustainable construction methods and provision of green infrastructure and measures to conserve and enhance the Kent Downs AONB in which the site is situated.

5. It should result in no increased impact on the openness of the Green Belt and AONB within which the site lies. This means that development should be contained within the Major Employment Site boundary. In addition the overall quantity of development on the site should not increase (with the CLUED used as a reference point) and the height of buildings should also be contained to avoid any increased visual impact on the surrounding area. Existing woodland around the site incorporates ancient woodland that should be protected in its own right but in addition needs to be retained to ensure the developed site remains well-screened. As far as possible, the overall development should contribute positively to the AONB.

4.17 At this stage it is considered premature to set out a detailed proposal for future redevelopment and Policy EMP3 instead sets out broad sets out requirements for future development and the principles that will apply when redevelopment proposals are being considered. The delivery mechanism to the policy proposes the preparation of a development brief for the site to provide a more specific agreed planning framework.

4.18 The Core Strategy states (para 4.5.20) that the defined boundary of the site from the Saved Local Plan will be reviewed to more fully reflect the developed area in business use. This review has been carried out and the new boundary is shown in Appendix 6

Policy EMP3 - Redevelopment of Fort Halstead

Fort Halstead, as defined in Appendix 6, is allocated as a Major Employment Site in the Green Belt.

Redevelopment proposals will be expected to achieve a range of employment uses appropriate to an employment site such as research and development serviced offices and workshops or land-based employment, and generate at least the number of jobs that the site accommodated immediately prior to the announced withdrawal of DSTL from the site. Redevelopment may also include a hotel. Land based employment, such as the management of the woodland and downland will also be supported, subject to the criteria below.

Residential development of up to 450 units may also be permitted provided it forms part of a mixed used scheme that delivers an employment-led development and is designed and sited in a way that is consistent with the

provision of a range of employment uses appropriate to an employment site. It must also comply with other aspects of the policy.

The inclusion of appropriate community facilities and infrastructure to support the sustainable development of the site consistent with the policy will be required.

Redevelopment of the site will maintain or reduce the amount of built development on the site and be fully contained within the Major Employment Site Boundary. It should have no greater impact on the openness of the Green Belt. The height of the buildings must take into account the need to conserve and enhance the natural beauty of the countryside in this location.

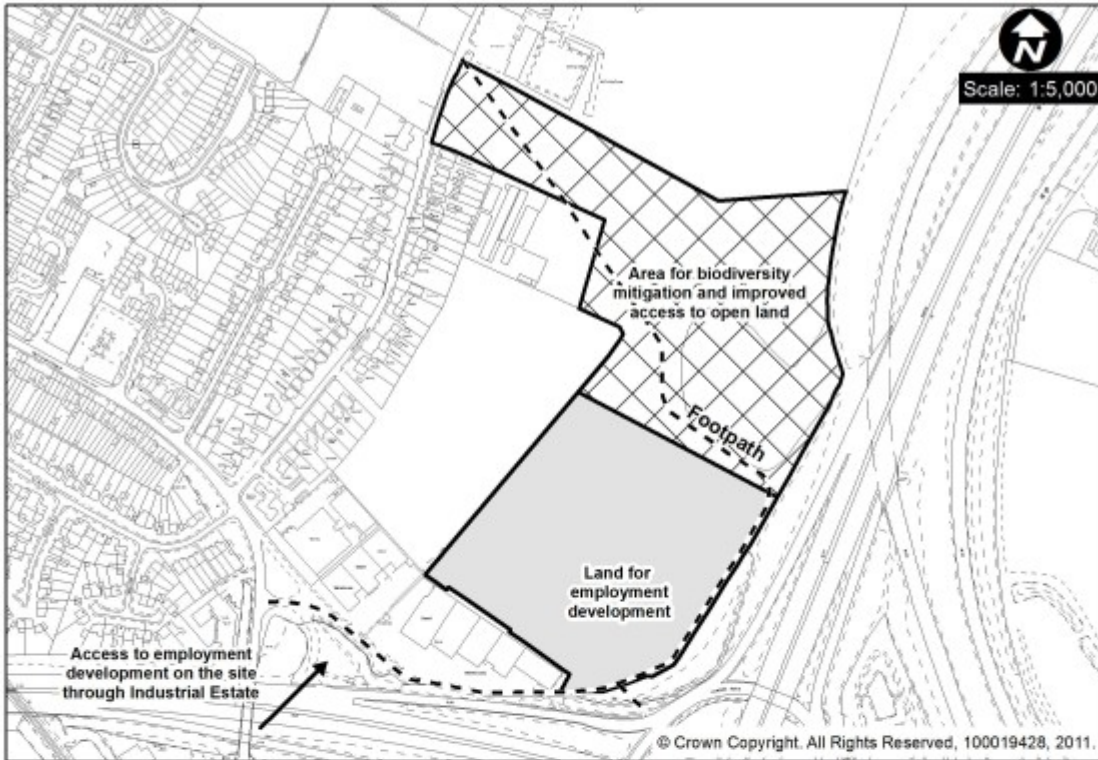
Redevelopment proposals, ~~including those to widen the mix of uses on site, such as including an element of residential development and a hotel,~~ would be expected to:

- Be sustainable in respect of the location, uses and quantum of development and be accompanied by a Travel Plan incorporating binding measures to reduce dependency of future occupants on car use;
- Provide accessibility to jobs, shops and services by public transport, cycling or walking, including proposals for onsite provision proportionate to the proposed development;
- Make a positive contribution to the achievement of aims and objectives of the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquillity of the Kent Downs Area of Outstanding Natural Beauty;
- Confirm, by way of a Transport Assessment, that the development would not have an unacceptable adverse impact on the local and strategic road networks;
- Protect and integrate the Scheduled Ancient Monument and listed buildings into the development with improved access and setting;
- Integrate existing dwellings located in close proximity to the boundary of the Major Employment Site into the new development;
- Incorporate principles of sustainable design and construction to minimise energy consumption in its construction and operation;
- Improve the provision and connectivity of green infrastructure, including the protection, enhancement and management of biodiversity and the provision of improvements to the Public Right of Way network.
- Provide for a comprehensive development and include a phasing plan, including phasing of infrastructure

			<p data-bbox="592 208 1378 275">provision, showing how each phase of the development will contribute to the implementation of the policy.</p> <p data-bbox="592 353 879 387">Delivery Mechanism:</p> <p data-bbox="592 416 1347 539">A Planning Brief will be prepared to guide the redevelopment of Fort Halstead, in consultation with, amongst others, the site owners, local parish councils, the Kent Downs AONB Unit and infrastructure providers</p>
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MM9 EMP4 Land at Broom Hill, Swanley

Ref	Page	Policy/ Paragraph	Main Modification
MM9	P.44	Broom Hill Paragraph 4.30	The 'Employment Land Review' (2007) and the 'Employment Land Review Update' (2011) are based on the development of 4.1ha of the total 8.1ha allocated for employment use at Broom Hill. This provides the opportunity to consider a mix of uses on the site. Planning permission was recently granted for residential development on the western half of the site for up to 61 dwellings, partly on the basis that employment requirements could be met on the eastern half. The Council consider that the site is suitable for a mix of employment proposed allocation remains suitable for employment development, as well as providing opportunities for improved open space provision on the site and land in the Green Belt to the north.
		Appendix 4	EMP4 Land at Broom Hill, Swanley (Note: annotation 'land to be maintained as open space' deleted on the western edge of the site)
		Appendix 9	Delete designation 2053 (Land at Broom Hill) for natural and semi natural open space on the map of Swanley. Delete corresponding entry in the schedule (listed as 2063).



MM10&MM11 Implementation and Monitoring: Performance Indicators and Targets

Ref	Page	Policy/ Paragraph	Main Modification	
MM10 & MM11	Various	Implementation and Monitoring Performance Indicators and Targets	Performance indicator	Proposed Target
			Environment p. 26	
			Number of applications for demolitions in Conservation Areas	No demolitions should be granted contrary to advice from the Conservation Officer and/or English Heritage.
			Housing p. 36	
			Progress on delivering new housing on Housing Allocation sites	Housing allocations completed in line with the phasing set out in the development guidance in Appendix 3 of the ADMP
			Progress on delivering new housing on mixed use allocation sites	All mixed use allocation sites completed in line with the phasing set out in the development guidance in Appendix 5 of the ADMP
			Additional completed units from residential subdivision	No additional completed units granted contrary to policy or overturned at appeal following a refusal
			Number of completed housing sites with a net loss of units	No more than 5% of completed housing sites to have net loss during the plan period.*
			Economy and Employment p. 45	
			Maintenance of Employment Allocations and Major Developed Employment Sites in the Green Belt	No loss of Employment Allocations and Major Developed Employment Sites in the green belt
			Progress on Broom Hill development	Development completed within the Plan period.
			Change in Employment floor space in non allocated sites	No annual net loss of employment floor space across the District
			Town and Local Centres p. 55	
			Percentage of A1 frontage within Primary Frontages	At least 70% A1 frontage within Primary Frontage of Sevenoaks Town Centre

of Sevenoaks Town Centre	
Percentage of A1 frontage within Primary Retail Frontage of Edenbridge Town Centre	At least 45% A1 frontage within Primary frontage of Edenbridge Town Centre
Green Infrastructure and Open Space p. 65	
Development of school playing fields	No development of school playing fields contrary to policy or overturned at appeal
The Green Belt p. 83	
Proportion of additional employment floor space in Urban Confines	90% of newly built employment (B use classes), excluding replacement buildings, to be within the Urban Confines during the plan period**
Proportion of completed housing in Urban Confines	80% housing units to be built within Urban Confines***
Proportion of residential Green Belt applications overturned at appeal for: Extensions, Basements, Outbuildings, Replacement dwellings	No refused proposals for extensions, basements, outbuildings or replacement dwellings overturned at appeal
Net additional caravan/mobile home units for agricultural and forestry workers in the Green Belt	No refused proposals for additional caravan/mobile home units for agricultural and forestry workers in the Green Belt overturned at appeal
Leisure and Tourism p. 87	
Additional Hotel and Tourist Accommodation Units in Urban Confines and Green Belt	No net loss of hotel and tourist accommodation in the District
Additional Tourist attractions and facilities	No net loss of tourist attractions and facilities in the District
Number of equestrian related applications	No refused equestrian related development overturned at appeal

		<table border="1"> <tr> <td><i>overturned at appeal</i></td> <td></td> </tr> <tr> <td><i>Development at Brands Hatch</i></td> <td><i>No refused proposals for development at Brands Hatch overturned at appeal</i></td> </tr> <tr> <td colspan="2">Community Facilities p.89</td> </tr> <tr> <td><i>Development of redundant school buildings</i></td> <td><i>No development of redundant school buildings where the applicant was not able to show that alternative community uses were not previously considered.</i></td> </tr> <tr> <td colspan="2">Travel and Transport p. 94</td> </tr> <tr> <td><i>Number of developments which include publicly accessible electric vehicle charging points</i></td> <td><i>A net increase in electric vehicle charging points over the plan period</i></td> </tr> <tr> <td><i>Number of developments which depart from Vehicle Parking Guidance Note</i></td> <td><i>No developments permitted which depart from Vehicle Parking Guidance Note</i></td> </tr> </table>	<i>overturned at appeal</i>		<i>Development at Brands Hatch</i>	<i>No refused proposals for development at Brands Hatch overturned at appeal</i>	Community Facilities p.89		<i>Development of redundant school buildings</i>	<i>No development of redundant school buildings where the applicant was not able to show that alternative community uses were not previously considered.</i>	Travel and Transport p. 94		<i>Number of developments which include publicly accessible electric vehicle charging points</i>	<i>A net increase in electric vehicle charging points over the plan period</i>	<i>Number of developments which depart from Vehicle Parking Guidance Note</i>	<i>No developments permitted which depart from Vehicle Parking Guidance Note</i>
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<i>Number of developments which depart from Vehicle Parking Guidance Note</i>	<i>No developments permitted which depart from Vehicle Parking Guidance Note</i>															
		<p><u>* Since 2006, 548 housing sites have been completed of which 7 (2.8%) had an overall net loss of units.</u></p> <p><u>** Since 2006, 1.4% of additional newly built (excluding replacements) employment (B use classes) floorspace built within the District was within the Green Belt.</u></p> <p><u>***Since 2006, 80% of net housing was built within the Urban Confines. Of the remaining 20%, 17% completed housing units were considered appropriate development within the Green Belt including rural exception sites, conversions of existing buildings and redevelopment of sites where there is no greater harm to the openness of the green belt.</u></p>														

MM12 Implementation and Monitoring: Core Strategy Performance Indicators and Targets

Ref	Page	Policy/ Paragraph	Main Modification	
MM12	Various	Implementation and Monitoring Core Strategy Performance Indicators and Targets	Core Strategy Performance Indicator	Target
			Chapter 1. Sustainable Communities and Development Principles p.14	
			Proportion of completed housing in main settlements of Sevenoaks, Swanley and Edenbridge	68% of the housing supply in predicted to be within Sevenoaks Urban Area and Swanley. 74% of the housing supply is predicted to be within Sevenoaks Urban Area, Swanley and Edenbridge.
			Change in Employment floor space in the Main Settlements	The overall stock of employment land to be maintained
			Proportion of additional employment floor space in Urban Confines	The overall stock of employment land to be maintained
			Proportion of completed housing in Urban Confines	No new dwellings were allowed on appeal by the Planning Inspectorate within the Green Belt
			Changes in Settlement Hierarchy services and facilities score for individual settlements	No loss of services and facilities that serve the local community within rural settlements
			Chapter 2. Environment p. 26	
			Performance of new housing against Building for Life criteria	Two thirds of new housing development to be rated good or better against the Building for Life criteria and no development to be rated poor.
			Changes in Settlement Hierarchy services and facilities score for individual settlements	No loss of services and facilities that serve the local community within rural settlements
			Change in the number of Heritage Assets	No loss of listed buildings, historic parks and gardens, scheduled monuments or sites of archaeological interest.
			Change in Conservation Area extents	No reduction in the extent of Conservation areas due to insensitive development
			Chapter 5. Town and Local Centres p.55	

		Change in Retail floorspace in the main settlements	Approximately 4000sqm net additional floorspace to be provided in Sevenoaks Town Centre by 2026.
		Swanley Regeneration Scheme	A town centre regeneration scheme, consistent with the Core Strategy, to be approved within five years and completed within ten years of the Core Strategy adoption.
		Changes in Settlement Hierarchy services and facilities score for individual settlements	No loss of services and facilities that serve the local community within rural settlements
Chapter 6. Green Infrastructure and Open Space p.65			
		Protection of Open Space Allocations	To maintain the Open Space allocations
Chapter 9. Community Facilities p.89			
		Changes in Settlement Hierarchy services and facilities score for individual settlements	No loss of services and facilities that serve the local community within rural settlements

MM13 Commitment to review Core Strategy

Ref	Page	Policy/ Paragraph	Main Modification
MM13	Page 11	Paragraph 1.3 Core Strategy	<p>Core Strategy</p> <p>1.3 The Core Strategy promotes sustainable development. It is the over-arching planning document that sets out the Council's vision, strategic objectives and broad policies for the amount and location where future development should be sustainably located in the District over the period 2006 -2026, as well as a number of generic policies concerning, for example, design quality, sustainable development and infrastructure provision.</p> <p><u>Subject to the findings of an up-to-date Strategic Housing Market Assessment, which the Council will commence in 2014, the Council commits to undertake an early review of the Core Strategy, in part or in whole, within the next five years, in accordance with the National Planning Practice Guidance, in order to ensure that it has an up-to-date suite of policies and proposals in place to deliver sustainable growth in accordance with the NPPF.</u></p> <p>A summary of the approach included in the Core Strategy is set out below.....</p>

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Item 12 – Adoption of the Development in the Green Belt Supplementary Planning Document (SPD)

The attached report will be considered by the Local Planning and Environment Advisory Committee on 27 January 2015, a Minute extract is therefore not yet available.

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ADOPTION OF THE DEVELOPMENT IN THE GREEN BELT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

CABINET – 5 FEBRUARY 2015

Report of Chief Planning Officer

Status: For Decision

Also considered by: Local Planning and Environment Advisory Committee – 27 January 2015

Key Decision: No

Executive Summary:

The Development in the Green Belt SPD provides detailed guidance on the implications of applying for planning permission for development located within the Green Belt. It explains how the Green Belt policies that have been found sound in the Allocations and Development Management Plan will be implemented. The guidance will help to ensure consistency in decision making when determining planning applications in the Green Belt.

The SPD has been amended following public consultation in February 2013, and this report seeks the adoption of the document.

Portfolio Holder Cllr. Piper

Contact Officer(s) Emma Boshell (7358)

Recommendation to Local Planning and Environment Advisory Committee:

That the recommendation to Cabinet is endorsed.

Recommendation to Cabinet:

That the Development in the Green Belt SPD is adopted.

Reason for recommendation:

To ensure consistency in decision making when determining planning applications in the Green Belt.

Introduction and Background

- 1 The Development in the Green Belt SPD was drafted in early 2013 and provides detailed guidance on the implications of applying for planning permission for development located within the Green Belt. The document builds on the Green

Agenda Item 12

Belt policies in the Allocations and Development Management Plan (ADMP), which have now been found sound following examination in March 2014. It will help to ensure consistency in decision making when determining planning applications in the Green Belt and provide guidance to applicants on how the policies will be applied.

- 2 The SPD will be used by the Council in determining planning applications.
- 3 Public consultation was carried out between 21 March and 2 May 2013, at the same time as the ADMP, for 6 weeks. All contacts on the Local Plan consultation database were notified by email or by letter, including Parish and Town Councils, and a notice was placed on the Council's website. Copies of the document were placed in local libraries for inspection.
- 4 A total of 42 representations were received from members of the public, Parish and Town Councils, agents and other stakeholders. A summary of these comments is set out in Appendix A.
- 5 A number of amendments are proposed:
 - In response to comments made during the public consultation;
 - In response to updates to government guidance;
 - In response to amendments to the Green Belt policies in the ADMP; and
 - A number of general minor amendments relating to the presentation of the document and the updating of planning terms.
- 6 These amendments are set out in Appendix A, and incorporated into the document itself at Appendix B.
- 7 The Council is unable to make significant amendments to policies in the ADMP without undertaking further consultation and submitting the revised policies for examination again.

Conclusions

- 8 This report seeks approval for the adoption of the Development in the Green Belt SPD.

Other Options Considered and/or Rejected

The Council could choose not to adopt the Development in the Green Belt SPD. However, this is not recommended as it would leave the Council without consistency in decision making when determining planning applications in the Green Belt.

Key Implications

Financial

None – the costs of preparing the Development in the Green Belt SPD are part of the Planning Policy budget.

Legal Implications and Risk Assessment Statement

None – the Development in the Green Belt SPD has been prepared consistent with national planning policy and guidance and is a subsidiary document to the ADMP, which has been found sound.

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.

Appendices

Appendix A – Summary of comments and proposed amendments to the Development in the Green Belt SPD

Appendix B – Development in the Green Belt SPD (as amended)

Background Papers:

[Allocations and Development Management Plan \(submission\)](#)

Richard Morris
Chief Planning Officer

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APPENDIX A – Summary of comments and proposed amendments to the Development in the Green Belt SPD

Chapter 2 – Overview of Green Belt Policies

Comment ID	Consultee Name	Company / Organisation	Support / Object to changes	Summary of Comment	Officer Response
GB17	Christine Lane	Edenbridge Town Council	Support subject to changes	* Concerned that the definition of Green Belt in paragraph 2.1 is misleading, as it could be interpreted that the Green Belt exists to retain countryside.	* Noted, however paragraph 2.1 reflects the definition of Green Belt as set out in the NPPF – no change.
GB38	Brian Lloyd	CPRE Protect Kent	Support subject to changes	<p>* Paragraph 1.2 should be amended – SPDs do not form part of the Local Plan.</p> <p>* The word ‘acceptable’ in paragraph 4.6 should be amended to ‘appropriate’ to reflect the language used in the NPPF.</p> <p>* The description of the term ‘development plan documents’ in the glossary should be amended to remove the reference to SPDs.</p>	<p>* Agree – the NPPF states that SPDs are capable of being a material consideration in planning decisions but are not part of the development plan. Amend paragraph 1.2:</p> <p><u>‘Once adopted the SPD provides additional information to assist with the interpretation and implementation of policies set out in the Core Strategy and Allocations and Development Management Plan (ADMP), and is will form part of Sevenoaks District Council’s Local Plan (also known as the Local Development Framework) and will be used by the District Council in determining planning applications.’</u></p> <p>* Agree – amend paragraph 4.6:</p> <p>‘To avoid increasing impact, conversions that involve disproportionate extensions will not be considered acceptable <u>appropriate</u>...’</p> <p>* Agree – amend the term ‘Development Plan Documents (DPD)’ in the Glossary to exclude Supplementary Planning Documents.</p>

				* References to the 'proposals map' should be amended to 'policies map'.	* Agree – amend paragraph 1.6 and the Glossary to replace the word 'proposals' with 'policies'.
GB39	Liz Shier	Kent County Council	Support subject to changes	* The Green Belt policies in the ADMP are repeated in the SPD – considered unnecessary and should be removed from the SPD.	* Noted, however it is considered that the inclusion of the Green Belt policies in the SPD provide clarity for the reader and prevents cross referencing – no change.
GB40	Liz Shier	Kent County Council	Support subject to changes	* Policy GB4 should be amended to require replacement dwellings to harmonise with the historic character of the surrounding area with respect to layout, materials, massing and scale.	* Noted, however policy GB4 has been found sound by the Planning Inspector – no change.

Chapter 3 – Limited Residential Infill in Villages in the Green Belt

Comment	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB3	Jennifer Wilson	Environment Agency	Support	No further comments received.	* Support noted – no change.
GB6	Trevor Hall	Kent Police	Object	No further comments received.	* Objection noted – no change.
GB41	Alan Gunne-Jones	Planning & Development Associates	Object	<p>* Paragraph 3.1 states that 'development within villages in the Green Belt is limited to small scale infilling'. This is not consistent with Core Strategy policy L07 which refers to 'infilling and redevelopment on a small scale' or the NPPF which refers to limited infilling.</p> <p>* Paragraph 3.2 misrepresents the NPPF – limited infilling is not inappropriate development, and there is no reference to preserving the</p>	<p>* Noted, however it is considered that paragraph 3.1 is consistent with Core Strategy policy L07 and NPPF paragraph 89 – no change.</p> <p>* Agree in part – NPPF paragraph 89 considers exceptions to inappropriate development in the Green Belt. Amend paragraph 3.2 for clarity:</p>

				<p>openness of the Green Belt.</p> <p>* Paragraph 3.3 definition of infilling is considered too restrictive and contrary to the NPPF. The paragraph should be deleted.</p> <p>* Paragraph 3.4 definition of substantially built up frontage too restrictive and precludes appropriate development within Core Strategy policy LO7 settlements. The paragraph should be deleted.</p>	<p>'The National Planning Policy Framework (NPPF) states that <u>limited infilling in villages, and limited infilling of brownfield sites which would not have a greater impact on the openness of the Green Belt, are is not inappropriate development in the Green Belt, provided it preserves the openness of the Green Belt.</u>'</p> <p>* Noted, however neither the NPPF nor NPPG provide a definition of 'infilling', therefore the SPD aims to provide clarity on what is and is not acceptable. The main aim of Green Belt policy is to keep land open, therefore infill development beyond an appropriate scale would compromise the purposes of the Green Belt. It is considered that paragraph 3.3 provides such clarity – no change.</p> <p>* Noted, however neither the NPPF nor NPPG provide guidance on what constitutes an appropriate location for infilling, therefore the SPD aims to provide clarity on where infilling is and is not acceptable. By its very nature, in order to 'infill' a piece of land, it requires existing development either side, and Core Strategy policy LO7 resists development outside of defined boundaries. It is considered that paragraph 3.4 provides such clarity – no change.</p>
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Chapter 4 – Conversion of Buildings in the Green Belt

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB11	Phil Aelen	DHA Planning	Support subject to changes	* The reference in paragraph 4.2 to Core Strategy policy SP8 which sets out the Council's preference for	* Noted, however Core Strategy policy SP8 is an adopted policy and cannot be changed through the SPD – no change.

<p>Page 242</p>				<p>commercial re-use rather than residential is not consistent with NPPF paragraph 55 and should be deleted.</p> <p>* NPPF paragraph 90 notes that the re-use of buildings is not inappropriate providing that they are ‘of permanent and substantial construction’. However ADMP policy GB7(b) states that the should be ‘capable of conversion without major or complete re-construction that would detract from their original character’. This is a more onerous test than the NPPF and should therefore be deleted.</p> <p>* Paragraph 4.4 requires ‘at least 75% of the original structure maintained’ – this is an unjustified approach and should be deleted.</p>	<p>* Noted, however neither the NPPF nor NPPG provide guidance on what constitutes a building that is ‘of permanent and substantial construction’, therefore the SPD aims to provide clarity on the matter. By quantifying what the applicant needs to demonstrate in submitting an application for the re-use of a building within the Green Belt, it is considered that criterion b) in policy GB7 provides such clarity. In addition policy GB7 has been found sound by the Planning Inspector – no change.</p> <p>* Noted, however paragraph 4.4 sets out that the conversion of a building that requires substantial rebuilding in order to make it suitable for re-use will not be permitted. In order to quantify this, the Council suggests that at least 75% of the original structure should be maintained to protect its character. However, this is only a starting point, and the paragraph is suitably flexible to recognise that a lesser proportion could be acceptable – no change.</p>
<p>GB18</p>	<p>Holly Ivaldi</p>	<p>Eynsford Parish Council</p>	<p>Object</p>	<p>* ADMP policy GB7 is much weaker than Local Plan policy GB3B.</p> <p>* The wording needs to be robust enough to prevent agricultural buildings being built under permitted development where the intention may be to convert to residential at a later date – applications should require agricultural justification for proposals. Suggested wording: ‘Where little or no</p>	<p>* Noted, however policy GB7 has been found sound by the Planning Inspector – no change.</p> <p>* Noted, however paragraph 4.7 addresses this concern. There has been a recent change to the General Permitted Development Order affecting agricultural buildings therefore an additional paragraph is proposed under paragraph 4.7:</p> <p><u>‘4.8 In April 2014, permitted development rights were amended to allow the change of use of</u></p>

				<p>agricultural use has been made of the building and a request for conversion is received, removal of the building should be the preferred option’.</p> <p>* ADMP policy GB7 may encourage speculative building in the Green Belt.</p>	<p><u>agricultural buildings and land to residential to be considered under prior approval, rather than the submission of a full planning application. This applies to agricultural buildings up to 450 square metres for conversion to a maximum of three dwellings, providing there is no increase to the external dimension of the existing building. Home owners and developers who are considering such conversions are encouraged to refer to this guidance.’</u></p> <p>* Noted, however policy GB7 has been found sound by the Planning Inspector – no change.</p>
GB33	J L Phillips	Tandridge District Council	Support	<p>* Agrees that the re-use of buildings in the Green Belt may be appropriate, providing there is no additional impact than the present use on the openness of the Green Belt.</p> <p>* Considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p>	<p>* Support noted – no change.</p> <p>* Support noted – no change.</p>

Chapter 5 – Residential Extensions and Replacement Dwellings

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB1	Cllr John Scholey	Edenbridge and District Community Link	Support subject to changes	<p>* ADMP policy GB1(c) – does the reference to ‘outbuildings within 5m of the existing building’ mean outbuildings that are wholly or partly within 5m of the existing building?</p> <p>* Paragraph 5.20 – if a loft is</p>	<p>* Noted, policy GB1 does not require outbuildings to be wholly within 5m of the existing dwelling, only partly within 5m – no change.</p> <p>* Noted, however paragraph 5.20 addresses</p>

				converted to habitable space by the use of roof lights, will this floorspace form part of the floorspace of the 'original building' when calculating the 50% limit for future extensions?	this concern – no change.
GB12	Phil Aelen	DHA Planning	Support subject to changes	<p>* ADMP policy GB1 should be amended to delete criterion (c). The floorspace limit of 50% does not reflect the NPPF.</p> <p>* Supports ADMP policy GB4(b) and considers this policy wording should be used in policy GB1 as well, rather than reference to a floorspace limit.</p>	<p>* Noted, however policy GB1 has been found sound by the Planning Inspector – no change.</p> <p>* Noted, however policies GB1 and GB4 have been found sound by the Planning Inspector – no change.</p>
GB14	C Milligan	N/A	Support subject to changes	* Insufficient emphasis on design in ADMP policy GB4 – the document should include reference to design guidance e.g. the Kent Design Guide.	* Noted, however the SPD includes a section on design guidance, at chapter 11 – no change.
GB20	Holly Ivaldi	Eynsford Parish Council	Support subject to changes	<p>* Is newly created floorspace in the roof included in the total floorspace for future calculations? Would parish councils be sent plans of such applications for reference in assessing future applications in order to calculate cumulative increases?</p> <p>* Is newly created floorspace in the basement included in the total floorspace for future calculations? Would parish councils be sent plans of such applications for reference in assessing future applications in order to calculate cumulative increases?</p> <p>* Are granny annexe type developments included in the definition</p>	<p>* Noted, however paragraph 5.20 addresses this concern. Parish councils will receive the plans that are applicable for the consideration of the planning application – no change.</p> <p>* Noted, however paragraph 5.26 addresses this concern. Parish councils will receive the plans that are applicable for the consideration of the planning application – no change.</p> <p>* Noted, a granny annexe is an outbuilding if it is a separate building to the main dwelling, and of</p>

				of 'outbuildings'?	an ancillary use – no change..
				* Strongly agree with paragraph 5.6.	* Support noted – no change.
GB28	J L Phillips	Tandridge District Council	Support	<p>* Agrees with ADMP policy GB5 and considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p> <p>* Agrees with ADMP policy GB1 and considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p> <p>* Agrees with ADMP policy GB4 and considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p> <p>* Agrees with ADMP policy GB3 and considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p>	<p>* Support noted – no change.</p> <p>* Support noted – no change.</p> <p>* Support noted – no change.</p> <p>* Support noted – no change.</p>

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB24	Holly Ivaldi	Eynsford Parish Council	Support	<p>* Typo in ADMP policy GB9(b) – ‘not’ used twice.</p> <p>* ADMP policy GB9(c) – would be clearer if the text said ‘use class’ rather than ‘use’.</p>	<p>* Noted, this is a typo in the reproduction of ADMP policy GB9. Amend criterion b):</p> <p>‘b) the design and volume of the proposed replacement building would not be not materially larger than the ‘original’ building...’</p> <p>* Noted, however policy GB9 has been found sound by the Planning Inspector – no change.</p>
GB29	J L Phillips	Tandridge District Council	Support	<p>* Agrees with ADMP policy GB8 and considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p> <p>* Agrees with ADMP policy GB9 and considers that such development should not result in any adverse impact on the character of the openness of the countryside in Sevenoaks District adjoining the Tandridge/Sevenoaks boundary.</p>	<p>* Support noted – no change.</p> <p>* Support noted – no change.</p>

Chapter 7 – Previously Developed Brownfield Site Redevelopment

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB2	Cllr John Scholey	Edenbridge and District Community	Support subject to changes	* Clarification sought on what (c) refers to in paragraph 7.4.	* Agree – amend paragraph 7.3 to replace the bullet points with small letters a), b) and c).

		Link			
GB4	Paul Carter	Paul Carter Planning	Object	* The document does not acknowledge that infilling may be acceptable and provides no guidance on how such proposals will be assessed.	* Agree in part – NPPF paragraph 89 considers exceptions to inappropriate development in the Green Belt. Amend paragraph 7.2 for clarity: 'Paragraph 89 (bullet 6) of the NPPF states that <u>considers exemptions to inappropriate development in the Green Belt, including 'limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land)...</u> '
GB8	Mark Carter	Carter Planning Ltd	Support	* Supports chapter as it is in accordance with NPPF paragraph 89.	* Support noted – no change.
GB35	Craig Noel	Strutt & Parker LLP	Object	* Chapter is too restrictive in respect of Green Belt PDL sites. In particular GB1 permits extensions by up to 50%, but there is no allowance for this in paragraph 7.3. The document should be silent on the interpretation of the NPPF or be re-drafted. * Concerns with the wording of paragraph 7.5 which suggests that the dispersal of buildings may have an adverse impact on the openness of the Green Belt. This is the reverse of the suggestion at paragraph 5.31 which states that 'clusters of buildings would have a more intrusive impact on the openness of the Green Belt'. Paragraph 7.5 should be deleted because it is inconsistent with paragraph 5.31.	* Noted, however policy GB1 has been found sound by the Planning Inspector – no change. * Noted, however paragraph 5.31 relates to residential outbuildings in the Green Belt and paragraph 7.5 relates to brownfield site redevelopment. The Council considers that both paragraphs are consistent with the respective parts of the NPPF – no change.
GB36	Hannah Whitney	Nathaniel Lichfield & Partners	Support subject to changes	* The document should include a list of the 4 major developed sites that are in the Green Belt, including the GSK site.	* Noted, however these sites are already listed in the Core Strategy and the Allocations and Development Management Plan. The Council

				<p>* Paragraph 7.3 should clarify how the Council will deal with applications for major developed sites in the Green Belt. The following text is suggested:</p> <p>‘In line with the NPPF the Council will consider proposals for limited infilling or the partial or complete redevelopment of brownfield sites (including major developed sites in the Green Belt) based on whether they would have a greater impact on the openness of the Green Belt.’</p>	<p>considers it unnecessary to repeat them in the SPD – no change.</p> <p>* Noted, however paragraph 7.1 already references major developed sites in the Green Belt, and paragraph 7.3 sets out how the Council will consider proposals for these brownfield sites – no change.</p>
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Chapter 11 – Design Guidance

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB37	Keith Nicholson	Kent Wildlife Trust	Support	* Supports the document and particularly pleased to note the protection that is given to existing trees, shelterbelts and other biodiversity features.	* Support noted – no change.

Glossary

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB27	Y Tredoux	Kemsing Parish Council	Support	* Clarity required for the term ‘floorspace’.	<p>* Agree – amend the Glossary to include the term ‘floorspace’:</p> <p><u>‘Floorspace – Total floor area enclosed by the exterior walls of a building.’</u></p>

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Appendix 2 – Practical Example of how the Council will determine an application against Policies GB1 and GB3: Limited Extensions or Outbuildings to Existing Dwellings in the Green Belt

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB26	Holly Ivaldi	Eynsford Parish Council	Support	* Supports the approach which places responsibility onto the applicant for supplying measurements and calculations.	* Support noted – no change.

General Green Belt comments

Comment ID	Consultee Name	Company / Organisation	Support / Object	Summary of Comment	Officer Response
GB7	Mark Carter	Carter Planning Ltd	Support subject to changes	<p>* Paragraph 2.5 should include reference to NPPF paragraph 54 relating to local needs housing on rural exception sites.</p> <p>* The document should set out the steps that are necessary to provide affordable housing as an exception site on the edge of a settlement in the Green Belt.</p> <p>* Welcomes the commitment to review the Green Belt boundary in the ADMP</p>	<p>* Agree – this is a consequential change following an amendment to the ADMP. Amend paragraph 2.5 to include an additional bullet point:</p> <p><u>'local needs housing on rural exception sites in accordance with Core Strategy policy SP4.'</u></p> <p>* Noted, however the SPD doesn't seek to cover rural exception sites. See Core Strategy policy SP4 – no change.</p> <p>* Support noted – no change.</p>
GB10	A Howells	Westerham Town Council	Support	No further comments received.	* Support noted – no change.
GB13	John Lister	Natural England	Support	* Supports the approach.	* Support noted – no change.

Page 249

Agenda Item 12

GB15	Alison De Jager	Ash-cum-Ridley Parish Council	Support	No further comments received.	* Support noted – no change.
GB16	Kevin Bown	Highways Agency	Support	* Supports the approach.	* Support noted – no change.
GB42	Jennifer Bate	Kent Downs AONB Unit	Support subject to changes	* Concerns that there are no criteria based policies relating to the countryside and AONB other than those covered by the overarching Sustainability and Environment policies in the ADMP.	* Noted – this has been addressed by a modification to the ADMP – no change.

Appendix B

Table of Contents

1. Introduction	4
2. Overview of Green Belt Policies	6
3. Limited Residential Infill in Villages in the Green Belt	8
4. Conversion of Buildings in the Green Belt	10
5. Residential Extensions and Replacement Dwellings	12
6. Non Residential Extensions, Replacement Buildings and Redevelopments	20
7. Previously Developed Brownfield Site Redevelopment	22
8. Agriculture and Forestry	23
9. Leisure, Tourism and Equestrian Development	24
10. Change of Use of Green Belt Land	25
11. Design Guidance	26
12. Very Special Circumstances	29
Glossary	31
Appendix 1 - Conversion Guidance	33
Appendix 2 - Practical Example of how the Council will determine an application against Policies GB1 and GB3: Limited Extensions or Outbuildings to Existing Dwellings in The Green Belt	35
Appendix 3 - How the Council will determine an application against Policy GB4: Replacement Dwellings in The Green Belt	36
Appendix 4 - Pre-Application Advice	37

1. Introduction

What is the Supplementary Planning Document?

1.1 This Supplementary Planning Document (SPD) provides detailed guidance on the implications of applying for planning permission for development located within the Green Belt. The guidance will help to ensure consistency in decision making when determining planning applications in the Green Belt.

1.2 The SPD provides additional information to assist with the interpretation and implementation of policies set out in the Core Strategy and Allocations and Development Management Plan (ADMP), and is used by the District Council in determining planning applications.

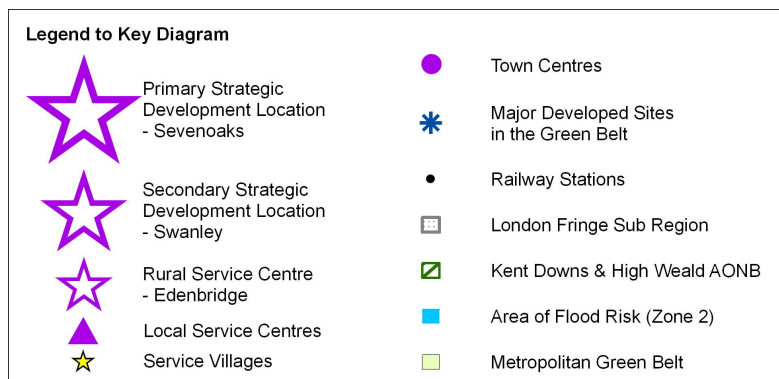
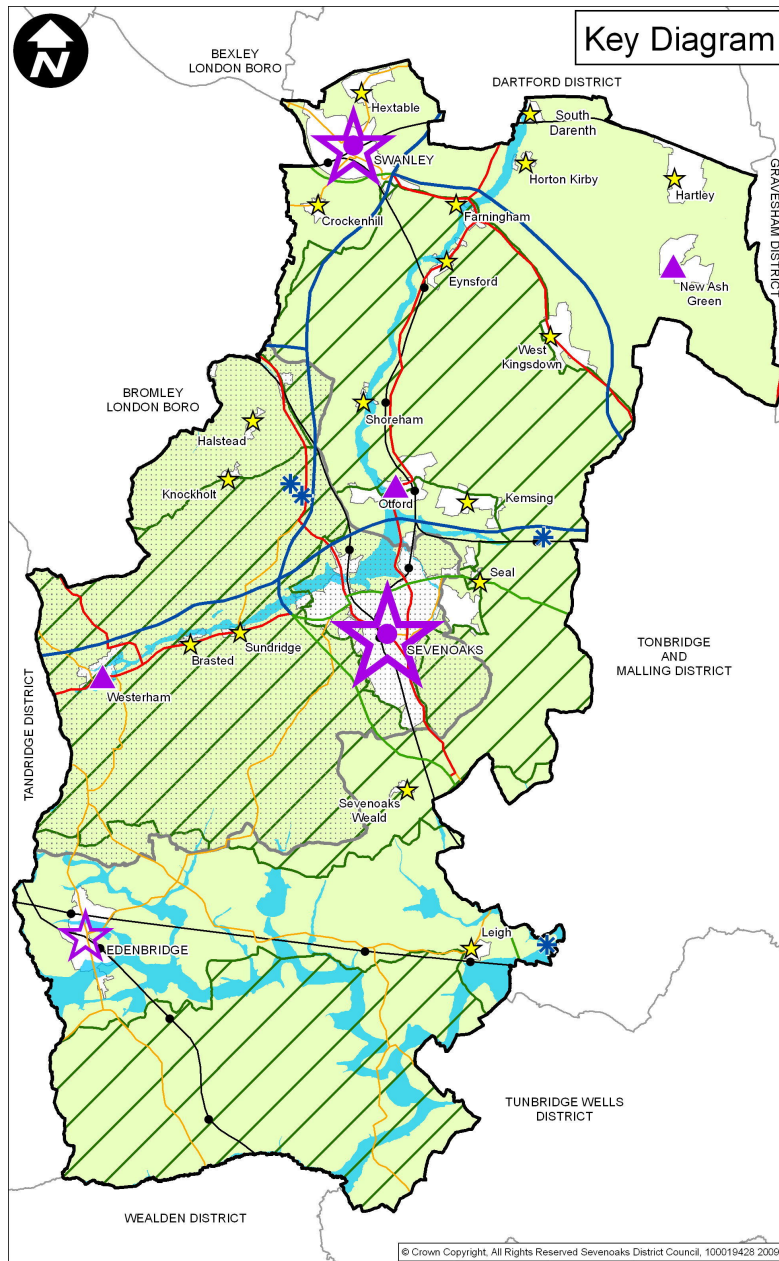
1.3 The District Council will take a positive approach to development in the Green Belt that accords with the Sevenoaks District Local Plan, including the guidance set out in this document and, where relevant, guidance contained within the Residential Extensions SPD (adopted August 2009).

1.4 Some minor development is permitted by the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 without the need for a planning application (usually known as 'permitted development'). Home owners and developers who are considering such alterations are encouraged to refer to the guidance in this SPD when considering even minor development. This guidance clarifies the implications of development built as permitted development on future planning proposals in the Green Belt.

The Green Belt in Sevenoaks District

1.5 Sevenoaks is a large District lying to the south east of London with an overall area of just over 143 square miles (370 square km). Despite adjoining the outer edge of London it is predominantly rural in character with 93% of the District designated as Green Belt.

1.6 The Core Strategy Key Diagram outlines the extent of the Green Belt in Sevenoaks District whilst the Local Plan Policies Map illustrates the detailed boundaries.



The Core Strategy Key Diagram highlights the extent of the Green Belt

2. Overview of Green Belt Policies

National Planning Policy Framework

2.1 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent uncontrolled spread of urban areas by keeping land permanently open. The essential characteristics of the Green Belt are its openness and its permanence.

2.2 The Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.3 The Green Belt performs all these purposes in Sevenoaks District.

2.4 The National Planning Policy Framework (Paragraph 87) sets out that inappropriate development in the Green Belt is, by definition, harmful to the Green Belt and should not be approved except in *Very Special Circumstances*. Inappropriate development in the Green Belt is harmful in principle, even if it is not visible from a public viewpoint.

2.5 Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- *buildings for agriculture and forestry;*
- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan;*
- *limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development; or*
- *local needs housing on rural exception sites in accordance with Core Strategy policy SP4.*

2.6 Paragraph 90 states that certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

- *mineral extraction;*
- *engineering operations;*
- *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
- *the re-use of buildings provided that the buildings are of permanent and substantial construction; and*
- *development brought forward under a Community Right to Build Order.*

The Sevenoaks Local Plan

Sevenoaks District Core Strategy

2.7 The Core Strategy Development Plan Document (adopted February 2011) is the key strategic development plan document produced by Sevenoaks District Council.

2.8 The document sets out the strategic approach to the Green Belt and demonstrates that existing Green Belt boundaries should be maintained. The Core Strategy also states that Green Belt land is not required for the Council to meet development needs up until 2026. In line with the Core Strategy (Paragraph 4.1.17) the case for any small scale adjustments to cater for situations where land no longer contributes to the Green Belt is considered through the Allocations and Development Management Plan (ADMP).

Allocations and Development Management Plan

2.9 The ADMP sets out policies applying to development in the Green Belt:

POLICY GB1	LIMITED EXTENSION TO DWELLINGS IN THE GREEN BELT
POLICY GB2	BASEMENTS WITHIN RESIDENTIAL DEVELOPMENTS IN THE GREEN BELT
POLICY GB3	RESIDENTIAL OUTBUILDINGS IN THE GREEN BELT
POLICY GB4	REPLACEMENT DWELLINGS IN THE GREEN BELT
POLICY GB5	DWELLINGS PERMITTED UNDER VERY SPECIAL CIRCUMSTANCES OR AS RURAL EXCEPTIONS IN THE GREEN BELT
POLICY GB6	SITING OF CARAVANS AND MOBILE HOMES IN THE GREEN BELT
POLICY GB7	RE-USE OF A BUILDING WITHIN THE GREEN BELT
POLICY GB8	LIMITED EXTENSIONS TO NON RESIDENTIAL BUILDINGS IN THE GREEN BELT
POLICY GB9	REPLACEMENT OF A NON RESIDENTIAL BUILDING IN THE GREEN BELT

2.10 Advice about how the District Council interprets the policies of the NPPF and the Local Plan is set out in the subsequent sections of this document.

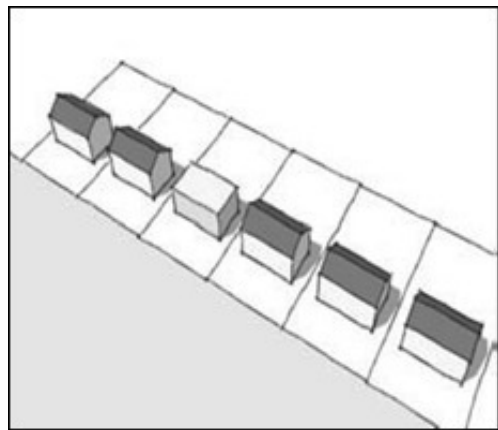
3. Limited Residential Infill in Villages in the Green Belt

3.1 Development in rural settlements is covered by Core Strategy Policy L07, which sets out that small scale redevelopment and infilling will be permitted in the Service Villages, which have defined Green Belt boundaries. Development within villages in the Green Belt is limited to small scale infilling only, due to the limited range of services and facilities in these settlements and the need to protect the openness of the Green Belt.

3.2 The National Planning Policy Framework (NPPF) states that limited infilling in villages, and limited infilling of brownfield sites which would not have a greater impact on the openness of the Green Belt, are not inappropriate development in the Green Belt.

3.3 The District Council defines limited infill development as the completion of an otherwise substantially built up frontage by the filling of a narrow gap normally capable of taking one or two dwellings only.

3.4 The District Council defines a substantially built up frontage as an otherwise continuous and largely uninterrupted built frontage of several dwellings visible within the street scene.



Edge of settlements with Green Belt boundaries

3.5 For settlements where a Green Belt boundary has been defined, the boundary usually marks the edge of the settlement where there is a break in development or a change in character to more loose-knit development. Where this is the case, infill development beyond a defined settlement boundary would compromise the purposes of the Green Belt and would constitute inappropriate development.

3.6 Where a change of character is not apparent between the defined settlement and development within the adjoining Green Belt, there may be circumstances where infill development is appropriate in the Green Belt, provided the purposes of the Green Belt would not be compromised.

Villages washed over by the Green Belt

3.7 Sevenoaks District contains villages which are 'washed over' by the Green Belt. Some of these have substantially built up frontages whereas others are loose knit. There may be opportunities for limited infill development within parts of villages washed over by the Green Belt which have substantially built up frontages. Limited infilling will not be acceptable in low density areas, where gaps between dwellings form part of the character of the area and contribute to openness. Limited infilling is also not acceptable in isolated or loose-knit groups of dwellings, where there is a break between the dwellings and the continuous built-up frontage of the village in order to protect the openness of the Green Belt.

Openness of the Green Belt

3.8 The NPPF states that one of the essential characteristics of Green Belts is their openness. Infilling should not therefore compromise the openness of the Green Belt.

4. Conversion of Buildings in the Green Belt

4.1 There is pressure in rural areas to convert existing buildings to residential or commercial use. The re-use of buildings in the Green Belt may be appropriate, providing there is no additional impact on the openness of the Green Belt.

4.2 In accordance with Core Strategy Policy SP 8 - Economic Development and Land for Business, the reuse of existing buildings for a commercial use that would make a positive contribution to the rural economy is preferred to residential conversion in the Green Belt.

4.3 The conversion of buildings in the Green Belt will be supported providing the proposal meets the criteria contained in Policy GB7 of the ADMP, which states;

POLICY GB7 - RE-USE OF A BUILDING WITHIN THE GREEN BELT

Proposals for the re-use of a building in the Green Belt which would meet the following criteria will be permitted:

a) the proposed new use, along with any associated use of land surrounding the building, will not have a materially greater impact than the present use on the openness of the Green Belt or harm the existing character of the area; and

b) the applicant can demonstrate through a detailed structural survey and method statement that the buildings are of permanent and substantial construction and are capable of conversion without major or complete re-construction that would detract from their original character.

Where a proposal seeks the re-use of an agricultural building constructed within the last 10 years, it will be necessary for the applicant to demonstrate that there is no longer an agricultural need for the building, or that the building is no longer fit for its agricultural purpose.

Where it is accepted that there is no future agricultural need for the building, the Council will resist future proposals for new agricultural buildings, unless it is apparent that they are of a different type and nature than that previously identified as being surplus to requirements.

4.4 Conversion of a building that requires substantial rebuilding in order to make it suitable for re-use will not be permitted. As a starting point when determining whether a proposal constitutes substantial new rebuilding, the Council will wish to see at least 75% of the original structure maintained to protect its character. However, the Council recognise that in some instances proposals may be able to protect the character of the existing building with a lesser proportion of the original structure being retained.

4.5 Further detailed guidance regarding information that should be submitted with a conversion application is included at **Appendix 1**.

4.6 To avoid increasing impact, conversions that involve disproportionate extensions will not be considered appropriate. Extensions to converted buildings may be controlled by the removal of Permitted Development Rights at the time of permission. Any proposals to extend a converted building will be reviewed with particular attention to ensure that the proposals do not detract from the character of the original building.

4.7 There is concern that permitted development rights in respect of agricultural buildings should not be abused as a way of obtaining residential or non-agricultural businesses development in the countryside. The Local Planning Authority will examine the history of buildings recently erected under agricultural permitted development rights where these come forward with proposals for change of use. Where a proposal seeks the re-use of an agricultural building constructed within the last 10 years, the applicant should demonstrate that the building is no longer required or fit for agricultural purposes.

4.8 In April 2014, permitted development rights were amended to allow the change of use of agricultural buildings and land to residential to be considered under prior approval, rather than the submission of a full planning application. This applies to agricultural buildings up to 450 square metres for conversion to a maximum of three dwellings, provided there is no increase to the external dimension of the existing building. Home owners and developers who are considering such conversions are encouraged to refer to this guidance.

4.9 Where the conversion of existing buildings would lead directly to a need for a replacement building and this could have a significant detrimental effect on the Green Belt, the Council will not generally permit the future construction of new agricultural buildings of the same type and nature and will consider the need to attach a condition to the permission removing permitted development rights for the erection of new buildings. The purpose of this control is to ensure that new agricultural buildings in the Green Belt are not permitted solely for the intention of subsequent conversion.

5. Residential Extensions and Replacement Dwellings

5.1 The NPPF and ADMP policies allow additions and alterations to buildings in the Green Belt provided they do not result in disproportionate additions in relation to the original building.

5.2 This section relates solely to proposals for residential buildings and outlines the approach to determining whether a proposal is proportionate to the original building. Guidance on the policies for non residential buildings is included at Chapter 6.

What is the Original Dwelling?

5.3 In determining proposals for residential extensions or replacement dwellings in the Green Belt an assessment will be made against the impact of the 'original' existing development.

5.4 Establishing what the Council deems to be the 'original dwelling' depends on when the property in question was first built and whether it pre-dates the modern planning system. In many cases the 'original dwelling' will refer to the floorspace of the dwelling when it was first constructed.

5.5 However for older homes constructed prior to July 1st 1948, the 'original dwelling' refers to the floorspace of the dwelling as it was on this date, when the Town and Country Planning Act was first introduced.

5.6 In either case any additions that have occurred since the 'original' dwelling date will be considered cumulatively and will be counted as part of the overall increase in floorspace of the dwelling when new additions are being assessed. This is because small reductions in openness, repeated many times, can have a cumulatively detrimental effect.

5.7 The original dwelling relates solely to the main dwelling and does not include ancillary outbuildings, whether subsequent or original, more than 5m from the dwelling. Any original outbuilding within 5m of the original dwelling may be included in the floorspace of the original dwelling.

5.8 Applications that seek the development of a former historic dwelling site, which has been demolished and the land returned to open use, will be resisted unless *Very Special Circumstances* have been demonstrated (see section 12).

Approach to Considering Residential Proposals

5.9 Policy GB1 of the ADMP is the policy by which a residential extension in the Green Belt will be considered. The policy states that;

POLICY GB1 - LIMITED EXTENSION TO DWELLINGS IN THE GREEN BELT

Proposals to extend an existing dwelling within the Green Belt which would meet the following criteria will be permitted:

- a) the existing dwelling is lawful and permanent in nature; and
- b) the design is in keeping with the original form and appearance of the building and the proposed volume of the extension, taking into consideration any previous extensions, is proportional and subservient to the 'original' dwelling and does not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion; and

If the proposal is considered acceptable when considered against criteria a) and b), the following criterion will then be assessed and must also be met for the proposal to be considered appropriate:

- c) the applicant provides clear evidence that the total floorspace of the proposal, together with any previous extensions, alterations and outbuildings would not result in an increase of more than 50% above the floorspace of the "original" dwelling (measured externally) including outbuildings within 5m of the existing dwelling.

Planning applications that include the conversion of loft space through the addition only of roof lights will be permitted and will not be subject to the floorspace allowance in criterion c), provided there is no increase in volume or bulk to the existing building as result of the proposal. Proposals for loft conversions that include the addition of dormer windows or other alterations that create volume or bulk will be subject to criterion c).

5.10 Policy GB4 of the ADMP is the policy by which replacement dwellings in the Green Belt will be considered. The policy states that;

POLICY GB4 - REPLACEMENT DWELLINGS IN THE GREEN BELT

Proposals to replace an existing dwelling within the Green Belt which would meet the following criteria will be permitted:

- a) the existing dwelling is lawful and permanent in nature;
- b) the design and volume proposed does not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion;
- c) the proposal adheres to the "original" dwelling curtilage; and
- d) the applicant provides clear evidence that the total floorspace of the replacement dwelling, together with any retained extensions, alterations and outbuildings would not

result in an increase of more than 50% above the floorspace of the "original" dwelling (measured externally).

Construction of permanent dwellings as replacements for mobile homes or caravans will not be permitted.

Lawfulness and Permanence

5.11 Policies GB1 and GB4 adopt a sequential approach to considering proposals for extensions or replacement dwellings in the Green Belt.

5.12 Criterion a) for both policies requires that the existing dwelling is lawful and permanent in nature.

5.13 The term lawful means that planning permission was granted for the original construction of the dwelling, that the dwelling was constructed prior to the introduction of planning controls or that the dwelling was constructed unlawfully but a certificate of lawfulness has since been granted. An existing dwelling can also be lawful if created through an approved change of use or conversion.

5.14 Criterion a) also requires the dwelling to be permanent in nature. For the purpose of these policies permanent in nature means it must be built on permanent foundations with connections to water supply and electricity. Non permanent buildings such as summerhouses or portacabin buildings, even though they may have such infrastructure connections, do not constitute permanent buildings and consequently Policies GB1 and GB4 do not apply to such buildings.

Consideration of Volume, Scale and Bulk

5.15 The volume, scale and bulk of an extension or replacement dwelling should not result in a large, bulky or intrusive building which would adversely impact on the character of the countryside or the openness of the Green Belt.

5.16 The impact of the development on the countryside is clearly greater if located in a highly visible location. However, the test of impact still applies even if there are limited or no public views of it as, if allowed, the argument could be repeated, with a potentially more serious cumulative impact on the openness of the Green Belt and the urbanisation of the countryside and for these reasons would be unacceptable. In some locations any extension or replacement dwelling may be inappropriate.

5.17 Where a development is acceptable in principle, its form should be well proportioned and present a satisfactory composition with the house. Rural buildings often have a simple form or may possess a visual symmetry which should not be significantly altered.

Floorspace Increase

5.18 National and local policies allow for a limited extension or moderately increased replacement dwelling directly related to the original dwelling. The size of the original building rather than the size of the plot will be used in assessing the appropriate size increase that is likely to be acceptable.

5.19 An appropriately proportioned enlargement, for the purpose of dwellings in the Green Belt is considered to be a floorspace increase of no more than 50% of the original floorspace of the dwelling and does not constitute a 50% increase per planning application. This is consistent with the approach of the previous Local Plan, but Policies GB1 and GB4 also emphasise the scale, bulk or visual intrusion; impact on openness and any cumulative impact.

5.20 Development proposals that increase the floorspace of the original dwelling by 50% are likely to be substantial in size, and most likely to increase the impact of the dwelling on the Green Belt.

5.21 Applicants should be aware that an addition may be considered 'disproportionate' or 'materially larger' as a result of unacceptable design even where it is below a 50% floorspace increase, depending on the other individual circumstances of the site, and what type of development is proposed.

The conversion of loft space through the inclusion of roof lights

5.22 Whilst the 50% floorspace approach has been successful in principle, the Council acknowledges that the floorspace does not always fully reflect the impact of extensions or replacement dwellings on the size of the original building. Alterations to the roof can be made to a building that increase the floorspace without significantly affecting the size of the building. For example the use of loft space that includes roof lights can create extra accommodation in the roof space without any significant harm in terms of height and bulk, and consequently without any significant impact on openness. Consequently, planning applications that include the conversion of loft space through the addition only of roof lights will not be subject to the floorspace allowance.

Residential Curtilage Restrictions for Replacement Dwellings

5.23 To ensure replacement dwellings do not result in a significantly greater impact on the Green Belt, Criterion c) of Policy GB4 restricts the replacement of dwellings to the originally defined residential curtilage to ensure the wider extent of the Green Belt is protected.

Basements

5.24 The introduction of basements to residential properties is covered in AMDP Policy GB2.

POLICY GB2 - BASEMENTS WITHIN RESIDENTIAL DEVELOPMENTS IN THE GREEN BELT

Proposals to extend or replace a dwelling in the Green Belt that includes the provision of a basement which would meet the following criteria will be permitted and will not be subject to the floorspace allowance as set out in Policies GB1 and GB4:

- a) The basement would not exceed the footprint of the original dwelling (based on the footprint of the original building as at 1st July 1948 or, when it was first constructed, if this is later;
- b) The basement would be situated entirely underground with no part of it visible at any point externally;
- c) There would be no external windows, entrances or exits to the basement;
- d) The extension or replacement dwelling would not be artificially raised above natural ground level to accommodate the extension; and
- e) The elements of the proposal situated above ground would comply with Policy GB1 (extension) or GB4 (replacement dwellings) in all other respects;

For basement proposals that do not comply with the above, the floorspace of the basement shall be included within the calculation for the purpose of Policy GB1 or GB4.

5.25 The policy restricts basements to the footprint of the extension or replacement dwelling in order to ensure that only an acceptable proportion of accommodation is provided underground and that basement accommodation does not expand beyond the extent of the dwelling. For this reason basements will also be restricted to single storey underground.

5.26 The policy supports basements which would be situated entirely underground with no part of it visible at any point externally, no external windows, light-wells, entrances or exits and no artificial raising of the building above natural ground level to accommodate a basement. Compliance with these three criteria is essential if an applicant wishes to have the basement floor space excluded from the 50% floor space increase criterion. Where these criteria are not met the Council will include any floorspace created by the inclusion of a basement as counting towards the floorspace increase.

5.27 Where a basement is accepted as an exclusion to the 50% increase allowance, permitted development rights for further extensions may be removed to prevent unreasonably large sized dwellings (by controlling their scale and appearance) and to prevent any potential negative impact on the openness of the Green Belt.

Residential Outbuildings in the Green Belt

5.28 The ADMP recognises that permitted development rights exist for certain outbuildings and that many proposals will not require planning permission.

5.29 For those outbuildings which would need planning permission, Policy GB3 states:

POLICY GB3 - RESIDENTIAL OUTBUILDINGS IN THE GREEN BELT

Proposals for residential outbuildings, within the curtilage of an existing dwelling in the Green Belt, will be treated as an extension under Policy GB1 if the proposed outbuilding would be located within 5m of the existing dwelling.

Outbuildings located more than 5m from the existing dwelling will be permitted where the building, including the cumulative impact of other outbuildings and extension within the curtilage of the dwelling, would be ancillary to the main dwelling in terms of function and design and would not materially harm the openness of the Green Belt through excessive bulk or visual intrusion.

5.30 Where planning permission is required for these structures in the Green Belt, and where the outbuildings are more than 5m from the existing dwelling, outbuildings will be permitted in addition to the allowance under Policies GB1 or GB4 if the design and cumulative impact would not materially harm the openness of the Green Belt through excessive bulk or visual intrusion. The outbuilding should be well designed in relation to the dwelling, compatible with the character of the area and designed and sited to minimise visual intrusion. In order to minimise the impact of outbuildings on the openness of the Green Belt, the Council will seek to restrict any outbuildings to a limit of 40sqm (measured externally).

5.31 Clusters of buildings would have a more intrusive impact on Green Belt openness and therefore, if the proposed outbuilding would be located within 5m of the existing dwelling, proposals for residential outbuildings will be treated as an extension under Policy GB1, or as part of the replacement dwelling under Policy GB4.

5.32 The Council will seek to ensure that such proposals do not dominate the main dwelling or its setting. Their scale should not exceed what might reasonably be expected for the function of the building. Garages and outbuildings for domestic purposes should not normally need to exceed a single storey in height or have excessive volume. Such buildings should be clearly ancillary to the main dwelling in terms of function and design.

5.33 Whether planning permission is required or not, the design of outbuildings should not impact detrimentally on the space surrounding buildings and should be limited in scale.

5.34 Outbuildings should not compete with the main house. Often secondary buildings were traditionally erected with a simplicity of design. This may be used to good effect to reinforce the distinction between the original building and the secondary building. The

form of garages and outbuildings (including roof pitches) and architectural features should be in keeping with the existing and surrounding properties.

5.35 Where permission is granted for an outbuilding, a suitably worded condition may be imposed, or legal agreement required, to ensure that outbuildings are retained for purposes ancillary to the main dwelling and to prevent their conversion without the approval of planning permission. Consideration will also be given to the need to remove permitted development rights.

Dwellings Permitted Under Very Special Circumstances or As Rural Exceptions

5.36 The NPPF provides opportunity for applicants to pursue development in the Green Belt based on a *Very Special Circumstances* case if proposals are contrary to national and local Green Belt policy (see section 12). Where developments are, or have been, allowed under *Very Special Circumstances* they have been permitted in instances where development would not usually have been allowed, and it is reasonable that further extensions or a replacement dwelling that would impact on the openness should be resisted. Policy GB5 of the ADMP therefore removes permitted development rights for developments allowed under *Very Special Circumstances* and will refuse future proposals for extensions and outbuildings that impact on Green Belt openness in any way. Consequently Policies GB1, GB2, GB3 and GB4 will not apply to dwellings permitted under Very Special Circumstances or as rural exception (local needs) affordable housing schemes.

5.37 Similarly, the NPPF allows the construction of agricultural workers dwellings in the countryside, where there is an 'essential need for a rural worker to live permanently at or near their place of work in the countryside'. As above, the Council will remove permitted development rights and refusal future proposals for extensions and outbuildings that impact on Green Belt openness.

5.38 Policy GB5 states:

POLICY GB5 - DWELLINGS PERMITTED UNDER VERY SPECIAL CIRCUMSTANCES OR AS RURAL EXCEPTIONS IN THE GREEN BELT

Where new dwellings are permitted in the Green Belt on grounds of very special circumstances or as part of a rural exception scheme, the Council will remove permitted development rights for extensions and outbuildings to prevent future additions that cumulatively impact upon the openness of the Green Belt.

Applications to extend dwellings or erect or extend outbuildings to dwellings that have or are permitted on grounds of very special circumstances or as part of a rural exception scheme will not be permitted.

5.39 A worked example of how the Council will consider planning applications against Policies GB1 and GB3 is included at Appendix 2, whilst an example against Policy GB4 is included at Appendix 3.

6. Non Residential Extensions, Replacement Buildings and Redevelopments

6.1 Commercial buildings vary widely in form, size and function and a general floorspace increase allowance would not be appropriate or workable for the extension or replacement of non residential buildings.

6.2 Instead, the Council will adopt a design based approach to assess proposals against the impact that they would have on Green Belt openness, as detailed within this chapter.

Approach to Considering Non Residential Extensions and Single Replacement Buildings

6.3 Policy GB8 of the ADMP sets out how the Council will consider extensions to non residential buildings in the Green Belt. It states that:

POLICY GB8 - LIMITED EXTENSION TO NON-RESIDENTIAL BUILDINGS IN THE GREEN BELT

Proposals to extend an existing non-residential building within the Green Belt which would meet the following criteria will be permitted:

- a) the existing building is lawful and permanent in nature; and
- b) the design and volume of the proposed extension, taking into consideration the cumulative impact of any previous extensions, would be proportional and subservient to the 'original' building and would not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion

6.4 Policy GB9 of the ADMP sets out how the Council will consider non residential replacement buildings in the Green Belt. It states that:

POLICY GB9 - REPLACEMENT OF A NON-RESIDENTIAL BUILDING IN THE GREEN BELT

Proposals to replace an existing non-residential building within the Green Belt which would meet the following criteria will be permitted:

- a) the existing building is lawful and permanent in nature;
- b) the design and volume of the proposed replacement building would not be materially larger than the 'original' building and would not materially harm the openness of the Green Belt through excessive scale, bulk or visual intrusion; and
- c) the replacement building would be within the same use as the building to be demolished.

Lawfulness and Permanence

6.5 Criterion a) for both policies requires that the existing dwelling is lawful and permanent in nature.

6.6 The term lawful means that planning permission was granted for the original construction of the building, that the building was constructed prior to the introduction of planning controls or that the building was constructed unlawfully but a certificate of lawfulness has since been granted.

6.7 Criterion a) also requires the building to be permanent in nature. For the purpose of these policies, permanent in nature means it must be built on permanent solid foundations. Portacabins, caravans and mobile homes are not considered to be permanent buildings and are not considered to be entitled to rights to extend or be replaced under Policies GB8 or GB9.

Consideration of Volume, Scale and Bulk

6.8 The volume, scale and bulk of an extension or replacement building should not result in a large, bulky or intrusive building which would adversely impact on the character of the countryside or the openness of the Green Belt.

6.9 The impact of the development on the countryside is clearly greater if located in a highly visible location. However, the test of impact still applies even if there are limited or no public views of it as, if allowed, the argument could be repeated, with a potentially more serious cumulative impact on the openness of the Green Belt and the urbanisation of the countryside and for these reasons would be unacceptable. In some locations any extension or replacement building may be inappropriate.

6.10 Where a development is acceptable in principle, its form should be well proportioned and present a satisfactory composition with the building. Rural buildings often have a simple form or may possess a visual symmetry which should not be significantly altered.

Future Use of a Replacement Building

6.11 In order to comply with National Planning Guidance, criterion c) of Policy GB9 requires that the replacement building would be within the same use as the building to be demolished.

7. Previously Developed Brownfield Site Redevelopment

7.1 Sevenoaks District has a number of historic previously developed brownfield sites within the Green Belt, including sites identified as Major Developed Sites in the Green Belt in the Core Strategy.

7.2 Paragraph 89 (Bullet 6) of the NPPF considers exemptions to inappropriate development in the Green Belt, including:

'limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development'.

7.3 In line with the NPPF the Council will consider redevelopment proposals of brownfield sites based on whether they would have a greater impact on the openness of the Green Belt. The Council will consider the impact of proposals on a case by case basis and the unique circumstances of the site but in order to maintain the same impact on the openness of the Green Belt and fulfil its purpose, the Council would generally expect redevelopment proposals to:

- a. have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible have less;
- b. not exceed the height of the existing buildings; and
- c. not occupy a larger area of the site than the existing buildings.

7.4 The most relevant area for the purpose of (c) is the aggregate ground floor area of the existing buildings (the "footprint"), excluding temporary buildings, open spaces with direct external access between wings of a building, and areas of hardstanding. However the Council will consider alternative approaches to determining impact where there is justification to do so.

7.5 The character and dispersal of proposed redevelopment will need to be considered as well as its footprint. For example many buildings may together have a much smaller footprint than a few large buildings, but may be unacceptable because the dispersal of the buildings and their curtilages over a large part of the site may have an adverse impact on the openness of the Green Belt and its purposes.

7.6 Proposals for protected employment sites and designated Major Developed Employment Sites in the Green Belt will also be subject to relevant policies contained in the ADMP and the Core Strategy, including Policy SP8 that seeks to protect existing employment sites.

8. Agriculture and Forestry

8.1 New buildings that are demonstrably essential for agriculture or forestry purposes are considered to be appropriate development in the Green Belt.

8.2 Where possible these buildings should normally form part of a group, rather than stand in isolation and should relate to existing buildings in size and materials. However, where new buildings of modern design are proposed, they may be best separated from a group of traditional buildings to avoid visual conflict.

8.3 Where it is at an acceptable distance, the site selected should be close to an existing highway in order to avoid long obtrusive driveways. The development should respond well to landscape features such as local topography, woodland or hedgerows and not harm views of the skyline.

8.4 Applicants should include arrangements for siting, access, curtilage, boundary treatment, materials and landscaping in their plan proposals.

8.5 Although many agricultural and forestry related proposals may benefit from permitted development rights, the Council may request details of siting, design and external appearance to be submitted prior to approval for works to commence.

Agricultural and Forestry Workers Accommodation

8.6 Applications for agricultural or forestry workers dwellings are excluded from permitted development and therefore always require full planning permission in addition to fulfilling relevant functional and financial tests of their business.

8.7 If the proposal is to enable an agricultural or forestry worker to live at, or in the immediate vicinity of, their place of work on a temporary or permanent basis, as part of their planning application, applicants should demonstrate that they have first examined the possibility of providing the accommodation by alternative means other than locating it on the land.

8.8 Where workers accommodation cannot be provided in the local area or by conversion of an existing building on site, there will be a requirement to provide evidence in support of both financial and functional tests. For permanent accommodation, the Council will need to be satisfied that there is a long term need for such accommodation.

8.9 Workers accommodation should be sited close to existing farm buildings wherever possible. An occupancy condition tying the accommodation to the employment use will be applied as a matter of course. Permitted development rights from the proposed new buildings are likely to be removed, in order to safeguard the openness of the Green Belt from further development.

9. Leisure, Tourism and Equestrian Development

Leisure Proposals

9.1 Sevenoaks District has a wide range of natural and cultural attractions throughout the area. They form the basis of the tourism industry that is vital to the local economy.

9.2 The Core Strategy has an objective to safeguard existing open spaces, sport and recreational facilities that meet community needs and improve provision where necessary.

9.3 The erection of new buildings for the purpose of leisure or tourism would be considered to be inappropriate development in the Green Belt unless it would provide essential facilities for outdoor sport and recreation that preserve the openness of the Green Belt and do not conflict with its overall purpose. Where this would not apply, *Very Special Circumstances* must be demonstrated for any proposals for tourism.

9.4 The Council will encourage the conversion, extension or replacement of buildings into tourism facilities providing the proposal complies fully with respective Policies GB7, GB8 and GB9 of the ADMP. Any proposal should also comply with the other relevant general policies set out in the ADMP and the Green Belt design guidance contained within this document.

Equestrian Development

9.5 The Core Strategy identifies horse riding as a significant recreational activity in rural areas of Sevenoaks District, which offers benefits to local communities.

9.6 Horse and other equestrian-related activities are popular forms of recreation in the countryside that can fit in well with farming activities, and help diversify the rural economy.

9.7 The Council will support equine enterprises in the Green Belt that maintain environmental quality and countryside character.

9.8 Policy LT2 of the ADMP covers Equestrian Development in the Green Belt and states:

Proposals for equestrian development in the Green Belt will be permitted where the scale of the development is appropriate to a Green Belt setting, and where the cumulative impact of other buildings, does not harm the openness of the Green Belt. Where stables or associated equestrian buildings are proposed they should be designed and constructed in materials appropriate to a rural area and should not be of a size and degree of permanence that they could be adapted for other use in the future.

Buildings would be appropriate in scale to their setting and would be closely related to existing farm buildings or other groups of buildings that are well screened from public view;

9.9 Any proposal for equestrian development should also comply with the other relevant general policies set out in the ADMP.

10. Change of Use of Green Belt Land

10.1 Permission is required if a proposal would result in the change of use of land. The use of land can by its very nature have a greater impact on the openness of the Green Belt than the current authorised use, for example the use of land as a car-park or domestic garden and therefore impact would need to be assessed. A common change of use in the Green Belt is from an agricultural use to a garden / curtilage extension or recreational use such as horse riding. The following section explains how change of use applications will be considered.

Garden / Curtilage Extensions

10.2 Owners of homes in the Green Belt sometimes want to extend their garden, or 'curtilage', into the surrounding countryside. These types of extensions are considered to be a change of use and can detrimentally impact on the openness of the Green Belt. This process can be cumulative and over time can lead to suburbanisation and urban sprawl.

10.3 For these reasons, the Council consider garden and curtilage extensions in the Green Belt to be inappropriate development which will not be permitted.

Recreation

10.4 Use of land in the Green Belt can provide opportunities for outdoor recreation and outdoor sporting activities near urban areas. Provision may be made for structures related to outdoor recreation as long as they are considered to be appropriate.

10.5 Where outdoor recreation activities are acceptable in principle, they may still result in unacceptable adverse impacts. The landscape character and the visual amenity of the countryside may be affected as well as other possible impacts from noise, traffic generation, car parking, lighting, and disruption to residential amenity.

10.6 New buildings should be limited to facilities that are the minimum essential for the operation of the associated activity, for example small changing rooms. 'Appropriate Facilities' means that they are genuinely required for uses of land that preserve the openness of the Green Belt and do not conflict with the purposes of the Green Belt.

10.7 The erection of horse related structures such as stables, fences, and jumps can fall within the definition of appropriate Green Belt development provided that they are small in scale. Such developments may not require the benefit of planning permission subject to certain criteria being met, providing the use of the land is authorised for the keeping of horses.

11. Design Guidance

11.1 The following considerations are applicable to all development in the Green Belt, unless otherwise stated. These issues should be considered thoroughly by the applicant when preparing any proposal and Design and Access Statement within the Green Belt.

Siting

11.2 Careful consideration should be given to the impact of the proposal when viewed from locations in both the immediate vicinity and the wider countryside. The view of the proposal from roads, public footpaths and settlements will be given significant weight when assessing planning applications.

11.3 Applicants should give careful consideration to the siting of proposed buildings.

11.4 Buildings located on the crest of a hill are visually intrusive. If such a location is unavoidable, special consideration will be necessary to minimize the impact.

11.5 On sloping sites it is normally best to align a building parallel with the contours and use cut and fill as opposed to underbuilding. If different floor levels are practicable, the building should be stepped down the slope.

11.6 Existing trees and hedgerows should be retained and new buildings should respect the existing field boundary pattern.

Form

11.7 Where an extension is acceptable in principle, its form should be well proportioned and present a satisfactory composition with the original building. Rural buildings often have a simple form or may possess a visual symmetry which should not be significantly altered.

11.8 Extensions should not overwhelm or destroy the original form of the building, but should appear secondary to it. The scale of an extension should fit unobtrusively with the building and its setting. An extension which infills a void between existing parts of a building, such as a space in an 'L' shaped house, may be less obtrusive and could reduce impact on the openness of the Green Belt.

11.9 Roof shape is critical to creating a successful built form. The pitch of extension roofs should be as, or similar to, the main house roof pitch. It should be noted that a flat roof extension in the countryside designed in order to reduce the bulk of the proposal is unlikely to be acceptable in appearance. The pitch of replacement dwelling roofs should be as, or similar to, the original house roof pitch to reflect the character of the original dwelling and surrounding area. Roof shape also determines the rate at which run-off enters the drainage system in periods of intense rainfall and this should be taken into consideration.

11.10 Particular account will be taken of the cumulative impact of extensions, including the effect on the character of the original property. Repeated extensions to properties impact significantly on the original form and can have a cumulatively detrimental effect.

Landscape Features and Setting

11.11 The landscape is very important to the openness and visual amenity of the Green Belt. All applications for development in the Green Belt will be required to demonstrate how they protect the openness and visual amenity of the Green Belt, through the form and design of buildings and all external areas, landscape works and planting. Further information on the landscape character of the area in which the proposed development is located can be found in the Sevenoaks District Countryside Character Assessment SPD.

11.12 Consideration must be given to the best way of integrating a new building with its immediate surroundings and landscape.

11.13 Existing trees, shelterbelts and other biodiversity features (e.g. ponds, unimproved grassland, etc) should be retained, and where appropriate enhanced.

11.14 Wherever possible, native trees should be used for new planted areas, rather than fast growing conifer hedges. Any new planting should be first agreed with the Council. Any areas proposed for new planting should take account of any plans for future development.

11.15 Sustainable drainage systems should be included as part of on site green infrastructure to reduce the risk of surface water flooding. Any systems should have appropriate management arrangements. Planting assists in water retention and amelioration of any flooding.

11.16 Waste material and redundant machinery should be removed, as should obsolete buildings except where those constructed in the local style and are worth retaining.

11.17 Consideration should be given to how hard-surfaced areas will link together and where resurfacing is needed, materials that are in-keeping with the surrounding area should be used. Non-porous surfaces that aggravate water run-off should be avoided where feasible.

Materials

11.18 Materials should be sympathetic with the location, minimising visual impact. Applicants should take into consideration any local vernacular when selecting materials and colours for their building.

11.19 The use of dark colours for window and door frames, guttering and other such elements is often preferable to lighter colours but this will also depend on the materials used within the building fabric. The use of overly bright colours should generally be avoided.

11.20 In relation to agricultural buildings, with a wide range of cladding materials and colours available, applicants should consider using materials and colours that have been used on similar buildings, if located within a farm complex. There should be an emphasis on materials and colours that have the least visual impact on the surrounding area.

12. Very Special Circumstances

There are some situations that may allow certain developments to take place in the Green Belt, which under any other circumstances would not be allowed. These are known as '*Very Special Circumstances*' and if proven, are treated as a departure from the Development Plan.

12.1 When attempting to prove *Very Special Circumstances* the onus is on the applicant to prove that the exceptional nature of the proposal outweighs the harm that it would cause to the Green Belt.

12.2 Circumstances that are accepted as being "very special" are very rare, but will usually involve a specific judgement being made that no other option is available in light of the unique circumstances and individual case. These circumstances are not common and are unique 'one-offs' that are rarely likely to be repeatable.

12.3 If a proposal is against Green Belt policy it would therefore be inappropriate development. In such circumstances an application may still be submitted, however the Council would have to judge there to be *Very Special Circumstances* for it to be permitted.

12.4 Each '*Very Special Circumstances*' argument will be judged on its own unique set of circumstances. Any accepted case would not necessarily result in a precedent for similar arguments on the same or alternative sites.

12.5 Where new dwellings are permitted in the Green Belt on grounds of very special circumstances or as part of a rural exception scheme, the Council will remove permitted development rights for extensions and outbuildings to prevent future additions that cumulatively impact upon the openness of the Green Belt.

'Departures' from the Local Plan

12.6 If the Council receives an application considered to be inappropriate development in the Green Belt, yet considers approving it, the decision is considered to be a departure from the Development Plan. The Council may need to send the planning application to the Secretary of State giving them the opportunity to 'call it in' to make their own determination.

12.7 This process ensures that the Secretary of State has the opportunity to consider whether to call-in the more significant and potentially most harmful proposals for inappropriate development, thereby helping to strengthen planning controls in the Green Belt.

12.8 Applications will be referred to the Secretary of State if:

- the Council does not plan to refuse the application; and
- the application is considered to be inappropriate development in the Green Belt and involves either:

- a) the construction of a building or buildings with a floor space of more than 1,000 square metres; or
- b) any other development that, by reason of its scale or nature or location, would have a significant impact on the openness of the Green Belt.

Glossary

Explanation of some planning terms commonly used:

Amenity - positive element that contributes to the overall character or enjoyment of an area.

Cumulative Impact - A number of developments in a locality or a continuous activity over time that together may have an increased impact on the environment, local community or economy.

Curtilage - The enclosed area immediately surrounding a building.

Departure - A proposed development that is not in accordance with the Development Plan, but for which the local planning authority proposes to grant planning permission.

Development Management/Control - The process whereby a local planning authority receives and considers the merits of a planning application and whether it should be given permission.

Development Plan Documents (DPD) - The documents that a local planning authority must prepare (to make up its Local Plan), and which have to be subject to rigorous procedures of community involvement, consultation and independent examination. Should include the following elements:

- Core Strategy;
- Site specific allocations of land and development management policies; and
- Policies Map (with inset maps, where necessary).

Dwelling - A self-contained building or part of a building used as a residential accommodation, usually housing a single household.

Floorspace - The total floor area enclosed by the exterior walls of a building.

Green Belt - A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped.

Infill Development - The completion of an otherwise substantially built-up frontage, by the filling of a narrow gap normally capable of taking one or two dwellings.

Local Plan - The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.

Local Planning Authority - The authority entitled to make a particular planning decision. Sevenoaks District Council determine all planning applications in their administrative area.

National Planning Policy Framework - Produced by the Government in March 2012 to guide Local Authorities when they are producing their Local Plans and determining planning applications. The NPPF replaced most of the guidance previously contained in Planning Policy Guidance Notes and Policy Statements (PPGs/PPSs).

Planning Permission - Permission to carry out development issued by a local planning authority.

Rural Exception Sites - Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Supplementary Planning Documents - Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Urban Sprawl - The uncontrolled or unplanned extension of urban areas into the countryside.

Very Special Circumstances (VSC's) - unique and rare situations that may allow certain developments to take place in the Green Belt, which under any other circumstances would not be allowed. If proven, VSC's are treated as a departure from the Development Plan.

Washed Over - If a settlement is 'washed over' by the Green Belt, it is treated as being part of the Green Belt and the Green Belt policies apply to any development in the village.

Appendix 1 - Conversion Guidance

For any proposed conversion the Council needs to be satisfied that:

- A building is structurally sound at the time the application is submitted.
- That it is capable of being converted without significant re-building, and
- Can remain standing as existing throughout the construction process.

Minimum information required:

- A structural survey of the existing building, to include an internal inspection.
- Attached to the survey should be plans and elevations of the existing building highlighted to show any remedial work such as under-pinning or replacement roof timbers that would be required and to show any areas that would or may need re-building, even if this is only localised, such as demolition of the wall under a window to make it a door. Clarify whether the roofing material and structure is to be removed and replaced.
- Where there are concerns about the stability or amount of re-building proposed, this should be clarified or the application refused due to lack of information to confirm whether the building is capable of conversion.
- A method statement should set out how you intend to keep the building standing and stable in its current state throughout the construction process. They may need to refer to how vulnerable walls will be protected when new openings are formed or when there is under-pinning. If the existing structure is not going to be load bearing, will it be strong and stable enough to remain standing whilst the new structure / foundations are built around it. Identify which parts of the existing structure and materials will remain, be repaired or replaced.

Typical Brief for Structural Survey

Outline: The survey should include:

- The inspection of visible, exposed and accessible parts of the fabric of the building.
- Refer to building services, drainage, outbuildings as well as the load bearing structure and general fabric of the building.
- Details of all defects or potential defects.
- If the survey indicates that the condition of the building's structure or the potential for future movement or deterioration cannot be accurately predicted, this should be stated.

Detailed requirements to consider:

- Are the walls, roof and any other load bearing elements adequate on their own and in their current condition to allow for the conversion of the building for the purpose intended? If not, what remedial work is required e.g. repairs, replacements of some parts, a new roof structure, an independent internal load bearing structure.
- Confirm whether there are any existing foundations and if so, whether they are adequate to allow for the conversion of the building for the purpose intended.

- If new foundations are required in whole or part or the existing foundations need to be re-enforced, comment on the impact this may have on the existing structure. For example, could such work affect the stability of a wall?
- Do any parts of the structure require work to guarantee structural stability?
- Is the structural stability of the building sufficient to be maintained whilst work is undertaken to convert the building for the purpose intended?
- A defects drawing and report is required.
- A drawing and report to confirm the extent of remedial works is required.

When considering the structure and whether it is adequate for the purpose intended, consideration should be given to the requirements of the Building Regulations.

Please note that for conversion of buildings in the Green Belt the Council needs to be satisfied that any conversion can be carried out without the need for significant rebuilding and without additions. The survey should need to bear this in mind.

Appendix 2 - Practical Example of how the Council will determine an application against Policies GB1 and GB3: Limited Extensions or Outbuildings to Existing Dwellings in The Green Belt

The Council will require full floorspace and elevation drawings of the existing and proposed dwelling, clearly indicating, if applicable, the extent of any previous extensions in order to calculate the floorspace. Failure to submit such drawings may make the application invalid.

The Council will also require a breakdown of the applicant's floor space figures detailing how the proposals comply with the details of the policy.

Upon receipt of a valid planning application, the Council will assess an application based on the following steps;

Step 1: The Council will determine whether the existing dwelling is lawful and permanent in nature.

Step 2: The case officer will visit the site and determine whether the design and proposed volume of the extension, taking into consideration any previous extensions, is proportional and subservient to the 'original' dwelling and would not materially harm the openness of the Green Belt through excessive bulk or visual intrusion.

If the proposal is considered acceptable when considered against steps 1 and 2, the council will review the floorspace figures as detailed below.

Step 3: The Council will determine what they believe to be the floorspace of the original dwelling **(A)**.

Step 4: The Council will determine the total floorspace that the proposed extension or alteration seeks to add **(B)**

Step 5: The Council will determine the floorspace of any previous extensions or alterations **(C)**.

Step 6: Calculation

If the floorspace of the dwelling as proposed, plus the floorspace of any previous extensions are equal or less than the total floorspace of the original dwelling plus 50% increase, then the proposal will be considered to comply with criterion c) of the policy.

If it is greater than an 50% floorspace increase, the Council will consider the proposal a disproportionate addition contrary to the policy unless *Very Special Circumstances* apply.

Appendix 3 - How the Council will determine an application against Policy GB4: Replacement Dwellings in The Green Belt

The Council will require full floorspace and elevation drawings of the existing and proposed dwelling, clearly indicating, if applicable, the extent of any previous extensions in order to calculate the original floorspace. Failure to submit such drawings may make the application invalid.

The Council will also require a breakdown of the applicant's floorspace figures detailing how the proposals comply with the details of the policy.

Upon receipt of a valid planning application, the Council will assess an application based on the following steps;

Step 1: The Council will determine whether the existing dwelling is lawful and permanent in nature;

Step: 2: The case officer will visit the site and determine whether the design and proposed volume of the replacement dwelling would materially harm the openness of the Green Belt through excessive bulk or visual intrusion.

Step 3: The Council will ensure that the curtilage of the proposed replacement dwelling adheres to that of the original dwelling.

If the proposal is considered acceptable when considered against steps 1, 2 and 3 the council will review the floorspace figures as detailed below.

Step 4: The Council will determine what they believe to be the floorspace of the original dwelling **(A)**.

Step 5: The Council will determine the total floorspace of the replacement dwelling **(B)**

Step 6: The Council will determine the floorspace of any retained extensions, alterations or outbuildings **(C)**.

Step 7: Calculation

If the floorspace of the replacement dwelling, plus the floorspace of any retained extensions, alterations or outbuildings are equal or less than the total floorspace of the original dwelling plus 50% increase, then the proposal will be considered to comply with criterion d)

If it is greater than an 50% floorspace increase, the Council will consider the proposal a disproportionate addition contrary to the policy unless 'Very Special Circumstances' apply.

Appendix 4 - Pre-Application Advice

Pre-Application Advice

Pre-application advice is valuable in ensuring the best possible development outcomes for the community. It is also of benefit to any prospective applicant for the following reasons:

- It gives you an opportunity to understand how our policies will be applied to your development and you can identify and resolve potential problems before an application is submitted. This can help prevent costly and time-consuming amendments to schemes later;
- It may indicate that a proposal has little or no realistic chance of success, thus saving you considerable time and money;
- It may lead to a reduction in time spent by your professional advisers in working up the proposals in more detail;
- It can identify at an early stage whether any specialist advice is necessary (e.g. listed buildings, trees, landscape, transport, ecology or archaeology);
- We can give advice that can help you prepare a better planning application so we can process it more quickly and give you a decision sooner.

The Council introduced charges for pre-application meetings and letters from 1 July 2008. These charges apply to enquiries or meeting for planning officer advice prior to the submission of a new application or following the refusal of planning permission. For up-to-date details or the fee required for pre application advice, please visit the Council's website via the below link;

http://www.sevenoaks.gov.uk/environment/planning/pre_application_enquiries/3373.asp

What information we require for pre-application advice

All proposals;

- Site location plan with the site clearly marked (to a recognised scale, Nth point etc)
- Written details of the address and proposal
- Sketch block plan for any built development (to a recognised scale)
- Photographs showing key features of the site (directions shown on plan)

Residential extensions or replacement dwellings in the Green Belt;

- Existing floor plans and proposed floor plans to scale and detailed calculations of original floorspace and resulting floorspace

How to submit your pre-application

There are a few ways in which you can submit your pre-application:

By email to: planning.preapplication.advice@sevenoaks.gov.uk

By post or in person: Community and Planning Services, Sevenoaks District Council, Argyle Road, Sevenoaks, Kent, TN13 1HG.