

Appendix 2: Stakeholder / Organisational responses:

Neighbouring authorities:

LB Bromley
Dartford Borough Council
Tandridge District Council
Tonbridge & Malling Borough Council
Tunbridge Wells Borough Council
Maidstone Borough Council
Kent County Council
Greater London Authority
(no responses from LB Bexley, Gravesham or Wealden)

Town/Parish Councils:

Badgers Mount Parish Council
Chevening Parish Council
Chiddingstone Parish Council
Edenbridge Town Council
Eynsford Parish Council
Leigh Parish Council
Otford Parish Council
Seal Parish Council
Sevenoaks Town Council
Sevenoaks Weald Parish Council
Shoreham Parish Council
Swanley Town Council
West Kingsdown Parish Council
Westerham Town Council

Key Statutory consultees:

Environment Agency
Historic England
Natural England

Stakeholders (national and local):

Biffa Waste Services
Campaign for Real Ale (CAMRA)
CPRE
Dartford, Gravesham and Swanley CCG
Education and Skills Funding Agency
Forestry Commission
Fort Halstead Residents Association
High Weald AONB Unit
Highways England
Home Builders Federation
Kent Downs AONB Unit

Montreal Park Residents Association
National Federation of Gypsy Liaison Group
National Grid
NHS Property Services
Sevenoaks Conservation Council
Sevenoaks Society
Shoreham Society
Southern Water
Sports England
Stangrove Residents Association
Thames Water
The Drive Residents Association
The Oaks Partnership (Swanley GP Surgery)
Transport for London
West Kent CCG
West Kent Housing Association

Appendix 3: Summaries of Key Organisational Responses

Neighbouring authorities

Tunbridge Wells Borough Council

Tunbridge wells notes that the Issues and Options document does not impose any direct effect on their borough, however, notes a considerable shortfall in Sevenoaks delivering their OAN and states that they do not have the capacity to accommodate any of our unmet development need.

Tandridge District Council

Tandridge seek further clarification on our preferred approach with a justification for our reasoning from deviating from the NPPF brownfield definition. This approach has raised concerns with Tandridge due to the sustainability of brownfield sites that are in the Green Belt. They go onto say they to also considered this approach, however they deemed it unsuitable as it would have resulted in a 'scatter gun approach to the green belt' meaning that this approach can lead to sprawl and encroachment on the openness of the Green Belt. They strongly believe that Green belt cannot act as a blanket to override sustainability considerations. Due to the similar characteristics across the two districts they also would like to understand the exceptional circumstances test that we have undergone so a similar approach can be established across the authorities. They also raised concerns around the 'Which Way Westerham' proposal as this would add to traffic travelling to Oxted without any mitigation measures. There is general support form Tandridge around our proposals for employment and are interested in discussing if there is potential for Sevenoaks to help meet Tandridge's need for Travelling Show People.

Tonbridge and Malling Borough Council

Tonbridge and Malling strongly believe that the characteristics of Sevenoaks District will necessitate some sites to be removed from the Green Belt and they believe there are exceptional circumstances in doing so; this includes the need to deliver growth where it is needed and to provide new opportunities for essential infrastructure. They state that Sevenoaks' approach will leave a significant amount of unmet housing need of up to a third of OAN, which has the potential to increase. They raised concerns over how sustainable Sevenoaks' approach is with brownfield sites in the green belt often being isolated and requiring future residents to travel long distances. In addition, these developments are likely to be much smaller so they will not generate sufficient developer contributions to deliver new infrastructure. They too would also like further clarification on how Sevenoaks will assess exceptional circumstances. It is stated that neighbouring Local Authorities are facing the same challenges and may have to revisit their strategies to ensure as much of the need is delivered as possible. Concerns were also raised from Sevenoaks deviating away from the NPPF definition of brownfield land. They believe that not all options have been fully explored before concluding that the needs cannot be met.

Dartford Borough Council

Dartford welcomes discussion for potential development options in Swanley due to cross-boundary functional organisational connections, including the shared Clinical Commissioning Group. They believe that the most sustainable approach would be developing around Transport Hubs however because of the lack of government guidance they encourage SDC to determine own criteria to identify transport hubs. They state that with Sevenoaks only meeting half of the unmet housing needs this must be supported by meaningful evidence that explores all options sufficiently before they are discounted. They also note that if land for employment is being looked at in the Green Belt then there needs to be consistency over site selection for all development and Green Belt release considerations. It was also noted by Dartford that by using a definition for brownfield land that deviates from the NPPF, a planning policy test must be fulfilled to ensure development on these sites would not constitute inappropriate development. Dartford also goes on to clarify the judgement ruled on Dartford BC v SSCLG in January 2016, stating that the inspector considered there to be very special circumstances that outweighed harm to the green belt in this particular case and judgement like this can only be made on a case-by-case basis not generally through a local plan. They state that the preferred strategy is currently insufficiently focused on sustainable outcomes, stating sustainable options such as transport hubs and a potential extension of Swanley appear to have been ruled out without a clear rationale as to why.

London Borough of Bromley

Bromley supports our housing approach subject to very clear demonstration of exceptional circumstances. There is general support for our gypsies and travellers approach, and they welcome the possibility of a new secondary school in the district.

Maidstone Borough Council

Maidstone generally supports Sevenoaks' approach, however, advises that the 31 sub areas of Green Belt which were identified as performing weakly against the NPPF should be explored fully before looking outside the district as they are sustainable locations for growth. Maidstone emphasises in their response that Sevenoaks and Maidstone do not share the same Housing Market Area (HMA) or Travel to Work Area (TTWA) and that Sevenoaks should look to their HMA to help meet any development needs that cannot be met within the District. Maidstone state that a small sites policy to enable the council to seek financial contributions on sites of 10 homes and under is not appropriate and would mean sites were unviable which could affect the delivery of the OAN. Maidstone also notes that conversion of offices to residential through permitted development has and will continue to make a significant contribution to overall housing land supply, therefore encourages Article 4 directions where they do not inhibit a positive contribution towards OAN. This outlook is also reiterated in regards to community uses.

Greater London Authority

The GLA directs Sevenoaks to look at their latest population and household projections for all local authorities in England which are now available on the London Data store. They do express concern for Sevenoaks only quantifying a supply of 6,500 homes across the plan period and recommends that Sevenoaks consider aligning their spatial strategy with the GLA's.

Kent County Council

KCC express their support for our preferred approach due to it being a sustainable way of providing houses subject to transport links. They do later state that development in the countryside is complex for Sevenoaks due to large settlements being dispersed across the district. When commenting on the 'exceptional circumstances' that have already come forward, KCC express concern for the Sevenoaks Northern Masterplan regarding the Quarry site due to sustainability and congestion with heavy congestion already at Bat and Ball Junction. KCC believes that the 'Which Way Westerham' proposal would relieve some traffic congestion but would need a robust traffic assessment. Edenbridge proves some concern for KCC due to the town having limited accessibility, with the only road access coming from B roads. However, KCC do express some support for development in Swanley due to good access to road and rail networks. They also support brownfield development due to traffic generation already occurring in these locations. KCC do recommend that Sevenoaks considers key worker housing to include social care workers and they supported the proportion of older person's accommodation stated as affordable housing. It is emphasised that new development should enhance biodiversity value and Public Rights of Way (PRoW) and where possible encourage more. Regarding the district's heritage, KCC states that it would be important for the Local Plan to describe how heritage assets will be conserved and used to improve the quality of life in the district. Also the plan could make reference to the process of a Conservation Area Appraisal so that the composition, significance, vulnerabilities and opportunities offered by the District's Conservation Areas can be properly addressed. KCC states that the potential of heritage in public health is underestimated and more needs to be done to properly measure and evaluate the health outcomes from activities such as heritage-led activities that contribute to improved public health by reducing social exclusion and increasing opportunities for community engagement. KCC are supportive of Sevenoaks' economic development approach and emphasise the importance of incorporating opportunities for smaller businesses, especially start-up units. It is recommended that Sevenoaks have a specific policy regarding the promotion of Fibre to the Premises (FTTP) to maximise the availability of high speed broadband services across the district. KCC stated that there are large variations between areas within the district regarding educational needs and further discussions will be had with Sevenoaks regarding education provision. KCC emphasise the importance of the Infrastructure Delivery Plan (IDP) and a mechanism for reviewing the IDP to respond to various changes that may take place over the plan period. Also a strategy for how that infrastructure is to be funded is essential to ensure the IDP is not simply aspirational but truly deliverable. They propose that a funding strategy which utilises s106 and CIL can be agreed as part of the Local Plan to ensure the infrastructure can be funded and the impact of planned housing on the local infrastructure can be adequately mitigated. KCC requests that any designs include smooth roads and pavements to reduce the number of trips and falls for older

people, people with mobility issues and wheelchair users, and is considered that appropriate levels of seating areas are provided. They support the approach to flooding in the plan and recommend that additional consideration is had in regards to drainage design. KCC reiterate in their comments that they will work closely with Sevenoaks to ensure that the infrastructure is provided where needed.

Health Bodies

West Kent CCG

West Kent CCG made comments in response to the Issues and Options consultation. The CCG notes that the District has issues with an ageing population, and associated conditions such as dementia. It also notes that the District has limited health/medical infrastructure with a number of general practices and a minor injuries unit. While the CCG is concerned that the increase in the population will impact existing medical practices, they have also set out criteria for future investment in their medical practices. The West Kent CCG Local Care Plan states that investment in general practices will be considered and prioritised according to:

- Where there is a identified population need for *existing practices*; or
- Where a merger of practices or a population growth would support a list of 8,000 patients for a *new practice*

The CCG recognises that the housing need figure is high for the District, noting that there must be a mixture of the type of housing to accommodate the needs of the population, as well as extra care and specialist dementia housing. The CCG also recommends that the Local Plan looks at providing nursing/residential care home spaces as this will have a significant impact on medical service provision in the District. Reference is also made to the development at Fort Halstead, as this development is considered to significantly impact the level of service at the Otford Medical Practice.

The CCG noted the concepts which have been outlined as potential “exceptional circumstances” cases, including the Northern Sevenoaks Masterplan, Westerham and Edenbridge. The CCG welcomes these approaches, as they aim to address development proactively and identifying the infrastructure requirements. Particular emphasis was placed on their plans to deliver a new medical facility in Edenbridge and outlined that the proposal from their own consultation received significant support.

The CCG has stated that it will continue to work with SDC and others, to ensure that medical and health facilities are delivered in the District as part of the Local Plan 2015-2035.

Dartford, Gravesham & Swanley CCG

Dartford, Gravesham and Swanley (DGS) CCG made comments in response to the Issues and Options consultation. The CCG has concerns with the pressure being put on their existing general practices. The CCG’s own population projections up to

2039 see a significant rise in area's population, in particular the older persons demographic. The main focus for the CCG is the medical provision that is available in Swanley. They note that the two current surgeries (The Cedars and The Oaks) are near to capacity, looking after 20,500 patients between them. The CCG recognises that Swanley has been considered as a growth area by the SDC's Master Vision and the latest U&I planning application for Swanley Town Centre, noting that to accommodate any additional growth, the health services provided in the area need to be improved and remodelled.

The CCG proposes a "health and well-being hub" within Swanley to help provide better primary care, social and mental health care to the communities, while allowing greater capacity and flexibility to meet the future demands of the growing population. This concept will also link with local hospitals (i.e. St Marys Hospital and the Darent Valley Hospital) building capacity to focus on specialist medical interventions.

Like the West Kent CCG, DGS CCG is committed to continue working with SDC and other partners to ensure that medical and health facilities are delivered in the District as part of the Local Plan 2015-2035.

NHS Property Services

NHS Property Services (NHSPS) made comments in response to the Issues and Options consultation, mainly focusing on two sites; the Edenbridge & District War Memorial Hospital, Edenbridge and the Sevenoaks Hospital, Sevenoaks.

Sevenoaks Hospital, Hospital Road, Sevenoaks

NHSPS has confirmed that the site is under their ownership and is currently supporting West Kent CCG in reviewing how health services are delivered within the Sevenoaks area. Like the CCGs, NHSPS recognises the rise in population across the new Plan period (up to 2035), and the particular pressures that this might put on existing medical/health facilities. NHSPS also commented on the projected growth of the elderly population, which will require the need for specialist housing as the demographic needs change.

NHSPS states that all organisations involved in commissioning healthcare, are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS confirmed that a property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. Therefore, should any part of the subject site be declared as surplus to the operational healthcare requirements of the NHS in the future (decision expected within 5 years), then the site should be considered suitable and available for alternative uses including a range of residential accommodation, depending on the needs of the local community which may include provision for the elderly.

Edenbridge & District War Memorial Hospital, Edenbridge

NHSPS has confirmed that the site is under their ownership and is currently supporting West Kent CCG in reviewing how health services are delivered within the Sevenoaks area. Like the CCGs, NHSPS recognises the rise in population across the new Plan period (up to 2035), and the particular pressures that this might put on existing medical/health facilities. NHSPS also commented on the projected growth of the elderly population, which will require the need for specialist housing as the demographic needs change.

NHSPS is working closely with NHS West Kent Clinical Commissioning Group (CCG), Kent Community NHS Foundation Trust and local GP's (**Edenbridge Medical Practice**) to develop a strategy for the future delivery of health services in this area, which would involve the release of certain NHSPS landholdings which are no longer required for the delivery of health services.

While a site has not been selected for a new facility in Edenbridge at present, NHSPS has confirmed that extensive consultation has been undertaken regarding the future of the existing facility. NHSPS confirmed that should the Edenbridge War Memorial Hospital be declared as surplus to the operational healthcare requirements of the NHS by health commissioners in the future (expected within 2 years), then the site could present an excellent opportunity for a modest, residential redevelopment and/or the provision of care home uses.

Statutory Bodies

Historic England

Historic England recognised that the Local Plan Issues and Options consultation is the first stage of Local Plan preparation and, as such, difficult to comment on very high-level issues. Historic England notes that it will comment on more specific matters as the Local Plan progresses, detailing draft policies and draft allocations. While the response to the consultation was general, Historic England highlighted a number of policy themes that should be accounted for when considering the historic environment. This also includes any future development management policies, neighbourhood and parish plans, as well as Village Design Statements. These included (but aren't limited to):

- The role of the historic environment supporting the local urban/rural economy and tourism;
- The delivery of transport and infrastructure, while conserving the historic environment and conservation areas; and
- The reuse of historic buildings to assist with the delivery of housing, or the integration of new development within historic areas.

Environment Agency

The Environment Agency responded to the consultation focusing on three main areas:

1. *Flood Risk (Technical Question T40)*

The Environment Agency supports the inclusion of a Flood Risk Policy within the Local Plan, as well as the consideration flood risk within the proposed Design Supplementary Planning Document. However, the use of both policies should not set precedence to building within the flood plain. The Environment Agency suggests that any further local policy or guidance should supplement national policy and focus on minimising the risk of internal flooding in high risk areas. The Agency also suggests that financial contributions should be sought to mitigate flood risks within developments. The Agency noted that it would welcome further talks with the Squerneys Estate and SDC with regards to any future development in Westerham.

2. *Groundwater and Contaminated Land*

While recognising that the Council's preferred strategy is to use brownfield land, the Agency urges SDC to ensure the necessary and adequate remediation works are taken into account, as well as ensuring that sustainable drainage measures are also addressed.

3. *Fisheries, Biodiversity and Geomorphology*

The Environment Agency strongly suggests that SDC should prepare a full District-wide appraisal of the biodiversity value before allocating sites within the Local Plan. This should also account for any gains that could be achieved through the design of development.

Natural England

Natural England raised a number of comments with regards to the potential impact on European sites, specifically the Ashdown Forest as a cross boundary issue with regards to air pollution and recreational pressures. Natural England recognises and agrees with the conclusions drawn for the HRA, which states that while the Ashdown Forest lies to the south the District, the number of journeys to and from this European designation would be minimal. Nevertheless, Natural England recommends that the Council look at modelling any potential air quality and transport impacts on the Ashdown Forest.

Further comments were made on specific placemaking areas, highlighting important natural features that should be accounted for within the emerging Local Plan. These include:

- **Upper Darent Corridor** - Westerham Woods (Site of Specific Scientific Interest (SSSI))
- **North East** - Partial Kent Downs Area of Outstanding Natural Beauty (AONB)
- **Sevenoaks Urban Area & Surrounds** - Hubbard's Hill SSSI, partial Sevenoaks Gravel Pits SSSI and Knole Park SSSI.
- **North West (Swanley & Surrounds)** - Partial Kent Downs Area of Outstanding Natural Beauty (AONB)

Highways England

Highways England noted that while the Local Plan is at an early stage of development, they would be concerned with any proposals that have the potential to impact the A21, M25, M26 and M20. As there are currently no firm proposals or draft allocations to comment on at this stage, Highways England have confirmed that they are committed to working with SDC throughout the Local Plan process through the Duty to Co-operate. They also confirmed that they levy developer contributions to fund infrastructure improvements through S278 Agreements as opposed to S106 agreements or the Community Infrastructure Levy.

Education and Skills Funding Agency

The Education and Skills Funding Agency (ESFA) is supportive of the vision and objectives relating to developing infrastructure to support the current needs of residents and the future growth of the District. ESFA notes that the District has a lack of secondary schools and notes the cross-boundary issues of secondary education with neighbouring authorities. It supports SDC's commitment to working with KCC and has asked that we continue to consult with the ESFA as the Local Plan progresses. Despite no draft allocations coming forward in the Issues and Options consultation, the ESFA notes the potential support for a secondary school in Edenbridge. ESFA has also urged SDC to consider the safeguarding/ allocation of land for schools where appropriate and where a need is identified. A number of examples of policies across the country were given, which SDC could look at when developing its own policies for the Local Plan. The ESFA is equally supportive of the need to maintain an up-to-date Infrastructure Plan and welcomes the opportunity to part of its preparation.

Appendix 4 - Summary of Technical Responses (by Objective)

Objective 1 - Promote housing choice for all

The main commentary focused on our preferred strategic option for housing delivery - namely increased density in existing settlements, sustainable brownfield land in the Green Belt and greenfield Green Belt land where there is a convincing exceptional circumstances case. There was general support for this approach with a number of caveats.

- There was some concern expressed that higher density development could lead to inappropriate high-rise development
- In relation to brownfield land, many respondents encouraged the use of previously developed land. Others noted that some of this land may be in remote locations and that developing green field land adjacent to settlements may provide a more sustainable pattern of development, when compared to some brownfield sites.
- There was some discussion regarding whether the wider definition of brownfield (to include any previously developed land) was appropriate or whether the exclusions set out in the NPPF (such as agricultural buildings and mineral workings) should apply.
- In relation to the potential exceptional circumstances cases, there was some concern that there is not currently sufficient information available on the different schemes in order to form a judgement
- Some respondents, predominantly developers, objected that the Plan does not currently meet full housing needs, and that other options (transport hubs, garden villages, Fort Halstead etc) should be fully explored

In relation to affordable housing, there was strong support for a continuation of our existing affordable housing policy (of up to 40%), a small sites policy to seek contributions on sites of 10 homes and under and new innovative types of affordable housing.

Objective 2 - Promote well designed, safe places and safeguard and enhance the District's distinctive high quality natural and built environments

General support from stakeholders regarding development of local policy that seeks to enhance the natural and built environment. This ranged from support for local Green Belt guidance, inclusion of biodiversity enhancement and green infrastructure linkages in schemes and development of a Design SPD and Design Panel, whereby an independent panel of experts would review proposed designs to encourage higher quality design in larger and more sensitive developments. Others (primarily developers) highlighted that there needs to be an awareness of viability in relation to these objectives and that there should be flexibility in relation to requirements on smaller sites.

Objective 3 - Support a vibrant local economy both urban and rural

The majority of respondents agreed that the Local Plan should continue to protect local employment sites and should include a 'redevelopment hierarchy' which ensures opportunities for non-residential uses are fully considered before residential schemes, for any proposed redevelopment. In relation to increasing the length of change-of-use marketing required for non-allocated employment sites from 6 to 12 months, there was a mixed response, where some agreed that a longer period of marketing may help retain existing sites, others stated that 6 months marketing is sufficient, whilst others stated that sites in residential areas should be excluded from the marketing requirements. In terms of future employment land needs, the majority of respondents agreed that land should be allocated including through mixed use developments and on brownfield land adjacent to settlements. Kent County Council said that new economic development should be around existing economic hubs. In terms of protection of existing and future office provision (from conversion to residential under permitted development rights), the majority of respondents agreed with the use of Article 4 directions (to remove permitted development rights).

Objective 4 - Support lively communities with well performing town and village centres which provide a range of services, facilities and infrastructure

The majority of respondents agreed that the Local Plan should continue to allocate town centre uses within the District's existing town and village centres, whilst looking to allocate both food and non-food retail floor-space in the District's most sustainable settlements. There was also support for protecting existing town centre uses by the Council asking for more information on a unit's viability and whether all alternative uses were considered before a residential use is considered. A proposal to set a local retail impact assessment threshold of 500m² was met with mixed opinion, with some respondents suggesting that the threshold is too low and would be cumbersome for the local planning process. Respondents also suggested that the retail impact assessment, if introduced, should be confined to "main town centre uses". Likewise with Objective 3, there was support from respondents on using Article 4 Directions on town centre uses, where appropriate. Some respondents went further, suggesting that community uses should also be included.

Respondents also support the Council's approach to engage and work with infrastructure providers and partners, to ensure that the infrastructure requirements of the District are met. Some respondents considered that infrastructure should be delivered *before* development takes place, while others said that infrastructure provision should be given greater emphasis during the local plan-making and decision making process. Specific issues were raised regarding traffic congestion, the lack of connectivity with high-speed broadband (especially in rural areas), and current pressure on existing schools and medical practices. Additional comments were also made on how infrastructure should be funded through the S106 agreement or Community Infrastructure Levy process, with some respondents noting that the Infrastructure Delivery Plan will set out the Council's priorities.

Objective 5 - Promote healthy living opportunities

The majority of respondents were supportive that the Local Plan should account for promoting healthier living opportunities. Respondents, including Kent County Council, indicated support for more sustainable transport measures to facilitate healthier living opportunities, whether that be through Travel Plans for individual planning applications or a new Integrated Transport Strategy for the District. Some respondents expressed their support for greater active travel (i.e. walking and cycling) opportunities but expressed that these initiatives should be delivered close to existing services and facilities for short journeys. Many respondents expressed concerns on the over-reliance on private vehicles, leading to traffic congestion, increase in parking issues and increasing issues with air quality. Kent County Council expressed support with the Council's approach for creating healthier communities, while noting that any strategy developed will have to accord with their own strategies and objectives (i.e. Local Transport Plan 4).

In terms of leisure and open space, respondents were supportive, with a number suggesting that where new leisure facilities are required, they should be provided for by the developer (for larger sites) or a financial contribution should be required (mainly on smaller sites). It was also suggested that there should be a mix of equipment which can meet all age groups and needs.

Objective 6 - Promote greener future

There was general support from respondents that the Local Plan should include policy covering flood risk, with a Design Supplementary Planning Document (SPD) outlining local flooding, drainage and SuDs guidance, and covering how development can reduce flood risk and the impact of flooding on development. Some respondents mentioned that this SPD should detail how existing houses can reduce flooding in addition to future development; more specifically how houses can reduce both the rate of surface water run-off and fluvial flooding. Including measures in the Local Plan to ensure that new developments can mitigate and adapt to climate change was supported by all respondents.

Place-making areas

The consensus across all six place-making areas is that the main priority issues are identified in the document; however, some additional issues have been noted by respondents. It was frequently mentioned that the need to protect local services should be identified as a priority across the whole district, with respondents particularly wanting improved broadband connectivity to enable small businesses in more rural locations. The responses indicated a need to acknowledge the impact of the expansion of Bluewater and the development of Ebbsfleet to the north of the district. Sustainable brownfield development across the district is generally supported; however, residential development of brownfield sites that is unrelated to existing settlement boundaries may fail to conserve or enhance the AONB.

The key issues for each place-making area are as follows:

Place-making area	Key Issues
Upper Darent Corridor	Respondents highlighted a need to encourage small businesses to support the rural economy. Many of the responses focused on 'Which Way Westerham' with concerns regarding the scale of the development and impact on the AONB.
Darent Valley	The respondents supported the priority issues as outlined in the document, however urged for the protection of local services to maintain and grow a strong rural economy.
North East	General support for the regeneration of New Ash Green shopping centre. A few respondents suggested that any leisure activities associated with Brands Hatch should be protected. Some concerns surrounding the housing numbers suggested for West Kingsdown due to its perceived isolated location.
Sevenoaks Urban Area and Surrounds	The priority issues were mainly supported; however, concerns surrounding new development encroaching on the Green Belt and AONB were raised. The responses indicate that maintaining the separation between settlements should be a key priority issue for this area.
South Area	There is general support for the identified priority issues. There are some concerns around releasing Green Belt but recognition that some flexibility may be needed where the Green Belt washes over most of the south area.
North-West	Some concerns relating to the potential intensification of Fort Halstead - impact on nearby villages / AONB. Some concern over the regeneration of Swanley town centre.