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Date: 2 April 2020

FAO Linda Larter  
Chief Executive / Town Clerk  
Sevenoaks Town Council  
  
By Email Only

Dear Linda

**RE: Sevenoaks District Council Response to Sevenoaks Town Neighbourhood Plan Consultation Draft**

Sevenoaks District Council (SDC) welcomes the opportunity to comment on the Sevenoaks Town Neighbourhood Plan Consultation Draft, prepared by Sevenoaks Town Council (STC). Please note that this is an officer level response. Sevenoaks Town is the principal town in Sevenoaks District, and the Neighbourhood Area was designated on 25 November 2013. SDC would like to make the following comments:

Contact between SDC and STC

As discussed in the meeting 4 March between the Town Council and District Council, you are aware that the neighbourhood plan needs to be in general conformity with the strategic policies in the existing Local Plan. For Sevenoaks, this consists of the Core Strategy (2011) and the Allocations and Development Management Plan (ADMP, 2015). As discussed, the draft neighbourhood plan broadly conforms with the strategic aims and policies of the District's existing policy framework.

The one specific area where the draft neighbourhood plan departs from existing district-level strategic level policy is in relation to references to development at the Tarmac quarry site. This site lies within the Green Belt and the Core Strategy states 'the extent of the Green Belt will be maintained' (Policy LO8). However, the Council's emerging Local Plan recognises the acute housing need in the District and proposes a number of strategic green belt releases, including the Tarmac quarry site, which is identified as a draft site allocation (site ST2-13) for mixed-use development. It is noted that the emerging Local Plan is no longer at examination since the Inspector's final report (2 March) concluded that the Plan is not legally compliant in respect of the Duty to Co-operate and recommended that the Plan is not adopted. The District Council is currently considering next steps, but it remains the case that the District is facing huge housing need and will continue to support the release of Green Belt in sustainable and suitable locations, to provide community infrastructure and to help meet identified housing and affordable housing need.

It should also be noted that the 'Planning Status' of the proposed development sites (P.65-73) should refer to their existing Planning Status within the Core Strategy and ADMP. These are as follows:

- Sevenoaks Community Centre, Oxted Road – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)
- Travis Perkins, Bat and Ball, Sevenoaks Business Centre – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)
- Cramptons Road Water Works, Cramptons Road – Allocated for Housing in ADMP – H1(b)
- Carpetwright / Wickes, Oxted Road – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)
- Sevenoaks Gasholder Station, Cramptons Road – Allocated for Housing in ADMP – H1(c)
- Bat and Ball Enterprise Centre, Bat and Ball Road – Allocated for Employment in ADMP – EMP1(b)
- Tarmac Ltd Site, Greatness, Accessed of Bat and Ball Road – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)
- Sevenoaks Station and Surrounding Area, London Road – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)
- Former Edwards Electrical, 166 High Street – Located within designated town centre
- Buckhurst Lane Sites, Sevenoaks Town Centre – Located within designated town centre
- Post Office / BT Exchange, South Park – Allocated for mixed-use in ADMP, Located within designated town centre (secondary frontage) – H2(a)
- Sevenoaks Town Council Offices, Bradbourne Vale Road – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)
- Sevenoaks Adult Education Centre, Bradbourne Road – No allocation, however, policy presumption to retain employment use (Policy EMP1/EMP5)

### Sustainability Appraisal

The Neighbourhood Plan will require a Strategic Environmental Assessment screening opinion prepared by the Council. We will work with the Town Council to produce this report in line with the legislation.

### Other comments

The following comments were provided by email to Sevenoaks Town Council on Thursday 16 January 2020 but have been re-iterated in this response for completeness.

Page 6 – It may be worth mentioning that SDC also agreed Net Zero 2030 for Sevenoaks District at a Full Council meeting on 19 November 2019.

Page 9 – There are a couple of places throughout the document where the text reads ‘planning and non-related policies’ – suggestion for this to read ‘planning and non-planning related policies’

Page 19 – Suggestion to remove the date for the Local Plan adoption, so that it reads ‘will, when adopted, replace the...’

Page 28 – 3<sup>rd</sup> to last paragraph – Suggestion to clarify that ‘the median Sevenoaks resident earns £33,600’. The last sentence specifies that ‘levels of unemployment and deprivation are low in the district’ – our records show that there are areas of deprivation and unemployment within the District – should this refer to Sevenoaks Town?

Page 31 – ‘The need to support and encourage further tourism’ – our evidence suggests that the District should be encouraging further spend by existing tourists e.g. by them staying for a meal / staying overnight etc and not necessarily encouraging far greater numbers. Perhaps the sentence could be revised to ‘The need to support and encourage existing and further tourism, including additional overnight stays in the District’

Page 38 – Policy C3 – Planning Applications in residential areas should be encouraged to contain a brief statement... (to show how they comply with the residential character area SPD) – suggest adding the underlined words – they are already required to demonstrate how they are in accordance with the SPD. The difficulty with making it mandatory for them to include a statement is that this would have to be added to the local validation checklist – and making changes to that list requires separate consultation in its own right.

Page 38 – Suggestion to refer to ‘planning officers’ instead of ‘council officers’

Page 39 – suggested that wording on this page is changed to:

Aim C4: The Town Council will engage with Sevenoaks District Council to undertake a design review, to ensure good design quality is embedded in all significant development in Sevenoaks.

Design review is a tried and tested method of independently evaluating and improving the quality of developments by bringing proposals before a panel of experts from across the built environment professions. The Town Council recommend that prospective applicants come to the design review panel as early as possible in the pre-application or application process. Depending on the scale and significance of the proposal a series of reviews may be required. ***Detailed guidance on this process can be found in the Sevenoaks District Council Design Review Panel Supplementary Planning Document as part of the emerging local plan (Consultation Draft December 2019).***

Page 42 – Objective Two: To protect views both to local landmarks and to the open countryside – suggest deleting the word ‘view’ as no right to a ‘view’ in planning – perhaps use the word setting instead i.e. to protect the setting of local landmarks and the landscape setting of the town

Page 47 – Policy L3 – Re Tarmac open space – ‘this space must be delivered as a pre-cursor to any residential development on this site’ – the proposed development is in 2 phases, with the first small phase proposed to take place whilst the quarry is still operational. The open space/leisure lake etc would be delivered when the quarry ceases operations as part of the second, wider phase of development – therefore suggest the following wording: ‘this space must be delivered in parallel with development on this site’ – please also see Policy S1 where this wording is used.

Page 69 – Tarmac – development quantum – suggest this should read 600-800 units – the developable area for residential and mixed-use development is approximately 20ha with the remainder of the site (approximately 70ha) proposed for green/blue infrastructure. At a

density of 30dph this would result in 600 units and at 40dph this would result in 800 units. Site density will vary across the site to reflect the gateways, the mixed-use hub and site edges etc – therefore suggesting a range (600-800) would be appropriate. Where land is to be released from the Green Belt, there should be a commitment to the most effective and efficient use of land that can be achieved in that location, without compromising design or residential amenity and without causing adverse impact on the surrounding environment, particularly noting the setting of the AONB in this location. The proposed additional capacity would need to be subject to further design and site master-planning work to demonstrate that the proposed uses and density can be adequately accommodated on site.

Page 74 – Suggestion to include a key with the map

Page 86 – Suggestion to replace Emerging Local Plan quote with existing policy – *'The District Council's existing Local Plan Policy SP1 states that: 'All new development should be designed to a high quality and should respond to the distinctive local character of the area in which it is situated'. (Sevenoaks District Core Strategy, Policy SP1)*

### Additional Comments

Page 38 – Policy C1 – 'New development must be informed by **national and** local design guidance such as the **National Design Guide** and Conservation Area Appraisals

Page 38 – Paragraph 2 – suggestion to include 'higher level' clarification on this terminology i.e. should it say national policy

Page 38 – Suggestion to include 'National Design Guide' as one of the Design guidance available. Not local but useful design guidance.

Page 38 – It is not a requirement that ALL planning applications submit a statement outlining how development proposals respond to residential character areas. Propose changing the wording to 'it is encourages that a statement is submitted with planning applications outlining...'

Page 40 – Clarification on mechanisms of adopting design guidance for areas out width the Residential Character Area Assessment.

Page 41 – Suggestion to change key to read 'areas where additional design guidance may be prepared'

Page 42 – Clarification that there is no legal right to a view

Page 42 – Policy C6 Clarification – conserve and enhance the setting of local landmarks

Page 42 – Policy C7 – Conserve and enhance the natural environment.

### Conclusion

In conclusion, the Sevenoaks Town Neighbourhood Plan is in general conformity with adopted and emerging planning policies. Sevenoaks District Council will continue to work with and support Sevenoaks Town Council in the adoption of their Neighbourhood Plan.

Yours Sincerely

Emma Coffin  
Planning Policy Officer