

Dear Swanley Town Council,

Re: Sevenoaks District Council Response to the Swanley Neighbourhood Plan Regulation 14 Version Consultation.

Sevenoaks District Council welcomes the opportunity to comment on the Regulation 14 Version of the Swanley Neighbourhood Plan, prepared by the Neighbourhood Plan Steering Group on behalf of Swanley Town Council. Please note that this is an officer level response.

Contact between SDC and the Neighbourhood Planning Group

To date we have commented informally in March 2020 and following our meeting with Lorraine Hart in February 2022, we sent comments regarding the proposed policies.

General comments

- It is recommended that the timespan for the Neighbourhood Development Plan (NDP) is stated, either on the document cover, or as footers at the base of each page.
- It is recommended that where the NPPF is referenced the associated paragraph number is included.
- Throughout the document there are references to the emerging Local Plan 2018, including allocations, and whilst having regard to the direction of travel is important, it refers to a document which has now been withdrawn from Examination. Some consideration needs to be given about how this should be referred to and addressed throughout the document.
- At present the NDP is quite lengthy and it may benefit from being pared back. This could be achieved, in part, by not repeating the vision and associated explanatory text at the beginning of each chapter. Furthermore, whilst the policies need to be clearly justified and linked to the evidence, the detail about this evidence may be better placed in the evidence base, so supporting text just needs to the main points with signposting to where the detail can be found in the evidence base. There are also a couple of instances where the text has been repeated.

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- It is often useful to have a full list of the policies towards the front of the document. It also helps having the policies following the associated supporting text/justification.
- There are some elements that could be re-positioned e.g. the air quality paragraph doesn't sit naturally with the rest of the text.
- Sevenoaks District Council is on occasion referred to as just Sevenoaks Council and this needs to be corrected to avoid confusion.
- It is recommended that the terminology, formatting and referencing are used consistently across the document e.g. policies are sometimes labelled as NP Policy SwC5, Policy SwDC&H2 or just setting out the reference number e.g. SWDC&H1.
- Some of the mapping doesn't follow on from the associated text and/or doesn't include a key. It may work better to either move the mapping so it follows the associated text or to put the mapping in an appendix, with clear signposting.
- Maps and diagrams etc - need to make sure that these are clearly labelled and where necessary a key is used. E.g. the map on page 3 isn't showing the key.
- It is occasionally unclear whether the document is referring to the wider Swanley parish boundary or Swanley Town.
- Documents need to be accurately referenced and/or the most up-to-date documents referred to e.g. in one instance the Green Belt Assessment is dated as 2018 rather than 2017.
- If this hasn't already been done, it is recommended that consideration is given to how these policies will be monitored.
- Terminology is on occasion confusing as it does not reflect terminology that is widely used e.g. Heritage Assets not Historic Assets.
- For future iterations and rounds of consultation, interactive mapping is recommended as we find that it can be very useful.

Introduction

Page 2 - The current wording reads as though Planning Appeals are decided by the Local Planning Authority (LPA), rather than the Planning Inspectorate (PINs).

A profile of Swanley

It would be useful to include a map showing the Swanley Parish boundary in the wider context of the district and beyond.

Page 7 - The first line could do with being re-written to highlight that Swanley is a parish within the district of Sevenoaks, which is within the county of Kent and that it includes two settlements comprising Swanley Town and Swanley Village. At present it isn't clear that there is a second settlement until the fourth paragraph.

Page 8 - It might be clearer to write that only Swanley Town has a defined Green Belt boundary, whilst the remainder of the parish, including Swanley Village, is washed over by Green Belt.

Page 9 - It is probably more accurate to state that the full extent of the Green Belt in the parish of Swanley is as shown on the map. It may also be useful at this point to clarify what else the map is showing, as it is taken from the Green Belt Assessment 2017.

Page 9 - The last paragraph could do with some re-writing, as the figure in the Core Strategy 2011 is a housing provision figure (rather than a housing need figure) identified through the South East Plan and it needs to be clearer that the emerging Local Plan dating from 2018 has now been withdrawn.

Pages 11 - 12 - It may be useful to include a map showing the respective wards and also aggregate the data.

Vision and Objectives for the Neighbourhood Plan

Objectives might benefit from their own referencing system.

Sustainable Development Strategy for Swanley

Page 17/18 - It might be useful to include the map showing the Green Belt Assessment parcels here.

Community Infrastructure

Page 20 - Some of the evidence seems to be outdated e.g. Open Space Sports and Recreation Study 2009. There is more recent evidence base associated with the emerging LP e.g. Open Space Study 2018.

Page 21 (and elsewhere) - Refers to 1,148 properties being planned but part of that figure is based on the previously emerging LP, which has now been withdrawn. It will be necessary to ensure your figures tie up with the latest version of the emerging Local Plan (Plan 2040), in order to ensure the Swanley NDP does not become quickly outdated.

Page 22 - Includes a paragraph on Air Quality (with a policy in the chapter relating to Transport) which doesn't seem logically to sit within this chapter. Also to note that a more up-to-date Air Quality Annual Status Report 2022 is available on the SDC website.

Page 23 - Reference is made to the NP Steering Group having undertaken its own survey and assessment of open spaces. It's not entirely clear but does this only look at the sites already identified and just provides additional information or has it identified additional sites and/or re-categorised existing sites?

Conservation design and heritage

Page 32 - This chapter is slightly confusing. The title suggests that it is about the historic environment and heritage assets etc. However, it then references good design and landscape character. It may just be a matter of changing/amending the title of the chapter.

Page 35 - The section titled Character of the Swanley Neighbourhood Plan Area talks a lot about the NPPF, which would sit better in the Planning Policy background section.

Page 37 -The Swanley Character Assessment 2022 is briefly summarised in relation to 6 different areas. It may be useful to include a map showing where each of these areas are as it is not clear from the description itself.

Pages 37 and 38 - The definition for tall buildings needs some re-working as it refers to buildings up to 4-storeys, whereas presumably it should read buildings which are either 4 storeys and higher or above 4 storeys in height. As it currently reads any building between 1 and 4 storeys would be categorised as tall. The same applies to the definition of a tall building in the Town Centre.

Page 38 - Historic assets and the built environment - this repeats a paragraph from the profile and if this section is meant to be about heritage assets then perhaps these could be deleted/re-written so that the focus is entirely on Swanley Village's Conservation Area and Listed Buildings.

Page 39 - It may be useful to clarify that Swanley refers to Swanley Town when setting out the listed buildings. It may also be useful to add a line referring to Historic England's website for more information on listed buildings e.g. their Grade and for the most up-to-date list of buildings. Reference is also made to a desire to protect St. Mary the Virgin's church and the gates at the former White Oaks Hospital, amongst others. Has work been undertaken looking to identify other buildings and structures as non-designated heritage assets? Does the supporting evidence base include justification for these assets and are they mapped?

Page 42 -This talks about conserving and enhancing the heritage assets of Swanley and Swanley Village but then proceeds to talk about a design guide for Swanley Village and is slightly confusing.

Housing

Pages 46 - 48 - This needs to be updated to reflect the current situation with regards to the emerging Local Plan. In addition, the list of evidence may need updating.

Page 49 - Does some of the data need updating as it shows allocated sites with planning applications up to 2020.

Page 55 - A Targeted Review of Local Housing Needs was completed in January 2022, which is available on our website, and it is recommended that this is reviewed, and any updates incorporated.

Page 56 - Where it refers to the Annual Monitoring Report, this should be amended to refer to the Authority Monitoring Report.

Page 56-57 - The table continues to show housing allocations proposed in the emerging Local Plan 2018, which has now been withdrawn. It may need some reworking.

Economy and Employment

Page 62 - Is this referring to the Authority Monitoring Report (3rd para)?

Page 64 - The table references sites in the emerging LP. Maps should follow the associated text. Does the evidence base include information on the use of these sites at the point in time they were surveyed?

Page 66 - The pie chart and graph would benefit from having NDR written in full and providing information on what they represent e.g. labelling the axis on the graph and what each section of the pie chart represent.

Transport

Page 76 - This section should reference Kent County Council as the County Highway Authority.

Page 76 - Whilst future proofing by having regard to the emerging Local Plan (Plan 2040) is recommended, it should also set out current local plan policies relating to transport.

Page 77 - The current emerging Local Plan runs until 2040. This section may need to highlight that the SWECO work was carried out in relation to the recently withdrawn emerging local plan.

Page 77- 82 - It may be beneficial to consider the ordering of this section e.g. Transport Provision in Swanley section may benefit from being shifted ahead of the section about the Swanley Transport Study 2018. Table 1 sets out cycle parking provision but the section above (4th para, page 79) refers to it showing cycle route provision.

Page 82 - It may be worth updating this to include the data from the more recent reports.

Page 88 - Need to be clearer that this is a direct quote from One Tree Planted.

Page 91 - 92 - These repeat elements e.g. car ownership levels etc and consideration could be given to removing or re-positioning some of this text. Page 92 lists three things which are to be encouraged; should this form part of a separate project section.

Page 94 - Last 'policy' refers to areas outside of the Neighbourhood Area and is not a planning policy.

Comments on policies

Attached as an appendix.

Sustainability Appraisal

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

Kind regards,

The Planning Policy Team
Sevenoaks District Council