

Sevenoaks Town Neighbourhood Plan - Examiner procedural letter and questions & responses 15-11-2022

	Inspector Comments	Responses
	<p>Following the submission of the Sevenoaks Neighbourhood Plan (SNP) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for the Sevenoaks Town Council (STC) as Qualifying Body, a smaller number for Sevenoaks District Council (SDC) and some that request a joint response from both Councils. These are attached as an Annex to this letter, and I would like to receive the responses by Tuesday 15 November 2022.</p>	
1	<p><u>Examination Documentation</u></p> <p>I can confirm that I have received a complete submission of the Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement, the Strategic Environmental Assessment, and the Regulation 16 representations. I am satisfied that I have enough relevant evidence to enable me to undertake the examination.</p> <p>Subject to my detailed assessment of the Plan, I have not identified any very significant and obvious flaws that might lead me to advise that the examination should not proceed.</p>	<p>Thank you and noted.</p>
2	<p><u>Site Visit</u></p> <p>I intend to undertake a site visit to the neighbourhood plan area in the week commencing X November 2022. This will assist in my assessment of the draft Plan, including issues identified in the representations.</p>	

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	<p>The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.</p> <p>I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.</p>	Noted
3	<p><u>Written Representations</u></p> <p>At this stage, I consider the examination can be conducted solely by the written representations' procedure, without the need for a hearing. However, I will reserve the option to convene a hearing should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.</p>	Noted
4	<p><u>Further Clarification</u></p> <p>I have a number of questions seeking further clarification from both STC and SDC. I have set these questions out in the Annex to this letter. I would be grateful if the written responses could be provided by Tuesday 15 November 2022.</p>	
5	<p><u>Examination Timetable</u></p>	

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	<p>As you will be aware, the intention is to examine the SNP (including conduct of the site visit) with a view to providing a draft report (for ‘fact checking’) within 4-6 weeks of submission of the draft Plan</p> <p>However, I have raised a number of questions to which I must provide you with sufficient opportunity to reply. Consequently, the examination timetable will be extended. Please be assured that I will endeavour to mitigate any delay as far as is practicable. The IPe office team will seek to keep you updated on the time of my site visit and on the anticipated delivery date of the draft report.</p> <p>If you have any questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.</p> <p>In the interests of transparency, may I prevail upon you to ensure a copy of this letter and any subsequent response, are placed on the websites of the Town Council and the District Council.</p> <p>Thank you in advance for your assistance.</p>	<p>Sevenoaks Town Council (STC) has a website dedicated to providing updates on the Sevenoaks Neighbourhood Plan (SNP). I have uploaded a copy of the letter onto the “News” section of this website, and also provided a link to it on STC’s website under “Neighbourhood Development Plan”. Please see below for links: News – Sevenoaks Town Neighbourhood Plan (wordpress.com) Neighbourhood Development Plan - Sevenoaks Town Council</p> <p>Sevenoaks District Council (SDC) also has a webpage dedicated to providing updated on the SNP where a copy of the letter is posted, available via the following link: https://www.sevenoaks.gov.uk/info/20069153/sevenoaks_town_neighbourhood_plan</p> <p>Both Councils will upload a copy of this response letter as well.</p>
6	<p>From my initial reading of the submission draft Sevenoaks Neighbourhood Plan (SNP) and the supporting evidence, I have 4 questions to which I require a joint response from both the District and Town Councils; a further 3 questions</p>	

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	<p>for Sevenoaks District Council; and 32 questions for Sevenoaks Town Council. I have requested the submission of the responses by Tuesday 15 November 2022. All of the points set out below flow from the requirement to satisfy the Basic Conditions.</p> <p>I have noted that the consultation response from the District Council (ID BHLF-P5FW-8U88-Y) confirms that in its view the SNP broadly conforms with the strategic aims and policies in the District’s existing policy framework.</p>	
	<p><u>Questions for both Sevenoaks Town Council and Sevenoaks District Council (4)</u></p> <p><i>I would prefer a joint response to these 4 questions but if that cannot be successfully achieved then independent responses should be submitted by the two Councils.</i></p>	
1	<p>Seal Parish Council (ID BHLF-P5FW-8U8Q-R) suggests that the referendum area should be extended beyond the Town Council area because the SNP, if made, would have implications for the village of Seal. Firstly, would such an extension of the area be justified and if so, what would be an appropriate boundary to use?</p>	<p>STC has consulted extensively and transparently with all neighbouring parishes throughout the SNP process.</p> <p>Sevenoaks is the major town and will have an impact on all neighbouring parishes which could include Riverhead, Otford and Dunton Green in addition to Seal.</p> <p>In 2013-2014 STC worked with Seal Parish Council (SPC) and Wildernesse Residents Association (WRA) on extending the parish boundary and creating a Neighbourhood Development Order, considerable resources were invested in this however Seal Parish Council and WRA decided not to proceed and STC reverted to its SNP. See Appendix to Agenda of 28th May 2014 Steering Committee, which gives details on a phone call between WRA and STC: <i>“An agreement had been reached that Sevenoaks Town Council would proceed with a Neighbourhood Development Plan for its parish boundary. Wildernesse Resident Associations would progress discussions with Seal</i></p>

		<p><i>Parish Council regarding a potential additional Neighbourhood Development Plan/Order for the area which included 35 houses of the Wildernesse Estate in the Seal parished area.”</i></p> <p>The decision recorded in the Minutes of the Steering Committee held 28th May 2014, was “subject to confirmation from DCLG that the modification was possible without reopening the public consultation process and Seal Parish Council confirming they were amenable to the remaining 35 houses being included within Sevenoaks Town Neighbourhood Area designation this option be pursued. If the above is not possible then the prospect of a Wildernesse Estate Neighbourhood Development Order be brought back for discussion”. Option one was nullified, as it was confirmed as not possible to change the boundary without public consultation (confirmed by Planning Aid England 28th May 2014). Option two was not further pursued by WRA or SPC, and STC continued to progress its SNP.</p> <p>When the parish boundary was consulted on for the SNP there were not any objections from Seal Parish Council or other neighbouring parishes.</p> <p>Seal Parish Council have lobbied successfully that all development within the Tarmac plan remains within Sevenoaks parish with the part within Seal parish remaining as public open space as per current Local Plan. See abstract from Seal Parish Council’s response to STC’s 2020 Public Consultation, dated 2nd March 2020 in a letter to Linda Larter: <i>“Similarly [Seal Parish Council] requests that the Neighbourhood Plan defines the boundary of the Green Belt as the limit of built development on the site, and thus ensure that Seal Village remains separate from the urban area.”</i></p> <p>Given that the major impact of the SNP will be experienced by residents of Sevenoaks parish it would be seen to be unfair that one neighbouring parish could overly influence the voting outcome especially as, were Seal Parish producing an NDP, Sevenoaks residents would not be able to vote on this.</p> <p>It would also not be consistent to only allow one neighbouring parish to participate in the referendum, as for example, the neighbouring village of Otford or Kemsing could</p>
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		<p>make such a request and then it would be challenging to determine where to draw the line.</p> <p>To date, 13 towns and parishes within the District have designated their neighbourhood areas, in relation to the production of a Neighbourhood Plan, and this includes Seal Parish. All these area designations exactly follow the parish boundaries and therefore it would seem to be consistent (and avoid any overlap) if the corresponding boundaries are used for the referenda.</p>
2	<p>The Sevenoaks Society (ID BHLF-P5FW-8UWZ-Z) refers to the relationship between the SNP and the replacement Local Plan. Could both Council's confirm that they are satisfied that there is no substantive reason why work on the Neighbourhood Plan should be delayed?</p>	<p>It had originally been anticipated that the SNP would follow Sevenoaks District Council's (SDC) replacement Local Plan and was delayed partially due to this, however the Local Plan did not proceed as anticipated.</p> <p>STC and SDC have worked collaboratively on the SNP, and it is consistent with both the current and forthcoming draft (Reg.18) Local Plan – we cannot see any reason to delay this. Please see Q5 below for further details.</p> <p>The delay of the SNP further, would incur additional costs to the local community in relation to updating data.</p> <p>Parishioners when raising concerns about development proposals state that they are keen the SNP does not incur further delays.</p> <p>Both SDC and STC confirm that there are no substantive reasons why work on the SNP should be delayed. Whilst SDC continues to progress the Local Plan (Reg. 18 consultation commences 16 Nov), the new Plan is not anticipated to be adopted until 2024, as set out in the Council's Local Development Scheme.</p>
3	<p>The Sevenoaks Society suggests that Aim C2 regarding vacant and underused sites (page 42), should be elevated to policy status. Is such a change required to meet the Basic Conditions?</p>	<p>No – refer to response to item 9</p> <p>SDC – this change is not considered to be required to meet the basic conditions but is nonetheless a helpful suggestion which STC may wish to consider as an amendment.</p>

<p>4</p>	<p>In the response from Tarmac Ltd (ID ANON-P5FW-8U8W-X) it is stated that the sites identified in policies D1 on page 70 (potential development sites) and D2 on page 81 should either be allocated or replaced with a general policy on windfall sites. Can an explanation be given as to how, in the view of the Councils, the approach being taken on this issue in the SNP meets the Basic Conditions?</p>	<p>Policy D1 provides site-specific design principles for sites that may come forward for development within the Neighbourhood Plan area either as windfall or through allocation in the Local Plan. Similarly, Policy D2 provides a site-specific design principles for the Tarmac site (the most significant potential site within the neighbourhood plan area). The sites were identified through the Neighbourhood Plan process as vacant or underutilised.</p> <p>Core Strategy policy SP1 - Design of New Development, states that all new development should be high quality and respond to local character. Policy D1 and D2 is in conformity with policy SP1 and provides and identifies site specific principles that help to articulate what 'high quality' and 'response to local character' means in respect of each site. These principles have been informed by consultation on the Neighbourhood Plan, including at Regulation 14.</p> <p>Furthermore, Policies D1 and D2 have been prepared in response to the NPPF and will (amongst other things) help to promote healthy and safe communities, make effective use of land and achieve well-designed places.</p> <p>The Neighbourhood Plan does not allocate the sites for development but providing principles that guide future design on the sites is important to both delivering on the Neighbourhood Plan Vision and Objective 15 to promote high quality design development that enhances the town and consolidates vacant or under-utilised land. The Town Council believes that both Policies have regard to national policies, contribute to achieving sustainable development, and are in general conformity with strategic policies in the Local Development Plan and therefore meet the Basic Conditions.</p> <p>13 sites were identified early on during the SNP process as having the potential for future development. The decision was made to provide design guidance as to what the SNP would expect from these sites, as opposed to allocating them which would require further investigation and resources. Historic England however then raised their concerns during Regulation 14 that identifying sites and including a development</p>
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	<u>Question for Sevenoaks District Council (3)</u>	
5	<p>Paragraph Reference ID: 41-009-20190509 of the Planning Practice Guidance on Neighbourhood Planning, advises that ‘where a neighbourhood plan is brought forward before an up-to-date local plan (i.e., the Local Plan for Sevenoaks District) is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in the emerging neighbourhood plan, the emerging local plan and the adopted development plan’. Could the Council confirm that such discussions have taken place and summarise the conclusions that were drawn?</p>	<p>Yes. SDC and STC have discussed at length the relationship between the proposed Neighbourhood Plan, SDC’s adopted Plan (the Core Strategy 2011 and Allocations and Development Management Plan 2015) and SDC’s emerging Local Plan, which will be subject to Regulation 18 consultation, commencing on 16 November 2022.</p> <p>This discussion has evolved over the years in which the neighbourhood plan has been in preparation. Initially, it was anticipated that the Local Plan would be adopted first, and then the Neighbourhood Plan would follow. However, due to DTC challenges at examination, a new Local Development Scheme (LDS) is now in place to produce a new Local Plan by 2024, with Regulation 18 consultation commencing this month. The LDS is available here: https://www.sevenoaks.gov.uk/directory_record/8/local_development_scheme</p> <p>In summary, STC is very aware that the Neighbourhood Plan needs to be in general conformity with the strategic policies in the existing development plan as set out below, and SDC has confirmed that this is the case.</p> <p>In addition, STC are aware of the emerging policy direction in the new Local Plan and have included elements within the Neighbourhood Plan which support and are consistent with the emerging position, in order to ensure the Neighbourhood Plan remains up-to-date. For example, this includes references to the Sevenoaks (Tarmac) Quarry site, which is also included within the forthcoming Regulation. 18 Local Plan.</p> <p>It is undeniable that it is a slightly more complicated approach where the Neighbourhood Plan comes before the adoption of the new Local Plan, but SDC has worked closely with STC to ensure consistency of approach, and we would not want to inhibit the Neighbourhood Plan in coming forward, particularly since the Local Plan is not programmed for adoption until 2024.</p>

<p>6</p>	<p>It is clear from some of the consultation responses that traffic levels, parking and congestion are significant concerns to some residents. Can the District Council confirm (in liaison with Kent County Council as Highway Authority) that it is satisfied with the approach towards the issue being taken by the Town Council.</p>	<p>Kent County Council has provided comment on the Neighbourhood Plan as part of the Regulation 16 consultation. In relation to highways and transport, the following KCC comments are relevant:</p> <p>Theme Three: Movement and Public Realm <i>Highways and Transportation: The County Council would refer to the Highway Code which has updated priorities for different road user classes, which is aimed to eventually change car driver perceptions regarding transport and public realm improvements. KCC would also encourage the proposal of Low Traffic Neighbourhoods within the Plan in order to prevent rat-running by motorists.</i></p> <p>Objective 8 <i>Highways and Transportation: The County Council would recommend removing the text ‘whilst ensuring that the centre is still accessible by car’, as car use may be restricted in order to reduce pollution levels or traffic levels around schools. The text on pages 30 and 102 contradicts this statement and there also may not be sufficient highway space for all transport modes. The text is therefore advised to be removed accordingly.</i></p> <p>Policy M4 <i>Highways and Transportation: The County Council would add that 20mph zones close to schools and in certain residential areas will also help to facilitate on-carriageway cycling, therefore providing a safer environment.</i></p> <p>Policy M6 <i>Highways and Transportation: KCC would recommend that Sevenoaks Station Interchange prioritises sustainable and active travel modes over improved drop-off and pick-up by private car</i></p> <p>Appendix B: Transport Strategy. Pedestrians <i>Highways and Transportation: In regard to the statement ‘Whilst zebras work in congested areas and do not unnecessarily hold up the movement of traffic, they don’t give the priority to pedestrian movements that would normally be expected in a town</i></p>
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7	<p>Could the Council confirm what is the current Development Plan as it relates to the town of Sevenoaks?</p>	<p>The current Development Plan consists of:</p> <ul style="list-style-type: none"> • Core Strategy 2011 • Allocations and Development Management Plan (ADMP) 2015 • Kent Minerals and Waste Local Plan (KMWLP) 2016 as amended by the Early Partial Review 2020 and Minerals Sites Plan 2020

	Questions for Sevenoaks Town Council (32)	
8	<p>In sub-section 7 on page 16:</p> <ul style="list-style-type: none"> - are there any other notable views that should be identified (second bullet point); and - is the Town Council satisfied that a building over 6 storeys high at the railway station may be acceptable visually and in terms of townscape? 	<p>Two representations at Regulation 16 Stage have reference the view from Granville Road towards the station and AONB as being notable (in addition to the view from London Road). The Town Council would be happy to amend wording of the second bullet point to include reference to this view.</p> <p>The third bullet makes reference to the ‘potential for a taller building to mark the station’. In principle marking the town’s station with a taller building is considered acceptable (greater height has already been permitted in the area – buildings ranging from four to ten storeys) however consideration will need to be given to how the development appears in views (second bullet point).</p>
9	<p>In the second paragraph under 4.1 (page 41) it explains that the ‘Aims’ are ‘non-planning related policies. However, I consider that, for example, Aim C2 (development of vacant and underused sites), Aim C7 (design guidance) and Aim L7 (improvements at Bradbourne Lakes) address (to some degree) planning related issues. I am not suggesting that the Aims become Policies, but I would welcome the response of the Town Council as to how greater clarity regarding the difference between Aims and Policies could be achieved. A decision maker needs to have a clear understanding regarding the difference in status between Aims and Policies.</p>	<p>The Neighbourhood Plan describes the distinction between Policies and Aims on page 9 and states that: <i>‘Neighbourhood Plans are permitted to include both planning and non-planning related policies. However, these must be clearly distinguishable. In this Plan the planning policies are labelled ‘Policy’, and the non-planning related policies are identified as ‘Aim’.</i></p> <p><i>Policies will be used by planning officers to determine planning applications. Aims represent other strategies that will be pursued by the Town Council over the life of the Plan.’</i></p> <p>Aims C2, C7 and L7 are all strategies or actions that the Town Council intend to progress (in some cases working with partners) to support Neighbourhood Plan objectives</p>
10	<p>The response from Kent Downs AONB Unit (ID ANON-P5FW-8UWT-T) includes a suggested amendment to Objective 2 (page 46). What are the views of the Town</p>	<p>Kent Down AONB have provided an alternative form of words for the final paragraph on page 46 which would replace with an alternative form of words. Current wording:</p>

	<p>Council on this suggestion? Is it required to ensure that the Basic Conditions are met?</p>	<p><i>'development should be designed to minimise impact on the setting of the Kent Down AONB. This can be achieved through working with the landscape and through planting that can act as a visual screen; through the use of materials that blend into the landscape, and by minimising light spill.'</i></p> <p>Proposed wording: <i>'Be designed to mitigate impacts on the setting of the Kent Downs AONB through structural planting, consideration of building heights, design, siting and materials and careful use of lighting'.</i></p> <p>The Town Council consider that the current wording meets the Basic Conditions but are happy to accept the alternative wording.</p>
11	<p>In policy C10 (page 48) is the word 'encourages' sufficiently strong? How would a decision maker interpret the policy?</p>	<p>These locations are considered to be important gateways and arrival points into the town and influence and impact on the perception of the town to visitors. This policy highlights the importance of the locations and the word 'encourage' is used to represent the fact that the Town Council will look to support proposals that enhance the arrival experience. The wording here could be amended to read "encourages and would be open to supporting proposals that enhance the arrival experience to Sevenoaks."</p> <p>The term support encompasses various ways that the Town Council could provide support on a relevant scheme, including financially, through Masterplanning, and/or through recommending approval via the Planning Committee.</p>
12	<p>How would a decision maker know what constitutes 'best endeavours' as referred to in policy L1 (page 50)?</p>	<p>Applicants would need to demonstrate the process that they have been through and the options they have considered to deliver biodiversity net gain.</p>
13	<p>Concerns have been raised by a local resident regarding protection for the Millpond at Greatness ((ID ANON-P5FW-8UWX-X). Is the Town Council satisfied that the SNP (and other policy documents) affords sufficient protection to this feature?</p>	<p>Millpond at Greatness is a 'public open space' and is protected under relevant legislation.</p> <p>STC is satisfied that the SNP and other policy documents affords sufficient protection to this feature.</p>

14	<p>What is the view of the Town Council on the amendment to policy L2 (page 51) as suggested by Thames Water (ID ANON-P5WF-8UWH-E)? Is it required to ensure that the Basic Conditions are met?</p>	<p>STC believes that Basic Conditions are met in respect of meeting the challenge of flooding however does not object to the additional wording being added to Policy L2:</p> <p><i>‘Developers will be expected to demonstrate that infrastructure capacity exists or will be provided ahead of occupation and that development will not overload the existing network or result in difficulties with local water supplies, sewerage and sewage treatment and waste disposal. Developers are encouraged to engage with all utility providers ahead of the submission of any applications to discuss infrastructure requirements.’</i></p>
15	<p>In policy L4 (page 52) there is a reference to trees and hedgerows lost through development being replaced. Where would the Town Council expect those ‘replacements’ to take place?</p>	<p>STC would expect ‘replacements’ to be a) where possible within the development site 2) close proximity, 3) within the parish boundary. “Trees and hedgerows” could be amended to read “semi-mature trees” as recommended in Response ANON-P5FW-8UW6-V.</p>
16	<p>It is not clear to me where the two allotment sites referred to in policy L8 (page 55) are located. Figure 4.4 just refers to ‘existing and proposed allotments’. Indeed, there appears to be no substantive reference to the Policies Map in the SNP. Could the Town Council provide clarity regarding which plans will form part of the Policies Map when the SNP is made, and which plans relate only to the presentation of the evidence on which the SNP is based.</p>	<p>Please refer to Figure 4.4 on page 54 of the SNP. This plan could be amended to show the difference between the existing allotments (East) and the proposed allotment site (to the West) via different coloured shading.</p>
17	<p>Is there a difference between ‘supports’ (policy M2 on page 57) and ‘promotes’ (policy M3 on page 57) and if so, why is it not explained?</p>	<p>STC supports the Sevenoaks District Cycling Strategy referred to in Policy M2) but this has been prepared by the District Council / Kent County Council.</p> <p>The walking and cycling route from Bat and Ball to Dunton Green was initially conceived in the Northern Sevenoaks masterplan commissioned by the Town Council and so is a project that the Town Council ‘own’.</p>

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		<p>The difference therefore is that how much action/participation is implied. Supports is agreeing with something promoted by another body while promotes means the project is being actively pursued by STC.</p>
18	<p>Is the inclusion (on page 57) of policies M2 (support for cycling strategy) and M4 (support for 20 mph speed limits) justified, bearing in mind they are basically statements of fact? How would a decision maker know in which residential areas a 20mph speed limit would be supported?</p>	<p>This would be done through Kent County Council and public consultation, and via results and the data from these. For information, KCC recently undertook a public consultation which closed on 10th November 2022, and feasibility study see Sevenoaks Town-wide 20mph speed limit and traffic calming scheme Let's talk Kent</p> <p>Sevenoaks Town Council responded to this consultation on 7th November 2022 and reaffirmed its support for 20mph speed limits outside schools and where requested by the Residents Associations and local groups. This response was agreed by the Planning Committee held on 31st October 2022, which was open to the public and the discussion and subsequent decision are minuted.</p>
19	<p>Can the Town Council confirm that the Sevenoaks District Cycling Strategy is sufficiently up to date?</p>	<p>Sevenoaks District Council is currently producing a Local Cycling and Walking Infrastructure Plan via Sustrans which is expected December 2022, please see Sevenoaks Urban Area LCWIP - Sevenoaks District Council - Citizen Space</p> <p>Kent County Council is also working on an east-west cycling route (mostly in Sevenoaks Town) using government active travel funding, with expected public consultation by the end of 2022</p> <p>For information, Sevenoaks Town Council is consulting with Otford Parish Council on a north-south cycling route from Otford High Street to Sevenoaks High Street to improve on KCC's 2017 feasibility study. This is in very early stages of discussion, however.</p> <p>Together the two above routes are the main elements of the Sevenoaks Cycling Strategy.</p>
20	<p>What are the outstanding proposals at Bat and Ball station as referred to in policy M6 (page 58)?</p>	<p>At the time of the SNP originally created proposals were as following:</p>

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		<ul style="list-style-type: none"> • refurbish derelict station building and environs – completed • provide sustainable use for station building – completed • install step free access to platform 1 – completed • link to refurbished Bat & Ball Centre – completed • install pedestrian steps from Otford Rd, via station to Centre – outstanding proposal • increased size of car park – outstanding proposal
21	Why are public realm improvements not included in policy M7 (page 59) as they are referred to in the supporting text?	Policy M7 is focused on the facilities within the station curtilage, however the wording in the supporting text also highlights the importance of public realm proposals close to the station. Objective Nine and Policy M11 and Aim M12 are focused on enhancements to the public realm
22	What are the enhancements to bus services and facilities that will be supported as referred to in policy M8 (page 59)?	Installation of real time travel information throughout the town, encouraging more people to use public transport by providing more attractive facilities via physical improvements to bus shelters. Also continuing STC’s support for bus routes, for instance the No. 8 bus.
23	In the supporting text under policy M9 (page 59) there is reference to charging points being introduced in appropriate public locations. How will this be achieved and by whom? How would ‘appropriate’ be defined?	<p>Councils (KCC, SDC & STC) are installing EV Charging Points within their assets and part of their climate change plans (please see this link to Sevenoaks Town Council’s Green Community Investment Plan). Preliminary research is being undertaken for shared EV points located in residential areas where properties do not have off road car parking.</p> <p>Appropriate could be defined by publically accessible 24 hours, in a location that allows passive surveillance to ensure safety and discourage vandalism, convenient to users and in a mix of residential/public venues.</p>
24	Policy E1 (page 62) refers to support for start-up business space across the town. How would that support manifest itself?	<p>Since work began on the SNP STC has created a Business Hub. There are three further similar facilities now in the town.</p> <p>Change of Use planning applications to buildings for similar use would be viewed sympathetically.</p>

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25	How does policy E3 (page 63) on parking provision accord with the approaches currently being taken on the issue by the District and County Councils?	Current SDC Policy on Parking is set out in ADMP Policy T2 (P.93) and relies on KCC vehicle parking standards in Interim Guidance Note 3 to the Kent Design Guide. The SNP's Policy E3 notes the need for flexibility in the application of these standards. SDC's emerging plan also refers to flexibility in relation to car parking (paragraphs 10.8 and 10.9) although this is generally in relation to reduced car parking, for example in relation to the provision of car clubs or the proximity to services.
26	Policy E5 (page 63) regarding neighbourhood centres uses the words 'such as'. This implies to me that there are other neighbourhood centres, in addition to the three that are listed. Firstly, if that is the case why is it not a comprehensive list? And secondly, any neighbourhood centres that are identified in the policy should be shown on the Policies Map.	There are only three neighbourhood centres so recommend removal of the wording 'such as'. The centres are identified in Figure A23 (page 121)
27	The paragraph below policy COM1 (page 64) states that the community centre has recently been completed. Therefore, what is the justification for the policy?	This new Centre has been rebuilt during the creation of the SNP. It could be removed as a policy but retained as information to demonstrate commitment to regeneration of northern ward.
28	Policy COM3 (page 66) refers to a 'cultural quarter' but plan 4.5 does not identify a specific area. Does it include all of The Vine (to which I could not find a reference in the supporting text)? Has a boundary for the area subject to policy COM3 been defined?	The Cultural Quarter does not include all of the Vine, but does include the Vine Gardens, bandstand and café at the Vine as cultural events may happen here. The Green Space is seen as a Sports facility so has not been included. The Cultural Quarter area has been defined in STC's Cultural Strategy (Appendix C titled "Sevenoaks – A Thriving Cultural Town", found on page 166 of the submitted plan). This could be made clearer by STC providing a red-line outline version of this to indicate boundaries, and for that to be included in the main SNP document, or for that diamond shape to be added to Figure 4.5 on Page 67.
29	Does the Town Council have any comments regarding the consultation response from Natural England? (ID BHLF-P5FW-8U8R-S) Are any changes required in order to ensure that the Basic Conditions are met?	The detailed descriptions relating to the sites on pages 74-76 and 83 identify that a number of the sites are within the Impact Risk Zones of Sevenoaks Gravel Pits SSSI and / or Greatness Brickworks SSSI. This is listed under planning designations / constraints. This is considered to meet Basic Conditions.

		Natural England have provided additional guidance on potential effects and mitigation in relation to the SSSI's. This information whilst useful is more detailed than the information provided in the Plan on other constraints / designations and whilst the Town Council would not object to its inclusion this information would perhaps be more detailed than is considered necessary.
30	Does the Town Council have any comments regarding the consultation response from Kent County Council (ID BHLF-P5FW-8U87-X)? Are any changes required to ensure that the Basic Conditions are met?	<p>Kent County Council provide detailed comments on the Neighbourhood Plan. Many of this supportive. The Town Council suggest making the following minor amends to the Plan in response to KCC comments.</p> <ul style="list-style-type: none"> i) Aim C3 supporting para: remove <i>'Applicants are encouraged to complete a heritage impact assessment ...'</i> and replace with <i>'Applicants should complete a heritage impact assessment...'</i> ii) Aim C3 supporting para: remove <i>'Where land has been identified as having archaeological importance, applicants are encouraged to undertake archaeological evaluations prior to construction, with any findings appropriately reported and documented on the local historic environment record in line with best practice guidance'</i>. And replace with <i>'Where land has been identified as having archaeological importance, desk-based assessment, and perhaps fieldwork will be required. The assessment should be appropriately reported and documented on the Kent Historic Environment Record in line with best practice guidance'</i>. iii) Policy M2 – add reference to LCWIP Strategy in the supporting text
31	There is a reference in policy D2 (page 81) to an 'agreed masterplan' (Tarmac Ltd site). Who should it be agreed by?	Agreed and supported by Sevenoaks Town Council with advice taken through the use of a Design Review Panel (Neighbourhood Plan Aim C6)
32	Seal Parish Council summarise a number of concerns in its consultation response (ID BHLF-P5FW-8U8Q-R). What is the response of the Town Council to the issues raised? (see also Question 1 above to both Councils). Are any changes required in order to ensure that the Basic Conditions are met?	No.

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33	The consultation response from Tarmac Ltd (ID ANON-P5FW-8U8W-X) raises a number of issues (see also Questions 4 and 31 above). Are any changes required in order to ensure that the Basic Conditions are met?	The SNP does not seek to allocate sites, however policy D2 provides design principles to ensure that, should the site be brought forward, positive design elements are included.
34	My understanding is that part of the Tarmac Ltd. Site at Greatness (page 83) falls outside the boundary of STC. Is this correct and should it be acknowledged in the SNP?	Part of the Tarmac site does fall outside the boundary of STC however parts of the site outside of the STC area are only identified for green (and blue) infrastructure. See also Q33.
35	How would policy D6 on retrofitting (page 85) be implemented?	<p>In terms of retrofitting – the London Plan requires development to undertake a Whole Life Carbon assessment. This then takes into account environmental damage from demolition, materials, construction, and operational energy. The policy in London requires a Whole Life Cycle Carbon Assessment for applications referred to the mayor which includes developments of over 150 dwellings.</p> <p>https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance</p> <p>Sevenoaks Town Council proposes to add the creation of a development strategy that includes requirement for a Whole Life Carbon Assessment in some form to its five-year Action Plan, and to work with SDC to create this strategy document. SDC has confirmed that it would be happy to work towards this with STC. Please see Q39 regarding a five-year Action Plan.</p>
36	The NHS Kent and Medway integrated Care Board (ID ANON-P5FW-8U8N-N) suggests that reference should be made, on page 122, to the Otford Medical Practice, which I am told lies to the north of the A25. Is such a reference necessary?	No. That is outside of the Neighbourhood Plan area. The issue being raised is that there is no medical practice in the northern part of Sevenoaks Town i.e., within Sevenoaks Town but north of the A25.
37	The National Trust recommends a small number of changes to the document (ID ANON-P5FW-8U8T-U). What is the view of the Town Council on the suggestions? Are the changes required to ensure that the Basic Conditions are met?	<p>No not to meet Basic Conditions, however a couple of minor factual changes are recommended, and the Town Council would be happy to make the changes:</p> <ul style="list-style-type: none"> i) On page 32 amending the number of volunteers from between 450 and 500 to 350; and

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		ii) <i>On page 96 'This significant open space attracts over 250,000 visitors to the National Trust facilities plus around another 400,000 people walking in the parkland annually contributing greatly to the local economy.'</i>
38	The Sevenoaks Society makes a number of suggested changes to the SNP in its consultation response (ID BHLF-P5FW-8UWZ-Z). Do the Town Council consider that any of the suggestions made are required to ensure that the Basic Conditions are met?	No
39	The monitoring and review of Plans is an important component in the plan-making process, in order to ascertain whether or not the policies are effective. I could find no reference in the SNP to the monitoring of the policies or to the future role of the Town Council in this process. I would welcome the views of the STC as to why this issue has not been addressed in the SNP.	<p>The Town Council had the intention to create an Action Plan to monitor the policies within the SNP. Wording could be added to the SNP to declare this.</p> <p>It is the intention to review the SNP on a 5 yearly basis.</p> <p>Climate Change matters are being actioned via STC's Green Community Investment Plan. This information could also be added to the SNP.</p>