

Sustainability Appraisal for the Sevenoaks Local Plan 2015-35

Interim SA Report
to accompany the Local Plan
Issues and Option Consultation

July 2017

Quality information

Prepared by

Nick Chisholm-Batten
Principal Consultant

Rosie Cox

Environmental Consultant

Checked by

Nick Chisholm-Batten
Principal Consultant

Approved by

Steve Smith
Technical Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
V.3.0	27 th July 2017	Consultation version	27 th July 2017	Steve Smith	Technical Director

Prepared for:

Sevenoaks District Council

Prepared by:

AECOM Infrastructure & Environment UK Limited
Aldgate Tower
2 Leman Street
London
E1 8FA
aecom.com

Limitations

This document has been prepared by AECOM Infrastructure & Environment UK Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

© This Report is the copyright of AECOM Infrastructure & Environment UK Limited. Any unauthorised reproduction or usage by any person other than the addressee is strictly prohibited.

Table of contents

1.	Introduction	5
1.1	Background	5
1.2	Current stage of plan making	6
1.3	Sustainability Appraisal (SA) explained.....	6
1.4	This Interim SA Report.....	6
2.	Options appraised and appraisal methodology.....	8
2.1	What is the scope of the SA?	8
2.2	Options appraised as reasonable alternatives	13
2.3	Approach to the appraisal.....	13
3.	Appraisal of development strategy options for housing	15
3.1	Housing need in Sevenoaks District.....	15
3.2	Housing delivery options.....	15
3.3	Appraisal findings	17
4.	Appraisal of options for key policy themes	31
4.1	Key policy themes.....	31
4.2	Appraisal of options for meeting affordable housing need	31
4.3	Appraisal of options for older people's housing.....	35
4.4	Appraisal of options for Gypsies and Traveller provision	41
4.5	Appraisal of options for the redevelopment of employment land.....	44
4.6	Appraisal of options for retail impact assessments	47
4.7	Appraisal of options for retail floorspace	49
5.	Next steps	52

This page is intentionally blank.

1. Introduction

1.1 Background

AECOM has been commissioned to undertake an independent Sustainability Appraisal (SA) in support of Sevenoaks District Council's emerging Local Plan.

Sevenoaks District Council is currently preparing a new Local Plan to replace the Core Strategy (adopted Feb 2011) and the Allocations and Development Management Plan (adopted Feb 2015). The new Local Plan, which will cover the period to 2035, will include strategic and detailed planning and development management policies, land allocations for housing, employment and mixed use and identify areas in the district for protection.

Key information relating to the Local Plan is presented in Table 1.1.

Table 1.1: Key facts relating to Sevenoaks Local Plan 2015-2035

Name of Responsible Authority	Sevenoaks District Council (SDC)
Title of Plan	Sevenoaks Local Plan 2015-2035
Subject	Spatial plan
Purpose	The Sevenoaks Local Plan will set out the strategy for future growth within Sevenoaks District in the period to 2035. It will replace the saved policies of previous Core Strategy (February 2011) and the Allocations and Development Management Plan (February 2015).
Timescale	To 2035
Area covered by the plan	Sevenoaks District. (Figure 1.1)
Summary of content	The Sevenoaks Local Plan will present the spatial vision for the district, strategic planning policies, development management policies, site specific allocations and proposals maps.
Plan contact point	Helen French, Senior Planning officer Email address: helen.french@sevenoaks.gov.uk

1.2 Current stage of plan making

This Interim SA Report accompanies the current consultation on the Local Plan (*Sevenoaks Local Plan 2015-2035, Issues and Options*).

At the current stage of plan-making SDC is not consulting on a draft plan. Rather, the Council is consulting on an initial 'Issues and Options consultation document'. The aim of the Issues and Options consultation is to gain stakeholders' views on the approach Local Plan policies can take on various key planning issues, including alternative development strategies for the district. The document is an initial stage in developing the Local Plan and has been prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012).

The current Issues and Options consultation precedes the release of the draft Local Plan for further consultation in spring 2018. Drawing on consultation responses received at the current stage of plan-making and new evidence base studies undertaken to inform the Local Plan, this document will set out the proposed policies for the Local Plan, including a preferred development strategy.

1.3 Sustainability Appraisal (SA) explained

SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution to sustainable development.

An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹. SA also widens the scope of the assessment from focusing on environmental issues to also include social and economic issues.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

The 'likely significant effects on the environment', are those defined in Annex I of the SEA Directive as '*including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors*'. Reasonable alternatives to the plan need to take into consideration the objectives for the plan and its geographic scope. The choice of 'reasonable alternatives' is determined by means of a case-by-case assessment and a decision.²

1.4 This Interim SA Report

At the current stage of plan-making, SDC is not consulting on a draft plan. Rather, the Council is consulting on an initial 'Issues and Options consultation document'.

This report has therefore been produced voluntarily with the intention of informing this early stage of preparation of the Local Plan. Specifically, this report presents a consideration of the high-level approaches and alternatives presented within the Issues and Options consultation document. This is for the benefit of those who might wish to make representations through the consultation and for the benefit of the plan-makers tasked with selecting preferred approaches for the Local Plan.

¹ Directive 2001/42/EC

² Commission of the European Communities (2009) Report from the Commission to the Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC). (COMM 2009 469 final).

The aim of the current consultation is to gain stakeholders' views on the approach SLP policies could take on various key planning issues, including alternative spatial strategies for the district. A key role of this and subsequent stage of the SA process is to inform the development of spatial options for the SLP, including strategic site allocation options.

2. Options appraised and appraisal methodology

2.1 What is the scope of the SA?

2.1.1 SA Scoping Report

The SEA Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ These authorities were consulted on the scope of the Local Plan SA in September 2016.

The baseline information (including baseline data and context review) initially included in the SA Scoping Report has been updated in the period since 2016 and provides the basis for the SA process.

2.1.2 SA Framework

Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability problems / issues that should be a particular focus of SA, ensuring it remains targeted. These issues were then translated into an SA 'framework' of objectives and appraisal questions.

The SA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach.

The SA Framework and the appraisal findings in this Interim SA Report have been presented under ten SA Themes, reflecting the range of information being considered through the SA process. These are:

- Biodiversity
- Climate Change
- Landscape and Historic Environment
- Environmental Quality
- Land, Soil and Water Resources
- Population and Communities
- Health and Wellbeing
- Transportation
- Economy
- Town and Local Centres

The SA Framework is presented in Table 2.1 below.

³ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *"by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme"*.

Table 2.1: SA Framework for the Sevenoaks Local Plan 2015-35

SA Themes	SA Objectives	Appraisal questions: Will the option/proposal help to...
Biodiversity and geodiversity	Protect and enhance all biodiversity and geological features	<ul style="list-style-type: none"> • Support continued improvements to the status of the SSSIs present in the district? • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Enhance regional ecological networks? • Support the provisions of the Kent Biodiversity Strategy, including relating to Biodiversity Opportunity Areas? • Achieve a net gain in biodiversity? • Protect and enhance the district's rich geodiversity resource? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	Promote climate change mitigation in Sevenoaks District	<ul style="list-style-type: none"> • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Reduce the need to travel? • Promote use of energy from low carbon sources? • Reduce energy consumption and increase efficiency?
	Support the resilience of Sevenoaks District to the potential effects of climate change	<ul style="list-style-type: none"> • Ensure that no development takes place in areas at higher risk of flooding, taking into the likely effects of climate change into account? • Sustainably manage water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk? • Improve green infrastructure networks in the district area to support adaptation to the potential effects of climate change?

SA Themes	SA Objectives	Appraisal questions: Will the option/proposal help to...
Landscape and Historic Environment	Protect, maintain and enhance Sevenoaks District's cultural heritage resource, including its historic environment and archaeological assets.	<ul style="list-style-type: none"> • Conserve, and where possible, enhance cultural heritage assets and their settings? • Conserve, and where possible, enhance the district's conservation areas? • Reduce the number of features and areas in the district deemed to be 'at risk'? • Support access to, interpretation and understanding of the historic environment?
	Protect and enhance the character and quality of Sevenoaks District's landscapes and townscapes.	<ul style="list-style-type: none"> • Support the integrity of the Kent Downs AONB, including in conjunction with the provisions of the AONB Management Plan? • Support the integrity of the High Weald AONB, including in conjunction with the provisions of the AONB Management Plan? • Conserve and enhance landscape and townscape character? • Conserve and enhance local diversity and distinctiveness? • Support the integrity of the district's conservation areas? • Preserve the historic settlement pattern of the district?
Environmental Quality	Improve air, soil and water quality.	<ul style="list-style-type: none"> • Maintain or improve local air quality? • Promote the remediation of contaminated land? • Protect and improve the area's chemical & biological water quality? • Protect groundwater resources?
Land, Soil and Water Resources	Ensure the efficient use of land.	<ul style="list-style-type: none"> • Avoid the use of land classified as the best and most versatile agricultural land? • Promote the use of previously developed land?
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<ul style="list-style-type: none"> • Reduce the amount of waste produced? • Move waste up the waste hierarchy?
	Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Minimise water consumption?

SA Themes	SA Objectives	Appraisal questions: Will the option/proposal help to...
Population and Communities	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?
	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of residents? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?
	Reduce deprivation and promote more inclusive and self-contained communities.	
Health and Wellbeing	Improve the health and wellbeing of Sevenoaks District's residents.	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities for all age groups? • Encourage healthy lifestyles and reduce health inequalities? • Enhance multifunctional green infrastructure networks in the district? • Provide and enhance the provision of community access to green infrastructure? • Improve access to the countryside for recreation? • Enhance the energy efficiency and quality of the housing stock?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Reduce the need to travel through sustainable patterns of land use and development? • Encourage modal shift to more sustainable forms of travel? • Enable transport infrastructure improvements? • Facilitate working from home and remote working?

SA Themes	SA Objectives	Appraisal questions: Will the option/proposal help to...
Economy	Promote the economic vitality of Sevenoaks District.	<ul style="list-style-type: none"> • Support the economic vitality and viability of the district's settlements? • Create opportunities for a variety of businesses to flourish in the district? • Enable transport infrastructure improvements? • Support the rural economy? • Support the visitor economy? • Facilitate working from home, remote working and home-based businesses? • Enhance educational opportunities?
Town and Local Centres	Promote the vitality of Sevenoaks District's Town, Neighbourhood and Village centres.	<ul style="list-style-type: none"> • Support the vitality and viability of Sevenoaks District's Town, Local, Neighbourhood and Village Centres? • Support the retail offer of Sevenoaks, Swanley, Edenbridge and Westerham town centres, including retail markets? • Promote a daytime and night time economy of Sevenoaks, Swanley, Edenbridge and Westerham town centre? • Preclude the development of out of centre shopping precincts? • Promote the local offer of the district's Local Service Centres, Neighbourhood Centres and Village Centres?

2.2 Options appraised as reasonable alternatives

2.2.1 Reasonable alternatives in SA

A key element of the SA process is the appraisal of 'reasonable alternatives' for the Local Plan. The SEA Regulations⁴ are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the "*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*".

2.2.2 Options appraised

In response to this, a number of alternative policy approaches have been considered for the Local Plan through the SA process to date. These relate to the following:

- Development strategy options for housing
- Options for meeting affordable housing need in the district
- Options for delivering affordable housing in rural areas
- Options for providing housing for older people
- Options for delivering Gypsy and Travellers accommodation
- Options for the redevelopment of existing employment land for non-residential uses
- Options for the undertaking retail impact assessments
- Options for allocating new retail floorspace

Further detail on these options and their appraisal is presented in **Chapters 3** and **4**.

2.3 Approach to the appraisal

The options considered as 'reasonable alternatives' have been appraised against the SA Framework (**Section 2.1**).

In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each SA Theme.

Where a causal link between the options and SA Themes was established, impacts were identified on the basis of professional judgment with reference to the evidence base. The appraisal was undertaken with reference to the criteria in Schedule 1 of the SEA Regulations, that is:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (for example, due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to-
 - special natural characteristics or cultural heritage;

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

- exceeded environmental quality standards or limit values; or
- intensive land-use; and
- the effects on areas or landscapes which have a recognised national, community or international protection status.

The following chapters therefore:

- 1) Provide more detail on the options considered as reasonable alternatives through the SA process; and
- 2) Present the appraisal findings relating to these options.

3. Appraisal of development strategy options for housing

3.1 Housing need in Sevenoaks District

In September 2015, an estimate of objectively assessed housing need (OAHN) for Sevenoaks District was published in the Sevenoaks and Tunbridge Wells Strategic Housing Market Assessment (SHMA).⁵

The September 2015 OAHN, which had regard to relevant underlying trends (including the latest available demographic projections, anticipated economic growth and market signals), established a need for 12,400 dwellings to be delivered in the district over the period 2013-2033. This equates to an annual average of 620 new dwellings per annum.

3.2 Housing delivery options

This part of the report presents information regarding the consideration of reasonable alternative approaches to housing growth, or 'development strategy alternatives'. Given that presenting a development strategy for housing is at the heart of the plan objectives, it is reasonable that alternatives appraisal should focus on this matter.⁶

In this context, the Council has identified five different approaches that endeavour to accommodate the housing need identified for the district. The five options are as follows:

Option H1: Brownfield Green Belt

Option H1 seeks to maximise development of available brownfield sites in the district. In addition to maximising supply through directing development to brownfield sites within the district's settlements, it also directs development to available brownfield sites within the Green Belt.

Brownfield or 'Previously Developed Land' (PDL) is defined in national policy (NPPF) as land "*which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure*". The NPPF then lists a number of exclusions such as land that has been used for agriculture and forestry, minerals and waste workings.

However, for the purposes of the identification of potential land in this consultation, 'brownfield' land has been defined in the widest sense i.e. land that has been previously developed (is no longer a green field), without considering the exclusions outlined in the National Planning Policy Framework (NPPF). Once the Local Plan is further developed, consideration will be given as to whether the exclusions set out in the NPPF are relevant for the development of the strategy.

In addition to the call for sites process, through which landowners across the district were asked to submit land that might be suitable for development for consideration by the Council, SDC has contacted every Town and Parish Council in the district to understand if there are other brownfield sites in their areas which may be suitable. This combined process has yielded sites which could accommodate approximately 1,500 units on suitable brownfield land in the Green Belt.⁷

Overall it is anticipated that this option will yield in the region of 6,500 dwellings, which is just over 50% of the OAHN for the district.

⁵ GL Hearn (September 2015). Sevenoaks & Tunbridge Wells Strategic Housing Market Assessment: Final Report https://www.sevenoaks.gov.uk/downloads/file/699/strategic_housing_market_assessment_shma_september_2015

⁶ Recent case-law (most notably Friends of the Earth vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal.

⁷ Category 2 and 3 sites, SDC (April 2017) Strategic Housing and Economic Land Availability Assessment (SHELAA) <http://cde.sevenoaks.gov.uk/mgAi.aspx?ID=8418>

Option H2: Green Belt land adjacent to higher-tier settlements

In addition to maximising supply through directing development to brownfield sites within the district's settlements, Option H2 enables the allocation of housing on sites within the Green Belt in the district where 'exceptional circumstances' can be proven.

SDC are monitoring a number of different initiatives in relation to the top tier settlements within the district which may eventually have the potential to provide exceptional circumstances for Green Belt release. Although the NPPF does not define exceptional circumstances, the Local Plan will seek to interpret national policy in order to provide clearer guidance. For example, exceptional circumstances may occur where new housing development achieves the sustainable reuse of brownfield land; ensures the delivery of new and needed key infrastructure; is needed to achieve regeneration and/or helps achieve significant compensatory improvements in the Green Belt.

The potential housing yield from this option is not yet known.

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H3 comprises a hybrid of Option H1 and H2. In addition to maximising supply through directing development to brownfield sites within the district's settlements, Option H3 potentially enables development to take place on brownfield sites within the Green Belt and on sites within the Green Belt in the district where 'exceptional circumstances' can be proven to apply.

The potential housing yield from this option is not yet known.

Option H4: Housing delivery through a large urban extension or a new settlement

In addition to maximising supply through directing development to brownfield sites within the district's settlements, Option H4 enables the delivery of a large urban extension or a new settlement.

During 2016, SDC consulted on the option of a Swanley Garden Village for 3,000 new homes as part of the Swanley Master Vision. After giving consideration to consultation responses received, SDC has resolved not to promote a garden village as part of the regeneration options for Swanley, and will instead focus on options that do not entail Green Belt release. More recently, substantial areas of land that could accommodate new settlements or larger scale development have been submitted to SDC through the call for sites process. Whilst these sites are in the Green Belt, they will be assessed in the same way as other sites received under the call for sites process. They will form part of an updated SHELAA in 2018.

The potential housing yield from this option is not yet known.

Option H5: Housing delivery on Green Belt land near transportation hubs

In addition to maximising supply through directing development to brownfield sites within the district's settlements, the option seeks to enable development within the Green Belt on weakly performing Green Belt land near transportation hubs.

This partially responds to the recent Housing White Paper (2017) which suggests that '*when carrying out Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs*'. It is suggested that this is a reference to public transport hubs, such as train stations and bus interchanges. This approach will be considered in more detail once the Government provides additional clarification as to what it considers constitutes a 'transport hub' and also as further local evidence is gathered. The potential housing yield from this option is not yet known.

3.3 Appraisal findings

The findings of the appraisal of the options are summarised below. These have been presented in a series of tables which present the appraisal findings SA Theme.

Table 3.1: Biodiversity and Geodiversity

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

Whilst the significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures within development, it can be generally considered that a higher level of housing development in a location increases the likelihood (and potential magnitude) of negative effects on the designated sites and habitats and species present in the vicinity. This is linked to an increased likelihood of direct effects, such as from land take, disturbance or the loss of key features of ecological value, and an increased likelihood of indirect effects, such as from a reduction of ecological connectivity, and changes in land use patterns or an increase in recreational activity.

Effects on biodiversity have the potential to take place on both previously developed and greenfield land. Whilst greenfield development has the potential to lead to the loss of key landscape features of biodiversity value and impact on ecological corridors, previously developed land can support a rich biological diversity. In this context, previously developed land can provide habitat for UKBAP Priority Species and contribute to wider ecological networks, as well as the provision of ecosystem services such as pollination. As such, both Option H1 and, to a lesser extent, Option H3 have increased potential to lead to impacts on brownfield biodiversity in the district. If these options are taken forward, a detailed assessment of the biodiversity constraints and opportunities on potential brownfield sites in the Green Belt will be required. It should also be noted that focusing development on brownfield land will reduce the need for new development areas in other areas of the district, including undeveloped land. This would likely help reduce impacts on habitats, species and ecological networks in these locations.

In relation to nationally designated nature conservation sites, a number of SSSIs are located adjacent to the built up area of Sevenoaks town. These include the Dryhill SSSI, Sevenoaks Gravel Pits SSSI, Greatness Brickworks SSSI, Knole Park SSSI and Hubbards Hill SSSI. Whilst no SSSIs are located adjacent or are likely to be affected by residential development in Swanley and Edenbridge, the Westerham Woods SSSI and the Westerham Mines SSSI are located adjacent to Westerham. SSSI Impact Risk Zones (IRZs) are a GIS tool/dataset which maps zones around SSSIs according to the particular sensitivities of the features for which they are notified. They specify the types of development that have the potential to have adverse impacts at a given location. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this context, IRZs for residential development cover most of Sevenoaks and Westerham. The release of Green Belt land adjacent to the higher tier settlements of Sevenoaks and Westerham through Option H3 therefore has the potential to focus development at locations with the potential to have impacts on the SSSIs in the vicinities of the two towns.

Option H4 has the potential to have concentrated effects on biodiversity assets through promoting a significant scale of development at particular locations. In this context, the delivery of housing allocations on fewer, but larger sites has the potential to lead to an increased magnitude of localised effects on individual biodiversity assets. This includes habitat loss and direct and indirect impacts on species. The delivery of larger sites in the district, however, presents opportunities for significant enhancements to green infrastructure networks, which support habitats and ecological linkages and enhance sub-regional biodiversity networks. This, however, depends on the design and layout of new development and implementation of high quality multifunctional green infrastructure networks.

Option H5 seeks to enable Green Belt development near key transportation hubs in the district. Development on Green Belt land in these locations has the potential to lead to impacts on habitats, species and ecological networks near to these locations. In this context, sensitive locations in the north of the district where development might take place under this option include: Longfield/Hartley, which have numerous BAP Priority

Habitats located in the vicinity of the settlements; Shoreham and Otford, which are both located in close proximity to the Otford to Shoreham Downs SSSI; and Dunton Green and Bat and Ball, which are both in close proximity to (and within the IRZ for residential development) for the Sevenoaks Gravel Pits SSSI. Sensitive locations in the south of the district include: Leigh, which has numerous BAP Priority Habitats located in the vicinity of the station; and Cowden railway station, which is within an IRZ for residential development relating to the Cowden Meadow SSSI.

Table 3.2: Climate change

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

Climate change mitigation

Road transport is an increasingly significant contributor to greenhouse gas emissions in Sevenoaks District. The options which direct an increased level of housing provision to the higher tier settlements will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel to services and facilities, therefore helping to limit emissions from transport. In this context, Option H2 promotes the largest level of housing in the vicinities of the higher tier settlements including Sevenoaks, Swanley, Edenbridge and Westerham, which are the settlements with the widest range of services and amenities in the district. Option H5 will also support the use of sustainable modes of transport through focusing development at transportation hubs in the district. This will help limit increases in greenhouse gas emissions from new development in the district.

In relation to Option H5, the delivery of housing through a large urban extension or a new settlement offers opportunities to deliver new services, facilities and amenities to accompany development as well as enhancements to sustainable transport networks. There is also the potential to support lower carbon lifestyles, including through decentralised energy provision and realising low to zero-carbon energy potential opportunities. As such, development through this approach has the potential to help limit the carbon footprint of new housing growth and support lower carbon lifestyles.

Many of the sites likely to be taken forward through Option H1, whilst brownfield sites, are located in the open countryside. As such, the option, through spreading growth around the district is likely to be less sustainable than focusing development in the vicinities of the key settlements because the more rural locations will have fewer services and amenities readily available. This will encourage more travel, and is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not deliver the 'critical mass' necessary to deliver new/improved public transport services to the nearest centres. As a result more trips are likely to be made by private car, with implications for greenhouse gas emissions.

In terms of the other aspects relating to greenhouse gas emissions, the sustainability performance of development depends on elements such as the integration of energy efficient design within new development and the provision of renewable energy generation. This, however, can only be assessed on a site-by-site basis once the details of potential development become clearer (e.g. when 'pre-app' discussions take place between developers and the Council or a planning application is submitted). It should be noted though, that a higher quantum of development will do more to increase the built footprint of the district, with associated potential overall increases in greenhouse gas emissions.

In terms of carbon sequestration, this depends on elements such as the integration of green infrastructure enhancements within new development areas, incorporating the on and off-site provision of carbon sinks.

Climate change adaptation

In relation to fluvial flood risk, this largely relates to the presence of the River Darent, River Medway, and the River Eden in the district. In the context of flood risk from the River Darent, Option H5 is likely to direct an increased level of development to Shoreham and Otford, parts of which are located in flood risk areas, and Option H2 is likely to direct an increased level of development at Westerham. In relation to the River Medway, Option H5 is likely to promote an increased level of development at Leigh, and in relation to the River Eden, Option H2 is likely to promote an increased level of development at Edenbridge.

Whilst all options have the potential to lead to development in flood zones, or elevated levels of flood risk, it is considered that the provisions of the NPPF and national policy in relation to flooding will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. For example, the NPPF does not permit development within flood risk areas or where the effect would be to increase flood risk elsewhere without appropriate mitigation measures. Likewise, adherence to the recommendations and guidance presented in the Strategic Flood Risk Assessment (SFRA) undertaken to inform the Local Plan will help limit effects.

In relation to surface water flooding, given the urbanised nature of parts of the district, this is a risk in many parts of Sevenoaks. However, the effect of each option on flood risk from surface water runoff is difficult to establish given uncertainties regarding the nature of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS).

In relation to other climate change adaptation issues, and the need to increase the resilience of the district to extreme weather events, the urban heat island effect and other elements associated with the potential effects of climate change, it is not possible to evaluate the extent to which the options will support adaptation. This will depend on the extent to which new development facilitated through the options promotes, for example, the provision of high quality green infrastructure networks. However, Option H4, which seeks to enable housing delivery through a large urban extension or a new settlement has significant potential for the incorporation of green infrastructure networks, SuDS and other provisions which will support the resilience of the area to the effects of climate change.

With regards to the cumulative impacts of development, there is potential for negative effects on flood risk if unmitigated. In respect to development on brownfield land within settlements and land adjacent to existing built up areas, the cumulative effect of housing delivery could be a significant change in the provision of hard standing which may lead to an increase in flooding either locally or elsewhere, if unmitigated. In addition, there is a potential for cumulative effects to occur where development in a number of settlements along the same watercourse might lead to changes to watercourse flow rates and an increased risk of flooding. For example, Eynsford, Shoreham, Chipstead, Farningham, Otford, Sundridge, Brasted and Westerham are all located along the River Darent. However, it is considered that potential cumulative effects with respect to this issue will be limited due to the provisions of the NPPF and national policy in relation to flooding.

Table 3.3: Landscape and Historic Environment

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

Option H1 promotes the redevelopment of areas of previously developed land within the Green Belt. Whilst development within open countryside has the potential to lead to impacts on landscape character, given the contribution of some of these areas to poor quality landscapes, development at these locations has the potential to enhance landscape character at some locations. However this depends on the extent to which high quality and distinctive design and layout is integrated within new development areas.

Option H3 has the potential to have concentrated effects on landscape character in the locations where the large urban extension(s) or a new settlement is proposed. Whilst, as for the other options, impacts depend on the extent to which high quality and distinctive design and layout is integrated within new development areas, the likely scale of development proposed through the options (i.e. potentially 1,000+ homes) has increased potential for significant effects on landscape character.

60% of Sevenoaks District is covered by land designated as Areas of Outstanding Natural Beauty (AONB). Given the coverage of the two AONBs in the district, all of the options have the potential to lead to impacts on the setting of the AONB.

The Kent Downs AONB covers much of the central part of the district. In this context, Option H2, and to a lesser extent, Option H3, which enables Green Belt development adjacent to higher-tier settlements, has the potential to increase the likelihood of impacts on the setting of the AONB in the vicinity of Sevenoaks and Westerham. Option H5 also has the potential to increase the likelihood of impacts on the Kent Downs AONB in the vicinity of Eynsford, Shoreham, Otford and Kemsing through focusing development at these locations with good public transport links.

The High Weald AONB covers the southern part of the district. Option H5 has the potential to increase impacts on the AONB through targeting development at Leigh, Hever and Cowden. Given the location of the higher-tier settlements in the parts of the district outside of the High Weald AONB, Option H2 will not lead to additional impacts on landscape character in this AONB.

93% of the district is covered by the Metropolitan Green Belt. Whilst the Green Belt is designated to prevent urban growth into countryside, and, as such, not directly designated for landscape quality purposes, development within the Green Belt is nonetheless likely to have adverse impacts on landscape character and local distinctiveness through facilitating growth in the open countryside. In this context all of the options have the potential to lead to the loss of areas of Green Belt. This will have impacts on landscape character and local distinctiveness.

Sevenoaks District has a rich historic environment, with numerous features and areas nationally and locally designated for their historic environment interest.

Whilst the significance of the effects from each option on features of cultural, built and archaeological heritage assets depends on the location, scale and nature of development, it can be considered that a higher level of housing development within a settlement increases the likelihood (and potential magnitude) of negative effects on the heritage assets locally. This is linked to an increased likelihood of direct and indirect impacts on the fabric and setting of features and areas of historic environment interest in the vicinity of the settlement.

Whilst development has the potential to have negative effects on the fabric and setting of the historic environment, it should also be noted that well sited development coupled with high quality design and layout can support enhancements to cultural heritage assets and their settings. Likewise new development areas in Sevenoaks' towns and villages offer significant opportunities to rejuvenate disused and underutilised heritage assets and enhance their settings. As such, effects on the historic environment have the potential to be both positive and negative.

Option H2 has increased potential to lead to impacts on the historic environment in the vicinities of the higher tier settlements of Sevenoaks, Swanley, Edenbridge and Westerham. Option H5, through enabling housing delivery on Green Belt land near transportation hubs has increased potential for impacts on the historic environment in the vicinities of the towns and villages with or close to railway stations, including Sevenoaks, Swanley,

Edenbridge, Longfield, Eynsford, Shoreham, Otford, Dunton Green, Bat & Ball, Kemsing, Leigh, Hever and Cowden.

The impact of Option H4 on the historic environment depends largely on the location of the large urban extension(s) or a new settlement promoted through the option, and the historic sensitivity of the area where development is proposed. The option however, through promoting a likely scale of development of 1,000+ homes, has the potential to lead to significant effects on the fabric and setting of the historic environment. Option H1, through promoting the redevelopment of areas of previously developed land within the Green Belt, has the potential to have impacts on the fabric and setting of historic environment assets at these locations. This however depends on the extent to which high quality and distinctive design and layout is integrated within new development areas, and the option offers the opportunity to rejuvenate disused and underutilised heritage assets and enhance their settings at these locations.

Table 3.4: Environmental Quality

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

Air quality

Air quality is a key issue for parts of Sevenoaks district. Given that the options currently being considered are housing focused, this assessment focuses on emissions from transport related to housing growth.

Eleven Air Quality Management Areas have been designated in the district due to emissions from road transport. Whilst five of these are located on the Strategic Road Network (including the M25, M26, M20 and A20(T) away from significant settlements, the remaining AQMAs are located within the built up parts of some of the district's towns and villages.

In relation to the AQMA in Swanley, Option H2, and to a lesser extent, Options H3 and H5, have the potential to increase the scale of development in the town. This has the potential to increase traffic flows, with associated impacts on air quality. Similarly Options H2, H3 and H5 have the potential to lead to an increased level of development in the Sevenoaks area, leading to increases in traffic flows at sensitive locations such as the AQMA covering the High Street and part of London Road, Pembroke Road and parts of the town centre, the AQMA covering the Bat & Ball Junction with the A25 and the AQMA at Seal. Option H2, and to a lesser extent, Option H3 also have the potential to lead to increases in traffic flows at the AQMA covering the High Street, Market Square, Vicarage Hill, and London Road in Westerham.

However, the options which direct an increased level of housing provision to the key centres will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel to services and facilities, therefore helping to limit emissions from transport. In this context, Option H2 promotes the largest level of housing in the vicinities of the higher tier settlements including Sevenoaks, Swanley, Edenbridge and Westerham, which are the settlements with the widest range of services and amenities in the district. Option H5 will also support the use of sustainable modes of transport through focusing development at transportation hubs in the district. This will help limit the contribution of growth to air quality issues in the district.

In relation to Option H5, the delivery of housing through a large urban extension(s) or a new settlement offers opportunities to deliver new services, facilities and amenities to accompany development as well as enhancements to sustainable transport networks. This may help to manage air quality issues associated with a focused expansion of growth in the district.

Many of the sites likely to be taken forward through Option H1, whilst brownfield sites, are located in the open countryside. As such, the option, through spreading growth around the district is likely to be less sustainable than focusing development in the vicinities of the key settlements because the more rural locations will have fewer services and amenities readily available. This will encourage more travel, and is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not create the 'critical mass' necessary to deliver new/improved public transport services to the nearest centres. As a result more trips are likely to be made by private car, with implications for air quality over a wider area.

Soil quality

All five options have the potential to support the remediation of contaminated land in the district through promoting the use of previously developed land. However, Options H1 and H3, which enable the development of previously developed Green Belt sites have the most potential among the options to deliver the remediation of brownfield land. In contrast, Options H2, H4 and H5, which promote an increased level of greenfield development will do less to facilitate the remediation of areas of land contamination by reducing a focus on previously developed land.

Water quality

Whilst the significance of the effects from each option on water quality largely depends on the location, scale and nature of development and the incorporation of mitigation measures (e.g. SuDS), it can be considered that a higher level of housing development within a settlement increases the likelihood (and potential magnitude) of negative effects on both surface water and groundwater resources. This is linked to increased levels of surface

water runoff, increased suspended sediment loading and discharge of polluted runoff.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area.

Reflecting the vulnerability of groundwater in the area to pollution, Zone 1 SPZs are located in the following locations: the area around Sevenoaks Hospital and Bat and Ball railway station; east of Seal; close to Knole House/Sevenoaks School; east of Sundridge; north west of Westerham; Eynsford; Hartley; and Ash Green. In this context Option H2 (and to a lesser extent Option H3), through enabling the development of Green Belt land adjacent to higher-tier settlements has increased potential to lead to impacts on groundwater quality in Sevenoaks and Westerham, and Option H5 has increased potential to lead to impacts on groundwater quality in Sevenoaks, Eynsford and Hartley through facilitating an increased level of housing development in these locations.

Table 3.5: Land, Soil and Water Resources

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

Land and soil resources

All five options support the use of previously developed land in the district. However, Options H1 and H3, which enable the development of previously developed Green Belt sites have the most potential among the options to support the efficient use of land. In contrast, Options H2, H4 and H5, which promote an increased level of greenfield development, will do less to facilitate the redevelopment of previously developed land, and increase land take on productive agricultural land.

In terms of the location of the best and most versatile agricultural land, no land has been classified as Grade 1 in the district. Land classified as Grade 2 is, however, present in the north of the district, in the vicinity of Swanley and Horton Kirby, as well as in a band running from Eynsford, Otford and Chevening to the western edge of the district. As such, Option H2 (and to a lesser extent Option H3), through enabling the development of Green Belt land adjacent to higher-tier settlements has increased potential to lead to increased loss of the best and most versatile agricultural land in Swanley. Option H5 also has increased potential to lead to impacts on the best and most versatile agricultural land in Swanley, Eynsford and Otford through facilitating an increased level of housing development at these locations.

Elsewhere, in relation to agricultural land quality, recent (post 1988) detailed agricultural land classification has not been undertaken for most of the district. As such, it is uncertain whether land previously classified as Grade 3 land in the district comprises Grade 3a land (i.e. land classified as the best and most versatile) or Grade 3b land (i.e. land which has not been classified as such).

Water resources

In relation to water availability, the Darent and Cray Catchment Abstraction Management Strategy⁸ highlights that the Darent and Cray catchments are largely not available for licensing. More water has been removed from these catchments than the amount available. In this context Sevenoaks District lies within an area of water stress where consumption is greater than availability the Government's *2013 Water Stressed Areas* highlighted that much of district is classified as under "Serious" or "Moderate" water stress.

However, in relation to water supply, the NPPF states that local plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity (paragraphs 156, 157 and 162). In the context of the current assessment, it is anticipated that the Water Resources Management Plans prepared by water supply companies will be expected to address long-term water supply issues associated with growth.

Waste

The generation of waste is an inevitable consequence of development, including both waste generated by construction, as well as waste subsequently generated by households etc. In a simplified scenario, the more housing that is delivered, the more waste that will be generated. In this context, Options H3 and H4 have the most potential to increase waste arisings though delivering more housing in the district.

The management of waste, including the minimisation of waste and the encouragement of the re-use, recycling and recovery of waste materials would be undertaken on a site-by-site basis. All development would be required though to meet the relevant legislative requirements with regard to waste. Given the legislative and regulatory requirements regarding waste, it is considered that development is unlikely to have a significant negative impact on waste management.

⁸ Environment agency (2014) The Darent Management Catchment [Online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289922/LIT_5357_c4dd09.pdf

Table 3.6: Population and Communities

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

In relation to housing delivery, of the five options, Options H3 and H4 have the most potential to meet the established Objectively Assessment Housing Need for Sevenoaks district. All of the options are above and beyond the baseline/maximising supply position which currently estimates the provision of 5,000 new homes. Option H1 is currently estimated to add a further 1,500 new homes to this figure, which would constitute just over half of the OAHN. The extent to which the other different options might contribute to meeting housing need is currently unknown, and these options will be further developed as consultation is undertaken and the draft Local Plan progresses towards submission and examination. The Local Plan consultation document is very clear that Green Belt (93% of the District) will continue to be protected and development will only be considered where a convincing 'exceptional circumstances' case can be made, for which the bar is set very high. Meeting OAHN does not in its own right constitute 'exceptional circumstances'; rather the over-riding requirement is to ensure that development is sustainable.

Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In this regard, development in the vicinity of the higher tier settlements (Sevenoaks, Swanley, Edenbridge and Westerham) will enhance accessibility through directing housing to the settlements with the broadest range of services and facilities. This will support accessibility to the wider range of amenities located in these settlements. Locating more housing in closer proximity to the services and facilities available in the key centres of the district will also likely support quality of life and wellbeing through promoting walking and cycling and active lifestyles.

In this context, Options H2 and H3 promote the highest level of housing growth in Sevenoaks, Swanley, Edenbridge and Westerham which are the settlements with the widest range of services and amenities in the district. Similarly, Option H5 promotes the highest level of housing delivery closer to transportation hubs. On this basis, these options have the most potential to support accessibility to existing community facilities and promote more active lifestyles.

Whilst the location of development through Option H4 is uncertain, the delivery of a new urban extension(s) or a new settlement, is likely to be delivered alongside a significant improvement of services, facilities and amenities in the area. Proposals are also likely to be supported by enhancements to sustainable transport networks. As such, development through this approach has the potential to support the quality of life of residents by promoting accessibility to services and facilities, facilitating access to green infrastructure networks, and encouraging sustainable transport use, if appropriate infrastructure provision is included.

Option H1, through spreading growth around the district, including within the Green Belt, has an increased likelihood of delivering housing at locations with fewer services and amenities readily available. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services and walking and cycling networks to the nearest centres. As a result, development is less likely to take place in accessible locations through Option H1. Option H3, through also facilitating development within the Green Belt away from existing service centres, also partly has the potential to have a similar effect.

Whilst Sevenoaks has relatively low levels of overall deprivation, a number of pockets of deprivation are present in the district, including in Swanley, Edenbridge, and Farningham/Horton Kirby/South Darenth. In this context, the provision of increased levels of development at Swanley and Edenbridge through Options H2, H3 and H5, and Farningham/Horton Kirby/South Darenth via Option H5 (given the presence of the railway station at Farningham Road, located just outside the district), may help support the regeneration of these areas, helping to promote a reduction of deprivation levels locally. This, however, partly depends on new development areas being well planned, supported by appropriate infrastructure and service provision, and being of appropriate design which supports a high quality public realm.

Table 3.7: Health and Wellbeing

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

The health of people in Sevenoaks District is generally favourable in comparison to regional and national averages. Accessibility to community services and health and recreational facilities are a key influence on health and wellbeing. In this respect, development in the larger settlements (Sevenoaks, Swanley, Edenbridge and Westerham) will enhance accessibility through directing housing to the settlements with the broadest range of services and facilities; this will support accessibility to the wider range of amenities located in these settlements, with benefits for the health and wellbeing of residents. In addition, the key centres in the district have a wider range of health services, including primary health care services, and sports and recreational facilities, so better supporting residents' health and wellbeing. Furthermore, locating more housing in closer proximity to the facilities available in the key centres will also encourage healthier modes of travel including walking and cycling.

In this context, Options H2 and H3 promote the highest level of housing growth in Sevenoaks, Swanley, Edenbridge and Westerham, which are the settlements with the widest range of services and amenities in the district. Similarly, Option H5 promotes the highest level of housing delivery closer to transportation hubs. On this basis, these options have the most potential to support accessibility to community facilities (including health services and recreational amenities) and promote healthier modes of travel (including walking and cycling). Overall, Option H1 is likely to promote a lower proportion of housing growth in key centres of the district, doing less to support accessibility to services and facilities and support active modes of travel.

In relation to Option H4, it is considered that new housing delivered through this approach will be delivered alongside a significant improvement of services, facilities and amenities in the area. Proposals will also be supported by enhancements to sustainable transport networks, and green infrastructure enhancements. As such, development through this approach has the potential to support health and wellbeing by promoting accessibility to services and facilities, facilitating access to green infrastructure networks, and encouraging active modes of travel- if appropriate infrastructure provision is included.

Option H1, through spreading growth around the district, including within rural brownfield locations within the Green Belt, has the potential to encourage car use. This is due to the option being likely to deliver housing at locations with fewer services and amenities readily available. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services and walking and cycling networks to the nearest centres. As a result more trips are likely to be made by private car, with implications for health and wellbeing relating to air quality, road safety and undermining active modes of transport.

The delivery of higher levels of housing growth in the district has the potential to lead to effects on health and wellbeing through increasing road safety issues and impacts on air and noise from increased traffic flows at certain locations. This may have impacts on the health and wellbeing of residents. In this context, Options H3 and H4 have increased potential to lead to increases in traffic flows through delivering a higher quantum of development in the district. Effects, however, depend on the detailed location of new development areas and the integration of elements such as sustainable transport and green infrastructure provision.

Table 3.8: Transportation

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

The options which direct an increased level of housing provision to the key centres in Sevenoaks District will promote accessibility through directing housing to the settlements with the broadest range of services and facilities. This will help limit the need to travel by car to amenities.

In this context, Option H2 promotes the highest level of housing growth in Sevenoaks, Swanley, Edenbridge and Westerham, which are the settlements with the widest range of services and amenities in the district. Option H5 also directs the highest level of housing growth to the locations best serviced by public transport nodes, including railway stations. On this basis, these options have the most potential to support the use of sustainable modes of transport and minimise the need to travel.

Well located and coordinated development with nearby key amenities and community facilities reduces the need to travel. This provides opportunities for the development of sustainable movement corridors which utilise growth to support public transport and walking and cycling. In this context Option H4, which facilitates housing growth through a large urban extension or a new settlement, offers significant opportunities for contributing or realising the need for new transport infrastructure to accompany new development.

Option H1 will facilitate development at brownfield locations in the countryside. These locations are often in unsustainable locations, poorly accessible by non-car modes. At the same time, spreading growth around the district is likely to be less sustainable than focusing development in the vicinities of the key settlements because the more rural locations will have fewer services and amenities readily available and so development in these areas will likely encourage more travel. This is a factor that developers cannot easily mitigate. Dispersed growth is also more difficult to serve by public transport and may not achieve the 'critical mass' necessary to deliver new/improved public transport services to the nearest centres. As a result, more trips are likely to be made by private car. This will also require trade-offs for Option H3, which, while supporting development on land adjacent to higher-tier settlements, will also promote development on brownfield Green Belt sites, many of which are in inaccessible locations.

Table 3.9: Economy

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

Overall, through potentially delivering a larger number of dwellings in the district, Options H3 and H4 have the potential to best support the economic vitality of the district. All of the options are, however, likely to have a long-term positive effect on the economy through the delivery of housing, and if matched with housing provision, the delivery of employment and associated improvements to services/facilities. It should however be noted that, given the higher land values which can often be secured for housing, and the highly constrained nature of the district, an increased provision of housing may lead to a restriction of employment land delivery.

New housing provision may support the district's towns and villages' economic vitality through promoting the viability of local services and facilities, enhancing the local economic offer, increasing the local market for goods and services and supporting cultural activities. In this context, Option H2 will do most to support the vitality of the larger settlements in the district including Sevenoaks, Swanley, Edenbridge and Westerham through facilitating the development of Green Belt land adjacent to higher-tier settlements. Option H5 will support the economic viability and vitality of many of the smaller settlements in the district with good transport links, including Longfield, Eynsford, Shoreham, Otford, South Darenth, Horton Kirby and Kemsing in the north of the district, and Leigh, Hever and Cowden in the south of the district. This will have potential positive effects for the rural economy through enhancing the vitality of these more rural settlements.

In contrast Option H1, which directs an increased proportion of development to brownfield sites within the Green Belt, will do less to promote the economic vitality of existing centres in the district, given the location of many of the sites in less accessible rural locations. The option however has the potential to bring forward brownfield sites in rural areas with good suitability for employment uses, supporting the rural economy.

The potential impact of Option H4 on economic vitality, which facilitates housing growth through a large urban extension or a new settlement, depends on the location of such a strategic-scale development.

Table 3.10: Town and Local Centres

Development strategy options

Option H1: Brownfield Green Belt

Option H2: Green Belt land adjacent to higher-tier settlements

Option H3: Brownfield Green Belt and Green Belt land adjacent to higher-tier settlements

Option H4: Housing delivery through a large urban extension or a new settlement

Option H5: Housing delivery on Green Belt land near transportation hubs

New housing provision may support the district's town and local centres' vitality through promoting the viability of local services and facilities, enhancing the local economic offer, increasing the local market for goods and services and supporting cultural activities. In this context, Option H2 will do most to support the vitality of the larger settlements in the district including Sevenoaks, Swanley, Edenbridge and Westerham through facilitating the development of Green Belt land adjacent to higher-tier settlements. Given the accessibility of these locations, this will also be supported by Option H5.

Option H5 will support the economic viability and vitality of many of the smaller settlements in the district with good transport links, including the Local Service Centre of Otford, Service Villages including Hartley, Kemsing, Eynsford, Farningham, South Darenth, Horton Kirby, Shoreham and Leigh. This will have potential positive effects for the vitality of these more rural settlements.

In contrast Option H1, which directs an increased proportion of development to brownfield sites within the Green Belt, will do less to promote the vitality and viability of existing centres in the district. This is due to the location of many of the sites in rural locations with poorer accessibility to towns and villages.

4. Appraisal of options for key policy themes

4.1 Key policy themes

The aim of the current Issues and Options consultation is to gain stakeholders' views on the approach SDC policies can take on various key planning issues. At this early stage in the development of the Local Plan, it is anticipated that discussions on these issues will be broad and at a high level.

Reflecting this, SDC would like to consider alternative approaches for number of key policy themes for the Local Plan. As such the SA process has appraised a series of options for a range of themes, with a view to informing the current consultation on Issues and Options.

The detail of the options appraised, and the appraisal findings, are presented below.

4.2 Appraisal of options for meeting affordable housing need

Given affordable housing need in Sevenoaks District, as reflected by the suggestion in the SHMA that 422 affordable dwellings a year are required in the district, SDC are keen to consider a number of different approaches to affordable housing delivery. This is with a view to potentially increasing the delivery of affordable housing in the district.

In light of the above, the SA process has considered three options, as follows:

- Option AH1: Meet the full need for affordable housing in the district (it should be noted that Option AH1 would require a substantial increase in the number of homes to be delivered annually to meet overall affordable housing need)
- Option AH2: 40% affordable housing across the district as per current Core Strategy policy.
- Option AH3: 20% affordable housing across the district.

The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking.

Table 4.1: Appraisal of affordable housing options

Option AH1: Meet the full need for affordable housing in the district.

Option AH2: 40% affordable housing across the district as per current Core Strategy policy.

Option AH3: 20% affordable housing across the district.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		AH1	AH2	AH3
Biodiversity and Geodiversity	<p>The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all housing provision—including affordable housing seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.</p> <p>Whilst the significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures, it can, however, be considered that a higher level of housing development in a settlement increases the likelihood (and potential magnitude) of negative effects on the designated sites and habitats and species present in its vicinity. This is linked to an increased likelihood of direct effects, such as from land take, disturbance or the loss of key features of ecological value, and an increased likelihood of indirect effects, such as from a reduction of ecological connectivity, changes in land use patterns or increased recreational activity. In this context, given that affordable housing would need to be delivered alongside market housing to be viable, Option AH1 would require a substantial increase in the number of homes to be delivered annually to meet overall affordable housing need. As such this option has increased potential to have impacts on habitats, species and ecological networks in the district.</p>	3	1	1
Climate Change	<p>In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing, such as green infrastructure provision, and appropriate design and layout.</p> <p>The provision of an additional level of affordable housing through Option AH1 is unlikely to lead to significant effects on greenhouse gas emissions if energy efficiency measures are integrated within all types of housing provision. However, the increased level of overall housing delivery required under the option would have the potential to increase greenhouse gas emissions through leading to larger increases in the district's built footprint.</p>	3	1	1

Option AH1: Meet the full need for affordable housing in the district.

Option AH2: 40% affordable housing across the district as per current Core Strategy policy.

Option AH3: 20% affordable housing across the district.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		AH1	AH2	AH3
Landscape and Historic Environment	<p>93% of Sevenoaks District is covered by the Metropolitan Green Belt. Whilst the Green Belt is designated to prevent urban growth into countryside, and, as such, is not directly designated for landscape quality purposes, development within the Green Belt is nonetheless likely to have adverse impacts on landscape character and local distinctiveness through facilitating growth in the open countryside. 60% of the district is also covered by AONB designation. As such, given affordable housing would need to be delivered alongside market housing to be viable, Option AH1 would require a substantial increase over the number of homes to be delivered annually (630) to meet overall affordable housing need. This option therefore has increased potential to have impacts on landscape and townscape character, and the fabric and setting of the historic environment.</p> <p>In terms of Options AH2 and AH3, if all housing provision- including affordable housing- is appropriately located, and design and layout is sensitive to landscape character, then there should be no difference between the options in terms of landscape impacts and the setting of the historic environment. As such, it is not possible to differentiate the options in terms of potential effects on the historic environment. Effects depend on the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high quality green infrastructure provision.</p>	3	1	1
Environmental Quality	<p>Air quality is a key issue for parts of Sevenoaks District. As such, given that affordable housing would need to be delivered alongside market housing to be viable, Option AH1 would require a substantial increase in the overall number of homes to be delivered annually (630) to meet overall affordable housing need. This has the potential to lead to increases in traffic flows in key locations of sensitivity for air quality in the district, including the eleven AQMAs which have been designated in the district due to emissions from road transport.</p> <p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution.</p>	3	1	1
Land, Soil and Water Resources	<p>Given the limited availability of brownfield sites in the district, the increase in housing delivery that would be required under Option AH1 increases the potential for land take on productive agricultural land.</p> <p>In relation to water supply, the NPPF states that local plans should plan positively to ensure the provision of infrastructure for water supply, including an assessment of its quality and capacity. In the context of the current assessment, it is anticipated that the Water Resources Management Plans prepared by water supply companies will be expected to address long-term water supply issues associated with growth, including any additional growth facilitated by Option AH1.</p>	3	1	1

Option AH1: Meet the full need for affordable housing in the district.

Option AH2: 40% affordable housing across the district as per current Core Strategy policy.

Option AH3: 20% affordable housing across the district.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		AH1	AH2	AH3
Population and Communities	<p>Option AH1, through meeting affordable housing needs in the district, will help residents access a wider range of housing types, sizes and tenures. This will support the quality of life of residents and support the vitality and cohesiveness of communities.</p> <p>Given the challenge of delivering affordable housing in smaller settlements on sites of a limited size, initiating the current requirement for affordable housing provision on sites through Option AH2 has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. This will enable an increased number of existing residents to find affordable housing and remain living locally, supporting accessibility to current employment and social networks. It also has increased potential to support the vitality of these settlements by facilitating the provision of housing for a broader range of groups and ages.</p>	1	2	3
Health and Wellbeing	<p>Option AH1, and to a lesser extent Option AH2, through enabling residents to find affordable housing and remain living locally, will reduce the need to travel to existing employment and amenities. The option will also support community cohesion through helping to meet local housing needs and reinforcing existing social networks.</p> <p>Through these benefits, the option therefore has increased potential to support the physical and mental health and wellbeing of residents.</p>	1	2	3
Transportation	<p>There is unlikely to be a significant differentiation between the options in relation to this SA theme since the performance of the options will depend on the location of affordable housing provision and the delivery of infrastructure alongside such provision.</p>	?	?	?
Economy	<p>In relation to the economic vitality of the district, the delivery of an additional level of housing provision through Option AH1 has the potential to do more than the other options to support economic vitality.</p> <p>The implementation a more proactive approach to affordable housing provision through Options AH1 and AH2 has the potential to have particular impacts on affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. This will support the vitality of these settlements by facilitating the provision of housing for a broader range of groups and ages, with benefits for the rural economy. Through encouraging an increased provision of affordable housing in smaller settlements, Option AH2 will also support the availability of the rural workforce in key sectors such as agriculture, forestry and leisure/recreation.</p>	1	2	3
Town and Local Centres	<p>The delivery of an additional level of housing provision through Option AH1 has the potential to support the economic and cultural vitality of the district's towns and villages.</p> <p>The implementation a more proactive approach to affordable housing provision through Options AH1 and AH2 has the potential to have particular benefits for affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. This will support the vitality of smaller settlements by facilitating the provision of housing for a broader range of groups and ages, and supporting community cohesion through helping to meet local housing needs and reinforcing existing social networks.</p>	1	2	3

4.3 Appraisal of options for older people's housing

The identified need for older people's housing in Sevenoaks District is 66 new specialist homes per year in the form of sheltered and extra care schemes and 25 new bed spaces per year in the form of nursing/care homes.

Given this need, SDC are keen to consider a number of different approaches for delivering older people's housing. The SA process has therefore considered three options, with a view to exploring the sustainability implications of different approaches to delivering older people's housing in the district.

These are as follows:

- Option OP1: Meet the need for older people on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard.
- Option OP2: Meet the identified need through the provision of a 'retirement village' in a single location.
- Option OP3: Facilitate a market-led approach to older people's housing provision.

The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking.

Table 4.2: Appraisal of options for older people’s housing provision

Option OP1: Meet the need for older people on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard.

Option OP2: Meet the identified need through the provision of a ‘retirement village’ in a single location.

Option OP3: Facilitate a market-led approach to older people’s housing provision

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		OP1	OP2	OP3
Biodiversity and geodiversity	<p>Effects on biodiversity have the potential to take place through all of the options. The significance of these effects depends on the location, design and layout of new provision, and the integration of infrastructure which supports ecological networks in the area. Biodiversity assets have the potential to be impacted by older people’s housing provision in the district if these elements are not sufficiently integrated. However if provision seeks to address these issues, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.</p> <p>Option OP2 has the potential to have concentrated effects on biodiversity assets through promoting a significant scale of development at particular locations for retirement provision. This has the potential to lead to an increased magnitude of localised effects on individual biodiversity assets. This includes habitat loss and direct and indirect impacts on species. The delivery of larger sites however presents opportunities for enhancements to green infrastructure networks, which support habitats and biodiversity networks. This depends though on the design and layout of new development, and the implementation of high quality multifunctional green infrastructure networks.</p>	?	?	?
Climate Change	<p>In terms of greenhouse gas emissions, road transport is an increasingly significant contributor to emissions in the plan area. The extent to which the three options have the potential to support climate change mitigation through facilitating a reduced level of car dependency is therefore a key element.</p> <p>In this context Option OP1 has increased potential to facilitate the development of new housing at locations which are more integrated with the existing built up parts of settlements. As such, this option will enable residents to have easier access to sustainable transport options, reducing reliance on the car and helping to limit greenhouse gas emissions from transport.</p> <p>The impact of Option OP2 on greenhouse gas emission depends on the location of a proposed retirement village taken forward through this option. However, without the delivery of appropriate infrastructure provision, the option has the potential to a high degree of car dependency, with implications for emissions.</p> <p>As the broad location of provision under OP3 is unknown, it is not possible to establish the likely effect on climate change mitigation and adaptation. However, the option has the potential to facilitate new older people’s housing provision in less accessible locations requiring a dependency on the private car. This has the potential to have implications for greenhouse gas emissions from transport.</p> <p>Option OP2 has the most potential of the options to proactively support climate change adaptation through the incorporation of green infrastructure networks, SuDS and other provisions which will support the resilience of the area to the effects of climate change</p>	1	2	3

Option OP1: Meet the need for older people on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard.

Option OP2: Meet the identified need through the provision of a 'retirement village' in a single location.

Option OP3: Facilitate a market-led approach to older people's housing provision

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		OP1	OP2	OP3
Landscape and Historic Environment	<p>Given the likelihood for more concentrated development on larger sites under a market-led approach, Option OP3 has the potential to lead to changes in landscape and townscape character and quality. This includes the loss of landscape features and visual impact, including impact on the quality and distinctiveness of the AONBs.</p> <p>Similarly Option OP2 may also lead to adverse impact on the landscape considering the environmental constraints of the district and the availability of land to deliver this option. Visual impacts are expected to arise from the single location development proposed. The significance of these impacts will, however, depend on the openness of the site, the level of screening and whether the site lies within the AONBs in the district. However OP2 also has the opportunity to enhance local character and distinctiveness through incorporating high quality design within the new retirement village.</p> <p>As OP1 focuses provision on multiple sites in sustainable town and village locations, it is expected that the landscapes in these areas will be less vulnerable to new provision. However, concentrating such development in town and village centres may impact on heritage assets and their settings. Impacts on the heritage resource may be positive though if design incorporates enhancements to town and villagescapes, or looks to rejuvenate underutilised historic assets. Additionally, all options have the opportunity to enhance the historic environment through respecting existing historic features, and promoting local distinctiveness.</p>	1	2	3
Environmental Quality	<p>All options have the potential to lead to effects on air quality, however given the location of provision is unknown, effects may vary significantly. OP2 may lead to concentrated effects on air quality if retirement village type development is located in appropriate locations. This includes situating such development within locations which may affect the eleven AQMAs in the district, or impact on emissions at the more sensitive locations in the district (such as in the areas where the 19 roadside nitrogen dioxide monitoring stations are located in the district).</p> <p>Whilst focusing older people's housing provision in urban areas under OP1 may lead to provision being located areas of poor air quality, (for example at Seal and Sevenoaks), this approach will support sustainable transport use, with the potential to limit emissions from transport.</p>	2	1	2

Option OP1: Meet the need for older people on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard.

Option OP2: Meet the identified need through the provision of a 'retirement village' in a single location.

Option OP3: Facilitate a market-led approach to older people's housing provision

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		OP1	OP2	OP3
Land, Soil and Water Resources	<p>In terms of the location of the best and most versatile agricultural land, land classified as Grade 2 land is present in the north of the district, in the vicinity of Swanley and Horton Kirby, as well as in a band running from Eynsford, Otford and Chevening to the western edge of the district. As such, all options have the potential to lead to loss of high quality agricultural land depending on their location. However, Option OP1 has the potential to locate older people's housing provision on previously developed land, supporting the efficient use of land. Option OP3 also has the potential to locate new provision on previously developed land. However, given land availability, OP2 has the most potential to lead to the loss of significant areas of productive agricultural land due to the focused nature of older people's housing provision the option encourages.</p> <p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems (SuDS) are an effective means of minimising surface water runoff and hence pollution.</p>	1	3	2
Population and Communities	<p>Through promoting older people's housing provision on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard, Option OP1 is the most likely of the options to deliver the housing to meet residents' needs. Option OP2, through focusing provision within one retirement development, will also support provision which provides a broader range of services and facilities on-site.</p> <p>Providing homes for older people in sustainable locations (OP1) would offer accessibility to services, facilities and the sustainable transport network. This would support community cohesion and improve quality of life for residents. The provision of a retirement village outside of the town and local centres through Option OP2 may isolate residents, resulting in residents having to travel to access essential facilities and amenities. However, OP2 will support the provision of community infrastructure within the development, which has the potential to result in a distinct community, promoting residents' welfare and reducing pressure on existing infrastructure.</p> <p>Option OP3 may deliver provision in less accessible locations, which would result in residents travelling for day-to-day services and facilities, having a negative effect on residents' quality of life. However this is uncertain, and depends on such provision's proximity to existing or proposed communities, facilities and services.</p>	1	2	3

Option OP1: Meet the need for older people on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard.

Option OP2: Meet the identified need through the provision of a 'retirement village' in a single location.

Option OP3: Facilitate a market-led approach to older people's housing provision

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		OP1	OP2	OP3
Health and Wellbeing	<p>Larger development facilitated through OP2 may include the provision of community facilities including open space and recreational facilities, with the potential to support resident physical and mental health. OP1 is also likely to lead to housing provision which is located in close proximity to green space through promoting development in sustainable locations in the district. Additionally OP1 will support the development of older peoples housing at locations which are more easily accessible to existing services, facilities and amenities, including health and leisure facilities. This will also support healthier modes of travel.</p> <p>Accessibility to health and recreational facilities, and as such impact on health and wellbeing, will depend on the location of new provision under Options OP2 and OP3.</p>	1	2	3
Transportation	<p>Through promoting older people's housing provision in sustainable locations, option OP1 provides residents with ease of access to local services and facilities. This is expected to encourage the uptake of sustainable modes of travel, including walking and public transport use. Option OP1 also enables good access for residents to local public transport networks, facilitating access to other locations within and outside of the district. This will help reduce reliance on the car as the primary mode of transport, which may in turn limit impacts on congestion issues in traffic hotspots.</p> <p>Option OP2 has the potential to lead to development which is disconnected from sustainable transport networks, increasing car reliance. This may increase pressure in congested areas of the district, as residents are required to drive into centres for access to facilities and services.</p> <p>It is uncertain whether provision under Option OP3 will be located within areas with good transport links.</p>	1	2	2
Economy	<p>Option OP1 will support the economic vitality and viability of the district's settlements through providing older people's housing in sustainable locations in good proximity to centres. This option provides residents with good access to facilities and amenities, supporting the local economy.</p> <p>Option OP2 may contribute towards supporting local employment opportunities, through potentially requiring care support for older residents, and possibly through the provision of facilities and services within the retirement village that may require personnel for operation.</p> <p>The impact of Option OP3 on the economy depends on the location of such provision and scale and tenure of such provision.</p>	1	2	2

Option OP1: Meet the need for older people on multiple sites in sustainable locations close to services, facilities and transport links, and to provide a proportion of these as affordable housing and to the Lifetime Homes standard.

Option OP2: Meet the identified need through the provision of a 'retirement village' in a single location.

Option OP3: Facilitate a market-led approach to older people's housing provision

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		OP1	OP2	OP3
Town and Local Centres	<p>Option OP1 will support the vitality of the local centres through integrating development within existing communities. This will contribute towards the viability of centres, including through supporting existing facilities and amenities.</p> <p>OP2 is expected to facilitate new provision which is detached from existing town and local centre. However a retirement village may support the viability of facilities and services in nearby towns and village centres if these are not provided within the retirement village provision.</p> <p>Provision under Option OP3 may contribute towards the growth of the town centres through increasing the use of local facilities and amenities. This is however dependent on location.</p>	1	2	2

4.4 Appraisal of options for Gypsies and Traveller provision

SDC are keen to consider a number of different approaches to delivering Gypsy, Traveller and Travelling Showpeople’s needs. The SA process has therefore considered three options, with a view to exploring the sustainability implications of different approaches to delivering Gypsy, Traveller and Travelling Showpeople’s provision in the district.

These are as follows:

- GT1: Allocate new permanent pitches on the existing sites subject to suitability
- GT2: Allocate new permanent pitches on small scale extensions to existing sites
- GT3: Allocate pitches on new sites subject to suitability and sustainability

The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with ‘1’ the most favourable ranking and ‘3’ the least favourable ranking.

Table 4.3: Appraisal of options for Gypsies, Travellers and Travelling Showpeople provision

GT1: Allocate new permanent pitches on the existing sites subject to suitability

GT2: Allocate new permanent pitches on small scale extensions to existing sites

GT3: Allocate pitches on new sites subject to suitability and sustainability

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		GT1	GT2	GT3
Biodiversity and geodiversity	<p>No significant residual effects are predicted for biodiversity under Option GT1 as pitches are to be allocated on existing sites. However provision under this option may lead to the loss of existing features and areas of biodiversity interest on the site.</p> <p>Options GT2 and GT3 have increased potential to lead to impacts on habitats and species by leading to land take. Option GT2 includes small scale extensions, limiting the potential for impacts on biodiversity assets. Whilst impacts on biodiversity assets from option GT3 have the potential to be larger, this will depend on the location, design and layout of new sites, and the integration of infrastructure which supports ecological networks in the area. As such, if provision seeks to address these elements, then negative impacts on biodiversity and ecological networks will be limited.</p>	1	2	3

GT1: Allocate new permanent pitches on the existing sites subject to suitability
GT2: Allocate new permanent pitches on small scale extensions to existing sites
GT3: Allocate pitches on new sites subject to suitability and sustainability

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		GT1	GT2	GT3
Climate Change	<p>In terms of greenhouse gas emissions, road transport is a significant contributor to emissions in the district.</p> <p>Options GT1 and GT2 propose new pitches within, and as an extension of, existing sites. Policy SP6 of the existing Core Strategy states that Gypsy and Traveller sites '<i>should be located within or close to existing settlements with a range of services and facilities and access to public transport.</i>' As such it can be assumed that existing provision is located within sustainable locations, and therefore options GT1 and GT2 would also have good access to facilities via sustainable modes of travel.</p> <p>As the broad location of provision under GT3 is unknown, the effect on climate change mitigation cannot be determined at this stage. However the option indicates that new provision should be in sustainable locations.</p> <p>Options GT2 and GT3 have the potential to positively address climate change adaptation through the provision of green infrastructure enhancements and appropriate design and layout. In this context enhancements under option GT1 are less likely to be deliverable due to the expected reduced availability of space on existing sites.</p>	?	?	?
Landscape and Historic Environment	<p>No significant residual effects are predicted for landscape and historic environment under Option GT1 as pitches are to be allocated on existing sites. However an intensification of pitches on sites through this option may increase impacts on landscape quality and the setting of the historic environment. Options GT2 and GT3 have the potential to adversely impact landscape and historic assets through additional land take. However these are expected to be more limited under Option GT2 due to the small scale extensions proposed adjacent to existing development. Potential impacts on the landscape under options GT2 and GT3 include from the loss of landscape features and visual impact, including impact on the quality and distinctiveness of the AONBs.</p> <p>Under option GT3 in particular, the significance of impacts on landscape character and the setting of the historic environment will depend on the openness of the site, the level of screening and whether the site lies within the AONBs in the district.</p> <p>Impacts on the district's heritage assets will be dependent on the design and layout of new pitches delivered through the options and the location of the sites.</p>	1	2	3
Environmental Quality	<p>All options have the potential to lead to effects on air quality, however, given that the location of provision under option GT3 is unknown, effects may vary significantly. As such provision may lead to concentrated effects on air quality if pitches are located in unsustainable areas, such as in locations which may affect the eleven AQMAs in the district.</p>	?	?	?
Land, Soil and Water Resources	<p>Whilst no significant residual effects are predicted for land, soil and water resources under Option GT1 as pitches are to be allocated on existing sites, Options GT2 and GT3 have the potential to lead to the loss of productive agricultural land. Given Option GT2 includes small scale extensions, and Option GT3 will facilitate new sites, Option GT3 has the most potential for impacts on land and soil resources due to the likely extent of landtake through the option.</p> <p>In terms of water quality, it is difficult to come to a conclusion regarding the potential for new provision under the options without an understanding of the design measures that may be put in place.</p>	1	2	3

GT1: Allocate new permanent pitches on the existing sites subject to suitability
GT2: Allocate new permanent pitches on small scale extensions to existing sites
GT3: Allocate pitches on new sites subject to suitability and sustainability

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		GT1	GT2	GT3
Population and Communities	<p>Option GT3 is most likely to deliver provision to meet the assessed needs of Gypsies, Travellers and Travelling Showpeople. Option GT1 allocates pitches depending on suitability of existing sites; some of which may not be viable. As such, this option may do less to meet the district's needs.</p> <p>Option GT3 has the potential to provide housing in sustainable locations that allow easy access to a range of local services and facilities. However, as the location of provision is unknown, the effect of such provision through this approach remains uncertain.</p> <p>Options GT1 and GT2 include the provision of pitches within, and as an extension to, existing sites. A number of these sites are however located in areas with poor accessibility to services, facilities and sustainable transport networks.</p>	2	2	1
Health and Wellbeing	<p>Given the provisions of the existing Core Strategy, the delivery of pitches under option GT1 and GT2 would provide residents with access to facilities and conveniences serving the existing sites. However, under Option GT1, increasing provision at existing sites may adversely impact the public realm, reducing areas of accessible amenity and green space.</p> <p>Dependent on the location of sites under Option GT3, if pitches are located within sustainable locations, they are likely to have good access to services and facilities and sustainable transport options. This would positively affect residents' satisfaction with their place to live, and support physical and mental health and wellbeing.</p>	3	1	2
Transportation	<p>Many of the existing Gypsy and Travellers sites in the district are located in remote, inaccessible locations. As such the delivery of pitches under option GT1 and GT2 has the potential to limit access to sustainable transport networks, amenities and facilities. This has the potential to increase the need to travel and undermine the use of sustainable modes of transport.</p> <p>Option GT3's effects in relation to this SA Theme are uncertain and depends on location of new provision; however the option states that new pitches should be located in sustainable locations.</p>	2	2	1
Economy	<p>All options have the potential to support the economic vitality and viability of the district's settlements through supporting the availability of the local workforce.</p> <p>Many of the existing Gypsy and Travellers sites in the district are located in remote, inaccessible locations. As such provision under Options GT1 and GT2 has the potential to take place in locations poor access to facilities and amenities, doing less to support the local economy through facilitating demand. Provision under Option GT3 may also contribute to economic vitality through increasing local demand; however this is dependent on location of new sites.</p>	?	?	?
Town and Local Centres	<p>All of the options have the potential to support the vitality of local centres. However, this depends on the location of new provision and the extent to which existing and proposed sites relate to existing settlements.</p>	?	?	?

4.5 Appraisal of options for the redevelopment of employment land

Given housing needs in the district, SDC are keen to explore two different approaches for the redevelopment of employment land for potential residential development. The SA process has therefore considered two options, with a view to exploring the sustainability implications of an option which prioritises the redevelopment of employment land for residential uses against an option which seeks to retain employment uses in the first instance.

The options are as follows:

- EL1: Ensure employment-generating non-residential uses are considered before residential schemes in the redevelopment of both allocated and non-allocated employment land.
- EL2: Facilitate a market-led approach to the redevelopment of both allocated and non-allocated employment land.

The following table presents appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' the least favourable ranking.

Table 4.4: Appraisal of options for the redevelopment of employment land

EL1: Ensure employment-generating non-residential uses are considered before residential schemes in the redevelopment of allocated and non-allocated employment land.

EL2: Facilitate a market-led approach to the redevelopment of allocated and non-allocated employment land.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		EL1	EL2
Biodiversity and geodiversity	The significance of the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures. As such both options have the potential to lead to impacts on biodiversity if redevelopment of the site is not undertaken to support habitats and species which may be present.	?	?
Climate Change	Facilitating lower emitting residential uses on employment land has the potential to reduce the carbon intensity of the site being redeveloped. However, this is uncertain. For example: some employment sites may currently be disused or underutilised; many employment uses are energy efficient; and if high energy efficiency standards are integrated within new proposals, emissions from employment uses can be limited. As such it is uncertain as to which of the options will do more to support climate change mitigation. In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, this also depends on the provision of appropriate infrastructure alongside new housing or employment uses, such as GI provision, and appropriate design and layout.	?	?

EL1: Ensure employment-generating non-residential uses are considered before residential schemes in the redevelopment of allocated and non-allocated employment land.

EL2: Facilitate a market-led approach to the redevelopment of allocated and non-allocated employment land.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		EL1	EL2
Landscape and Historic Environment	Whilst the redevelopment of employment land for residential uses may support enhancements to the built environment, both options have the potential to lead to enhancements to the setting of the public realm, the historic environment and landscape/townscape character, if high quality design and layout is incorporated within new provision. As such it is not possible to differentiate between the options in terms of potential effects on townscape and landscape character.	?	?
Environmental Quality	In terms of the potential impacts on soil quality, both options will support the remediation of contaminated land by facilitating the redevelopment of employment land. In relation to the options' impact on air quality, this depends on the location and type of development, and the likelihood of the proposal stimulating traffic movements which will affect air quality. In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution. However, as for soil quality, both options have the potential to support water quality through promoting the remediation of contaminated land by the redevelopment of employment land.	?	?
Land, Soil and Water Resources	Both options will support the efficient use of land through promoting the redevelopment of previously developed land in the district.	1	1
Population and Communities	Option EL1, through ensuring that employment-generating non-residential uses are considered before residential schemes in the redevelopment of employment land, will help protect existing jobs and support new employment opportunities. Option EL2 will help the district meet local housing needs through enabling the redevelopment of employment land for residential purposes. However, given that it would lead to the loss of employment land, it is considered that this option would require more trade-offs in relation to this SA Theme than Option EL1.	1	2
Health and Wellbeing	There is no significant differentiation between these options in relation to this theme. Health and wellbeing will depend on a range of factors such as impacts on noise and air quality, the location and type of new development and the accessibility of new development to services and facilities.	?	?
Transportation	There is unlikely to be a significant differentiation between the options in relation to this SA theme. This is given that the performance of the options will depend on the location of the land being redeveloped for housing or employment land, and the type of redevelopment proposed.	?	?
Economy	Option EL1, through ensuring that employment-generating non-residential uses are considered before residential schemes in the redevelopment of employment land, could support existing economic activities, encourage business expansion and encourage new businesses to locate in the district. The availability of employment land is important in this context given that 87% of businesses in the district employ less than ten people, and only 2% employ 50 or more people. Due to high land prices in the district, and increased profit yields for residential development, there is a strong demand for the conversion of employment land for residential uses. As such Option EL1 will help reduce the loss of available employment land in the district.	1	2

EL1: Ensure employment-generating non-residential uses are considered before residential schemes in the redevelopment of allocated and non-allocated employment land.

EL2: Facilitate a market-led approach to the redevelopment of allocated and non-allocated employment land.

SA theme	Discussion of potential effects and relative merits of options	Rank of preference	
		EL1	EL2
Town and Local Centres	In relation to Option EL2, the vitality of some town centres may be supported by a change of use from employment to residential through supporting the vitality and vibrancy of these centres through increasing 24 hour footfall, promoting a night time economy and supporting local shops, leisure provision and services. However, Option EL1 will support the economic vitality of town and local centres through helping to ensure that employment land and opportunities are protected in these locations. Overall effect uncertain therefore.	?	?

4.6 Appraisal of options for retail impact assessments

SDC are keen to support the vitality of town centres in Sevenoaks District. As such the Council are keen to explore different approaches for undertaking retail impact assessments to demonstrate both need and the impact upon existing town centre facilities.

The SA process has therefore considered three options in relation to this issue, as follows:

- RI1: Require retail impact assessments to be submitted for all applications for 2,500m² or more of retail floorspace (i.e. as stated by the NPPF)
- RI2: Require retail impact assessments to be submitted for all applications for 1,500m² or more of retail floorspace
- RI3: Require retail impact assessments to be submitted for all applications for 500m² or more of retail floorspace

The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking.

Table 4.5: Appraisal of options for retail impact assessments

RI1: Require retail impact assessments to be submitted for all applications for 2,500m² or more of retail floorspace (i.e. as stated by the NPPF)

RI2: Require retail impact assessments to be submitted for all applications for 1,500m² or more of retail floorspace

RI3: Require retail impact assessments to be submitted for all applications for 500m² or more of retail floorspace

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		RI1	RI2	RI3
Biodiversity and geodiversity	The undertaking of Retail Impact Assessments will not have impacts on habitats, species or ecological networks. Therefore, no tangible effects as a result of the options.	N/A	N/A	N/A
Climate Change	Through supporting diverse and competitive local centres, Options RI2 and RI3 will encourage residents to use their local centres as destinations for shopping, services and amenities. This will help reduce the need to travel, supporting a limitation of greenhouse gas emissions from transport.	3	2	1
Landscape and Historic Environment	Option RI2 and RI3 will support the vitality of the district's centres through promoting their offer, competitiveness and diversity. This will support townscape quality and the setting of the historic environment through promoting the rejuvenation of heritage assets and the public realm as a living and vibrant environment.	3	2	1
Environmental Quality	Through supporting diverse and competitive local centres, Options RI2 and RI3 will encourage residents to use their local centres as destinations for shopping, services and amenities. This will help reduce the need to travel by the private car, supporting air and noise quality.	3	2	1
Land, Soil and Water Resources	Option RI2 and RI3 will support the vitality of the district's centres through promoting their offer, competitiveness and diversity. Through enhancing demand in these centres, the options will therefore promote an intensification of uses and the efficient use of land.	3	2	1

RI1: Require retail impact assessments to be submitted for all applications for 2,500m² or more of retail floorspace (i.e. as stated by the NPPF)

RI2: Require retail impact assessments to be submitted for all applications for 1,500m² or more of retail floorspace

RI3: Require retail impact assessments to be submitted for all applications for 500m² or more of retail floorspace

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		RI1	RI2	RI3
Population and Communities	Options RI2 and RI3 will, through ensuring that Retail Impact Assessments are carried out at lower floorspace thresholds, encourage residents to use their local centres as destinations for shopping, services and amenities. Supporting the vitality of the centres, this will enhance residents' accessibility to facilities, improve their perception of their neighbourhood as a place to live and support community cohesion. This will have benefits for the quality of life of residents.	3	2	1
Health and Wellbeing	By supporting diverse and competitive local centres, Options RI2 and RI3 will encourage residents to use their local centres as destinations for shopping, services and amenities. Supporting the vitality of the centres, this will enhance residents' accessibility to facilities, improve their perception of their neighbourhood as a place to live and support community cohesion. It will also help reduce the need to travel and promote walking, cycling and public transport use. This will have benefits for the health and wellbeing of residents.	3	2	1
Transportation	Option RI2 and RI3 will support the vitality of the district's centres through promoting their offer, competitiveness and diversity. This will encourage residents to use their local centres as destinations for shopping, services and amenities, and limit their need to travel longer distances for such provision. This will help reduce the need to travel and promote walking, cycling and public transport use.	3	2	1
Economy	Options RI2 and RI3 will, through ensuring that Retail Impact Assessments are carried out at lower floorspace thresholds, promote the economic vitality of a number of settlements in the district through supporting a diverse retail offer, and promoting retail development which supports and reflects the individuality of the town centres affected.	3	2	1
Town and Local Centres	Options RI2 and RI3 will, through ensuring that Retail Impact Assessments are carried out at lower floorspace thresholds, do more than Option RI1 to promote competitive town centres in the district. This includes through providing customer choice and a diverse retail offer, and promoting retail development which supports and reflects the individuality of the town centre affected.	3	2	1

4.7 Appraisal of options for retail floorspace

SDC would like to explore options for locating retail floorspace in the district.

The SA process has therefore considered three options in relation to this issue, as follows:

- RF1: Allocate retail floorspace only within town centres
- RF2: Allocate retail floorspace within town centres and local centres
- RF3: Allocate retail floorspace across the district with a focus on the most sustainable locations but providing more flexibility on location

The following table presents appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.

For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '3' the least favourable ranking.

Table 4.6: Appraisal of options for allocating retail floorspace impact assessments

RF1: Allocate retail floorspace only within town centres

RF2: Allocate retail floorspace within town centres and local centres

RF3: Allocate retail floorspace across the district with a focus on the most sustainable locations but providing more flexibility on location

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		RF1	RF2	RF3
Biodiversity and geodiversity	The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all retail development seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.	?	?	?
Climate Change	All of the options will support sustainable transport use. Option RF1 will focus retail development in town centres, which are the most accessible locations in the district. Option RF2 will facilitate retail development in town centres and local centres, helping to reduce the need to travel, and Option RF3 seeks to allocate retail provision in the most sustainable locations. As such all of the options will support a limitation of greenhouse gas emissions from transport.	?	?	?
Landscape and Historic Environment	Option RF2 will support the vitality of the district's smaller centres through promoting their offer, competitiveness and diversity. This will support townscape quality and the setting of the historic environment through promoting the rejuvenation of heritage assets and the public realm as a living and vibrant environment. In this context RF1 will have more of a focus on the town centres, limiting potential benefits to these locations. The impact of RF3 depends on the location of the retail floorspace being taken forward. However, there is the potential for the option to do less to support the vitality of existing town and village centres in the district, with fewer opportunities for revitalising the townscape and historic environment.	2	1	3

RF1: Allocate retail floorspace only within town centres

RF2: Allocate retail floorspace within town centres and local centres

RF3: Allocate retail floorspace across the district with a focus on the most sustainable locations but providing more flexibility on location

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		RF1	RF2	RF3
Environmental Quality	Through supporting diverse and competitive local centres, Options RF2 (and potentially Option RF3) will encourage residents to use their local centres as destinations for shopping, services and amenities. This will help reduce the need to travel by the private car, supporting air and noise quality.	3	1	2
Land, Soil and Water Resources	Options RF2 (and potentially Option RF3) will support the vitality of the district's centres through promoting their offer, competitiveness and diversity. Through enhancing demand in these centres, the options will therefore promote an intensification of uses and the efficient use of land.	3	2	1
Population and Communities	Through supporting diverse and competitive local centres, Options RF2 (and potentially Option RF3) will encourage residents to use their local centres as destinations for shopping, services and amenities. Supporting the vitality of the centres, this will enhance residents' accessibility to facilities, improve their perception of their neighbourhood as a place to live and support community cohesion. This will have benefits for the quality of life of residents.	3	2	1
Health and Wellbeing	By supporting diverse and competitive local centres, Options RF2 (and potentially RF3) will encourage residents to use their local centres as destinations for shopping, services and amenities. Supporting the vitality of the centres, this will enhance residents' accessibility to facilities, improve their perception of their neighbourhood as a place to live and support community cohesion. It will also help reduce the need to travel and promote walking, cycling and public transport use. This will have benefits for the health and wellbeing of residents.	3	2	1
Transportation	Options RF2 (and potentially Option RF3) will support the vitality of the district's centres through promoting their offer, competitiveness and diversity. This will encourage residents to use their local centres as destinations for shopping, services and amenities, and limit their need to travel longer distances for such provision. This will help reduce the need to travel and promote walking, cycling and public transport use. Option RF1 will however focus retail development in town centres, which are the most accessible locations in the district, best served by public transport links.	1	2	3
Economy	Whilst Option RF1 will support the economic vitality and offer of the town centres of the district, Option RF2 will do more to also support the economic vitality and viability of local centres. Option RF3, through promoting a more flexible approach, may do more to help encourage new retail provision to locate in the district. However, this is uncertain, and should be balanced against potential impacts on town and local centres.	2	1	3

RF1: Allocate retail floorspace only within town centres

RF2: Allocate retail floorspace within town centres and local centres

RF3: Allocate retail floorspace across the district with a focus on the most sustainable locations but providing more flexibility on location

SA theme	Discussion of potential effects and relative merits of options	Rank of preference		
		RF1	RF2	RF3
Town and Local Centres	<p>Option RF1 will promote competitive town centres in the district through promoting retail development and providing customer choice and a diverse retail offer in these locations. However, the focus on larger town centres through this option will do less to support the vitality and viability of local centres, and limit the scope for a diversification and targeting of retail offer in these smaller settlements. In this context, Option RF2 will do more to support the vitality of an increased number of settlements in the district.</p> <p>Option RF3, through enabling retail development to take place across a broader range of areas, including in non-town or local centre locations, has the potential to undermine the viability of town and local centres in the district.</p>	2	1	3

5. Next steps

This Interim SA Report accompanies the current consultation on the Local Plan (*Sevenoaks Local Plan 2015-2035, Issues and Options*).

Following the receipt of consultation responses, the draft Local Plan will be prepared by SDC and released for Regulation 18 consultation. Development of the draft Local Plan will be informed by the findings of this Interim SA Report, representations made through the current consultation and the outcomes of further evidence base studies prepared to inform the Local Plan.

A central element of the development of the draft Local Plan will be the appraisal of further alternative options for the Local Plan through the SA process. A key element of this process will be to undertake appraisal of more detailed development strategy options, including strategic site allocation options and policy options.

To support the draft Local Plan, a further Interim SA Report will be prepared. The Interim SA Report (2), which will be presented for consultation alongside the draft Local Plan, will provide the information required by the SEA Regulations.

In line with the SEA Regulations, the SA Report will answer the three questions:

- What has plan-making / SA involved up to this point?
 - Including with regards to the consideration of 'reasonable alternatives'.
- What are the appraisal findings at this current stage?
 - i.e. in relation to the policies currently proposed for the Local Plan, as presented in the draft Local Plan document,
- What happens next?
 - What are the next steps for plan making?

These questions are derived from Schedule 2 of the SEA Regulations, which set out 'the information to be provided within the [environmental] report'.

It is currently anticipated that consultation on the draft Local Plan and accompanying Interim SA Report (2) will take place in spring 2018.

Following the receipt of consultation responses, the draft Local Plan will be updated and released by Sevenoaks District Council for Regulation 19 consultation with a full SA Report. This is anticipated to take place in summer 2018.

Once the period for representations on the Regulation 19 version of the Local Plan document / SA Report concludes, the main issues raised will be identified and summarised by the Council, which will then consider whether, in light of representations received, the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted to the Secretary of State for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report alongside it.

At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Local Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan, these will be prepared (and undergo SA) and then be subject to consultation (with an SA Report Addendum published alongside).

Once found to be 'sound', the Plan will be formally adopted by SDC. At the time of adoption, a SA 'Statement' must be published that sets out (amongst other elements) "*the measures decided concerning monitoring [the Local Plan]*".

This page is intentionally blank.

