
Sevenoaks Local Plan SA: Initial note

Introduction

AECOM is commissioned by Sevenoaks District Council (SDC) to lead on Sustainability Appraisal (SA) in support of the emerging Sevenoaks Local Plan. The aim of this initial note is to introduce the scope of the forthcoming Interim SA Report that will be prepared in time for publication alongside the Plan 2040 Regulation 18 2022 consultation document. This note covers:

- Overview of the SA process
- Reasonable alternatives
- Key issues
- Next steps

Overview of the SA process

SA is a mechanism for considering and communicating the effects of an emerging plan, and reasonable alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans, and must be undertaken in-line with the procedures prescribed by the SEA Regulations 2004.¹

In-line with these Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially presents an appraisal of “the plan, and reasonable alternatives”. The SA report must then be taken into account, alongside consultation responses, when finalising the plan.

From the Local Planning Regulations (2012), the draft plan is understood to be the Proposed Submission Plan published for consultation under Regulation 19. However, where it is the case that the local planning authority chooses to formally consult under Regulation 18, which is the case here, then it is common practice to publish an “interim” report alongside, with a view to informing the consultation and subsequent plan-making.

Reasonable alternatives

Overview

The requirement is to define reasonable alternatives “*taking into account the objectives and geographical scope of the plan*” ([Regulation 12\(2\)](#) of the SEA Regulations). Once defined, reasonable alternatives (RAs) must be appraised in time to inform the draft plan. Appraisal findings must then be presented within the SA Report, alongside the Council’s reasons for supporting the preferred option, with a view to informing the consultation.

In the context of the Sevenoaks Local Plan we anticipate that RAs will ultimately take the form of alternative key diagrams, i.e. alternative spatial approaches to meeting established development requirements and wider plan objectives, including through site allocations and potentially broad locations for development ([NPPF paragraph 68](#)).

At the current stage of the Sevenoaks Local Plan process the intention is not to consult on a draft plan, or a key diagram / alternative key diagrams. As such, there is no strict legal requirement around RAs. Nonetheless, it is good practice to define, appraise and consult upon RAs at this stage, with a view to informing the consultation.

RAs at this current stage

A primary focus of the current consultation is on **maximising supply from within the district’s urban areas**. There is a strong argument for maximising this source of supply, because the effect will be to reduce development pressure on Green Belt and greenfield (non-Green Belt) locations, whether within Sevenoaks District or elsewhere.

By way of context, Sevenoaks District is entirely within the London Metropolitan Green Belt, as is land immediately to the east, namely the majority of Tonbridge and Malling District and the western part of Tunbridge Wells; whilst Wealden District to the south falls outside of the Green Belt but within the High Weald AONB.

¹ Specifically the Environmental Assessment of Plans and Programmes [SEA] Regulations 2004

However, given a limited supply of development sites within the district’s urban areas, maximising supply primarily translates as higher densities, which can lead to tensions with a range of objectives.

The current consultation document presents two alternative approaches to development density – ‘minimum uplift’ and ‘optimum +’ – and also describes the potential to take a mid-range approach. There is clear benefit to undertaking an appraisal of these density alternatives, with a view to informing the consultation.

However, a limitation of any appraisal, at the current time, relates to lack of understanding in respect of the locations to deliver growth to meet those development needs that cannot be met within the district’s urban areas.

This is an unavoidable limitation, because work to consider potential development locations outside of urban areas is yet to be completed. The Council has made the decision to focus attention on maximising supply from the urban areas in the first instance, in order to inform subsequent consideration of other supply options.

By way of context, Local Housing Need (LHN) is 714 homes per annum, which compares to a total (i.e. district-wide) annual average delivery figure of 250 homes per annum over the past ten years.

Nonetheless, the simple fact is that restricted supply from the urban areas will lead to increased development pressure on Green Belt and greenfield (non-Green Belt) locations, whether within Sevenoaks District or elsewhere, and this cannot be ignored. It is important that local stakeholders and consultees are provided with information on **the full range of potential consequences** of lower densities / lower supply from the urban areas, and vice versa.

RAs work at this early stage must be undertaken with this aim in mind, despite no decisions having been made regarding preferred or even potential locations for development outside of the district’s urban areas.

Finally, there is a need for RAs work at this early stage to be undertaken with another specific audience in mind, namely those with a particular interest in the **neighbouring local authority areas** that could be asked to provide for development needs that cannot be met in Sevenoaks (‘unmet needs’).

Specifically, this audience will wish to: A) see evidence that urban supply is set to be maximised; and B) understand how Green Belt development issues and opportunities in Sevenoaks District compare to issues / opportunities associated with development locations / options within their own area.

In respect of (B), there is only the potential to explore this matter in very high-level terms at the current time, but it is important to begin the discussion.

In this light, the RAs at this stage are as follows:

Scenario for SA testing	Sevenoaks local plan housing requirement	Density scenario
1	Less than 714 homes per annum	Minimum uplift
2		Optimum +
3	714 homes per annum (i.e. LHN)	Minimum uplift
4		Optimum +
5	Greater than 714 homes per annum	Minimum uplift
6		Optimum +

These scenarios are considered to be the RAs at this stage. They are considered suited to the task of ensuring an informed consultation and, in turn, ensuring informed plan-making / SA work subsequent to the consultation, including work to develop formal RAs for appraisal and consultation alongside the draft plan in due course.

It is recognised that there are other conceivable scenarios, for example involving a mid-range density scenario, or setting the housing requirement at various defined figures below 714 per annum (henceforth ‘LHN’). However, there is a pragmatic need to keep the number of scenarios to a minimum, in support of accessibility / engagement.

Final points to note, regarding the RA growth scenarios, are as follows:

- “Less than 714 homes per annum” – cannot be defined with any precision. However, it is important to note that, on the basis of work undertaken to date (i.e. ahead of consultation), there is thought to be the potential to provide for between ~50% and ~70% of LHN without any new Green Belt allocations, depending on the density scenario that is taken forward. Furthermore, it is difficult to envisage a scenario whereby the Sevenoaks Local Plan does not make any Green Belt allocations, given factors including: the constraints affecting neighbouring areas (including Green Belt and AONB); and the likelihood that, through further work, some locations can be identified within the district that are suitable for allocation despite being within the Green Belt, e.g. because they perform the function of Green Belt only to a limited extent. As such, at this early stage, it is considered reasonable to assume that the ‘below LHN’ scenarios would involve setting the housing requirement at 60 – 80% of LHN, leading to unmet needs of circa 2,500 to 5,000 homes.
- “Greater than 714 homes per annum” – would involve setting the housing requirement only modestly above LHN. This scenario is arguably unreasonable, given the constraints affecting Sevenoaks District, including Green Belt and AONB (which are “*areas... of particular importance [that provide] a strong reason for restricting the overall scale, type or distribution of development*” according to NPPF [paragraph 11](#)). However, on balance, it is considered reasonable to test this scenario at the current early stage in the process. There is an argument for assuming that the housing requirement at 843 homes per annum, as this is figure derived from the Government’s standard method if the ‘cap’ (step 3 of the method) is not applied. On balance, the assumption is simply that the housing requirement would be set at a figure between 800 and 850 homes.

Finally, it is important to note that under an ‘above LHN’ scenario, the aim would be to deliver additional affordable housing in order to more fully meet affordable housing needs locally, and the aim would *not* be to make land available to meet unmet needs from elsewhere. This is considered to be a reasonable assumption for two reasons. Firstly, Sevenoaks is a highly constrained district, and is associated with limited strategic growth opportunity (e.g. when viewed through a national, regional or even sub-regional lens). Secondly, affordable housing needs are high, at 59% of LHN, with the Targeted Review of Local Housing Needs (2022) explaining: “*There is an annual need for 423 affordable dwellings which justifies the need for a robust affordable housing policy.*” The potential for ‘robust affordable housing policy’ may be limited by development viability which, in turn, suggests the possibility of delivering more market homes so as to deliver more affordable housing. The PPG [states](#) that: “*an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*”

Key issues

It is proposed that the forthcoming Interim SA Report should present an appraisal of the six reasonable alternative growth scenarios ‘under’ the ‘SA framework’, which essentially comprises the following list of topic headings:²

- | | | |
|-----------------------------|-----------------------------|------------------|
| - Accessibility | - Climate change mitigation | - Housing |
| - Air quality | - Communities and health | - Landscape |
| - Biodiversity | - Economy and employment | - Land and soils |
| - Climate change adaptation | - Historic environment | - Transport |
| | | - Water |

At the current time, the intention is simply to present **an initial discussion**, under the SA framework, of the broad scope of issues / opportunities / potential impacts that might be a focus of the appraisal.

A summary is presented in **Table 1**, whilst further detail is presented in **Appendix I**.

The aim is to A) inform Member deliberations; and B) provide members with the opportunity to comment on the scope key issues / opportunities relating to the six reasonable alternative growth scenarios introduced above, ahead of the Interim SA Report being prepared for consultation.

² The SA framework was established following ‘scoping’ work undertaken earlier in 2022, which included targeted consultation on a Scoping Report. The Scoping Report is currently in the process of being updated / finalised to reflect consultation responses received; however, it is important to note that the SA scope naturally remains subject to adjustment over the course of the plan-making / SA process (which will last several years), in response to latest evidence and understanding.

Table 1: Summary discussion of key issues with a bearing on the choice between the scenarios

Sustainability topic	Key messages at this stage
Accessibility (to community infrastructure)	<ul style="list-style-type: none"> Higher density schemes in urban areas could lead to some additional opportunity to deliver community infrastructure, although this could primarily apply to larger sites. 'Strategic' scale Green Belt schemes can certainly lead to an opportunity to deliver strategic community infrastructure (e.g. new schools), and support for one or more such sites could enable the housing requirement to be set at LHN (714 per annum). Setting the housing requirement at a figure below LHN, and therefore exporting unmet needs, could lead to challenges in respect of community infrastructure capacity elsewhere in the sub-region, albeit this is uncertain ahead of consultation and engagement with stakeholder organisations including the County Council.
Air quality	<ul style="list-style-type: none"> There are significant air quality constraints locally, but it is difficult to suggest these as a reason for not supporting higher densities, <i>if</i> higher densities are directed to the most accessible locations (N.B. there can be a tension with wider objectives). With regards to Green Belt / greenfield development, there is feasibly an argument for supporting growth locations in central or even eastern Kent, where there is a near absence of Air Quality Management Areas (AQMAs), in favour of growth within Sevenoaks District. This might particularly be the case if it transpires that such areas are suited to supporting strategic growth locations (with potential for high trip internalisation and investment in transport links) in a way that Sevenoaks District not. However, on the other hand, central and eastern Kent is more rural and 'less accessible' than Sevenoaks District, broadly speaking, and meeting housing needs distant from source risks 'unsustainable' commuting and wider transport patterns.
Biodiversity	<ul style="list-style-type: none"> There is a strong argument for supporting higher densities in the urban areas in order to reduce pressure on Green Belt / greenfield development locations (whether in Sevenoaks District or elsewhere) and, in turn, tensions with biodiversity objectives. There are widespread constraints locally, but it is not obviously the case that Sevenoaks District is less constrained than neighbouring areas that might feasibly receive unmet needs. As such, biodiversity is not likely to provide a strong argument for setting the housing requirement at a figure below LHN, subject to further work to consider potential development locations within the district. However, biodiversity could potentially contribute to an overall argument for exporting unmet needs, e.g. noting that the aforementioned central Kent corridor is potentially subject to relatively low constraint, plus this area could be relatively well suited to strategic growth locations, which can give rise to a biodiversity opportunity.
Climate change adaptation	<ul style="list-style-type: none"> Focusing on flood risk, this is not likely to be a significant barrier to achieving higher density development in the District's urban areas, although one site currently identified as having potential for higher density is subject to flood risk. Flood risk is also not likely to be a significant barrier to delivering Green Belt development in the district, although the Edenbridge area is notably constrained. Focusing on locations outside but relatively close to the district, and outside of the Green Belt and AONB, it is important to note that flood risk is a significant constraint, notably southwest Maidstone District / north Tunbridge Wells Borough. As such, flood risk serves as a high level reason for seeking to set the local plan housing requirement at LHN (i.e. 714 per annum) so as to avoid exporting unmet needs.

Climate change mitigation	<ul style="list-style-type: none"> • A strategy focused on achieving higher densities in urban areas ahead of Green Belt / greenfield development can lead to tensions with built environment decarbonisation objectives, but is generally supported from a perspective of seeking to minimise per capita greenhouse gas emissions from transport. • Exporting unmet needs is not supported from a decarbonisation perspective, at least not in the absence of a sub-regional strategy that serves to demonstrate that concentrating growth in particular areas could lead to a decarbonisation opportunity.
Communities and health	<ul style="list-style-type: none"> • Higher density developments in urban areas can give rise to both tensions and opportunities. • Garden communities can be associated with a particular opportunity, hence ‘health and wellbeing’ considerations could feasibly serve as a high-level argument for seeking to meet some of the district’s housing needs outside the district, if it transpires that garden community options are limited or non-existent locally.
Economy and employment	<ul style="list-style-type: none"> • It is difficult to draw strong conclusions, at this stage, regarding the implications of higher density development in urban areas for achieving a mix of uses, to include office and potentially also light industrial floorspace. • It is also unclear at this stage whether there are strong arguments for delivering new strategic employment land locally, e.g. in proximity to M25 junctions, or whether needs are more sub-regional. If there is a need locally, then this could serve as an argument for considering mixed use strategic development options. • Sevenoaks District is not an identified area of strategic importance for employment growth, regionally or sub-regionally, but there is a need to consider proximity of the northern part of the district to the Thames Estuary, which is a national growth area.
Historic environment	<ul style="list-style-type: none"> • Higher density development in urban areas, where this is a departure from the typical built form, can give rise to clear tensions with historic environment and wider historic / townscape character objectives. • However, several settlements in the district are subject to relatively low historic environment constraint, and those parts of the district falling outside of the AONB are overall subject to limited or moderate constraint (with some exceptions, notably the River Darent corridor in the far north), such that historic environment objectives are not likely to be a significant barrier to setting the housing requirement at LHN.
Housing	<ul style="list-style-type: none"> • There is a clear argument for setting the local plan housing requirement at LHN. • In turn, there is a strong argument for maximising supply from the urban areas.
Landscape	<ul style="list-style-type: none"> • There is a strong argument for maximising supply from the urban areas, even though it is difficult to assume that reduced supply from the urban areas would lead to increased pressure on one or both of the AONBs. • It would likely be a challenge to evidence a conclusion that landscape serves as a reason for not setting the local plan housing requirement at LHN, at least in the absence of a sub-regional study exploring capacity/sensitivity outside of the AONBs.
Land and soils	<ul style="list-style-type: none"> • Focusing on avoiding the loss of best and most versatile agricultural land, there is a strong argument for maximising supply from the urban areas. • It would likely be a challenge to evidence a conclusion that agricultural land quality serves as a reason for not setting the local plan housing requirement at LHN. • Focusing on land outside and to the east of the district that falls outside of the AONBs and Green Belt, this area is associated with higher quality agricultural land.

- Transport
- Higher density development at Sevenoaks Station is strongly supported.
 - More generally, there is likely to be a strong argument for maximising supply from the urban areas, subject to further detailed work to consider accessibility / transport connectivity at the identified development sites.
 - In the absence of a sub-regional plan identifying optimum locations for strategic growth, from a transport perspective, it would likely be a challenge to evidence a conclusion that transport factors serve as a reason for setting the housing requirement below LHN. Sevenoaks is generally well-connected in transport terms.
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- Water
- Water resource and water quality objectives, whilst important considerations for the local plan, are unlikely to have a significant bearing on the two questions under consideration at the current time, namely: A) the extent to which higher densities should be supported in the urban areas; and B) whether the local plan should provide LHN in full (714 homes per annum) or, alternatively, provide for lower growth and therefore export unmet needs. This is an initial conclusion subject to further discussions with the Environment Agency and the water companies.

Next steps

The next step is to prepare an Interim SA Report for consultation. It is proposed that the focus of the report should be an appraisal of the six high-level growth scenarios discussed above, with a secondary focus on discussing draft development management policies. Comments on the scope of the Interim SA Report are welcomed.

Following consultation, the Council's intention is to hold a second consultation under Regulation 18 of the Local Planning Regulations, on what will likely be a more-or-less complete draft plan. An Interim SA Report will be published alongside that presents the information required of the formal SA Report.³

It is anticipated that a centre-piece of the second Interim SA Report will be an appraisal of reasonable alternatives in the form (more-or-less) of alternative key diagrams (or 'growth scenarios'), with a view to ensuring that consultees are provided with a mutually exclusive choice in respect of the matter at the very heart of the plan. Arriving at these growth scenarios will be a key task subsequent to the current consultation / ahead of the next consultation.

Subsequent to the second Regulation 18 consultation, the Council should be able to progress to preparing the final draft 'proposed submission' version of the local plan for publication under Regulation 19 of the Local Planning Regulations. The formal SA Report will be published alongside, again with a particular focus on presenting an appraisal of up-to-date reasonable alternative growth scenarios.

The next step, all being well, will then be to submit the Local Plan (and the SA Report) to the Government for examination in public, alongside a summary of the issues raised at the preceding Regulation 19 publication stage.

³ The SA Report must essentially present: A) an appraisal of the plan and reasonable alternatives; and B) an outline of the reasons for selecting the alternatives (and reasons for selecting the preferred option, in light of the alternatives appraisal).

Appendix I: Detailed discussion of key issues

Set out below is a discussion of key issues / opportunities / potential impacts with a bearing on the choice between the six reasonable alternative growth scenarios introduced above.

Accessibility (to community infrastructure)

A key issue for local plan-making can often be **primary and secondary school capacity**. However, there is currently limited potential to differentiate between the growth scenarios, given the available evidence base.

Strategic greenfield development schemes, whether in the form of an urban extension or a new settlement, can often deliver, or make land available for, one or more schools. The effect can be that the new housing development does not lead to increased pressure on existing schools capacity, and it can also sometimes be that the new schools capacity serves to ease or alleviate capacity issues at existing schools.⁴

However, at this stage there is little reason to assume the potential to deliver one or more strategic housing-led schemes in the district of a sufficient scale to deliver a primary school (e.g. 500-700+ homes), let alone a secondary school (e.g. 2,000+ homes). Also, there is limited understanding regarding capacity constraints, or capacity headroom, at the existing schools in the district, including within Sevenoaks town, which would likely see a focus of growth under growth scenarios involving an 'optimum +' density scenario (i.e. Scenarios 2, 4 and 6).

Also, there is currently no evidence to suggest any significant cross-border issues / opportunities. Specifically, there is no identified capacity issue in a neighbouring local authority that could serve as an argument in favour of a strategic growth location, whether within Sevenoaks District or within the neighbouring area (which, in turn, could feasibly suggest an opportunity for that neighbouring area meeting some of Sevenoaks' unmet needs).

Aside from schools capacity, it is also the case that growth at scale can enable a mix of uses to be delivered alongside new housing that would otherwise not be viable, including **community infrastructure and retail**. This could well serve as an argument for supporting 'optimum +' densities at some of the larger identified site options within the urban area, most notably Sevenoaks train station. Matters are discussed further under 'communities'.

In summary, at this stage the **key messages** are:

- Higher density schemes in urban areas could lead to some additional opportunity to deliver community infrastructure, although this could primarily apply to larger sites.
- 'Strategic' scale Green Belt schemes can certainly lead to an opportunity to deliver strategic community infrastructure (e.g. new schools), and support for one or more such sites could enable the housing requirement to be set at LHN (714 per annum).
- Setting the housing requirement at a figure below LHN, and therefore exporting unmet needs, could lead to challenges in respect of community infrastructure capacity elsewhere in the sub-region, albeit this is uncertain ahead of consultation and engagement with stakeholder organisations including the County Council.

Air quality

This is a significant issue across west and central Kent, and across London, albeit the situation is set to improve rapidly due to the anticipated national switch-over to electric vehicles (albeit EVs still generate particulate pollution, associated with break, tyre and road wear, recalling that EVs tend to be relatively heavy vehicles).

Within Sevenoaks District, the key areas of constraint are the designated **Air Quality Management Areas (AQMAs)**, these are: Swanley town centre; Sevenoaks High Street; the A25 corridor through Westerham, Sundridge and the northern part of Sevenoaks; and an area in north Swanley.

Looking at the spread of **potential urban development sites**, there are perhaps two that would either intersect or be located in close proximity to an AQMA, plus others with clear potential to generate additional traffic passing through an AQMA. One notable site is Land east of Sevenoaks High Street (MX/21/00049), given that the High Street is designated as an AQMA, and this is one of the seven sites identified as having the potential to support development at an 'optimum +' density. However, this site could potentially lead to low car trip generation, given the ability to access a wide range of services, facilities and retail by walking/cycling, and given that Sevenoaks train station within circa 1km.

⁴ For example, secondary school provision has been a key 'driver' of the Swale Local Plan, with close consideration being given to strategic growth locations that would deliver new schools capacity, as reported in the most recent [Interim SA Report](#) (2021).

Looking **beyond the district boundary**, and focusing attention on locations outside of the Green Belt and AONB (that could be a first port of call when considering locations suited to providing for unmet needs), it is noted that there are no AQMAs within the extensive sector of land east of the Green Belt, south of the Kent Downs AONB and north of the High Weald AONB as far as the coast (i.e. Folkstone and Hythe District) bar an extensive series of AQMAs constraining Maidstone town and the adjacent Medway Gap area of Tonbridge and Malling District.

In summary, at this stage the **key messages** are:

- There are significant air quality constraints locally, but it is difficult to suggest these as a reason for not supporting higher densities, *if* higher densities are directed to the most accessible locations (N.B. there can be a tension with wider objectives).
- With regards to Green Belt / greenfield development, there is feasibly an argument for supporting growth locations in central or even eastern Kent, where there is a near absence of Air Quality Management Areas (AQMAs), in favour of growth within Sevenoaks District. This might particularly be the case if it transpires that such areas are suited to supporting strategic growth locations (with potential for high trip internalisation and investment in transport links) in a way that Sevenoaks District not. However, on the other hand, central and eastern Kent is more rural and 'less accessible' than Sevenoaks District, broadly speaking, and meeting housing needs distant from source risks 'unsustainable' commuting and wider transport patterns.

Biodiversity

This is an issue with limited bearing on the question of development densities within urban areas, but with an important bearing on the question of whether residual needs, after having maximised urban supply, should be met within Sevenoaks District or elsewhere.

Sevenoaks District is overall quite highly constrained in biodiversity terms, certainly in the national context and also arguably in the regional / sub-regional context. However, much of the biodiversity constraint is concentrated within those parts of the district that fall within an **AONB**, which would be unlikely to come under significant development pressure under any scenario. With regards to the sectors of land within the district that fall outside of the AONB, these are subject to relatively low constraint, for the most part. In particular, areas of *relatively* low constraint are: the southern rail corridor, including Edenbridge; the Swanley area; the Horton Kirby area; and Halstead.

In this light, it is difficult to envisage biodiversity serving as a reason for setting the housing requirement at a figure below LHN; however, this is subject to further work to consider potential greenfield (Green Belt) growth locations within the District.

With regards to the aforementioned corridor of land within **central Kent** that is located outside of the Green Belt and AONB, this area is likely overall subject to relatively low constraint, particularly noting the low / very low density of ancient woodland (an 'NPPF footnote 7' constraint). However, wastewater treatment impacting on water quality could well be an issue in this area, noting that all land in this area drains to the River Beult SSSI, which is in unfavourable condition (and there is a need to consider that the River Beult is a tributary of the River Medway, which is sensitive in water quality and biodiversity terms, albeit the southern corridor of Sevenoaks District also ultimately drains to the River Medway). Indeed, much of this area is strongly associated with the river corridor.

In summary, at this stage the **key messages** are:

- There is a strong argument for supporting higher densities in the urban areas in order to reduce pressure on Green Belt / greenfield development locations (whether in Sevenoaks District or elsewhere) and, in turn, tensions with biodiversity objectives.
- There are widespread constraints locally, but it is not obviously the case that Sevenoaks District is less constrained than neighbouring areas that might feasibly receive unmet needs. As such, biodiversity is not likely to provide a strong argument for setting the housing requirement at a figure below LHN, subject to further work to consider potential development locations within the district.
- However, biodiversity could potentially contribute to an overall argument for exporting unmet needs, e.g. noting that the central Kent corridor is potentially subject to relatively low constraint, plus this area could be relatively well suited to strategic growth locations, which can give rise to a biodiversity opportunity.

Climate change adaptation

The key consideration here is **flood risk**, in terms of which the majority of settlements within Sevenoaks District are subject to relatively low constraint, reflecting the geology of the area, and a tendency for settlements to be associated with raised land (somewhat unusually). Sevenoaks town is associated with the headwaters of the River Darent, but it is only the northern edge of the town that is constrained by fluvial flood risk zones, and none of the identified urban development options within this area intersect the fluvial flood risk zone.

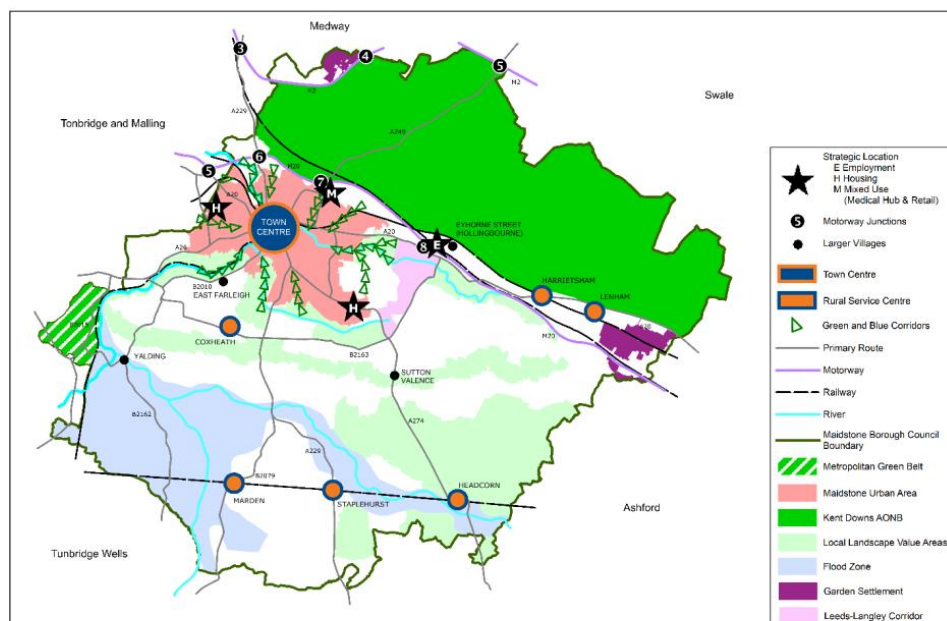
However, the situation is notably different for the district’s **southern rail corridor**, which is quite strongly associated with the River Eden and several of its tributaries. In particular, there is a concern regarding two of the identified development site options at Edenbridge that fall within the fluvial flood risk zone, one of which is currently used as a car park and the other used as amenity open space. There is a need to caution against directing growth to locations that have historically not been considered suitable for development, or considered suitable only for non-residential development, due to flood risk concern. Flood risk concerns are more significant than in the past due to uncertainties around climate change scenarios and, whilst there is good potential to avoid and mitigate flood risk through detailed measures at the development management stage (through building design, etc), there is a need to recognise the potential for residual risk to remain and, in turn, seek to avoid risk in the first instance as far as possible. It is important to note that Planning Practice Guidance (PPG) on flood risk has been updated recently (August 2022). For example, in respect of downstream impacts, the PPG now states: *“Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials.”*

One of the site options at **Edenbridge** subject to flood risk has been identified as potentially suitable for ‘optimum +’ densities, which will need close scrutiny given the need to ensure that flood risk mitigation can be designed-into the scheme. However, overall, flood risk is not likely to be a factor that has a significant bearing on the potential to achieve higher densities, in the Sevenoaks District context (contrast this to Lewisham, where the emerging local plan includes a considerable focus on underused land, including industrial land, along the main road and river corridors, which almost invariably follow river / stream corridors), as discussed within the recent [Interim SA Report](#).

With regards to potential **Green Belt options** within Sevenoaks District, overall flood risk is not likely to be a major constraint to growth / higher growth. However, there is a need to recognise that flood risk is quite extensive in the Edenbridge area. This is a constraint, although it is also the case that flood risk zones can serve to contain strategic growth locations and, in turn, contribute to ensuring ‘defensible boundaries’ in Green Belt terms (albeit rising is overall preferable to falling land (to a flood zone), in this respect).

On the matter of the corridor of land within central Kent corridor that falls outside of the Green Belt and AONB, a key point to note is that flood risk is a major constraint in this area, particularly within that part of the ‘corridor’ located closest to Sevenoaks District (recalling that unmet needs must be met as close to source as possible). Specifically, there is a very extensive zone of flood risk (roughly the size of LB Croydon) affecting the western edge of Maidstone District and the northern edge of Tunbridge Wells Borough, associated with the confluence of the Rivers Medway and River Beult. This constraint is very clearly depicted in the Key Diagrams presented below. Focusing on Tunbridge Wells Borough, the current proposal is to target considerable growth to this area, specifically Paddock Wood and Tudeley Village, with careful consideration given to masterplanning so as to avoid the flood risk zone (N.B. the Key Diagram shows only flood risk zone 3, with flood risk zone 2 more extensive and also a significant constraint, including given uncertainties around climate change scenarios).

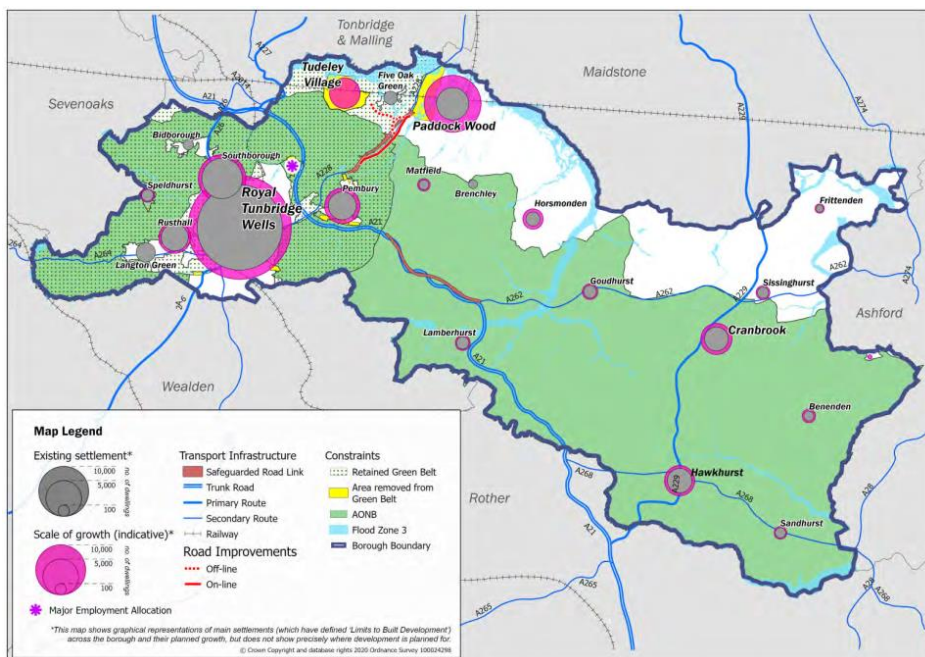
Figure 1: Maidstone Local Plan Review Key Diagram (2021)



Maidstone Borough Key Diagram

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Figure 2: Tunbridge Wells Local Plan Key Diagram (2021)



In summary, at this stage the **key messages** are:

- Focusing on flood risk, this is not likely to be a significant barrier to achieving higher density development in the District’s urban areas, although one site currently identified as having potential for higher density is subject to flood risk.
- Flood risk is also not likely to be a significant barrier to delivering Green Belt development in the district, although the Edenbridge area is notably constrained.
- Focusing on locations outside but relatively close to the district, and outside of the Green Belt and AONB, it is important to note that flood risk is a significant constraint, notably southwest Maidstone District / north Tunbridge Wells Borough. As such, flood risk serves as a high level reason for seeking to set the local plan housing requirement at LHN (i.e. 714 per annum) so as to avoid exporting unmet needs.

Climate change mitigation

Focusing on emissions from the **built environment** (as opposed to transport), **strategic growth locations** can lead to opportunities to minimise per capita emissions, and there is also the potential for local plans to set policy requirements, in respect of emissions standards, that go beyond the requirements of Building Regulations. However, in respect of the latter, the potential to do so is highly dependent on development **viability**.

The emerging [Stafford Borough Local Plan](#) is an example of a plan that is seeking both to direct a high proportion of growth to a strategic growth location and set policy that requires emissions standards significantly over-and-above Building Regulations. One implication is the need to accept a ‘trade off’ in respect of affordable housing delivery, as discussed within the forthcoming Viability Study and Interim SA Report (shortly to be available [here](#)).

In this light, there is a need to question the merits of any strategy that seeks to support higher densities in **urban areas** ahead of greenfield locations that will typically be associated with higher viability (and also potentially other locational or masterplan-related built environment decarbonisation opportunities). However, the question is not at all clear cut, as directing growth to urban areas is typically supported from a transport decarbonisation perspective.

A further consideration is that **higher densities** tend to be supportive of development viability only up to a point, with taller buildings (beyond circa six stories) often associated with more problematic viability, often leading to a need to deliver less than the full quota of affordable housing, and also potentially with implications for what built environment decarbonisation measures can be delivered. Also, taller buildings can lead to challenge in respect of solar gain and achieving good ventilation, potentially necessitating air conditioning.

Finally, with regards to the possibility of exporting **unmet needs**, this is generally not something to be supported from a decarbonisation perspective, given the implications for transport patterns. Whilst it could potentially be the case that unmet needs are met at one or strategic growth locations, where steps are taken to minimise per capita emissions from both transport and the built environment, there is no certainty that this would be the case.

In summary, at this stage the **key messages** are:

- A strategy focused on achieving higher densities in urban areas ahead of Green Belt / greenfield development can lead to tensions with built environment decarbonisation objectives, but is generally supported from a perspective of seeking to minimise per capita greenhouse gas emissions from transport.
- Exporting unmet needs is not supported from a decarbonisation perspective, at least not in the absence of a sub-regional strategy that serves to demonstrate that concentrating growth in particular areas could lead to a decarbonisation opportunity.

Communities and health

The matter of delivering strategic community infrastructure alongside housing, both to 'consume the smoke' of the new residents / community and also potentially to address an existing need, has already been discussed above.

More widely, **higher density** developments in urban areas can be supportive of viability (up to a point), and so be supportive of ensuring that a mix of uses is achieved onsite, along with investment in infrastructure, public realm, green infrastructure etc, both on and potentially also offsite.

However, it is clearly the case that higher density developments in urban areas can also give rise to tensions, in respect of 'communities and health' objectives. Tensions can arise both from a perspective of supporting the health and wellbeing of new residents, for example in terms of space standards, and the wider community, e.g. due to pressure on space for waste management. Matters are discussed further under other headings.

With regards to greenfield development, there are clear arguments for supporting strategic growth locations over-and-above smaller urban extensions. In particular, there are well-established opportunities associated with new **garden communities**, including around delivering new health infrastructure, supporting active modes of travel and ensuring good access to gardens, sports facilities, greenspace and the countryside.⁵ On this basis, 'health and wellbeing' considerations could feasibly contribute to an argument for seeking to meet some of Sevenoaks' housing needs outside the district, if it transpires that garden community / strategic growth options are limited locally.

In summary, at this stage the **key messages** are:

- Higher density developments in urban areas can give rise to both tensions and opportunities.
- Garden communities can be associated with a particular opportunity, hence 'health and wellbeing' considerations could feasibly serve as a high-level argument for seeking to meet some of the district's housing needs outside the district, if it transpires that garden community options are limited or non-existent locally.

Economy and employment

It is difficult to draw strong conclusions, at this early stage, regarding the question of whether **higher density** development would be supportive of achieving mixed use developments, to include employment floorspace. In particular, there is an important distinction between delivering mixed use developments to include **office space** versus mixed use developments involving 'co-location' of residential and **industrial** / light industrial floorspace. The possibility of co-locating residential and industrial / light industrial is a key issue across the London Boroughs, for example as discussed in the recent Lewisham Local Plan [Interim SA Report](#) and Croydon Local Plan [SA Report](#). Best practice is evolving, in respect of masterplanning and design solutions supportive effective colocation, but there can still be inherent challenges, both for businesses and communities.

With regards to the question of whether **greenfield** development is better directed to locations within Sevenoaks District or elsewhere, it is again difficult to draw conclusions at this early stage. Sevenoaks District is not an identified area of strategic importance for employment growth, e.g. in contrast to the A23 / M23 corridor from Croydon south to Gatwick and Crawley. However, there are locations in the district, outside of the AONB, where mixed use development could deliver new employment land well-connected to the M25. Also, there is a need to consider that the northern extent of the district could potentially play a supporting role in respect of achieving the established growth aspirations of the [Thames Estuary Growth Board](#).

It is understood that an Economic Needs Study (ENS) has recently been completed. This will provide an important source of evidence moving forwards.

In summary, at this stage the **key messages** are:

- It is difficult to draw strong conclusions, at this stage, regarding the implications of higher density development in urban areas for achieving a mix of uses, to include office and potentially also light industrial floorspace.

⁵e.g. see [england.nhs.uk/ourwork/innovation/healthy-new-towns/](https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/); and [tcpa.org.uk/guidance-for-delivering-new-garden-cities](https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities)

- It is also unclear at this stage whether there are strong arguments for delivering new strategic employment land locally, e.g. in proximity to M25 junctions, or whether needs are more sub-regional. If there is a need locally, then this could serve as an argument for considering mixed use strategic development options.
- Sevenoaks District is not an identified area of strategic importance for employment growth, regionally or sub-regionally, but there is a need to consider proximity of the northern part of the district to the Thames Estuary, which is a national growth area.

Historic environment

Higher density development in urban areas that is a departure from the typical approach to development can give rise to **clear tensions** with historic environment and wider historic / townscape character objectives. At this stage work is yet to be completed to examine specific issues (also feasibly opportunities) associated with the identified development site options, but there are likely to be significant tensions. A District- Wide Character Study (DWCS) has recently been completed, and will provide an important source of evidence moving forwards.

However, it is important to note that the historic environment sensitivity of settlements within the district does vary significantly, notably: **Swanley** subject to notably low constraint, at least in terms of listed buildings (there is just one grade 2 listed building) as a town that developed following the railway being built; the historic value of **Edenbridge** is strongly focused on its high street; and both **New Ash Green** and **Hartley**, in the northeast of the district, have quite low historic environment constraint, both being 20th century new settlements.

Also, looking more broadly at those parts of the district that fall outside of the AONB, there are quite extensive areas subject to low or perhaps moderate historic environment constraint, including much of the southern rail corridor (bar the eastern extent, in proximity to Tonbridge), where the headline historic environment constraint is in the form of dispersed historic farmsteads, hamlets and small villages, each associated with just a small number of grade 2 listed buildings. Finally, in the north of the district, it is also the case that there are quite extensive areas with limited historic environment constraint, although it is important to note that Horton Kirby is quite highly constrained, as a historic settlement associated with the River Darent corridor.

In summary, at this stage the **key messages** are:

- Higher density development in urban areas, where this is a departure from the typical built form, can give rise to clear tensions with historic environment and wider historic / townscape character objectives.
- However, several settlements in the district are subject to relatively low historic environment constraint, and those parts of the district falling outside of the AONB are overall subject to limited or moderate constraint (with some exceptions, notably the River Darent corridor in the far north), such that historic environment objectives are not likely to be a significant barrier to setting the housing requirement at LHN.

Housing

From a 'housing' perspective **there is a clear argument for setting the local plan housing requirement at LHN**, or perhaps even above LHN (in order to more fully provide for affordable housing needs, as discussed above). Exporting unmet needs not only leads to housing coming forward distant from the source of needs, but also gives rise to a risk of delayed housing delivery, and perhaps even a risk of the housing needs not being met at all.

In turn, **there is a strong argument for maximising supply from the urban areas**, recognising that:

- almost all greenfield site options in the district are constrained on account of Green Belt designation;
- there are wider constraints to housing growth locally, most notably extensive AONB designation; and
- there are major barriers to meeting unmet needs in neighbouring local authority areas, including Green Belt, AONB, flood risk; and
- there practical challenges around the timing of local plan development, recognising that neighbouring local authorities with a recently adopted local plan are unlikely to be in a position to plan for unmet needs from Sevenoaks District for several years.

Some specific considerations include:

- Dartford Borough – is located entirely within the Green Belt, but is not constrained by an AONB. The local plan, which is currently undergoing examination, directs growth to Ebbsfleet Garden City, which is a major strategic growth location that falls outside of the Green Belt, hence capacity here to accommodate unmet needs from Sevenoaks is an option that could be explored. However, there is pressure to provide for unmet needs from Gravesham Borough (as discussed [here](#)), where the main urban area (Gravesend) links very closely to Ebbsfleet Garden City growth area.

- Tandridge District – is located entirely within the Green Belt, and is partially constrained by the two AONBs. The local plan, which has been undergoing examination since submission in January 2019, proposes to set the housing requirement at a figure below ‘needs’, and to release land from the Green Belt in order to provide for this requirement. In particular, the proposal is to support a new garden community; however, the inspector has raised a number of concerns, such that the examination is currently paused for further work.
- Tonbridge and Malling Borough – is at an early stage of preparing a local plan, and there is a significant area of land within the Borough that falls outside of the Green Belt and AONB. As such, there could feasibly be the potential to explore the option of providing for unmet needs from Sevenoaks. It is noted that the current [Regulation 18 consultation](#) document presents the option of setting the housing requirement at a figure above LHN, presumably with a view to providing for unmet needs from elsewhere (not necessarily just Sevenoaks, e.g. noting the proximity of the constrained Medway towns); however, the consultation document only discusses the option of ‘need plus 10%’. There are a range of issues and constraints that create a clear challenge to providing for higher growth, e.g. around transport infrastructure.
- Tunbridge Wells and Maidstone – are the other nearby local authorities with significant areas of land located outside of the Green Belt and AONB. However, in both cases the areas of land in question do not link very well to Sevenoaks District (links are reasonable to the southern part of the district) and, in both cases, there are a range of issues and constraints to consider, as discussed above. Furthermore, in both cases, the local plans are at the examination in public stage.

In summary, at this stage the **key messages** are:

- There is a clear argument for setting the local plan housing requirement at LHN.
- In turn, there is a strong argument for maximising supply from the urban areas.

Landscape

The matter of townscape character has already been discussed above, under ‘historic environment’.

With regards to the question of whether the extensive landscape constraints affecting the district could serve as a reason for exporting unmet needs to one or more neighbouring local authority areas, the first point to note is an assumption that neither of the **AONBs** would be a focus of any significant housing growth under any scenario.⁶

With regards to the three broad parts of the district outside of the AONB: the first point to note is that the southern rail corridor is quite a low lying landscape, associated with the River Eden corridor, and where there are few concerns regarding setting of the adjacent AONBs; whilst the other two areas are raised landscapes, with greater potential for land to contribute to the setting of the North Downs scarp slope to the south.

With regards to **surrounding areas**, the aforementioned corridor of land within central Kent that falls outside of the Green Belt and AONB is considered likely to have a degree of landscape capacity that is broadly similar to that of the southern rail corridor in Sevenoaks District. Looking west, it is also notable that the central part of Tandridge District, whilst falling within the Green Belt, is quite a rural landscape (e.g. with a low density of listed buildings), potentially indicative of some capacity in landscape terms (albeit there are clearly wide ranging constraints, e.g. in respect of transport connectivity). Looking to the north, it is unlikely to be possible to conclude that Sevenoaks District is less constrained, in landscape terms, than Dartford Borough, Gravesham Borough or LB Bromley, noting factors such as the extent of ancient woodland and the inherent challenge of ensuring settlement separation around the London fringe, so as to maintain the integrity of the London Metropolitan Green Belt.

In summary, at this stage the **key messages** are:

- There is a strong argument for maximising supply from the urban areas, even though it is difficult to assume that reduced supply from the urban areas would lead to increased pressure on one or both of the AONBs.
- It would likely be a challenge to evidence a conclusion that landscape serves as a reason for not setting the local plan housing requirement at LHN, at least in the absence of a sub-regional study exploring capacity/sensitivity outside of the AONBs.

⁶ This is a fair assumption for the purposes of this current discussion. However, the possibility of considering one or more allocations within the AONB cannot be ruled out entirely at this stage in the process. For example, the Henley Neighbourhood Plan, in Oxfordshire, is proposing to allocate a site within the AONB for major development, due to a lack of alternative options, as discussed within the recent [Environmental Report](#). The [Examiner’s Report](#) for the plan has recently been published.

Land and soils

A key consideration here is avoiding the loss of **best and most versatile agricultural land**, which the NPPF defines as that which is of grade 1, grade 2 or grade 3a quality. As well as making the best use of brownfield and other non-agricultural land, there is a need to direct growth to areas of lower agricultural land quality, as far as possible. This is not typically a factor with a major bearing on local plan spatial strategy and site selection; however, the importance of food security is rising up the national agenda at the current time.

Focusing on those parts of the district outside of the AONB, a key point to note is that **the Swanley area** is associated with extensive **grade 2** quality land. On this basis, were it to transpire that there was a choice between directing growth to the Swanley area and exporting unmet needs to neighbouring areas, then protecting better quality agricultural land would serve as a reason for supporting the latter option.

Elsewhere in the district, the nationally available dataset shows agricultural land to be primarily 'grade 3' quality, which may or may not be best and most versatile, according to the NPPF definition. Very little of the district has been surveyed in detail, using 'post 1988' criteria in order to differentiate between areas of grade 3a and 3b land.

With regards to **neighbouring local authority areas**, key points to note are:

- land to the east is generally highly constrained, associated with both grade 1 and grade 2 quality land, although land to the north of Tonbridge is associated with grade 3 quality land, as is land in the vicinity of Paddock Wood, in Tunbridge Wells Borough;
- Tandridge District is not associated with any grade 1 or 2 quality land, according to the nationally available dataset, nor is the southern part of LB Bromley.

In summary, at this stage the **key messages** are:

- Focusing on avoiding the loss of best and most versatile agricultural land, there is a strong argument for maximising supply from the urban areas.
- It would likely be a challenge to evidence a conclusion that agricultural land quality serves as a reason for not setting the local plan housing requirement at LHN.
- Focusing on land outside and to the east of the district that falls outside of the AONBs and Green Belt, this area is associated with higher quality agricultural land.

Transport

Supporting **higher densities** at development sites that are best connected in transport terms is supported in transport terms, as there will be the potential for modal shift away from the private car to active modes and public transport. It is understood that the option of higher density development at Sevenoaks Station is being considered, which is strongly supported. However, there is a need for further work to scrutinise the development sites that have been identified as potentially suitable for 'optimum +' densities, given that townscape character is a key factor that has influenced identification of these sites, in addition to transport connectivity.

With regards to the question of whether **residual development needs**, after having maximised supply from the urban areas, should be met within Sevenoaks District or elsewhere, it is difficult to comment in any detail at this early stage, but factors for consideration include:

- There is a strong 'transport' argument for meeting housing needs as close as possible to source.
- Parts of the district are quite well-connected in transport terms, and there may be the potential to consider locations for growth in close proximity to a train station (albeit potentially with a limited service).
- At the current time there is thought likely to be limited potential to deliver growth at scale, e.g. a new 'garden community', which can give rise to an opportunity in terms of trip internalisation and investment in transport infrastructure. In turn, this could serve as a reason for considering whether some of Sevenoaks' housing need is best met at elsewhere in the sub region. However, there is much uncertainty at this early stage.

In summary, at this stage the **key messages** are:

- Higher density development at Sevenoaks Station is strongly supported.
- More generally, there is likely to be a strong argument for maximising supply from the urban areas, subject to further detailed work to consider accessibility / transport connectivity at the identified development sites.
- In the absence of a sub-regional plan identifying optimum locations for strategic growth, from a transport perspective, it would likely be a challenge to evidence a conclusion that transport factors serve as a reason for setting the housing requirement below LHN. Sevenoaks is generally well-connected in transport terms.

Water

It is thought unlikely that the option of supporting higher density development in the Sevenoaks District urban areas give rise to any significant tension with water resource or water quality objectives.

With regards to the question of whether residual development needs, after having maximised supply from the urban areas, should be met within Sevenoaks District or elsewhere, it is similarly unlikely that water resource or water quality considerations have a significant bearing.

With regards to **water resources**, it is likely to be the case that the entire sub-region is similarly 'water-stressed', although there will be a need for further discussions with the water companies to confirm this, as there can be significant variation between aquifers, and there is also a need to consider the water companies' plans for managing water resources over the coming decades, as set out in their Catchment Abstraction Management Plans (CAMs).

With regards to **water quality**, the key point to note is that there appears to be no risk of growth being directed to one of the catchments that Natural England has identified as requiring 'nutrient neutrality' (there are 27 such catchments nationally). The nearest such catchment is the River Stour catchment, which constrains the Canterbury area, but it is difficult to envisage a scenario whereby unmet needs from Sevenoaks are directed to this area.

In summary, at this stage the **key messages** are:

- Water resource and water quality objectives, whilst important considerations for the local plan, are unlikely to have a significant bearing on the two questions under consideration at the current time, namely: A) the extent to which higher densities should be supported in the urban areas; and B) whether the local plan should provide LHN in full (714 homes per annum) or, alternatively, provide for lower growth and therefore export unmet needs. This is an initial conclusion subject to further discussions with the Environment Agency and the water companies.