

# Settlement Capacity Study

## Sevenoaks District Council

### Addendum May 2022

#### Introduction

- 1.1 This addendum provides an update to the July 2019 Sevenoaks District Settlement Capacity Study (SCS), prepared by Troy Planning. It provides an update on the progress of the Council's Local Plan, the associated evidence base and the potential identified in the SCS to accommodate new homes in settlements across the District.

#### The Emerging Local Plan

- 2.1 The emerging Sevenoaks District Council (SDC) Local Plan was submitted for examination in April 2019. Following the completion of examination hearings, the Inspector concluded that the Duty to Co-operate had not been complied with and the plan should not be adopted. The Council is now preparing an updated evidence base to inform a revised Regulation 18 version of the Plan.
- 2.2 The Local Plan timetable set out in the Local Development Scheme (LDS) is being kept under review, in the light of views received during the course of the Plan preparation process and the emerging evidence described in this note. At this stage, it is anticipated that the emerging Local Plan will cover the period up to 2040.
- 2.3 The latest position on all of the evidence documents that underpin the emerging Local Plan can be found on the Council's website. The following documents are particularly relevant to the delivery of new homes and have emerged since the publication of the SCS in 2019. Evidence supporting the previously emerging Local Plan dates back to 2015 and some elements of the evidence base require updating in order to support a new Local Plan to 2040. In relation to housing and relevant to the Settlement Capacity Study, the following pieces of work have been undertaken:

#### *Targeted Review of Local Housing Needs (TRLHN)*

- 2.4 This document updates the overall affordable housing need and tenure requirements and determines the level of discount required for First Homes. The data is provided at placemaking level, recognising that housing needs differ across the geography of the District. The evidence will be used to inform both Local Plan preparation and the emerging Housing Strategy.

#### *District-Wide Characterisation Study (DWCS)*

- 2.5 The District-Wide Characterisation Study is an important piece of work in seeking to ensure that policies and allocations in the emerging Local Plan, as well as new development coming forward in the form of planning applications, makes the best and most efficient use of land. The aim of the work is to understand the key characteristics across the District which, when read alongside other evidence base documents, will inform a context-led approach to growth and change. The final DWCS report is expected to be published soon and will be available on the Council's website.

#### *Sevenoaks Town Centres Strategy (STCS)*

- 2.6 The Council commissioned a Town Centres Strategy, covering the towns and local service centres of Sevenoaks, Swanley, Edenbridge, Westerham and New Ash Green. This important piece of work plays a key role in helping to shape the future of town centres and provides up to date town centre and retail evidence for Local Plan policies and site allocations. Particular consideration has been given to ensure the continued vitality and viability of our town centres, in the light of changing shopping patterns and permitted development rights. The TCS is available to view on the Council's website.

#### *Settlement Capacity Study (SCS)*

- 2.7 The Settlement Capacity Study identified potential for the delivery of approximately 1,000 new dwellings in the existing settlements over the next 15 years. These units are in addition to the Council's windfall allowance and those sites previously identified and accounted for through the emerging Local Plan.
- 2.8 The vast majority of the sites identified in the SCS are less than one hectare in size and the NPPF notes the contribution that small to medium sites can make to meeting housing requirements. In particular, planning authorities are required to meet at least 10% of its housing requirement on sites no larger than 1 hectare (paragraph 69).
- 2.9 Further work is needed to assess the potential identified through this work including the consideration of appropriate development density and engagement with landowners to determine availability. The Council is mindful that information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development.

#### **Other Sources of Housing Supply**

##### *Call for Sites*

- 3.1 A two stage call for sites ran from October 2021 to January 2022, initially inviting sites within existing settlements and then opening up to sites located within the Green Belt. A total of 371 sites were submitted and assessment work has begun to determine suitability for development. The assessment process consists of two stages. Stage 1 is an initial sieve of the sites to discount any that don't meet the minimum size threshold required by the Planning Practice Guidance (and so as not to double count windfalls) and/or any sites that are not considered to be in sustainable/appropriate locations for development. This part of the assessment has been completed, leaving 158 sites to go through to stage 2. Stage 2 is a full site appraisal for each of the remaining sites, and this work is currently ongoing.

##### *Strategic Housing and Economic Land Availability Assessment (SHELAA)*

- 3.2 The assessment work being undertaken following the close of the call for sites will be included within an updated SHELAA, to identify a future supply of suitable, available and achievable land for housing and other uses over the plan period to 2040.

##### *Windfalls*

- 3.3 The SCS concluded that a further 900 units might come forward through windfall development on sites of smaller sites and through other sources, although these have not been added into the total so as not to duplicate and double count the windfall allowance included within the 5 year housing land supply.
- 3.4 NPPF paragraph 71 makes it clear that a windfall allowance can be included in anticipated supply providing that there is 'compelling evidence that they will provide a reliable source of supply'. The most recent evidence (as set out in the September 2021 Five Year Housing Land Supply) indicates that an average of 73 units per annum have been delivered in Sevenoaks District from sites of 1-4 units in the past five years. It is expected that this trend will continue.
- 3.5 The windfall allowance will be updated in the coming months to ensure it accurately reflects historic delivery, the emerging site assessments as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA), and the SCS.

#### **Outcomes and Next Steps**

- 4.1 The potential identified through the SCS will be reflected in the Regulation 18 version of SDC's emerging Local Plan. This will be expressed as specific sites and broad locations where small and medium sites up to 1 hectare are expected to be delivered.



# Settlement Capacity Study

Sevenoaks District Council:  
Final Report  
July 2019

**SEVENOAKS DISTRICT COUNCIL**  
**Settlement Capacity Study**  
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## **Final Report**

July 2019

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# Executive Summary

As part of its plan-making process, Sevenoaks District Council's Planning Policy Team commissioned Troy Planning + Design to prepare a Settlement Capacity Study with the aim of assessing the potential to accommodate new housing development within the defined urban areas across the District.

The study involved assessment of potential in the main towns in the District as set out in the settlement hierarchy in the emerging Local Plan, being:

- < Sevenoaks.
- < Swanley.
- < Edenbridge.
- < Westerham.
- < New Ash Green.
- < Otford.
- < Hartley.

The network of centres and railway stations, and walking catchment areas around these, were mapped and 'forensic' assessments of potential undertaken. A less forensic but still systematic review of other areas was also undertaken, involving a review of mapping, information held by the Council, and visits to each area.

The study has been undertaken in support of the emerging Local Plan and takes existing allocations and designations as read. The purpose of the study was to seek to identify what other potential exists over and above these. The suitability of identified sites were then discussed with Council Officers. Estimates of site capacity were generated through the use of density multipliers established in the Local Plan. The viability of sites was then considered and phased into delivery periods, each of five years. Those sites considered to have limited development prospects were discounted from the study.

Our findings are presented in Section 6 of this report. In short, **we estimate that, over the next fifteen years, the potential exists to accommodate approximately 1,094 new dwellings on sites identified in the existing built-up areas surveyed in this study.** This figure is over and above that already accounted for in the emerging Local Plan.



Any assessment of capacity is, by definition, a snapshot in time. Although the study can be used as a proactive tool by the Council to help bring forward land for development, some sites will not come forward for whatever reason. Some other un-identified sites will though. These will generally balance themselves out. It is therefore important that the findings of the study are regularly reviewed, testing the assumptions underpinning the estimates and monitoring the progress of identified sites over time.

It should be noted that this study is not a statement of Council policy. Rather, it is a technical document that comprises part of the evidence base assisting in production of the new Local Plan for Sevenoaks District Council. The study identifies land and buildings where the potential may exist for new housing development in the new Local Plan period. Inclusion of a site within the study does not constitute an allocation nor influence planning applications.

This document is just one of a suite of technical reports that have been prepared by the Council to inform the new Local Plan. Other studies include, for example, infrastructure delivery, open space, employment and retail provision. These need to be considered together to help inform policy decisions, and could affect both the estimated capacity of a particular site, or the total capacity for a settlement or the authority area.

# 1. Introduction

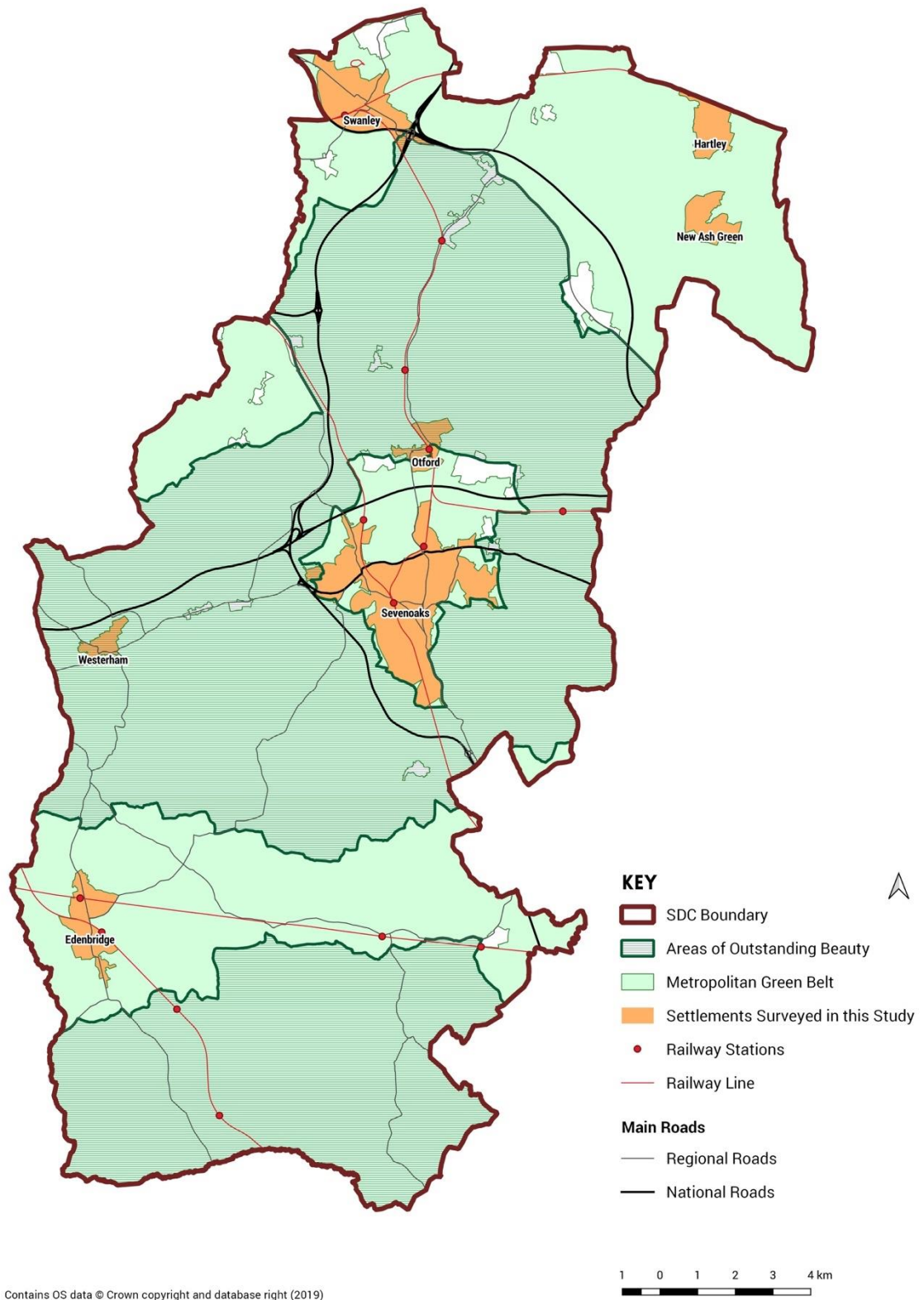
## Purpose of the Study

- 1.1 Sevenoaks District Council is in the process of preparing a new Local Plan to cover the period 2015-2035. This has been submitted for examination purposes<sup>1</sup>. This sets out how and where the District will be seeking to accommodate new homes over the Plan period, meeting the requirement for 707 homes per year (equivalent to 11,312 homes over the 16 year Plan period). This is a substantial increase over and above the requirements established in the adopted Core Strategy, which was planning to accommodate 165 homes per year.
- 1.2 A large proportion of the District is within the Green Belt (93%) and much is also designated as an Area of Outstanding Natural Beauty (60%) (see Figure 1). This brings with it significant challenges when considering how best to accommodate future growth requirements. The Local Plan notes that 'maximum use will be made of sites within existing settlements and on previously developed land'. This approach is set out in 'Policy ST1 – A Balanced Strategy for Growth in a Constrained District', with higher density mixed-use development encouraged, particularly in well-connected and served areas in the main towns in the District. However, and as a result of the highly constrained nature of the District, the Council has been unable to meet the housing need purely by focussing on existing settlement areas. The Council has explored whether it might be possible for some of this need to be provided within neighbouring authorities. Alongside this, the District Council has commissioned this Settlement Capacity Study to explore whether any further potential exists in the defined settlement areas for new homes.
- 1.3 The Settlement Capacity Study supplements the Council's Strategic Housing & Economic Land Availability Assessment (SHELAA)<sup>2</sup>, identifying potential sources of capacity for housing development in the defined settlement boundaries over and above that in the SHELAA. The Council's SHELAA was prepared in line with guidance established in the NPPF and associated Planning Practice Guidance and, in accordance with this, is primarily based on a 'Call for Sites' process, with landowners and developers submitting sites to the Council for assessment. As a result of this process, the Council is proposing to release some Green Belt sites to meet its housing need. At the same time, it is important to investigate all opportunities outside of the Green Belt. To this extent, this Settlement Capacity Study has been prepared. It takes a purposely proactive approach to site identification, identifying additional opportunities for housing potential within the existing settlements.

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<sup>1</sup> Sevenoaks District Council, Sevenoaks Local Plan, December 2018, Proposed Submission Version

<sup>2</sup> Sevenoaks District Council, December 2018, Strategic Housing & Economic Land Availability Assessment



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Figure 1: Sevenoaks District and the extent of the Green Belt and AONB designations

## The Study area

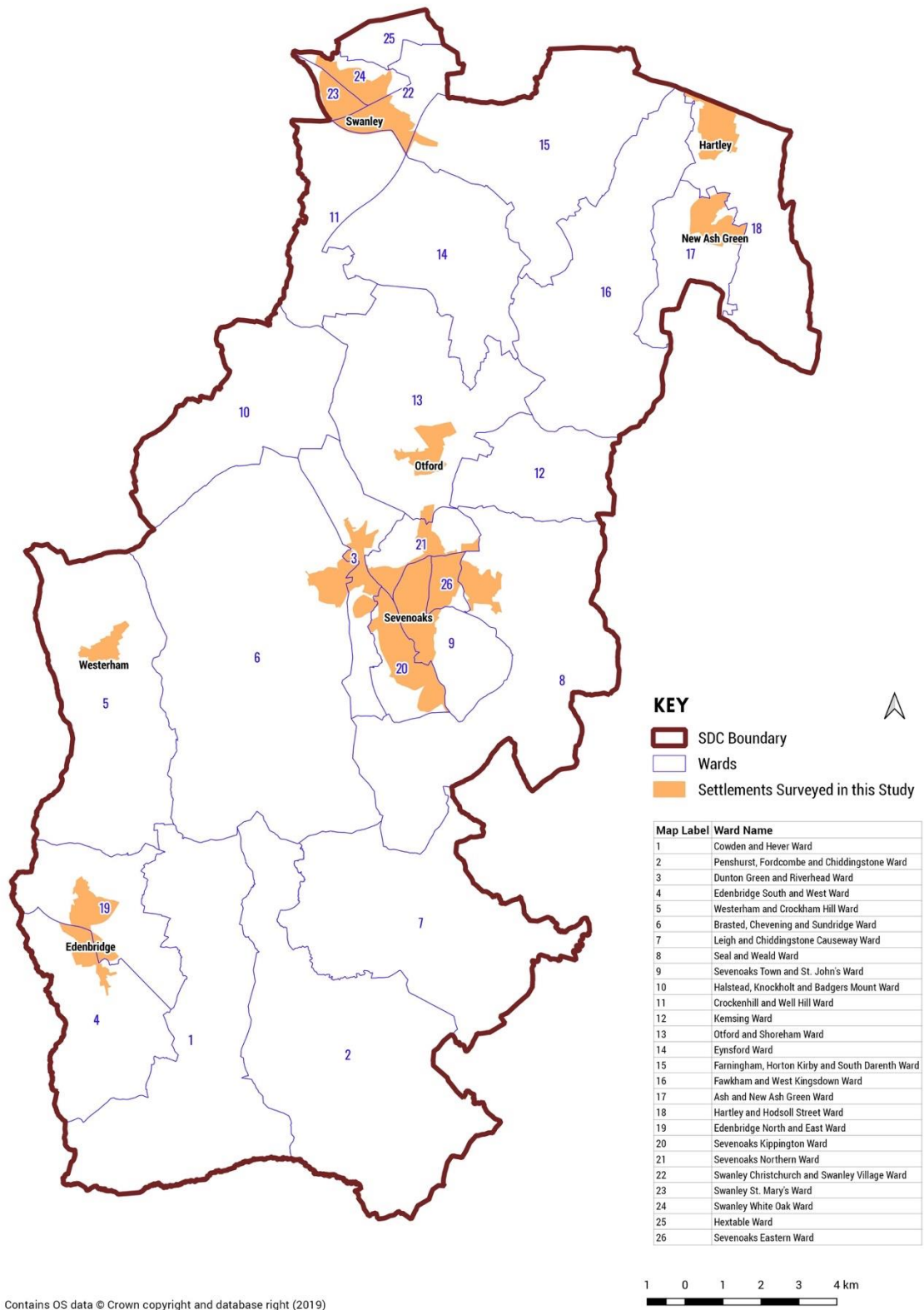
1.4 The study has assessed the opportunities in the main towns in the District settlement hierarchy, being:

- ◁ Sevenoaks.
- ◁ Swanley.
- ◁ Edenbridge.
- ◁ Westerham.
- ◁ New Ash Green.
- ◁ Otford.
- ◁ Hartley.

1.5 For the purpose of this study the opportunities have been identified and assessed on a ward basis. These are presented in Table 1 and Figure 2.

<b>Settlement</b>	<b>Ward(s)</b>	<b>Ward reference used for recording individual sites</b>
Sevenoaks	Brasted, Chevening and Sundridge Dunton Green and Riverhead Sevenoaks Eastern Sevenoaks Kippington Sevenoaks Northern Sevenoaks Town and St. John's	BCS DGR SE SK SN ST
Swanley	Swanley Christchurch and Swanley Village Swanley St. Mary's Swanley White Oak	SCSV SsM SWO
Edenbridge	Edenbridge North and East Edenbridge South and West	ENE ESW
Westerham	Westerham and Crockham Hill	WCH
New Ash Green	Ash and New Ash Green	NAG
Otford	Otford and Shoreham	OT
Hartley	Hartley and Hodsoll Street	HAR

*Table 1: List of settlement areas and corresponding wards surveyed within the Settlement Capacity Study*



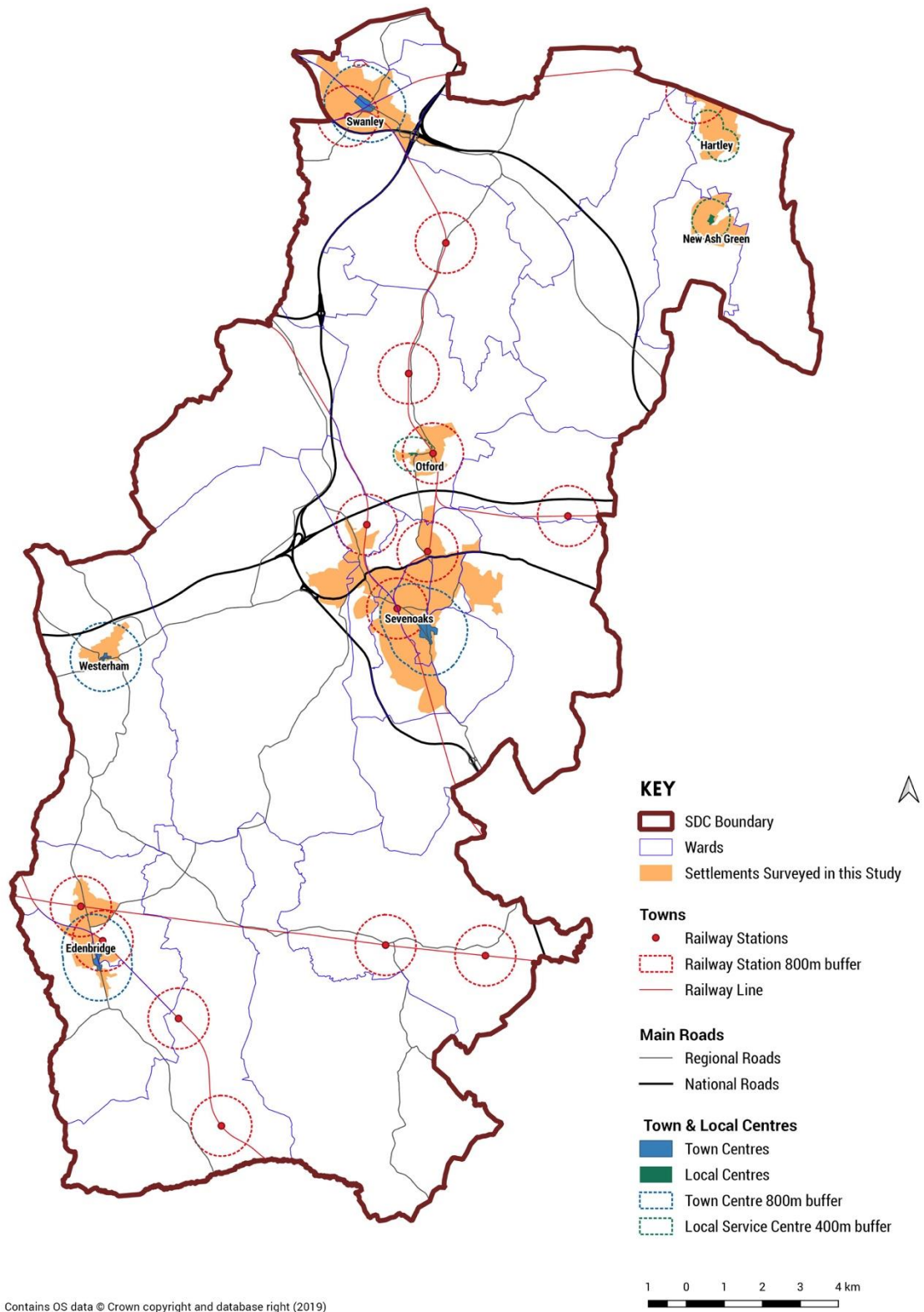
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Figure 2: Map of settlement areas and associated wards surveyed in the Settlement Capacity Study

- 1.6 The extent of town, district and local centres have been mapped (as defined in the Settlement Hierarchy and Local Plan policies map) and catchment areas drawn around these, extending to 800m around town and district centres, equating to a ten-minute walk, and 400m around local centres, equating to a five-minute walk. All railway stations have also been mapped and an 800m catchment area drawn around these (Figure 3). These catchment areas form the basis of the study, though all areas within the settlement boundaries have also been surveyed.

### **Structure of this Report**

- 1.7 Following this introductory section the report is presented according to the various stages of work, providing an explanation of the approach followed and a summary of findings. The report sections are:
- ◁ Section 2; which presents an overview of the method.
  - ◁ Section 3; which presents the approach to identifying potential development sites for housing in the built-up areas within Sevenoaks District.
  - ◁ Section 4; which presents the approach to estimating the development capacity of the identified sites, as well as considering the potential from non-physically identifiable sources (e.g.: reusing empty space above shops for new housing).
  - ◁ Section 5; which presents the approach to discounting and phasing sites, based on an understanding of viability matters. This section also considers the potential for new housing that might derive from small sites (i.e.: those which might generate fewer than five new homes).
  - ◁ Section 6; which presents the summary findings of the study.
  - ◁ Section 7; which presents a set of concluding comments.
- 1.8 Beyond these sections the report is supported by an appendix including land value information.
- 1.9 Furthermore, the information sitting behind this study, including site schedules and mapping (presented on a settlement-by-settlement basis), has been provided to the Council in electronic format.
- 1.10 This study does not represent a statement of policy, but is intended to help inform choices in the new Local Plan, and longer-term opportunities for development in the settlement areas. Equally, it can help inform updates to the Brownfield Land Register.



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Figure 3: Plan showing broad catchment areas around the railway stations, town, district and local centres in Sevenoaks

# 2. The method

## Summary method

2.1 Work on the Settlement Capacity Study involved three main stages:

### **Stage 1: Identifying capacity sources**

2.2 This stage involved a desk-based review of mapping and documentation in addition to site surveys to identify as many potential development opportunities as possible. This involved surveys on a street-by-street basis of the town and district centres in the District, the principal transport hubs (railway stations) and the catchment areas around these. All other areas and sites identified through the desk-based review were also visited, and any other opportunities identified during these visits also recorded.

### **Stage 2: Assessing capacity**

2.3 The use of density multipliers forms the basis for estimating the housing capacity of individual sites identified through the survey work. The multipliers used are based on the density matrix prepared by the District Council, with higher densities in central locations and which are considered to optimise the potential for land and development in the built-up area. More information on the approach taken is presented in Section 4 of this report.

### **Stage 3: Discounting capacity yields**

2.4 Following the assessment of capacity this figure was then discounted to give an informed assessment of the amount of housing that might be brought forward within the time horizon being considered in the emerging Local Plan. More information on the approach taken is presented in Section 5 of this report.



## Underlying principles

- 2.5 The methodology for the Settlement Capacity Study recognises the fundamental importance of:
- ◁ Relating the analysis of urban housing and other development, e.g. employment and retail potential, to proximity and access to local facilities and public transport, reflecting opportunities for sustainable patterns of development and optimal use of land.
  - ◁ The need for forensic surveys in the most sustainable locations, seeking to capture as many opportunities as possible, taking a longer-term view of site potential.
  - ◁ A clear and transparent approach to site assessment which strengthens the robustness of findings.
  - ◁ Reflecting local character and context within estimates of capacity.
  - ◁ Engaging with Council officers to review and agree the potential opportunities.
  - ◁ Provision of clear and easy-to-use data which can inform other studies (e.g.: Brownfield Land Register) and be updated by the Council.

# 3. Identifying the capacity

## Desk-based review

- 3.1 This first stage involved mapping the study area, including settlement boundaries, existing sites and allocations in the emerging Local Plan, and constraints to development, such as Green Belt, Flood Zones and AONB. Catchment areas around stations, town, district and local centres were also mapped.
- 3.2 A review of the mapping and associated aerial photography was undertaken to identify potential opportunity areas and sites not already identified in the Local Plan and not subject to an absolute policy constraint.
- 3.3 The desk-based review was not constrained by a particular size threshold. This allowed small sites, which may have potential to accommodate higher density development, to be tested and included as appropriate.
- 3.4 Following site visits and recording of opportunities, the stocktaking workshop, as outlined below, then considered the suitability of identified sites in policy terms.

## Site visits

- 3.5 Site survey work was undertaken to view and record the sites identified through the desk-based review, as well as providing opportunities to identify other potential development sites for consideration.
- 3.6 The site visits involved:
  1. Detailed, forensic surveys on a street-by-street basis of key opportunity areas and sustainable locations, comprising:
    - a. Town, district and local centres and their catchment areas.
    - b. The catchment area around train stations
  2. A systematic analysis of other areas, including visits to each of the sites identified during the desk-based review of mapping and information together with a general examination of other areas.
- 3.7 All information was entered into the site schedules, ordered on a ward-by-ward basis and including basic site information, such as location and area (measured in hectares). Any additional sites identified through the site visits were mapped and added to the GIS database and associated schedules.

## **Stocktaking workshop**

- 3.8 Deciding which of the identified sites should be taken forward for assessment in the capacity work was a crucial stage in the study.
- 3.9 As the proposed method for the survey work adopted an inclusive approach to site identification and buildings with potential for housing (after taking account of emerging Local Plan allocations and designations) it inevitably resulted in the identification of some sites where housing was not considered desirable. The purpose of the stocktaking process was to sieve these sites out. A stocktaking workshop was held with Council officers to review and refine the list of sites.

## **Summary of stage findings**

- 3.10 In total, 201 sites were identified for consideration. This was reduced through the stocktaking process to a total of 81 sites. This is broken down, by area, in Table 2 (overleaf).

<b>Settlement</b>	<b>Ward</b>	<b>Total sites identified</b>	<b>Sites removed through stocktaking process</b>	<b>Sites carried through to next stage of study</b>
Sevenoaks	Brasted, Chevening and Sundridge	2	2	0
	Dunton Green and Riverhead	14	9	5
	Sevenoaks Eastern	12	6	6
	Sevenoaks Kippington	5	3	2
	Sevenoaks Northern	13	5	8
	Sevenoaks Town and St. John's	22	15	7
Swanley	Swanley Christchurch and Swanley Village	18	9	9
	Swanley St. Mary's	9	4	5
	Swanley White Oak	20	5	15
Edenbridge	Edenbridge North and East	15	9	6
	Edenbridge South and West	17	12	5
Westerham	Westerham and Crockham Hill	12	8	4
New Ash Green	Ash and New Ash Green	18	17	1
Otford	Otford and Shoreham	8	6	2
Hartley	Hartley and Hodsoll Street	16	10	6
<b>Total</b>		<b>201</b>	<b>120</b>	<b>81</b>

*Table 2: Total sites identified by the settlement capacity study*



# 4. Unconstrained Capacity

## Physically identifiable sites

- 4.1 The development capacity of identified, acceptable sites was estimated through application of (1) gross to net ratios to consider the amount of land that might be suitable for housing on any one site, and (2) use of standard density multipliers applicable to the location. The ratios and multipliers used, and the reasons for their use, are outlined below:

### Gross to net ratios

- 4.2 It is important to consider gross to net ratios when estimating site capacity as the whole of a site identified as having potential for development will not always be developable. This is because site constraints and infrastructure requirements need to be factored in and thus reduce the developable area. This is well illustrated in Figure 4 showing how the developable area of a site reduces once various designations and policy constraints are considered.

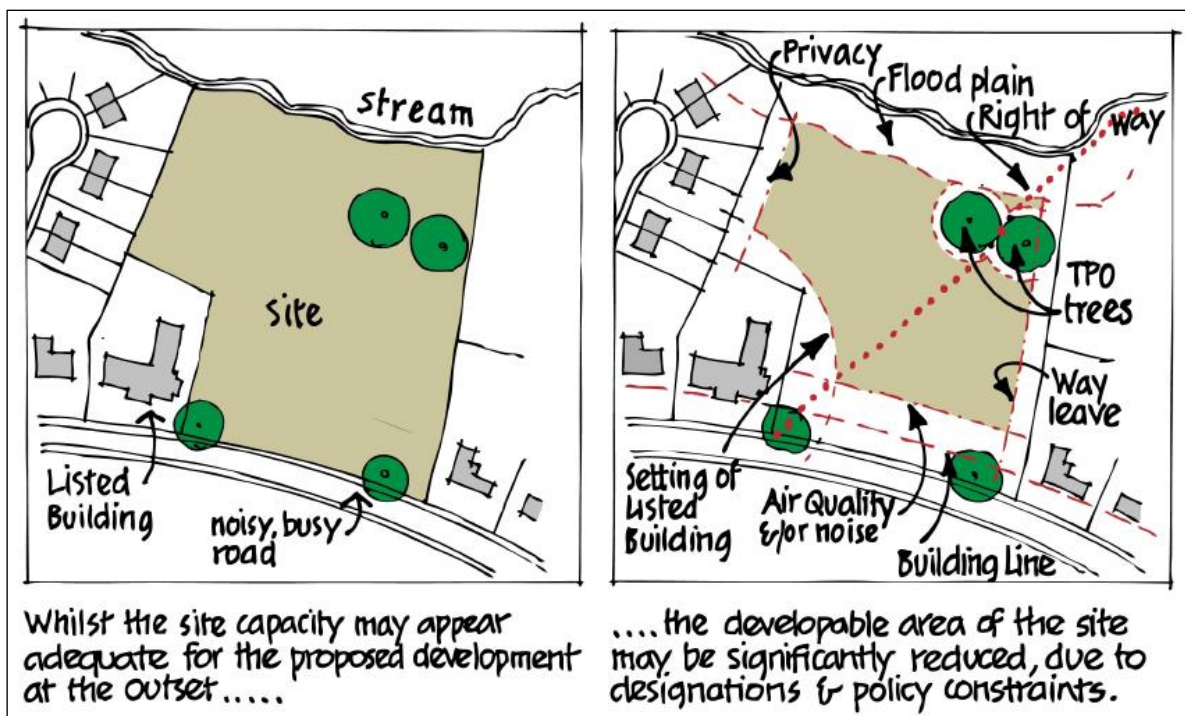


Figure 4: Difference between site boundary and developable area

Source: Elmbridge BC, April 2012, Elmbridge Local Plan: Design and Character SPD

4.3 A range of gross to net ratios are used in the Settlement Capacity Study to estimate the developable area of each site, to which density multipliers are then applied to estimate site development capacity. As the site area increases, so the need for additional infrastructure is likely to increase, making allowance for increased areas of play space and educational needs for example. The gross to net ratios are based on different site areas. These are reflective of research undertaken and informing former best practice guidance to urban capacity studies and site capacity assessment<sup>3</sup>. The ranges for each area band have been simplified for application in the Settlement Capacity Study, with a 'mid-point' used. The gross to net ratios used are outlined in Table 3.

<b>Site area (hectares)</b>	<b>Gross to net ratio (range)</b>	<b>Gross to net ratio used in UCS (Based on a mid-point)</b>
Site up to 0.4ha	100%	100%
Site between 0.4 – 2ha	75 – 90%	82.5%
Site greater than 2ha	50 – 75%	62.5%

Table 3: Gross to net ratios used within the settlement capacity study

4.4 By way of an example, and using the ratios outlined above, a site of 1ha would be reduced in size to 0.825ha. It is this area that density multipliers are then applied to, to estimate site capacity.

### **Approach to density**

4.5 For the Settlement Capacity Study a net density is used to estimate the potential dwelling capacity of each of the identified sites considered acceptable for residential development through the stocktaking exercise. The measure of density in this study is referred to as dwellings per hectare (du/ha).

4.6 Policy H5 (Housing Density) in the submission version Local Plan sets out the emerging approach to density in the District. All new development is expected to make the most efficient use of land, with higher densities than currently existing considered acceptable subject to meeting certain criteria, such as design quality and respecting local character.

4.7 Policy H5 is supported by a 'density matrix' prepared by the District to assess the potential capacity of sites. This gives consideration to the optimum density of potential development on any site, such that it makes the most efficient use of land. The matrix reflects (a) site location, (b) existing built form, (c) access to services, facilities and public transport, and (d) efficient use of land. The density multipliers of relevance to the study area for the settlement capacity study are set out in Table 4.

4.8 For each location type, a low and high-density multiplier is set out in the density matrix, generating a potential development range for each site.

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<sup>3</sup> See, for example, DETR, December 2000, Tapping the Potential: Assessing Urban Housing Capacity; Towards Better Practice

Once this is generated, the Settlement Capacity Study then calculates a mid-point figure between these. This allows for more detailed design to come forward as appropriate during later stages of the planning process, but recognising that, in some instances, development schemes will come forward at a lower density than estimated, and in other cases, at a higher density. The range applied and use of the mid-point allows for this fluctuation. The one area where a higher density multiplier is not set out in the matrix is the central locations. In these areas the density matrix assumes that densities of 150 du/ha plus are appropriate. For the purposes of the Settlement Capacity Study, a density of 150 du/ha is applied for the low and high calculations. This generates a single figure which reads across into the mid-point capacity estimates.

<b>Location defined in District density matrix</b>	<b>Areas of application in the Settlement Capacity Study</b>	<b>Low density multiplier (du/ha)</b>	<b>High density multiplier (du/ha)</b>
Central / town centres	Defined town centres in Sevenoaks, Swanley and Edenbridge	150+	n/a
Urban Areas	The catchment area around Sevenoaks, Swanley and Edenbridge town centres.  The local centre and catchment around this in Westerham, New Ash Green, Otford and Hartley.  The catchment area around all railway stations in the settlement areas.	50	150
Edge of urban areas	All other locations within the settlement area but not covered by one of the above	40	60

*Table 4: Density multipliers used within the settlement capacity study*



## **Mixed use development**

- 4.9 Although the Settlement Capacity Study is focused on the potential for accommodating new housing on land within the built-up areas, some of the sites identified and 'accepted' through the stocktaking exercise will be in locations where a mix of uses might be appropriate: in town centres for example, where retail use might be accommodated on the ground floor with residential above.
- 4.10 The Settlement Capacity Study allows for mixed use development by estimating how much of the site area might be used for housing and other uses, and reducing the area accordingly. It is then the reduced area that density multipliers are applied to. The following approach was taken:
- ◁ For infill sites in residential areas, it was assumed that 100% of the site is suitable for residential use.
  - ◁ In town and district centre locations it was assumed that 75% of the site would be suitable for residential, with the remainder for other uses, including, for example, retail and other commercial activities, at ground floor.
  - ◁ For community facilities, retail parks, employment areas and some car parks where mixed use intensification and or rationalisation of parking space might be appropriate it was assumed that 50% of the site would be suitable for residential use.

## **Summary of findings**

- 4.11 The study estimates that potential exists for approximately 1,240 dwellings (based on a mid-point) on the sites identified within the Settlement Capacity Study. This is broken down by location in Table 5.

<b>Settlement</b>	<b>Ward</b>	<b>Dwelling potential (low density multiplier)</b>	<b>Dwelling potential (high density multiple)</b>	<b>Dwelling potential (mid-point)</b>
Sevenoaks	Brasted, Chevening and Sundridge	0	0	0
	Dunton Green and Riverhead	51	126	88
	Sevenoaks Eastern	20	48	34
	Sevenoaks Kippington	42	125	83
	Sevenoaks Northern	52	157	104
	Sevenoaks Town and St. John's	95	174	135
Swanley	Swanley Christchurch and Swanley Village	131	181	156
	Swanley St. Mary's	79	98	89
	Swanley White Oak	100	213	156
Edenbridge	Edenbridge North and East	52	94	73
	Edenbridge South and West	76	156	116
Westerham	Westerham and Crockham Hill	16	43	30
New Ash Green	Ash and New Ash Green	4	13	9
Otford	Otford and Shoreham	44	133	89
Hartley	Hartley and Hodsoll Street	41	116	78
<b>Total</b>		<b>803</b>	<b>1,677</b>	<b>1,240</b>

*Table 5: Estimated 'unconstrained' development potential from the physically identifiable sites*

Note: total may not add due to rounding

# Other sources of supply

## Homes above the shop

- 4.12 Research published by the Federation of Master Builders<sup>4</sup> suggests that, across the UK, 'there is significant untapped potential to create additional homes above shops, on or near the high street', including 'unutilised space above shops that could be more intensively used or redeveloped into additional housing units'. The research also suggests that realising this potential can do more than just deliver new homes, as 'revitalising our high streets through well planned and designed residential units could help rejuvenate smaller town centres'. However, identifying space above shops for new homes is challenging and the potential is thus difficult to quantify<sup>5</sup>. In addition, once identified, there are other complexities to consider, including the creation of suitable access arrangements and the need to satisfy both building regulations and planning policies. Equally, potential may depend on the ability to coordinate development across multiple land ownerships.
- 4.13 Although we believe that potential is very likely to exist for new homes from this source type we have not, for the reasons outlined above, made an estimate of potential within this study. However, we recommend that this source is monitored over time.

## Empty properties

- 4.14 Data collected by the Government<sup>6</sup> records that, as of October 2018<sup>7</sup>, there were 367 'long-term vacant' properties in the district, defined as those 'dwellings which have been unoccupied and substantially unfurnished for over six months'. This equates to less than 1% of the total dwelling stock in the district<sup>8</sup>. The proportion of long-term vacant properties in the district has remained fairly consistent over the last fifteen years<sup>9</sup>. Returning such properties into use can be challenging, and expensive, sometimes requiring enforcement action and or significant investment to make them habitable.

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<sup>4</sup> Lichfields and Child Graddon Lewis for the Federation of Master Builders, December 2017, Homes on our High Streets: How to unlock residential development on our High Streets

<sup>5</sup> Research by Empty Homes, 2016. Affordable Homes from Empty Commercial Spaces, suggests that such spaces are seldom classified as dwellings (even if at one point in history there had been a flat above the shop), and are therefore not readily detected through council tax data which is used by local authorities to record and identify empty homes in their area. They are also not captured by data on empty retail units and offices. It is suggested that there is little alternative than to undertake door-to-door surveys to identify potential empty spaces.

<sup>6</sup> MHCLG, Live tables on dwelling stock (including vacants), Table 615: vacant dwellings by local authority district, from 2004, <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> (accessed June 2019)

<sup>7</sup> The most recent set of available data

<sup>8</sup> Based on the total number of Council Tax properties in Sevenoaks on the Valuation List (49,624): MHCLG, Council Taxbase 2016 in England, Council Taxbase local authority level data 2016 (revised 2017), <https://www.gov.uk/government/statistics/council-taxbase-2016-in-england> (accessed June 2019)

<sup>9</sup> See MHCLG Table 615. In 2004 records show there were 382 long-term vacant properties, with a 'high' of 483 in 2011 and a 'low' of 291 in 2015.

- 4.15 In all, Government records show that, as of October 2018, there were a total of 1,407 vacant dwellings in Sevenoaks District<sup>10</sup>: less than 3% of the total dwelling stock. This proportion allows for normal turnover and property market churn, as well as gaps in rental periods and the presence of second-homes. These figures are consistent with the averages for Kent and England as a whole<sup>11</sup>.
- 4.16 The Council's Housing Strategy<sup>12</sup> includes actions to improve the quality and use of existing housing stock, including provision of grant assistance to first-time buyers to purchase long-term empty homes. Since 2003 an average of 11 empty homes have been brought back into use through direct District Council intervention each year<sup>13</sup>. Based on this, the Council's Five-year Housing Land Supply Statement<sup>14</sup> makes allowance for 55 units to come forward in the first five years of the Local Plan period. However, this figure is not rolled forward for the remainder of the Plan period, recognising that empty homes represent a relatively small and finite element of supply. We recommend that this source is monitored over time.

### **Office to residential conversions / Permitted Development rights**

- 4.17 The Council's AMR<sup>15</sup> notes that 1,270sqm of office space has been lost to residential since the General Permitted Development Order was amended to allow such changes through the 'Prior Approval' route, generating 22 new housing units across four schemes. The AMR records that a further 85 new housing units could come forward on twenty sites through this route where development has not yet started, resulting in the loss of 5,841sqm of office space.
- 4.18 Whilst these patterns may continue the quantum of change is difficult to assess given the short time that the 'Prior Approval' route has been in operation. It is also noted that on many of the sites the number of new housing units generated is fewer than five, and thus they would be captured through an approach to windfall for small sites (see section 5 of this report). To avoid double-counting, and any uncertainties through extrapolation of recent trends in office to residential conversions, we have not made a separate, specific allowance for additional housing from this source type. As with the other categories outlined above, it should be monitored over time.

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<sup>10</sup> MHCLG Table 615

<sup>11</sup> As above, based on MHCLG Table 615 and record of total Council Tax properties

<sup>12</sup> Sevenoaks District Council, 2017, Housing Strategy 2017: Wellbeing Starts at Home. See Priorities 2.12 – 2.14

<sup>13</sup> Sevenoaks District Council, April 2019, 5 Year Supply of Deliverable Housing Sites 2019/20 to 2023/24

<sup>14</sup> Ibid.

<sup>15</sup> Sevenoaks District Council, Local Plan Annual Monitoring Report 2017/2018



# 5. Site discounting

## Introduction

- 5.1 This stage of the study comprises the discounting process, involving consideration of viability and delivery. It also looked at the size of site identified and whether (a) they are appropriate for inclusion within the supply of land, and (b) within what broad timeframe the site might possibly come forward for development. This section summarises the approach and findings from this stage of the study.

## Value mapping

### Overview

- 5.2 House prices in Sevenoaks are considerably higher than elsewhere in Kent and amongst the highest in the country<sup>16</sup>. Given that the sales return on private housing is the primary indicator of Gross Development Value on individual schemes this provides an initial view on the strong viability prospects for residential development in the district.
- 5.3 Between 2012/13 and 2017/18, completions of new residential dwellings have varied considerably. Completions were recorded at 141 and 378 for 2012/13 and 2017/18, respectively, however, 2015/16 saw a peak of 414. There has been an average of 278 completions per annum, which is significantly above the Core Strategy annual target of 165.
- 5.4 In the six years prior to this, there had been less variation, with the highest level of completions being recorded in 2010/11, at 281. Between September 2015 and September 2018, the proportion of housing transactions on new build properties has represented around 10% of activity in the total market. This is broadly similar to the average for the south-east region and England as a whole (both around 11% over the same period)<sup>17</sup>.
- 5.5 Despite the relatively limited volume of overall new dwelling completions the pattern of delivery across Sevenoaks illustrates a relatively diverse mix of different development types. This allows the values achieved to be considered across a range of sites and locations. Flatted development is particularly well-represented as a proportion of the overall total, representing approximately 16% of total sales in September 2018. At finer geographies (to Ward level) sample size can be more restricted, with examples limited to delivery of very small sites or one-off dwellings that might not be representative of the typologies in this Study.

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<sup>16</sup> Sevenoaks District Council, September 2015, Strategic Housing Market Assessment, paragraph 6.9

<sup>17</sup> Source: House Price Statistics for Small Area (HPSSAs) Data Sets 6, 7 and 8 available at [www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housepricestatisticsforsmallareas/yearendingjune2017](http://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housepricestatisticsforsmallareas/yearendingjune2017)

- 5.6 We have undertaken analysis on property values within this wider context. The results of this analysis are set out in Appendix A. Based upon this a map (Figure 5) has been produced that shows groupings of 'Matrix Value Areas' used for the purposes of this discounting process.

### **Commentary**

- 5.7 The data for our assessment is provided from individual transaction records from Land Registry 'price paid' data. We have used a period of October 2015 to September 2018 for transactions on 'new build' and existing properties but have analysed the two sources separately. Prices for earlier months have been adjusted for inflation (by property type), with historic values adjusted to the mean price in the most recent data. Finally, to indicate trends in development type, average floorspace of completed units, and transaction value by £/sqm, we have obtained the 'Energy Performance Certificate' to provide floor area data for a sample of the records.
- 5.8 The Council's Viability Study<sup>18</sup>, used to support the emerging development plan (submitted for examination April 2019), addresses similar considerations of property values in the local area. The modelling scope in the relevant studies adopts a range of "Value Levels" rather than concentrating on the specifics of settlement areas or centres. This reflects that values can vary greatly in any event across small geographic areas (including even the same postcode). The value levels used in the viability study span a larger range of typologies, which are grouped by location. Eleven value levels are used in the Viability Study. Whilst we acknowledge the benefits for analysis with a number of value levels, for this piece of work and in the interests of ease of use, we have identified three broad value areas (High, medium and low) but acknowledge there will be some variance between these levels, and that this will be teased out in further detail at a site specific level of analysis.
- 5.9 As value areas were mapped it became evident that as wards were grouped together relatively clear trends emerged to support the approach adopted. This is in general conformity with the way that sites were grouped through the Viability Study.
- 5.10 Although a matter of judgement on the reasonable prospect of development, this 'discounting' exercise does not consider specific viability outcomes but is designed to be more 'fine-grained' in considering the type, scale and location of development.

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<sup>18</sup> DixonSearle Partnership, for Sevenoaks District Council, November 2018, Local Plan and CIL Viability Study

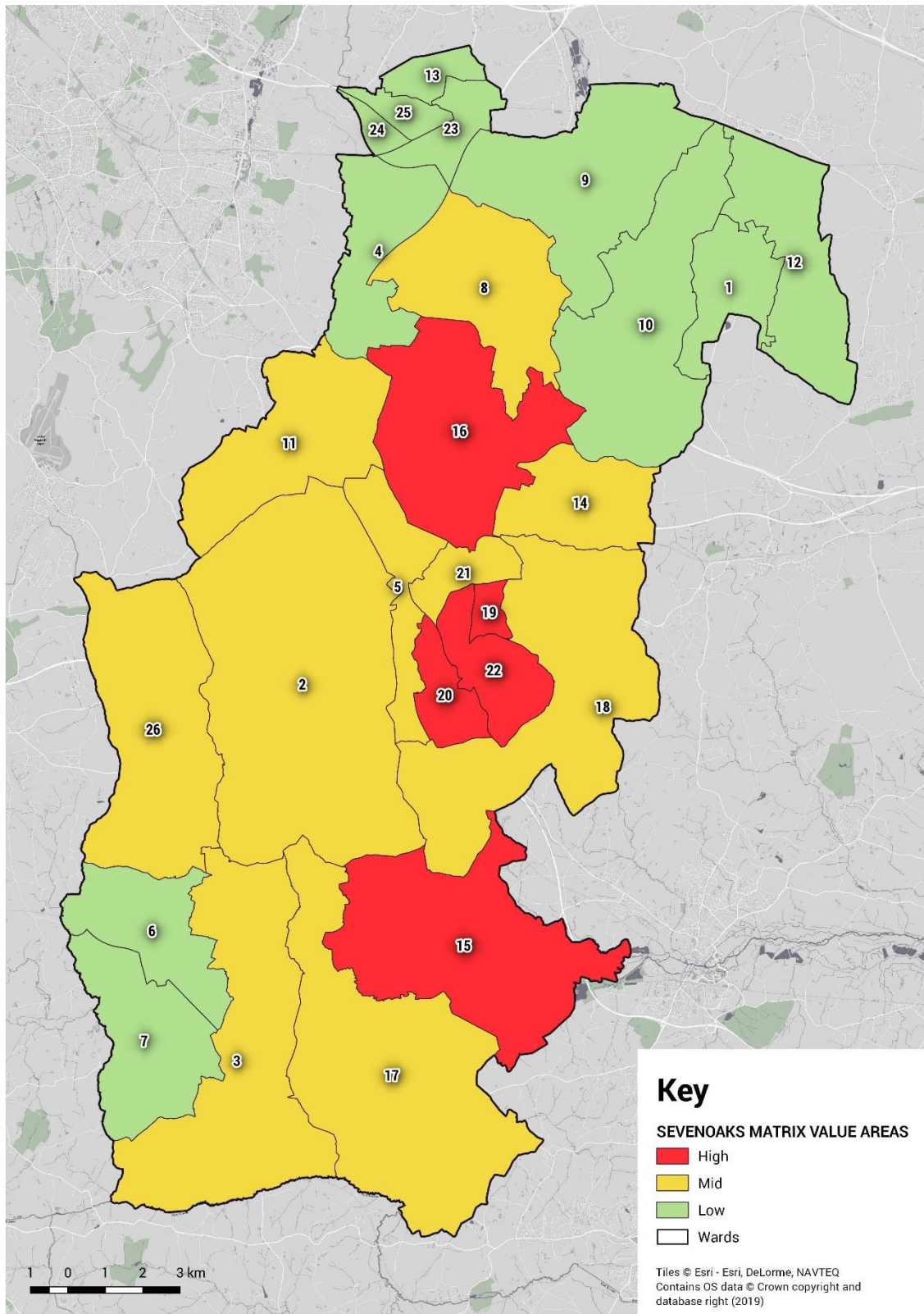


Figure 5: Map of land value areas identified for discounting purposes in the Settlement Capacity Study



## Development Potential

5.11 This section represents an important part of the study process. The total housing yield from sites carried through from earlier stages provides a broad indication of the potential suitability of land for development. This has to be considered in the context of national policy and guidance for the assessment of housing land. Guidance notes that the future supply of land identified should be *available* and *achievable* to demonstrate the ability to contribute to the requirements for development over the plan period. Addressing the factors of *availability* and *achievability* is therefore necessary at this stage of the process to demonstrate that the final recommendations regarding the potential for development are robust.

5.12 In terms of assessing development potential, guidance explains:

*"The development potential is a significant factor that affects economic viability of a site/broad location and its suitability for a particular use. Therefore, assessing achievability (including viability) and suitability can usefully be carried out in parallel with estimating the development potential."<sup>19</sup>*

5.13 Assessments of **achievability** are essentially a view on the economic viability of a site. This should be informed by the view that there is a reasonable prospect of a particular type of development being developed on the site at a given point in time, reflecting the capacity of a developer to complete and sell elements of the scheme over a certain period<sup>20</sup>. Evidence-based judgement should be informed by relevant available facts and based on a realistic understanding of the operation of the market. This will include factors affecting the costs and value of development in the local area<sup>21</sup>. The broader exercise of viability assessment within plan-making should be an iterative process, including collaboration with relevant stakeholders and providing a consistent approach to testing policy requirements for different development types<sup>22</sup>.

5.14 The PPG suggests that a typology approach can be appropriate in a viability assessment:

*"A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period.*

*In following this process plan makers can first group sites by shared characteristics such as location, whether brownfield or greenfield, size of site and current and proposed use or type of development. The characteristics used to group sites should reflect the nature of typical sites that may be developed*

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<sup>19</sup> NPPG ID: ID: 3-017-20140306

<sup>20</sup> NPPG ID: ID: 3-021-20140306

<sup>21</sup> NPPG ID: 10-004-20140306

<sup>22</sup> NPPG ID: 10-005-20140306

*within the plan area and the type of development proposed for allocation in the plan.<sup>23</sup>*

- 5.15 Whilst it is therefore not necessary to individually test each site relied upon within the Plan, and the use of typologies is appropriate, the plan-making process as a whole will provide a much more thorough indication of development viability outcomes than is possible in the context of this study. This will include specific testing of individual factors such as how individual and cumulative policy requirements affect a range of different development types. It would also include the establishment of detailed inputs for development costs and values (including where abnormal or additional strategic infrastructure costs might apply). Local assumptions on land value are also likely to be central the assessment of whether development is likely to proceed<sup>24</sup>.
- 5.16 Assessments of site **availability** typically rely on information to demonstrate that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. Planning permission itself does not necessarily provide confirmation that a site is available, and any past record of unimplemented consent may be taken into account. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome<sup>25</sup>.
- 5.17 Within the context of this discounting exercise it is important to recognise that planning practice guidance<sup>26</sup> provides direction for when constraints are identified in the assessment process meaning that sites may not necessarily be regarded as incapable of development:

*"Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development."*

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<sup>23</sup> NPPG ID: 10-004-20190509

<sup>24</sup> NPPG ID: 10-012-20180724

<sup>25</sup> NPPG ID: 3-020-20140306

<sup>26</sup> NPPG ID: 3-022-20140306

- 5.18 The nature of this study is also important in terms of the way in which guidance is applied. The study estimates potential housing yield from a wide range of individual sites but it is not policy and does not itself confirm support for the principle of development. Assessments are supported by the best information available within the methodology for the study, but it will be necessary to have regard to the evidence base for the development plan as a whole to determine whether individual sites are suitable for allocation.
- 5.19 It is also important to compare and contrast the evidence generated by this Settlement Capacity Study against other alternatives endorsed by national guidance. This Study provides an exhaustive assessment of potential development yields across a range of individual sites. By contrast, guidance recognises the role that identifying 'broad locations' can play in establishing future estimates of developable land for housing beyond year six of the plan period. These might include existing areas that could be improved, intensified or changed and where there is a reasonable prospect of housing being developed at the point envisaged.
- 5.20 The exercise of 'site discounting' within this context represents a proportionate assessment commensurate with the level of information available for identified sites. The discounting process may result in the removal or reduction in potential yield or indicate development is more likely in later years. This does not represent a specific view on viability or the potential value of a development scheme on individual sites.

## **Deliverable and Developable**

- 5.21 The NPPF makes the difference between deliverable and developable sites very clear. This is important for understanding during which part of the plan period a site can be expected to begin to deliver completions in.
- 5.22 In order for a site to be **deliverable**, the NPPF requires that the site should be "*available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years*" (annex 2 of the NPPF).
- 5.23 It is acknowledged that the definition of deliverable requires sites to have clear evidence of expected delivery, such that completions can be recorded in the first five years of the Plan period.
- 5.24 For a site to be **developable** it "*should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged*" (annex 2 of the NPPF).
- 5.25 This study has only considered the capacity of those settlements excluded from the Green Belt. As such, subject to the absence of any other constraints or matters that might make a site unviable for development, and with a policy framework that promotes sustainable development in existing settlements, it is reasonable to assume that sites in such locations are likely to be developable.

- 5.26 This is further supported by paragraphs 67 and 68 of the NPPF. Paragraph 68 states that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly”. For the purposes of this study, it is reasonable to assume that many of the sites identified (at least the smaller sites) could be “built out relatively quickly” and it is further reasonable to assume that “relatively quickly” can mean within the early years of the plan period. This is demonstrated for example through the quantum of windfall development that has occurred on small sites in Sevenoaks District. However, and for the purpose of this study, we have only included in years 0-5 those sites where development is expected, based on knowledge of anticipated planning applications. Caution has been taken with respect of other small sites which might come forward in the early years of the Plan period and which represent a reasonable prospect for delivery, but where landowner / developer intentions are not known. These require further investigation, and or a proactive approach to delivery to be taken by the Council (see Chapter 7 of this report for example), and are thus phased in later Plan periods.
- 5.27 It is though important to note the significance of the speedier delivery of smaller sites for the wider planning process. The new NPPF requires Local Authorities to demonstrate that they can pass the Housing Delivery Test:
- “Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance”.*
- 5.28 Policy and guidance emphasises the potential for smaller sites, that may have few constraints, and which can be delivered quickly and contribute to the housing land supply. This will assist Local Authorities in passing the Housing Delivery Test. It is thus important to acknowledge the benefits of smaller sites coming forward and supporting delivery, particularly in the early years of the Plan period.

# Factors Affecting Development Viability and Land Availability

- 5.29 The 'discounting' element of the assessment is informed by a range of broad factors that are likely to indicate the availability of land for development and will further govern where a site might be developed at a certain point in time. We briefly summarise these below; the order of importance of these factors is likely to vary on a site-by-site basis

## Compliance with Relevant Policies in the Development Plan

- 5.30 The existing Core Strategy was adopted in 2011 and covers the period up to 2026. Alongside this, the Allocations and Development Management Plan (adopted in 2015) together form the current Local Plan for Sevenoaks. However, the Council has prepared a new Local Plan, and this was submitted to the Secretary of State in April 2019. It is appropriate that our assessments are informed by the policies in the emerging Local Plan as this Study will be forming part of the evidence base for it.
- 5.31 National guidance for viability in decision-taking explains that "*where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable*".<sup>27</sup> Assumptions for development costs and setting an appropriate land or site value for comparison should both reflect the cumulative costs of policy requirements. Guidance states "*Reports and findings should clearly state what assumptions have been made about costs and values (including gross development value, benchmark land value including the landowner premium, developer's return and costs). At the decision-making stage, any deviation from the figures used in the viability assessment of the plan should be explained and supported by evidence*"<sup>28</sup>.
- 5.32 Compliance with the emerging Local Plan policy requirements in itself is unlikely to be a significant factor in the discounting process. Effects are only likely to be observed in combination with other factors considered in this section, and previous evidence has identified an ability for many development typologies to meet increased policy costs.

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<sup>27</sup> NPPG ID: 10-007-20190509

<sup>28</sup> NPPG ID: 10-020-20180724

## **Contributions to Infrastructure Funding and Relevant Planning Obligations**

### **Community Infrastructure Levy**

- 5.33 The Council adopted a Community Infrastructure Levy Charging Schedule in 2014 and applies a rate of between £75 and £125/sqm on residential development, dependant on whether the development is in Zone A or Zone B of the District (adjusted to reflect indexation).
- 5.34 Having undergone Examination and being in place for a number of years, we do not consider that the application of CIL will have a significant impact on any identified sites for the purpose of discounting.
- 5.35 The process of setting the charge established that any lower rate would be no more likely to ensure certain schemes to proceed where viability is challenging. The 2012 CIL Viability Assessment explains that *"there may be instances of lower value schemes and localities where developments struggle in viability terms, even without any significant CIL contribution. Wider scheme details or costs and obligations / abnormal can render schemes marginally viable or unviable prior to the consideration of CIL."* This is the position we adopt for the purposes of this process.
- 5.36 The Local Plan and CIL Viability Study will be used to inform a potential CIL Charging Schedule review going forward, which would *"support the provision of the infrastructure associated with the new Plan growth"*<sup>29</sup>. As the status of a review is not clear at this time, the existing position remains for this process.

### **Affordable Housing**

- 5.37 Policy H2 of the Council's emerging Local Plan seeks financial contributions towards the provision of affordable housing from all schemes comprising six to nine net dwellings, and on-site provision of affordable housing for all sites comprising 10 dwellings or more. Notwithstanding updates to national policy<sup>30</sup> the Council's position is to consider on a case-by-case basis the local circumstances for seeking policy-compliant contributions and the nature of development sites. The weight to attach to a policy within the development plan and to other material considerations, in a given set of circumstances, is a matter of discretion for the decision taker.
- 5.38 The significant pressure on house prices and affordability in the District provides clear reasons for the Council's approach in seeking to apply its existing policies.

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<sup>29</sup> Sevenoaks District Council – Local Plan & CIL Viability Study – Final Report (Executive Summary paragraph 6)

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf) paragraph 63

## Ashdown Forest Mitigation

- 5.39 The Council's emerging Local Plan Policy AF1 states that *"Any residential development within the 7km zone of Ashdown Forest (see map) will provide a Strategic Access Management and Monitoring (SAMMs) contribution, to address visitor impact on Ashdown Forest, in line with the SAMM strategy. If any major development is proposed in or adjacent to the zone, applications will be considered on a case-by-case basis to determine any additional mitigation requirements. Any proposals considered likely to have a significant adverse effect on the Ashdown Forest Special Protection Area (SPA) will not normally be permitted."* Tariff guidance is set out by the Council and is currently set at £1,170 per new residential unit. The effect of these obligations on development outcomes is not considered relevant for the purposes of the discounting assessment in isolation.

## Land Values – Including Existing Use Value and Alternative Use Value

- 5.40 National planning guidance explains that *"viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.<sup>31</sup>"* It is the responsibility of the site promoter to account for costs including profit and purchasing of the site. This will result in the determination of the residual value of a scheme (gross development value less total costs (excluding land)) with the ability to pay a suitable price for the site itself.
- 5.41 The Viability Assessment states that *"the levels of land values selected for this comparison context are often known as 'benchmark' land values (BLVs). They are not fixed in terms of creating definite cutoffs or steps in viability but, in our experience, they serve well by adding a filter to the results to enable the review of those. They help to highlight the changing strength of relationship between the values (GDVs) and development costs as the appraisal inputs (assumptions) change, with the key relevant assumptions (variables) in this case being the GDV level (value level – VL) and affordable housing proportion (%)"* (paragraph 2.14.4).
- 5.42 The Local Plan and CIL Viability Study (2018) explained that the study assumed a land purchase cost of between £100,000-£250,000/ha, applied to the gross site area.

## Availability including Relocation of Existing Uses and Land Assembly

- 5.43 In addition to consideration of potential land value comparisons, judgement is applied following site visits and desk-based assessment regarding the characteristics of existing uses. Factors such as existing policy designations and the performance of existing industrial or commercial areas have already been considered to some extent at the stocktaking stage. Phasing considerations are particularly important where the availability of a site for

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<sup>31</sup> NPPG ID: ID: 10-002-20190509

development is likely to rely on the relocation of existing operators or the availability of sites in combination to assemble land and realise potential yields. Impacts may be greater where there are a range of uses or operators across a given site, with leases expiring or the incentive to develop arising at different points. Only in the most complex configurations or combinations is this likely to mean that the discounting process arrives at removing the potential yield from the gross total - such as potential issues of 'ransom' over access.

### **Site Preparation including Infrastructure and Abnormal Development Costs**

- 5.44 The assessment process in this study allows site-specific consideration of these factors in more detail than might be considered in a wider viability exercise, although it is not possible to come to a definitive view on the effect on achievability. Following the site visits and desk-based assessment it is possible to identify physical attributes that may affect the achievability of sites and introduce abnormal costs. These might include unfavourable topography or where we anticipate the potential significant remediation depending on the characteristics of industrial or redundant brownfield land.
- 5.45 The identification of these factors does not automatically preclude the reasonable prospect of development in locations such as Sevenoaks. Potential outcomes should be considered in combination with other factors affecting indicative development values, such as the typology used to derive yield, as well as applicable policies. It is important that judgement is proportionate and national guidance explains that "abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value<sup>32</sup>."
- 5.46 The potential for discounting capacity would more often be in lower value schemes but may fall under any identified site where the combination of assumptions acts against development viability and may compromise outcomes or affect meeting policy requirements.
- 5.47 Development costs associated with the provision of typical on-site infrastructure necessary to typically make land suitable for development are not considered to have a significant role in terms of the discounting assessment. It is also not appropriate to speculate at this stage on the potential relationship between sites and strategic infrastructure requirements. This reflects the Council's established mechanisms for securing planning obligations and the characteristics (i.e. generally smaller or 'non-strategic' in terms of type and scale) of the sites identified.

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<sup>32</sup> NPPG 012 Reference ID: 10-012-20180724



## Application of Matrix Assumptions to Identified Sites

- 5.48 Having set out a broad framework for factors affecting availability and achievability the following section shows how these have been considered as consistently as possible within the study context. This leads to the application of a 'matrix' of assumptions applied to individual sites and the context of Sevenoaks.
- 5.49 The 'matrix' approach provides conclusions on whether there is, overall, a reasonable prospect of the identified yield being achieved. In accordance with national policy and guidance it also allows for an assessment of 'phasing' to determine when a site might reasonably be developed depending on the factors considered.
- 5.50 The matrix considers availability and achievability factors across two broad domains. The columns of the matrix represent physical characteristics of identified sites and their surroundings that may affect the capability of development or lead to increased costs – for example topography, remediation for contamination or the need to reconfigure multiple landholdings to provide access.
- 5.51 The rows of the matrix represent our judgment on those indicators likely to govern the outcomes of any identified site in terms of viability. Specifically, this might look at indicators of potential land value depending on existing uses, the development typology used to derive total potential yield and the possible impact of cumulative policy costs. In relevant circumstances this may also require judgement on whether there is a reasonable prospect of mixed-use development on an identified site.
- 5.52 Considering 'discounting' in this way means that factors affecting availability or achievability will not necessarily be limited to either the respective rows or columns of the matrix. As an example, a site identified within a well-performing industrial area would require judgement surrounding the land value associated with the existing function (row), any potential remediation costs associated with redevelopment (column 1 and 2) and the potential timescales over which the site might become available (last column).
- 5.53 Three separate iterations of the matrix have been developed based on whether the assumptions are applied to sites with a forecast development of 'high' (Table 6), 'medium' (Table 7) or 'low' (Table 8) based on the mapping of value areas in Figure 5 above. It is important to note that, as we have highlighted, overall mapping of value areas is only a starting point in the Sevenoaks context. The potential for exceptionally high development values exists across the District. The rows assessing 'weak' to 'strong' prospects of viability outcomes allow a more refined view to be taken on individual sites.
- 5.54 It should be noted that where application of the matrix approach results in a site falling within the 0-5 year phasing period this has then been further considered in respect of developer / landowner intentions. As explained in

the section on Phasing below (see para 5.59), it is only those sites where it is known that development is likely to come forward, because of emerging Planning Applications, that have been included in the first five years. Others are pushed back into later phasing periods. These should be closely monitored as they represent reasonable prospects and, in some instances, landowner support has been expressed for development (on Network Rail owned car parks for example).

### Copies of Matrices Used for Discounting and Phasing Assessment

Table 6: Phasing and discounting matrix for sites in 'High' value areas

Forecast Development Value			High
Development Constraints	<i>Significant Barriers to Development or Availability</i>	<i>Modest Barriers to Development or Availability</i>	<i>Limited Barriers to Development or Availability</i>
Viability Indicator			
<b>Weak</b>	Development Capacity Discounted	11-15 Years	6-10 Years
<b>Moderate</b>	11-15 Years	6-10 Years	0-5 Years
<b>Strong</b>	6-10 Years	0-5 Years	0-5 Years

Table 7: Phasing and discounting matrix for sites in 'mid' value areas

Forecast Development Value			Mid
Development Constraints	<i>Significant Barriers to Development or Availability</i>	<i>Modest Barriers to Development or Availability</i>	<i>Limited Barriers to Development or Availability</i>
Viability Indicator			
<b>Weak</b>	Development Capacity Discounted	11-15 Years	6-10 Years
<b>Moderate</b>	Development Capacity Discounted	6-10 Years	0-5 Years
<b>Strong</b>	11-15 Years	6-10 Years	0-5 Years

Table 8: Phasing and discounting matrix for sites in 'low' value areas

Forecast Development Value			Low
Development Constraints Viability Indicator	<i>Significant Barriers to Development or Availability</i>	<i>Modest Barriers to Development or Availability</i>	<i>Limited Barriers to Development or Availability</i>
<b>Weak</b>	Development Capacity Discounted	Development Capacity Discounted	11-15 Years
<b>Moderate</b>	Development Capacity Discounted	11-15 Years	6-10 Years
<b>Strong</b>	11-15 Years	6-10 Years	0-5 Years

## Small sites

- 5.55 The discounting stage also considers small sites – those generating fewer than five dwelling units. Although the study did identify some small sites, it is not possible, by their very nature, to identify all opportunities. Instead, these sites are discounted from the study and instead, an element of windfall allowed to cover this supply of sites. Discounting at this stage removes the potential for double-counting within the estimates of capacity.
- 5.56 The Council’s most recent Annual Monitoring Report<sup>33</sup> (AMR) uses past delivery rates on windfall housing sites below 0.2 hectares in size to estimate future delivery from small sites. It assumes that 74 units per year will come forward on these sites, though does not make an allowance in the first three years to avoid any risk of double-counting from extant permissions.
- 5.57 For the purposes of this study we follow the approach taken by the Council and have not made an allowance for small sites within the first three years, but do recognise the potential for delivery in later years. To avoid double-counting, any sites identified within the site surveys, and estimated to have a dwelling potential fewer than five units, have been removed (i.e.: discounted) from our schedules and estimates of capacity from the physically identifiable sites. The site survey work identified nine sites with an estimated development potential of one to four dwellings each.

## Summary of stage findings

### Discounting process

- 5.58 Through the discounting process the overall number of sites carried through the Settlement Capacity Study reduced from a total of 81 sites considered

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<sup>33</sup> Sevenoaks District Council, Local Plan Annual Monitoring Report 2017/2018

acceptable, in principle, to a total of 66 (see Table 9). Of those discounted, a small number (nine sites) were because the estimate of site capacity was less than five units and are thus considered small sites for the purposes of this study, which are removed to avoid double counting. A total of six sites were discounted for viability and delivery issues. This is reflective of the (a) relatively high land values in Sevenoaks, but, also (b) the fact that many sites have already been considered through the Local Plan and are not duplicated in this study.

## Phasing

5.59 All sites accepted through the discounting stage were placed into one of three phasing periods, each of five years in length, with the most reasonable prospects in the first five years, and more complex sites in later periods (years eleven to fifteen). The total number of sites in each phasing period, and the estimated capacity generated from these are shown in Table 10 and Table 11 respectively. This shows that, based on a mid-point, potential exists for almost 1,094 dwellings on sites identified within the settlement capacity study, with the majority of development potential phased from years six onwards. The following should be noted:

- ◁ The Settlement Capacity Study identifies opportunities for housing development over and above the sites already identified through the SHELAA and Local Plan process and which are already in the development pipeline. As such, the majority of sites in the first five year period are already known and so the Settlement Capacity Study only makes limited allowance for development in this period.
- ◁ Two sites are included within years 1-5. These are Council owned sites where it is known that a planning application will be submitted in late 2019 / early 2020. These sites missed the deadline for the 'Call for Sites' process as part of the Council's SHELAA but are deliverable in the first five years.
- ◁ Beyond this there are a number of sites within the settlements that do represent a reasonable prospect of delivery within the first five years, but where sufficient information on development timeframes and landowner intentions are not known, and which are thus phased in later periods. These include for example, (a) cleared sites ready for development which have been previously subject to planning permission but where progress has not been made, such as the site opposite Sevenoaks railway station, and (b), sites where support for development has been expressed: this includes station car parks in the ownership of Network Rail<sup>34</sup> and where rationalisation of existing parking may provide scope for development.
- ◁ A number of sites are considered to represent reasonable prospects for delivery in years 6 onwards, including those considered in other studies,

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<sup>34</sup> Letter from Network Rail to Sevenoaks District Council dated 14 June 2019 entitled 'Network Rail Support for Development and Growth'

such as the Sevenoaks Urban Area Economic Study<sup>35</sup>, which has assessed the net economic value of a number of sites in Sevenoaks and, which, subject to further masterplanning or design work, could feasibly come forward.

- ◁ Sites such as Telephone Exchanges and Petrol Stations, which are currently subject to operational requirements, but where evolving technology may lead to change in the future, have, where accepted through the discounting process, been identified as longer term opportunities (for the 11-15 year period).
- ◁ Garage Courts are recognised as having potential for development and although support has been expressed for this the reality of consolidating this supply will likely place these in later phasing periods (years 6 -15). However, this should be monitored: as small sites providing scope for delivery of affordable housing they could come forward earlier.
- ◁ Sites in multiple or complex ownerships, and which might involve the relocation of existing activities, have, where accepted through the discounting process, been placed in the later phasing period (11 – 15 years).

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<sup>35</sup> Urban Initiatives Studio and Hatch Regeneris for Sevenoaks District Council, March 2019, Sevenoaks Urban Area Economic Study

<b>Settlement</b>	<b>Ward</b>	<b>Sites subject to discounting process</b>	<b>Sites discounted due to viability / delivery issues</b>	<b>Sites discounted as small sites to avoid double counting</b>	<b>Sites remaining after discounting process</b>
Sevenoaks	Brasted, Chevening and Sundridge	0	0	0	0
	Dunton Green and Riverhead	5	0	1	4
	Sevenoaks Eastern	6	0	2	4
	Sevenoaks Kippington	2	0	0	2
	Sevenoaks Northern	8	0	0	8
	Sevenoaks Town and St. John's	7	0	0	7
Swanley	Swanley Christchurch and Swanley Village	9	4	0	5
	Swanley St. Mary's	5	1	1	3
	Swanley White Oak	15	0	3	12
Edenbridge	Edenbridge North and East	6	1	1	4
	Edenbridge South and West	5	0	0	5
Westerham	Westerham and Crockham Hill	4	0	0	4
New Ash Green	Ash and New Ash Green	1	0	0	1
Otford	Otford and Shoreham	2	0	0	2
Hartley	Hartley and Hodsoll Street	6	0	1	5
<b>Total</b>		<b>81</b>	<b>6</b>	<b>9</b>	<b>66</b>

Table 9: Sites discounted through the settlement capacity study, broken down by ward

<b>Settlement</b>	<b>Ward</b>	<b>Total sites remaining after discounting process</b>	<b>Sites in Years 1- 5</b>	<b>Sites in Years 6 - 10</b>	<b>Sites in Years 11 - 15</b>
Sevenoaks	Brasted, Chevening and Sundridge	0	0	0	0
	Dunton Green and Riverhead	4	0	2	2
	Sevenoaks Eastern	4	0	4	0
	Sevenoaks Kippington	2	0	2	0
	Sevenoaks Northern	8	0	7	1
	Sevenoaks Town and St. John's	7	1	3	3
Swanley	Swanley Christchurch and Swanley Village	5	1	0	4
	Swanley St. Mary's	3	0	0	3
	Swanley White Oak	12	0	0	12
Edenbridge	Edenbridge North and East	4	0	2	2
	Edenbridge South and West	5	0	1	4
Westerham	Westerham and Crockham Hill	4	0	2	2
New Ash Green	Ash and New Ash Green	1	0	0	1
Otford	Otford and Shoreham	2	0	2	0
Hartley	Hartley and Hodsoll Street	5	0	0	5
<b>Total</b>		<b>66</b>	<b>2</b>	<b>25</b>	<b>39</b>

Table 10: Number of potential sites within phasing period, by ward

		Total units on Sites in years 1-5			Total units on sites in years 6-10			Total units on sites in years 11-15			Total units		
Settlement	Ward	Low	High	Mid-point	Low	High	Mid-point	Low	High	Mid-point	Low	High	Mid-point
Sevenoaks	Brasted, Chevening and Sundridge	0	0	0	0	0	0	0	0	0	0	0	0
	Dunton Green and Riverhead	0	0	0	25	49	37	25	74	49	50	123	86
	Sevenoaks Eastern	0	0	0	16	42	29	0	0	0	16	42	29
	Sevenoaks Kippington	0	0	0	42	125	83	0	0	0	42	125	83
	Sevenoaks Northern	0	0	0	48	144	96	4	13	9	52	157	104
	Sevenoaks Town and St. John's	14	14	14	22	65	43	59	95	77	95	174	135
Swanley	Swanley Christchurch and Swanley Village	16	16	16	0	0	0	53	84	69	69	100	84
	Swanley St. Mary's	0	0	0	0	0	0	54	73	63	54	73	63
	Swanley White Oak	0	0	0	0	0	0	92	202	147	92	202	147
Edenbridge	Edenbridge North and East	0	0	00	17	27	22	21	25	23	38	53	45
	Edenbridge South and West	0	0	0	2	7	5	73	148	111	76	156	116
Westerham	Westerham and Crockham Hill	0	0	0	7	16	12	9	27	18	16	43	30
New Ash Green	Ash and New Ash Green	0	0	0	0	0	0	4	13	9	4	13	9
Otford	Otford and Shoreham	0	0	0	44	133	89	0	0	0	44	133	89
Hartley	Hartley and Hodsoil Street	0	0	0	0	0	0	39	109	74	39	109	74
Total		30	30	30	223	608	415	433	864	649	686	1,502	1,094

Table 11: Dwelling potential of the physically identified sites by phasing period, by ward

Note: totals may not add due to rounding





# **6. Summary estimates of capacity**

## **Unconstrained capacity of physically identified sites**

- 6.1 Through the Settlement Capacity Study 201 sites were identified. Following the stocktaking process this was reduced to a total of 81. Application of density multipliers resulted in an estimate of capacity between 803 and 1,677 dwelling units, or a mid-point of 1,240 dwellings.

## **Discounting and phasing the physically identified sites**

- 6.2 Through the discounting process the prospect of delivery of individual sites was assessed, considering viability and delivery issues. Those sites considered to have a reasonable prospect of delivery within a fifteen-year period were phased into five-year phasing periods. Small sites (those yielding less than five units) were discounted to avoid double counting (see below).
- 6.3 A total of 66 sites were retained through the discounting stage, generating an estimate of capacity between 686 and 1,502 dwelling units. Taking a mid-point between these results in a capacity estimate of 1,094 dwellings.

## **Small sites and other sources of potential**

- 6.4 Through the Settlement Capacity Study a number of small sites were identified where the estimated capacity yield was less than five dwellings. Because of the small nature of these sites it is not possible to identify all of them and they are often dealt with by way of a windfall allowance in the Local Plan. To avoid double-counting with these estimates, all small sites identified in the Settlement Capacity Study were discounted. A total of nine sites were discounted through this process.
- 6.5 Based on the Council's AMR and in consideration of recent delivery, it is assumed that approximately 74 units per year will be delivered on small sites. However, the Council does not rely on these in the first three years of the Plan period. In the first five years of the Plan period an allowance for 148 units is made, equating to two years supply. In years 6-10 and 11-15, an allowance for 370 units is made in each five year period. That equates to a total of 888 units from small sites.

- 6.6 The Settlement Capacity Study has also looked at the potential supply of homes from other sources, including homes above the shop, empty properties and office to residential conversions. These are difficult to quantify and, in the case of homes above the shop and empty properties, difficult to deliver. However, since 2003, and as a result of District Council intervention, an average of 11 empty homes have been brought back into use each year. Based on this, the Council's Five-Year Housing Land Supply Statement makes allowance for 55 units from this source in the first five years of the Plan, but does not rely on this in later periods, recognising that empty homes are a finite element of supply. This approach is reflected in this study.
- 6.7 Equally, whilst there has been some evidence of office to residential conversions in the district, the period that the 'prior approval' route has been in operation is relatively short and it is difficult to draw conclusions about future change. The Settlement Capacity Study recommends that these sources are monitored over time and an allowance made at a future date should information show these sources are generating additional homes.

## **Summary of constrained capacity**

- 6.8 The Settlement Capacity Study estimates that there is potential for approximately 1,094 new dwelling units on sites identified in the built-up areas (surveyed in this study) over a fifteen-year period, as presented in Table 12 (overleaf). This reflects a mid-point estimate of development potential on the physically identifiable sites and is in addition to those sites already identified and accounted for through the emerging Local Plan. A further 943 units might come forward through windfall development on smaller sites and through other sources.

<b>Plan period</b>	<b>Source of supply</b>	<b>Dwelling Range</b>	<b>Mid-point estimate</b>
Years 1-5	Physically identifiable sites	30	30
	Small sites	74 per year x 2 years	148
	Other sources	11 per year x 5 years (to be monitored)	55
Years 6 – 10	Physically identifiable sites	223-608	415
	Small Sites	74 per year x 5 years	370
	Other sources	0 (to be monitored)	0
Years 11-15	Physically identifiable sites	438-864	649
	Small sites	74 per year x 5 years	370
	Other sources	0 (to be monitored)	0
<b>Total</b>	<b>All sources</b>	-	<b>2,037</b>

*Table 12: Summary of Settlement Capacity Study estimates*

Note: total may not add due to rounding



# 7. Concluding comments

## **Potential exists, but does not provide all of the answers**

- 7.1 The Settlement Capacity Study has found that capacity does exist within the existing built-up areas within Sevenoaks District for new housing development. Although this could contribute to meeting future housing needs in the District (should sites be taken forward and potentially allocated in later phases of the Plan period) it will not provide all of the answers and further options will need exploring, including ongoing discussion with neighbouring authorities through the duty to cooperate process, exploring development potential elsewhere.
- 7.2 Notable opportunities for potential development within the settlement areas surveyed, and where a proactive approach to planning might help bring forward new homes, include:
- ◁ The cluster of sites around Sevenoaks Station (sites SK01, SK02, ST13 and ST14), which have been previously identified through the Sevenoaks Urban Area Economic Study. These benefit from close proximity to the station and town centre, with Network Rail expressing support for growth and development.
  - ◁ Land to the east of Sevenoaks High Street (site ST17), which, as above, has been previously considered through the Sevenoaks Urban Area Economic Potential and where development would also contribute to the wider placemaking agenda, supporting and strengthen the vitality of the town centre.
  - ◁ Land currently used for employment purposes along Rye Lane in Dunton Green (site DGR09), but which is adjacent to the redevelopment of a former employment area for housing and which benefits from close proximity to the railway station.
  - ◁ In Swanley, land along Station Road (site SCSV17), where potential exists to intensify the use of the land in close proximity to the railway station and where the wider potential for change in the town centre might act as a catalyst for development.
  - ◁ In Edenbridge, the vacant retail stores and associated car parking along and to the rear of the High Street (sites ESW12 and ESW13) would contribute to the vitality of the centre. These sites are in the same ownership and are in close proximity to Edenbridge Town railway station.

## **Rationalising car parking**

- 7.3 There are numerous areas of surface car parking in and around the town, district and local centres across the District. Whilst these have been identified and considered through the study, the majority were 'rejected' at the initial stocktake session, being considered important for the economy of the town centres. This is reflected in messages from the Sevenoaks Parking Service, whom advised that Council-owned car parks are, in the main, extremely busy and operating at or close to capacity on a daily basis, and where loss of parking capacity would be considered detrimental to the local community and businesses.
- 7.4 However, further analysis of this, through on-going assessment of car park utilisation and different models of provision over time may help bring forward additional potential: e.g.: provision of decked parking in one location may allow for the release of other sites for housing. This should perhaps go hand-in-hand with an approach to active travel that looks to promote a mode-shift to an increase in walking, cycling and public transport (bus) use across the District, including delivery of safe and direct cycle routes that make this an attractive and viable proposition for residents. Furthermore, other opportunities, including the rapidly evolving concept of 'mobility as service (MaaS)<sup>36</sup>' might provide scope for rationalisation.

## **Reconsidering the future of mobility and need for Petrol Stations**

- 7.5 Between 2000 and 2018 the number of petrol stations across the UK as a whole fell by 35 percent, with almost half of all fuel sold being through petrol stations located at superstores<sup>37</sup>. This pattern is expected to continue, if not accelerate, associated with a move to electric cars and provision of charging points at the home, workplace and in other public locations.
- 7.6 Under the 'Road to Zero' Strategy<sup>38</sup>, the Government is working towards half of all new car sales being ultra-low emission vehicles by 2030 (with the sale of all petrol and diesel vehicles phased out by 2040), whilst also rolling-out the necessary infrastructure to support the electric vehicle revolution. With technology rapidly evolving and the climate change agenda given ever more emphasis the role and future of the traditional petrol station will need to be questioned. Towards the end of the Plan period it is possible that a number of these sites may come forward for alternative uses, with others also coming forward in the lead up to 2040.

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<sup>36</sup> See, for more information: <https://maas-alliance.eu/homepage/what-is-maas/>

<sup>37</sup> See: [www.statista.com/statistics/312331/number-of-petrol-stations-in-the-united-kingdom-uk/](http://www.statista.com/statistics/312331/number-of-petrol-stations-in-the-united-kingdom-uk/)

<sup>38</sup> Department for Transport, July 2018, The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy

## **Making the most of public sector assets**

- 7.7 The Settlement Capacity Study has, in some locations, identified clusters of social and community uses, including for example village halls, community and youth centres, which could potentially be amalgamated to bring benefits in terms of shared facilities and parking, as well as reduced maintenance costs, or where intensification of the site might allow for replacement facilities to be provided on site. Where such amalgamation does take place, it could free up land for housing. However, if such an approach were followed, it should not result in a loss of service provision, nor a shortfall in local infrastructure.
- 7.8 The study also identified a large number of garage courts across the District, some of which represent small sites but, which, nevertheless, might present a fairly substantial supply over time. This type of site could provide a source of new housing in the District, but further investigation of garage use is required to help identify those which are under-used and that which provide opportunities in the short to medium term.
- 7.9 The Council's Housing Strategy notes the importance of taking a creative approach to development 'whilst continuing to maximise every opportunity for affordable housing through the planning process'<sup>39</sup>. This might include, for example, reuse and redevelopment of garage courts. The Housing Strategy also identifies other opportunities, including the rationalisation of existing employment and commercial activities to free up land for development, or 'air-space' development encouraging the upwards development of existing buildings.
- 7.10 Key priorities for the Council include (a) considering its remaining surplus land for housing, and (b) developing sites to maximise land use and inform the future housing strategy. This represents a key area of opportunity and proactive approach to delivery of small site development.

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<sup>39</sup> Sevenoaks District Council, 2017, Housing Strategy 2017: Wellbeing Starts at Home. See Strategic Priority 1 and Priorities 1.1 – 1.5



## **Further exploring potential through design**

- 7.11 The application of gross to net ratios and density multipliers within the Settlement Capacity Study has provided a broad estimate of site capacity. But the true potential of a site will not be known until further site-specific assessment, including design analysis, has been undertaken. Design analysis would allow the particular characteristics and site context to be investigated and may demonstrate the potential for higher density development that is appropriate to location, reflecting local character, scale and type of development.

## **Unblocking the potential**

- 7.12 The Settlement Capacity Study identifies a large number of sites, some of which might not be deliverable in the short-term, but which do offer longer-term potential subject to other factors, such as reviewing policy designations and current use types.
- 7.13 The approach to the Settlement Capacity Study is purposely proactive, seeking to explore as many opportunities for new development as possible (within the framework of the emerging Local Plan). Bringing these forward may involve a proactive approach to planning and development. The Council could, where appropriate:
- ◁ Facilitate discussions between landowners.
  - ◁ Create site specific development briefs.
  - ◁ Market land for development.
  - ◁ Use powers to acquire land and develop existing public sector land for new public sector housing across a variety of tenure types.

## **Area-wide masterplan approach to areas of opportunity**

- 7.14 The Settlement Capacity Study has identified some locations where there are multiple land owners and active uses, but where the opportunity exists to intensify land use, or where relocations might assist in the delivery of new housing. The viability of such opportunities is difficult to assess through the study given the complex ownership arrangements and warrant more detailed investigation, with a masterplan-led approach to change helping to realise the potential and the key steps and strategies required to facilitate change, including how and where measures for green infrastructure and, as appropriate, flood mitigation might be built-in to a scheme. Such areas include edge of centre locations in Swanley, including a mix of retail and servicing areas.



# **Appendix A: House Price Information**

**Statistical Data to Inform Matrix Value Areas including House Price Transaction Data**

**SEVENOAKS DISTRICT COUNCIL**  
**Settlement Capacity Study**

**Final Report**

July 2019

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