

# Sustainability Appraisal (SA) of the Sevenoaks Local Plan

Interim SA Report

November 2022



Prepared by	Checked by	Approved by
Laurie Marriot Consultant	Mark Fessey Associate Director	Steven Smith Technical Director
Mark Fessey Associate Director	Steven Smith Technical Director	

**Table of Contents**

1 Introduction..... 1

2 The plan scope..... 2

3 The SA scope ..... 3

Part 1: Plan-making / SA up to this stage?..... 4

4 Introduction to Part 1 ..... 4

Part 2: SA findings at this stage ..... 8

5 Introduction..... 8

6 Scenarios appraisal..... 8

Part 3: Next steps..... 34

7 Preparing the draft plan ..... 34

8 Plan finalisation ..... 34

Appendix 1: Development management policies ..... 35

Prepared for:  
Sevenoaks District Council

Prepared by:  
AECOM Limited  
Aldgate Tower  
2 Leman Street  
London E1 8FA  
United Kingdom  
aecom.com

© 2022 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) in accordance with its contract with Sevenoaks District Council (the “Client”) and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Sevenoaks Local Plan. Once adopted, the local plan will set the strategy for growth and change for the district up to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that essentially appraises “the plan, and reasonable alternatives”.<sup>1</sup> The SA report must then inform plan finalisation, alongside consultation responses.
- 1.2.3 More specifically, the SA Report must answer **three questions**:
  - What has plan-making / SA involved up to this point?
    - including around consideration of ‘reasonable alternatives’
  - What are the SA findings at this stage?
    - i.e. in relation to the draft plan
  - What are next steps?

<sup>1</sup> Regulation 12(2)

## 1.3 This Interim SA Report

- 1.3.1 At this current stage of the plan-making process the Council is not consulting on a full draft plan. Rather, the consultation is ‘targeted’ at certain key issues. In turn, this is a targeted Interim SA Report, structured so as to inform the consultation. It is not the formally required SA Report.

### Structure of this report

- 1.3.2 Despite the fact that this is a ‘targeted interim’ report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.

*Table 1.2: Structure of this report*

	Reporting question	Scope
<b>Part 1</b>	What has plan-making / SA involved up to this point?	Defining alternatives
<b>Part 2</b>	What are appraisal findings at this stage?	Alternatives appraisal
<b>Part 3</b>	What are next steps?	Next steps

- 1.3.3 Before answering the first question, there is a need to further set the scene by setting out:
  - the plan’s aims and objectives; and
  - the scope of the SA.
- 1.3.4 Finally, **Appendix 1** presents a not on development management policies.

### Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including the next steps section.

# 2 The plan scope

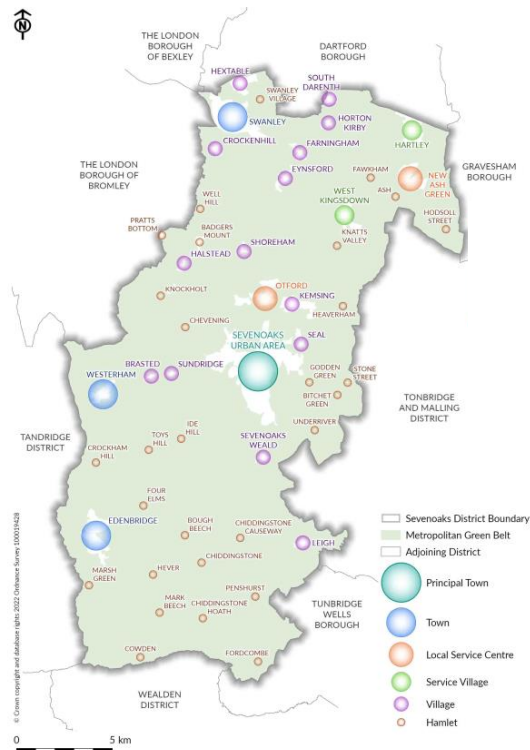
## 2.1 Introduction

2.1.1 The aim here is to briefly introduce: the plan area, the legislative and policy context; and the objectives that are in place to guide plan preparation.

## 2.2 The plan area

2.2.1 The figure below shows the settlement hierarchy, Green Belt and neighbouring authorities. Not shown are such things as the extent of the two AONBs intersecting the district, nor strategic transport infrastructure.

Figure 2.1: Introducing the plan area



## 2.3 The plan period

2.3.1 The duration of the plan is for 18 years from 1 April 2022 to 31 March 2040. This reflects paragraph 22 of the National Planning Policy Framework (NPPF), which states:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments... form part of the strategy for the area, policies should be set within a vision that looks further ahead... (at least 30 years)...”

2.3.2 There are two further points to note:

- 2,455 homes are set to come forward at sites with planning permission, as of 1 April 2022, known as ‘commitments’. The commitments figure will be updated after 31 March 2023, by which time there will also have been ‘completions’ (i.e. new homes delivered in the plan period). The aim of the local plan is to provide for housing over-and-above completions and commitments, primarily via site allocations (see NPPF paragraph 68).
- Whilst the aim is to allocate sites to meet the identified housing requirement in full for the entire plan period, and with a good degree of delivery certainty, there is a degree of flexibility. The NPPF requires identification of specific ‘deliverable sites’ for years one to five of the plan period, and specific, ‘developable sites or broad locations for growth’, for years 6-10 and where possible, for years 11-15 of the plan.

## 2.4 Legislative and policy context

2.4.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, must reflect current Government policy as set out in the NPPF (2021) and must accord with the Government’s Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed needs, including local housing needs (LHN), as far as is consistent with sustainable development.

2.4.2 The plan is also being prepared taking account of objectives and policies established by various organisations at national and local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by policy / strategy established by the South East Local Enterprise Partnership (LEP) and Kent County Council (notably in relation to transport, minerals, waste and education). Sevenoaks District also cooperates with neighbouring local authorities, including other Kent authorities, Surrey authorities and London boroughs.

2.4.3 Finally, it is important to note that the plan will be prepared mindful of the 'made' and emerging neighbourhood development plans ('neighbourhood plans'). There are currently no made neighbourhood plans in the district, but Sevenoaks Town Council recently submitted a final draft neighbourhood plan to the Sevenoaks District Council, which will be subject to examination.

## 2.5 Plan objectives

2.5.1 The consultation document presents a series of vision statements, each associated with one or more objectives to guide the plan, and to provide a starting point for defining reasonable alternatives through the SA process.

2.5.2 Vision statements cover:

- healthy places and spaces, promotion of mental and physical **health**;
- achievement of the Council's **Net Zero** aspirations;
- delivering design excellence in our built environment that responds to our distinctive local **character** and creates the heritage of the future;
- **homes** to meet identified needs;
- greater **economic** competitiveness;
- protecting and take opportunities to enhance our irreplaceable historic and natural **environment**;
- sustainable and equitable **infrastructure**; Embracing emerging trends, such as smart technology; and
- responding to demographic change; Engagement with **neighbouring authorities**.

# 3 The SA scope

## 3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan or the scope of reasonable alternatives.

3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA, as opposed to the detailed scope. There is a clear need for the SA scope to be flexible and adaptable, responding to the nature of the emerging plan and reasonable alternatives, and the latest evidence-base.

## 3.2 Consultation on the scope

3.2.1 The Strategic Environmental Assessment (SEA) Regulations 2004 require that: "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies." In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted in 2022.

3.2.2 The Scoping Report was updated subsequent to consultation, and is now available on the local plan evidence base [website](#). However, it is important to reiterate that the SA scope is naturally subject to refinement and adjustment over the course of the plan-making process. Comments on the SA scope are welcomed at the current time.

## 3.3 The SA framework

3.3.1 At the core of the SA scope is a list of 13 topics, each associated with one or more sustainability objectives. This list of topics and objectives provides a 'framework' under which to undertake assessment. The topics are: Accessibility, Air quality, Biodiversity, Climate change adaptation, Climate change mitigation, Communities and health, Economy and employment, Historic environment, Housing, Land and soils, Landscape, Transport, and Water resources /quality.

## Part 1: Plan-making / SA up to this stage?

# 4 Introduction to Part 1

## 4.1 Overview

- 4.1.1 The aim of this part of the report is to present an outline of the reasons for selecting the reasonable alternatives that are a focus of the appraisal presented in Part 2. Firstly, there is a need to consider the question of: “reasonable alternatives (RAs) in relation to what?”

## 4.2 RAs in relation to what?

- 4.2.1 The legal requirement is (ultimately) to examine RAs taking into account the “objectives... of the plan” (see Section 2). Following discussion of plan objectives, it was determined appropriate to focus on the **spatial strategy**, i.e. providing for a supply of land, including by allocating sites, to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly an overarching objective of the local plan.
- 4.2.2 Furthermore, it was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” RAs that are meaningfully different, in that they will have differential ‘significant effects’. This approach is in line with the SEA Regulations, and the PPG is clear that SA “*should only focus on what is needed to assess the likely significant effects of the plan*”. N.B. “do nothing” is not a reasonable alternative to “do something”. This is because “do nothing” is the baseline situation.
- 4.2.3 The decision was made to refer to the RAs as **growth scenarios**.

### What about site options?

- 4.2.4 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is not the case here (and is rarely the case for any local plan). Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs must be in the form of alternative *packages* of sites. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios (see discussion below).

## Is the focus on housing?

- 4.2.5 Establishing a supply of land to meet housing needs is typically a matter of overriding importance for local plans, and the Sevenoaks Local Plan is no exception. However, local plans are also tasked with meeting wider development needs. This includes needs in respect of employment land, and meeting the accommodating needs of Gypsies and Travellers.
- 4.2.6 It is reasonable for the process to be somewhat 'housing-led', at this early stage; however, other types of development need also feed-in.

## What about other aspects of the plan?

- 4.2.7 As well as establishing a spatial strategy, allocating sites etc, the local plan must also establish policy on thematic district-wide issues, as well as site-specific policies, to guide decision-making at the planning application stage. These can generally be called development management (DM) policies.
- 4.2.8 It can be a challenge to establish DM policy alternatives that are genuinely reasonable (see discussion above). However, further consideration will be given to this matter subsequent to the current consultation, and view on possible RAs are welcomed at the current time. **Appendix 1** presents a brief note on DM policies with the potential for significant effects.

## 4.3 Defining growth scenarios

### Overview

- 4.3.1 A primary focus of the current consultation is on the question of how best to maximise the supply of housing from the district's **urban areas**, in order to minimise pressure on greenfield land and minimise the risk of the local plan not being able to provide for locally arising housing needs in full.
- 4.3.2 Specifically, a package of development site options within the urban areas has been identified, and a key question for consultees is in respect of three alternative approaches to **density** across these sites. As such, there is a need for the three alternative approaches to urban development density to be a 'variable' across the reasonable growth scenarios.

- 4.3.3 Additionally, there is the question of **how many homes** the local plan should provide for in total, relative to the local housing need (LHN) figure of 714 dwellings per annum (dpa) or 12,852 homes over the 18 year plan period (2022 – 2040). It is reasonable for this to also be a variable.

- 4.3.4 As such, this section is structured under the following headings:

- Identifying site options
- Defining density alternatives
- Defining growth quanta alternatives
- Defining reasonable growth scenarios

### Identifying site options

- 4.3.5 A total of 25 sites have been identified through the officer-led Strategic Housing and Economic Land Availability Assessment (SHELAA). These are spread across six settlements, with the great majority of sites, and the great majority of total site-area, focused within the Sevenoaks urban area.

See: [maps.sevenoaks.gov.uk/shelaa2022](https://maps.sevenoaks.gov.uk/shelaa2022)

- 4.3.6 Additionally, at seven of the district's settlements that are inset from the Green Belt additional potential supply has been identified through the Settlement Capacity Study (2022).
- 4.3.7 Overall, the process of identifying development / redevelopment sites within the district's urban areas is considered to be at an early stage. Identifying urban development sites that are 'deliverable or developable' (NPPF paragraph 68) is inevitably complex, with a need for close working with land-owners, stakeholders, specialists etc. The current consultation will be followed-up with detailed work and then a second consultation under Regulation 18, at which time there will be greater certainty regarding which urban site options are, and are not, deliverable or developable.
- 4.3.8 As such, neither the package of identified urban site options, nor the proposed settlement capacity figures identified through the Settlement Capacity Study (2022), are considered further as a variable across the reasonable growth scenarios. Rather, both factors are held 'constant'.

## Defining density alternatives

- 4.3.9 The current consultation document sets out that:
- Each of the identified development site options is associated with either two or three density options. Specifically, at 18 of the site options there are two density options (“minimum uplift” and “optimum”), whilst at seven specific sites, where there is an identified opportunity for higher density development, there is an additional higher density option: “optimum+”.
  - With regards to the potential additional supply within settlements identified through the Settlement Capacity Study (2022) there are two density alternatives: minimum uplift and optimum.
- 4.3.10 The choice between alternative density scenarios is a primary focus of the consultation, and hence this matter should be explored further as a variable across the reasonable growth scenarios.
- 4.3.11 To simplify the process, it is reasonable to focus on the matter of density across the 25 identified development sites only, with three alternatives:
- Lower density option – **minimum uplift** at all 25 sites
  - Middle density option – **optimum** at all 25 sites
  - Higher density option – optimum at 18 sites and **optimum+** at 7 sites

## Defining growth quanta alternatives

- 4.3.12 It is too early to consider the question of whether the local plan will aim to provide for LHN in full - or alternatively provide for a figure below LHN - in any detail. However, it is important to begin to give high-level consideration to this question. This is because providing for LHN in full would require significant Green Belt release within the district, whilst not providing for LHN in full would lead to unmet housing needs that need to be provided for elsewhere within a constrained sub-region.
- 4.3.13 Additionally, it is pragmatic to give consideration to the option of the local plan providing for ‘above LHN’, in order to more fully meet affordable housing needs local, and also mindful of the risk of unmet housing needs arising from elsewhere in the sub-region.

4.3.14 In summary, there is a need to reflect the following three development quanta alternatives across the reasonable growth scenarios:

- Lower growth option – set the housing requirement **below 714 dpa**
- Middle growth option – set the housing requirement at **714 dpa**
- Higher growth option – set the housing requirement **above 714 dpa**

## Defining reasonable growth scenarios

4.3.15 The discussion above has identified two key choices, each associated with three options, which leads to nine reasonable alternative growth scenarios – see Table 5.1.

Table 4.1: The reasonable alternative growth scenarios

Scenario	Housing requirement	Density
1	Below 714 dpa	Minimum uplift
2		Optimum
3		Optimum +
4	714 dpa (i.e. LHN)	Minimum uplift
5		Optimum
6		Optimum +
7	Above 714 dpa	Minimum uplift
8		Optimum
9		Optimum +

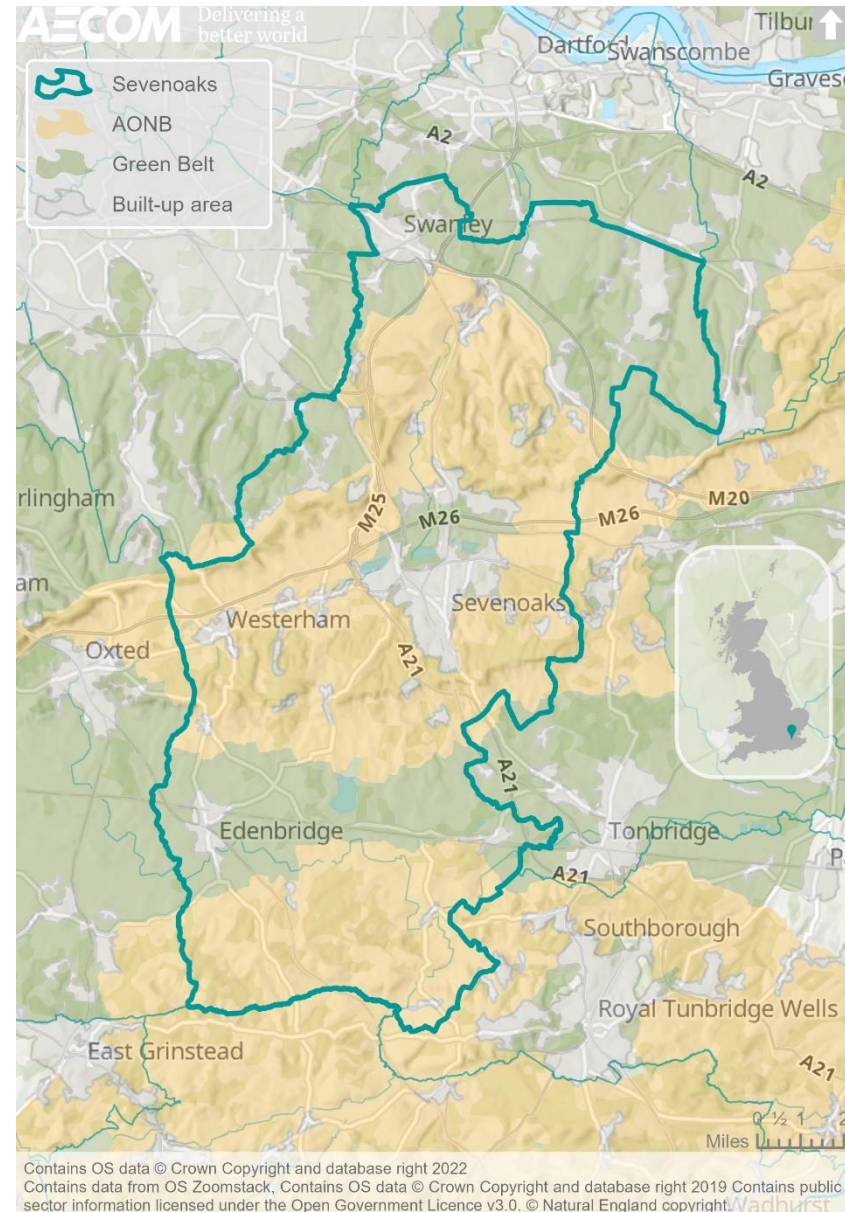
- 4.3.16 Final points to note are as follows:
- These scenarios are considered to be the RAs *at this stage* in the local plan / SA process. They are considered suited to the task of informing the current consultation, which is high-level, and, in turn, ensuring informed plan-making / SA work subsequent to the consultation, including work to develop RAs for consultation alongside the draft plan .



- “Less than 714 dpa” – cannot be defined with any precision. However, it is important to note that, on the basis of work undertaken to date, there is thought to be the potential to provide for between ~50% and ~65% of LHN without any new Green Belt allocations, depending on the density option that is taken forward. Furthermore, it is difficult to envisage a scenario whereby the Sevenoaks Local Plan does not make any Green Belt allocations, given factors including: the constraints affecting neighbouring areas (including Green Belt and AONB), and the likelihood that, through further work, some locations can be identified within the district that are suitable for allocation despite being within the Green Belt, e.g. because they perform the function of Green Belt only to a limited extent. As such, at this early stage, it is considered reasonable to assume that the ‘below LHN’ scenarios would involve setting the housing requirement at 60 – 80% of LHN, leading to unmet needs of circa 2,500 to 5,000 homes.
- “Greater than 714 dpa” – would involve setting the housing requirement only modestly above LHN. This scenario is arguably unreasonable, given the constraints affecting Sevenoaks District, including Green Belt and AONB. However, it is considered reasonable to test *on balance*, at this early stage in the process. There is an argument for assuming that the housing requirement would be set at 843 dpa, as this is figure derived from the Government’s standard method if the ‘cap’ (step 3 of the method) is not applied. On balance, the assumption is 800 - 850 homes.

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

Figure 4.1: The extent of Green Belt and AONB constraining the district



## Part 2: SA findings at this stage

# 5 Introduction

## 5.1 Overview

5.1.1 The aim of this part of the report is to present an appraisal of the nine reasonable alternative growth scenarios introduced above.

### What about other aspects of the consultation?

5.1.2 It is considered reasonable to focus attention at this stage on an appraisal of the nine reasonable alternative growth scenarios, which vary in terms of: 1) development density in urban areas; 2) total growth quantum. Additionally, **Appendix I** presents a note on DM policies.

5.1.3 The scope of appraisal work will be broader at the next consultation stage, at which time the focus of consultation will be a more-or-less draft plan. Specifically, the intention is that the Interim SA report published at that stage will present an appraisal of “the plan and reasonable alternatives” in line with Regulation 12(2) of the SEA Regulations.

# 6 Scenarios appraisal

## 6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable alternative growth scenarios introduced above.

### Methodology

6.1.2 The appraisal is presented below under 13 headings, with one heading for each of the sustainability topics that together comprise the core of the SA framework, as introduced above. A final section then presents conclusions.

6.1.3 Within each section, the aim is to discuss key issues and opportunities associated with the growth scenarios, before reaching a conclusion on ‘significant effects’. However, note that reaching such conclusions is inherently challenging due to the high-level nature of the scenarios.

## Broad scope of issues / opportunities / impacts

- 6.1.4 There is clearly a strong argument for maximising the supply of housing from urban areas, because the effect will be to reduce development pressure on Green Belt in Sevenoaks District and, in turn, Green Belt and greenfield (non-Green Belt) locations elsewhere.
- 6.1.5 However, given a limited supply of development sites within the district's urban areas, maximising supply primarily translates as higher densities, which can lead to tensions with a range of objectives. [Section 11](#) of the NPPF ('Making effective use of land') supports higher densities, but recognises that there is a need to balance a range of competing objectives, including *"the desirability of maintaining an area's prevailing character."*
- 6.1.6 With regards to potential greenfield development locations, there is no certainty at this early stage in the process. However, assumptions include:
- Scenario 1 (low densities, low housing requirement) – there would be some need for Green Belt release in Sevenoaks, plus high unmet needs.
  - Scenario 3 (high densities, low housing requirement) – little or no need for Green Belt release in Sevenoaks, plus high unmet needs.
  - Scenario 4 (low densities, housing requirement at LHN) – extensive Green Belt release in Sevenoaks, no need to export unmet needs.
  - Scenario 6 (high densities, housing requirement at LHN) – some need for Green Belt release in Sevenoaks, no need to export unmet needs.
- 6.1.7 Despite uncertainties, it is important to begin the discussion with stakeholders regarding the range of potential consequences of lower densities / lower supply from the urban areas, and vice versa.
- 6.1.8 One key group of stakeholders is those with an interest in the neighbouring local authorities that could be asked to provide for development needs that cannot be met in Sevenoaks ('unmet needs'). There is a legal requirement to engage effectively under the 'Duty to Cooperate'.
- 6.1.9 This audience will wish to evidence of: A) how urban supply will be maximised, as far as consistent with sustainable development; and B) how Green Belt / greenfield development issues and opportunities in Sevenoaks District compare to those within their own area.

## 6.2 Accessibility

- 6.2.1 A key issue for local plan-making can often be **primary and secondary school capacity**. However, there is currently limited potential to differentiate between the growth scenarios, given the available evidence.
- 6.2.2 Strategic greenfield schemes, whether in the form of an urban extension or a new settlement, can often deliver, or make land available for, one or more schools. The effect can be that the new housing development does not lead to increased pressure on existing schools capacity, and there can be the potential to ease or alleviate existing capacity issues ('planning gain').
- 6.2.3 For example, secondary school provision has been a key 'driver' of the Swale Local Plan, as reported in a recent [Interim SA Report](#) (2021).
- 6.2.4 However, at this stage there is little reason to assume the potential to deliver one or more strategic housing-led schemes in the district of a sufficient scale to deliver a primary school (e.g. 500-700+ homes), let alone a secondary school (e.g. 2,000+ homes). Also, there is limited understanding regarding capacity constraints / headroom, at the existing schools in the district, including within Sevenoaks town, which would likely see a focus of growth under growth scenarios involving an 'optimum +' density scenario (i.e. Scenarios 3, 6 and 9).
- 6.2.5 Furthermore, there is no evidence currently available to identify any primary schools in the more rural parts of the district where there is an issue in respect of a lack of students (given lower birth rates nationally subsequent to the 2008/9 recession). Rural schools can face this issue, and so be at risk of closure, which can serve as an argument for supporting growth.
- 6.2.6 Also, there is currently no evidence to suggest any significant cross-border issues / opportunities. Specifically, there is no identified capacity issue in a neighbouring local authority that could serve as an argument in favour of a strategic growth location nearby, whether within Sevenoaks District or within the neighbouring authority area (which, in turn, could feasibly suggest an opportunity around meeting some of Sevenoaks' unmet needs).

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

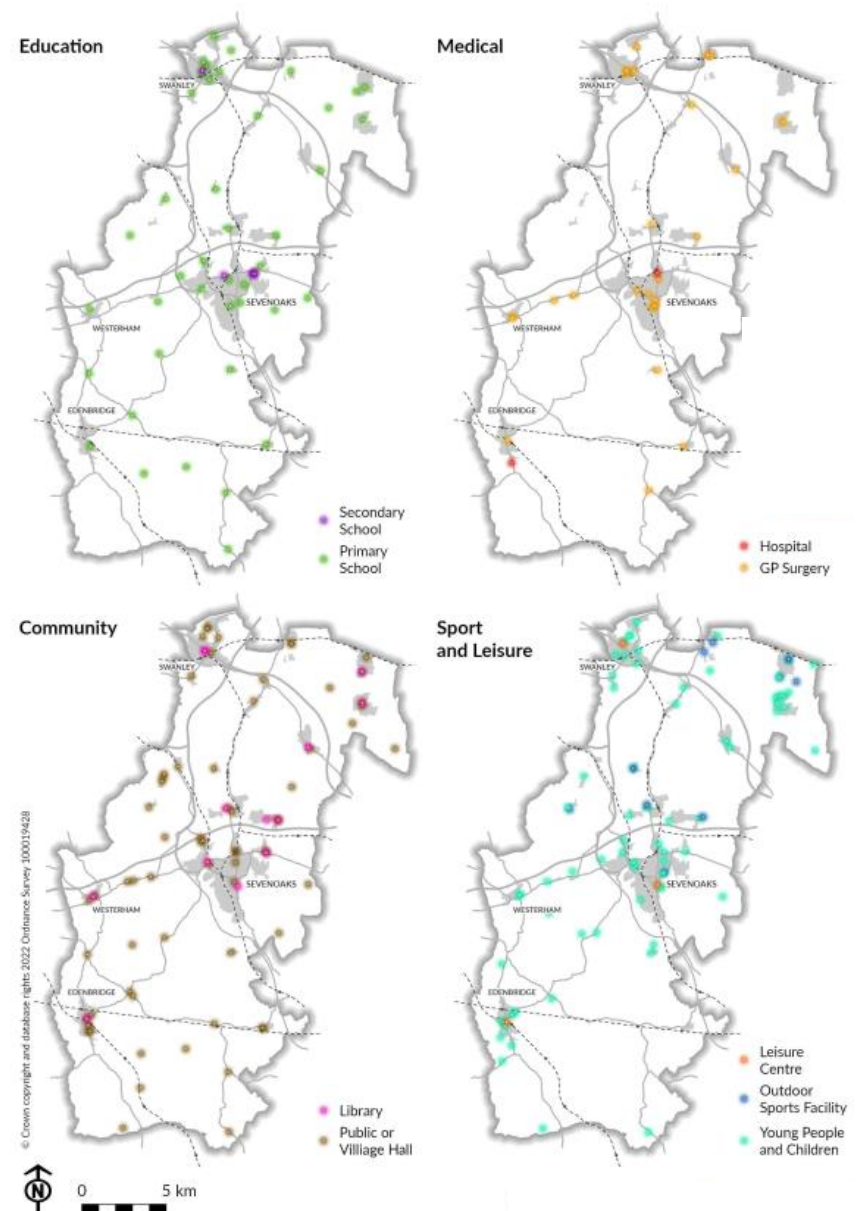
6.2.8 Figure 6.1 is taken from the current consultation document, and shows the distribution of key community infrastructure across the district, serving to clearly highlight the rural nature of the southern part of the district, albeit this area is quite well-linked to towns to the east, particularly Tonbridge.

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

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

6.2.10 With regards to **significant effects**, the primary consideration is an uncertain risk of negative effects under those scenarios that would generate high levels of unmet housing needs to be met elsewhere in the sub-region.

Figure 6.1: Key community infrastructure across the district



## 6.3 Air quality

- 6.3.1 This is a significant issue across west and central Kent, and across London, albeit the situation is set to improve rapidly due to the switch-over to electric vehicles (albeit EVs still generate particulate pollution, associated with break, tyre and road wear, recalling that EVs tend to be heavier vehicles).
- 6.3.2 Within Sevenoaks District the key areas of constraint are the designated Air Quality Management Areas (AQMAs), these are: Swanley town centre; Sevenoaks High Street; the A25 corridor through Westerham, Sundridge and the northern part of Sevenoaks; and an area in north Swanley.
- 6.3.3 Looking at the spread of **potential urban development sites**, two are notably located intersecting or in close proximity to an AQMA, plus others have clear potential to generate additional traffic passing through an AQMA. One notable site is Land east of Sevenoaks High Street (MX/21/00049), given that the High Street is designated as an AQMA, and this is one of the seven sites identified as having the potential to support development at an 'optimum +' density. However, this site could potentially lead to low car trip generation, given the ability to access a wide range of services, facilities and retail by walking/cycling, and with Sevenoaks station within circa 1km.
- 6.3.4 Looking **beyond the district boundary**, and focusing attention on locations outside of the Green Belt and AONB (that could be a first port of call when considering locations suited to providing for unmet needs), it is noted that there are no AQMAs within the extensive sector of land east of the Green Belt, south of the Kent Downs AONB and north of the High Weald AONB, except for an extensive series of AQMAs constraining Maidstone town and the adjacent Medway Gap area of Tonbridge and Malling District.
- 6.3.5 In summary, at this stage the **key messages** are:
- There are significant air quality constraints locally, but it is difficult to suggest these as a reason for not supporting higher densities if higher densities are directed to the most accessible locations.
  - With regards to Green Belt / greenfield development, there is feasibly an argument for supporting growth locations in central or even eastern Kent, where there is a near absence of AQMAs, in favour of growth within Sevenoaks District. This might particularly be the case if it transpires that such areas are suited to supporting strategic growth locations (with

potential for high trip internalisation and investment in transport links) in a way that Sevenoaks District not. However, on the other hand, central and eastern Kent is more rural and 'less accessible' than Sevenoaks District, broadly speaking, and meeting housing needs distant from source risks 'unsustainable' commuting and wider transport patterns.

- 6.3.6 With regards to **significant effects**, there is no potential to draw conclusions with any certainty at this current stage in the process.

Figure 6.2: AQMAs within the district

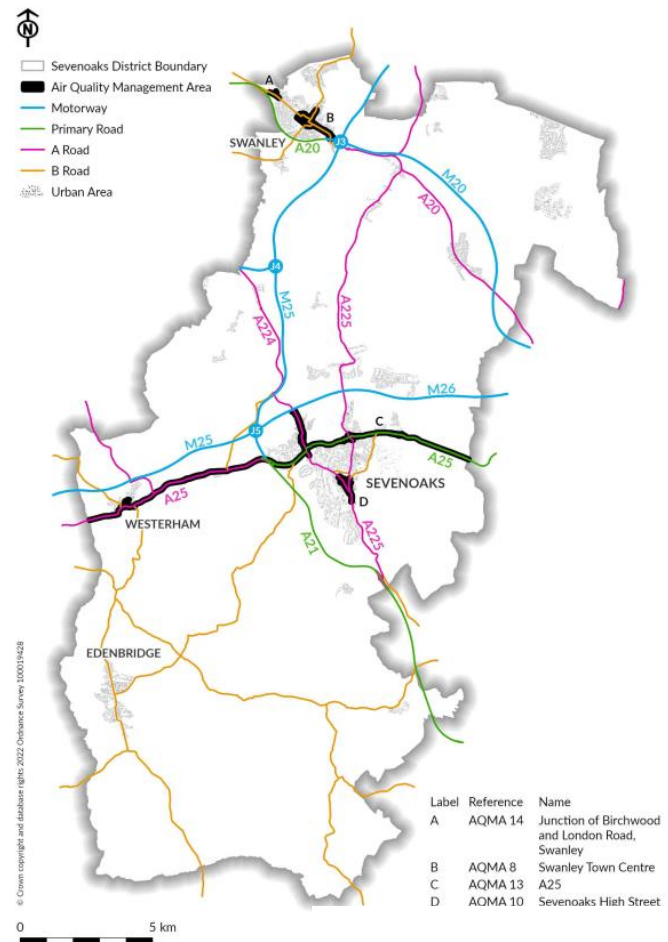
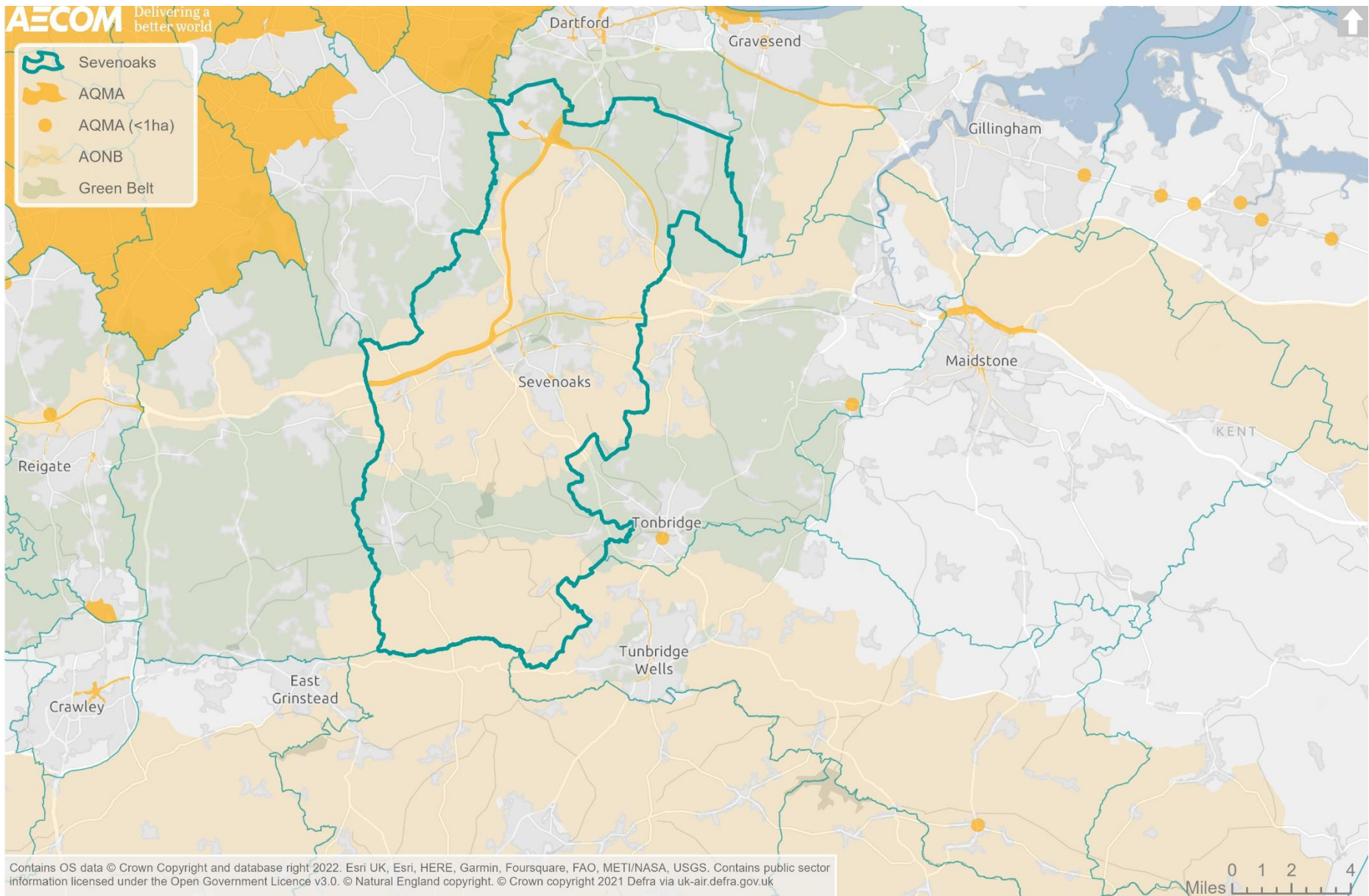


Figure 6.3: AQMAs across the sub-region



## 6.4 Biodiversity

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

6.4.2 Sevenoaks is overall quite highly constrained in biodiversity terms, certainly in the national context and also arguably in the regional / sub-regional context. However, much of the biodiversity constraint is concentrated within those parts of the district that fall within an **AONB**, which would be unlikely to come under significant development pressure under any scenario.

6.4.3 With regards to the sectors of land within the district that fall outside of the AONB, these are subject to *relatively* low constraint, for the most part. In particular, areas of lower constraint are: the southern rail corridor, including Edenbridge; the Swanley area; the Horton Kirby area; and Halstead.

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

6.4.5 With regards to the aforementioned corridor of land within **central Kent** that is located outside of the Green Belt and AONB, this area is likely overall subject to relatively low constraint, particularly noting the low / very low density of ancient woodland (an 'NPPF footnote 7' constraint). This can be seen in **Figure 6.4**.

N.B. the established network of Biodiversity Opportunity Areas (BOAs) are set to be replaced by a Nature Recovery Network, but are considered to remain a robust indicator of broad areas of constraint / opportunity at the current time.

6.4.6 However, wastewater treatment impacting on water quality could well be an issue in this area, noting that all land in this area drains to the River Beult SSSI, which is in unfavourable condition (and there is a need to consider that the River Beult is a tributary of the River Medway, which is sensitive in water quality and biodiversity terms). Indeed, much of this area is strongly associated with the river corridor (as discussed below).

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

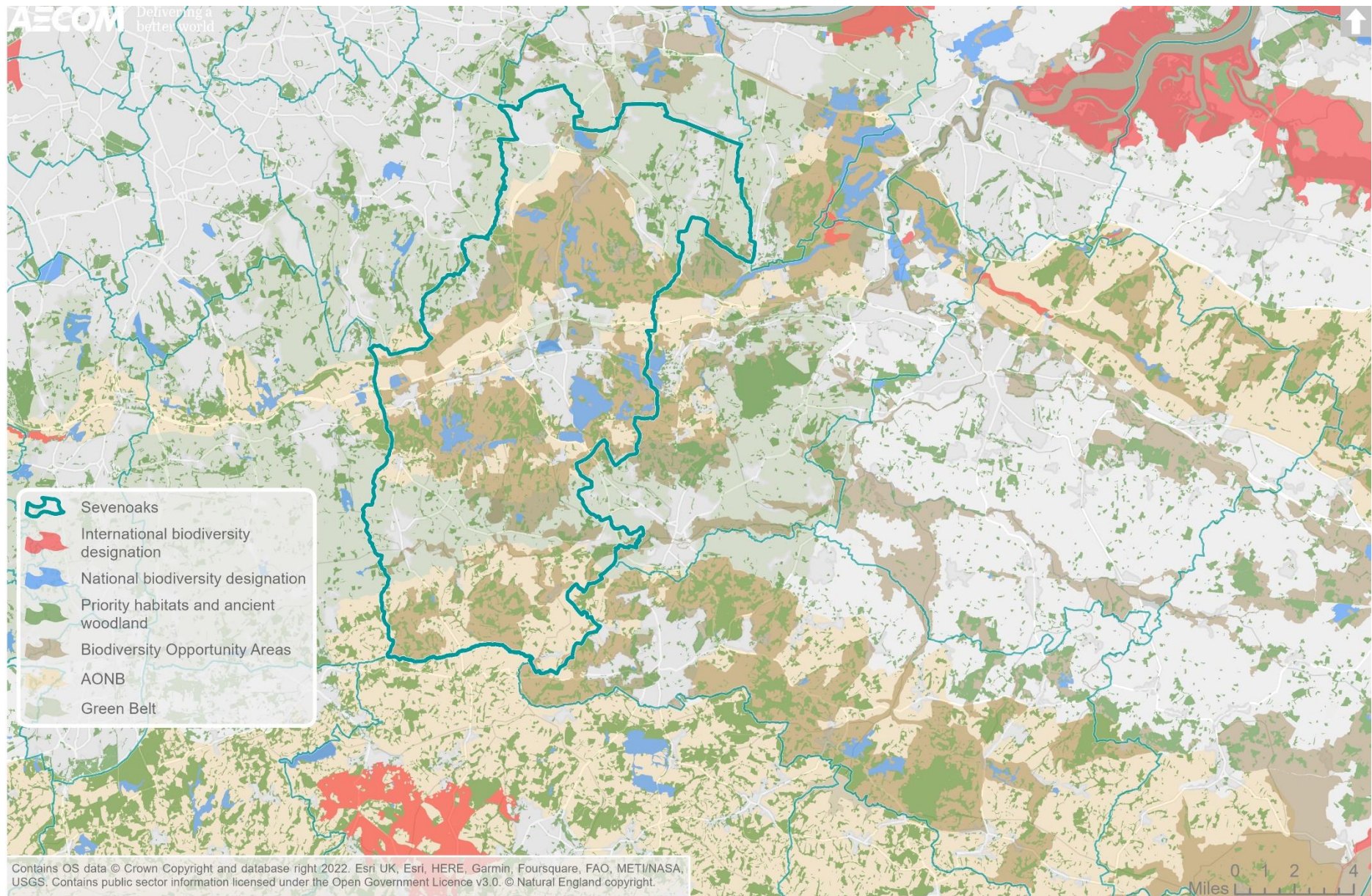
- There is a strong argument for supporting higher densities in the urban areas in order to reduce pressure on Green Belt / greenfield development locations (whether in Sevenoaks District or elsewhere) and, in turn, tensions with biodiversity objectives.
- There are widespread constraints locally, but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

6.4.8 With regards to **significant effects**, the primary consideration is a need to support higher densities in urban areas, as far as possible.

### Key constraints to growth



Figure 6.4: Strategic biodiversity constraints across the sub-region (also showing Green Belt and AONB for context)





## 6.5 Climate change adaptation

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

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

6.5.2 One of the site options at **Edenbridge** subject to flood risk has been identified as potentially suitable for 'optimum +' densities, which will need close scrutiny given the need to ensure that flood risk mitigation can be designed-into the scheme. However, overall, flood risk is not likely to be a factor that has a significant bearing on the potential to achieve higher densities, in the Sevenoaks District context.

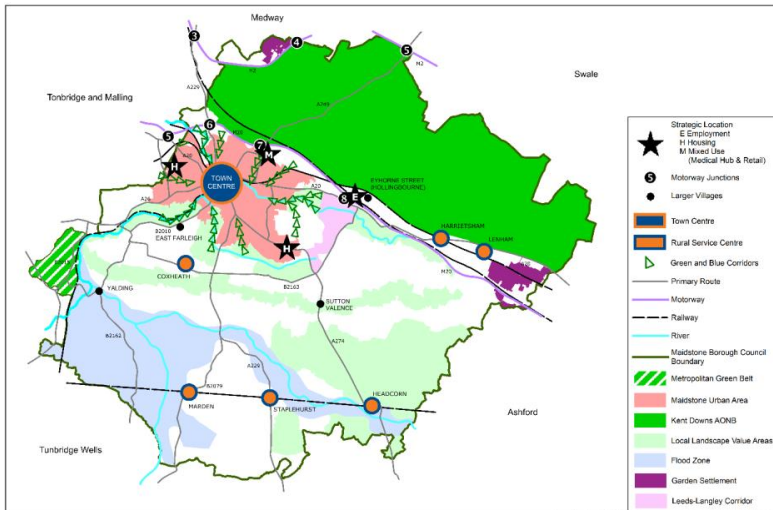
6.5.3 This can be contrasted to the experience elsewhere. For example, the emerging Lewisham Local Plan involves a considerable focus on underused land, including industrial land, along the main road / river corridors, as discussed within a recent [SA Report](#)). Also, the emerging Stafford Local Plan supports a large regeneration scheme that is affected by flood risk, as discussed within a recent [Interim SA Report](#).

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

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

6.5.6 Also, locations outside of the Green Belt in Dartford Borough and Tonbridge and Malling Borough - that might come into contention as potential locations for growth / higher growth in response to unmet needs from Sevenoaks - are affected by flood risk. However, once again, it is difficult to draw any strong conclusions without knowing precise growth locations / options. Focusing on Dartford, information is presented within a range of materials on the current local plan examination [website](#), including the [SFRA](#).

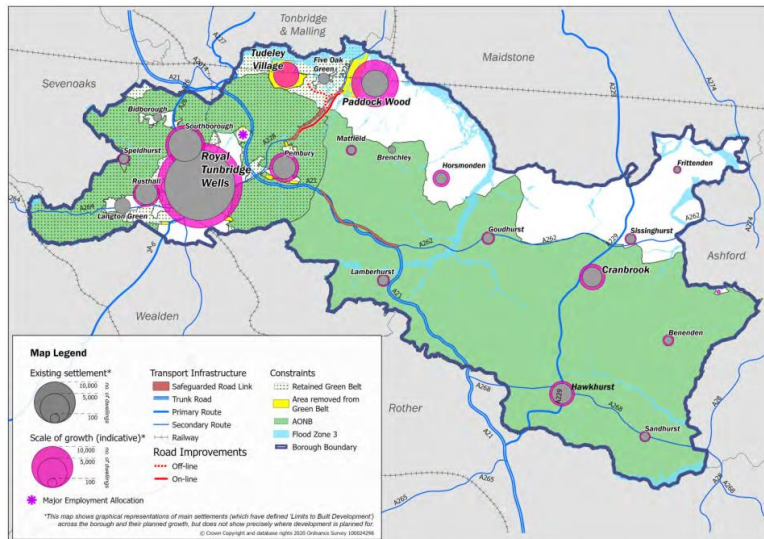
Figure 6.5: Maidstone Local Plan Review Key Diagram (2021)



Maidstone Borough Key Diagram

Reproduced from the Chislehurst Survey maps with the permission of the Controller of the Royal Ordnance Factories. All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording, or by any information storage or retrieval system, without the prior written permission of the Controller of the Royal Ordnance Factories. Maidstone Borough Council License No. 100119000. 2018 Scale: 1:100000 Produced by GIS Market Services

Figure 6.6: Tunbridge Wells Local Plan Key Diagram (2021)



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

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

6.5.8 With regards to **significant effects**, the primary consideration is an uncertain risk of negative effects under those scenarios that would generate high levels of unmet housing needs to be met elsewhere in the sub-region.

Figure 6.7: Current fluvial flood risk zones across the district

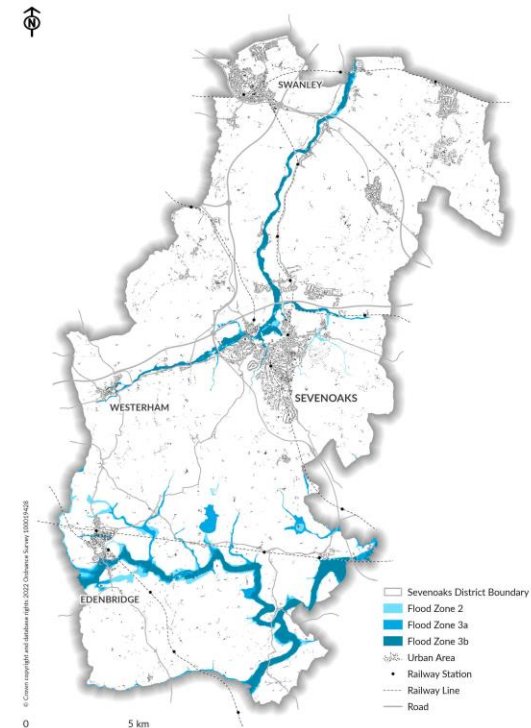
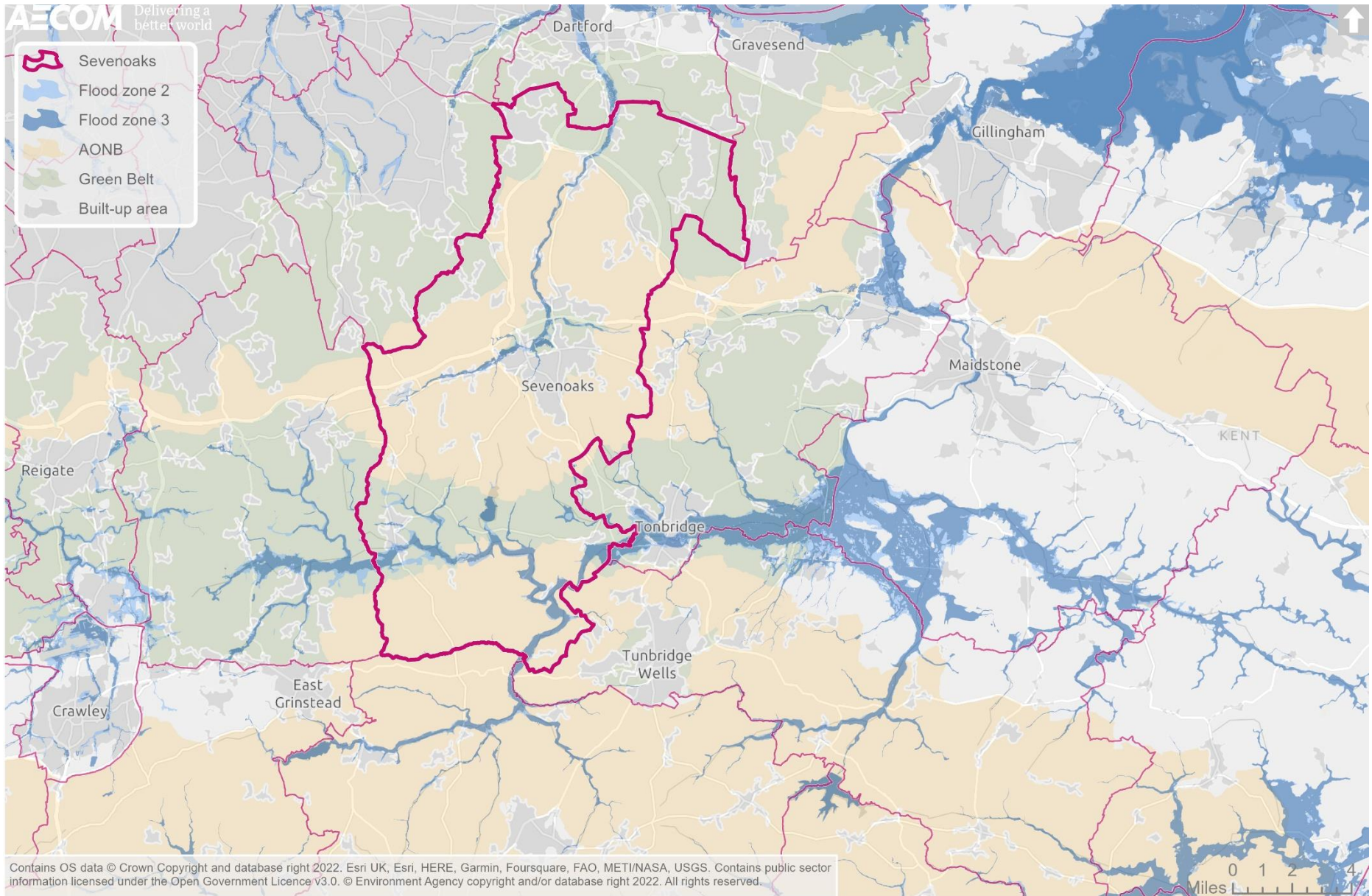


Figure 6.8: Current fluvial flood zones across the sub-region



## 6.6 Climate change mitigation

- 6.6.1 Focusing on emissions from the built environment (as opposed to transport), strategic sites can lead to opportunities to minimise per capita emissions (which must be the primary focus, as opposed to total district-wide emissions, district-wide net zero targets). Also, there is also the potential for local plans to set policy requirements, in respect of emissions standards, that go beyond the requirements of Building Regulations. However, in respect of the latter, the potential to do so is highly dependent on development viability.
- 6.6.2 The emerging Stafford Borough Local Plan is an example of a plan that is seeking both to direct a high proportion of growth to a strategic growth location and set policy that requires emissions standards significantly over-and-above Building Regulations, as discussed within a recent [Interim SA Report](#). One implication is the need to accept a ‘trade off’ in respect of affordable housing delivery, as discussed within the [Viability Study](#).
- 6.6.3 In this light, there is a need to question the merits of any strategy that seeks to support higher densities in **urban areas** ahead of greenfield locations that will typically be associated with higher viability (and also potentially other locational or masterplan-related decarbonisation opportunities). However, the question is not at all clear cut, as directing growth to urban areas is typically supported from a **transport** decarbonisation perspective.
- 6.6.4 A further consideration is that **higher densities** tend to be supportive of development viability only up to a point, with taller buildings (beyond circa six stories) often associated with more problematic viability, often leading to a need to delivery of reduced affordable housing and, in turn, potentially with implications for what built environment decarbonisation measures can be delivered (albeit higher densities can support heat networks). Also, taller buildings can lead to challenge in respect of solar gain and achieving good ventilation, potentially necessitating air conditioning.
- 6.6.5 Finally, with regards to the possibility of exporting **unmet needs**, this is generally not something to be supported from a decarbonisation perspective, given the implications for **transport** patterns. Whilst it could potentially be the case that unmet needs are met at one or strategic growth locations, where steps are taken to minimise per capita emissions from both transport and the built environment, there is no certainty in this respect.

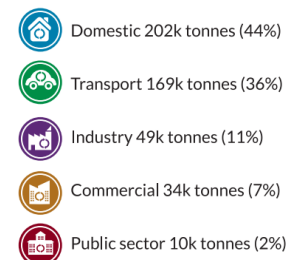
6.6.6 In summary, at this stage the **key messages** are:

- A strategy focused on achieving higher densities in urban areas ahead of Green Belt / greenfield development can lead to tensions with **built environment** decarbonisation objectives, albeit there can also be opportunities around supporting heat networks (although there are a range of technical challenges, with national practice still in its infancy).
- Higher urban densities are supported from a perspective of seeking to minimise per capita greenhouse gas emissions from **transport**.
- Exporting unmet needs is not supported from a decarbonisation perspective, at least not in the absence of a sub-regional strategy that serves to demonstrate that concentrating growth in particular areas could lead to a decarbonisation opportunity.

6.6.7 With regards to **significant effects**, the primary consideration is a risk, or even a likelihood, of significant negative effects under those scenarios that would generate high levels of unmet housing needs to be met elsewhere. It is noted that neither Sevenoaks District Council nor Kent County Council has set a net zero target date for the area as a whole ahead of the national target date of 2050; however, many local authorities nationally have set 2030 as a net zero target date, for example [Tonbridge and Malling](#).

6.6.8 The figure below breaks down emissions locally. A key point to note is that transport emissions are set to decline rapidly, but domestic emissions risk remaining stubbornly high without interventions, particularly around use of natural gas, in respect of both existing and new development. The latter is a key issue for the local plan, as is local level electricity generation and storage, in order to reduce pressure on, and balance, the national grid. The grid is decarbonising rapidly, but there are a range of risks and challenges.

### *A breakdown of current CO<sub>2</sub> emissions for the district*



## 6.7 Communities and health

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

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

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

6.7.4 With regards to greenfield development, there are clear arguments for supporting strategic growth locations over-and-above smaller urban extensions. In particular, there are well-established opportunities associated with new **garden communities**, including around delivering new health infrastructure, supporting active modes of travel and ensuring good access to gardens, sports facilities, greenspace and the countryside. This is a focus of the Town and Country Planning Association (TCPA), for example see: [tcpa.org.uk/guidance-for-delivering-new-garden-cities](http://tcpa.org.uk/guidance-for-delivering-new-garden-cities)

6.7.5 On this basis, ‘health and wellbeing’ considerations could feasibly contribute to an argument for seeking to meet some of Sevenoaks’ housing needs outside the district, if it transpires that garden community / strategic growth options are limited locally.

6.7.6 Another consideration can also be in respect of directing development so as to support investment aimed at enhancing access to the countryside, e.g. to woodlands or river corridors currently with limited or no access.

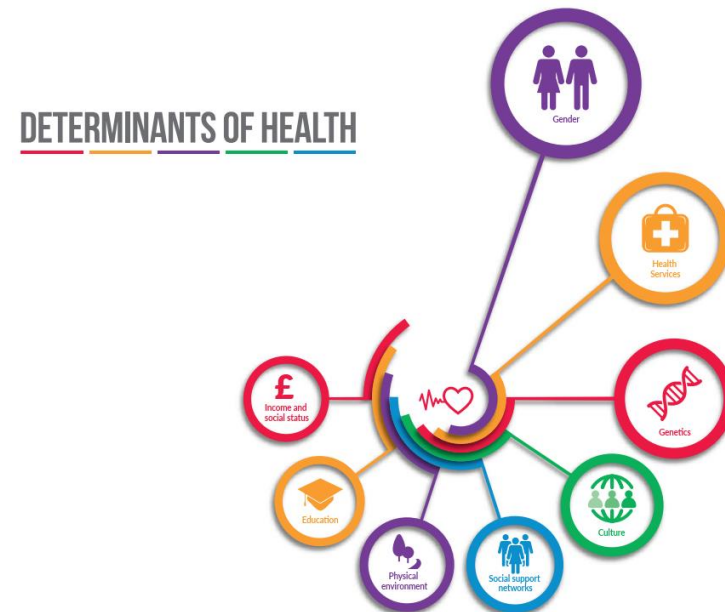
6.7.7 In summary, at this stage the **key messages** are:

- Higher density developments in urban areas can give rise to both tensions and opportunities.

- Garden communities can be associated with a particular opportunity, hence ‘health and wellbeing’ considerations could feasibly serve as a high-level argument for seeking to meet some of the district’s housing needs outside the district, if it transpires that garden community options are limited or non-existent locally.

6.7.8 With regards to **significant effects**, there is no potential to draw conclusions with any certainty at this current stage in the process.

### Key determinants of health



### Access to open / green space and the countryside is a key objective



## 6.8 Economy and employment

6.8.1 It is difficult to draw strong conclusions, at this early stage, regarding the question of whether **higher density** development would be supportive of achieving mixed use developments, to include employment floorspace.

6.8.2 In particular, there is an important distinction between delivering mixed used developments to include **office space** versus mixed use developments involving ‘co-location’ of residential and **industrial** / light industrial floorspace. The possibility of co-locating residential and industrial / light industrial is a key issue across the London Boroughs, for example as discussed in the recent Lewisham Local Plan [Interim SA Report](#) and Croydon Local Plan [SA Report](#). Best practice is evolving, in respect of masterplanning and design solutions supportive of co-location, but there can still be inherent challenges, both for businesses and communities.

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

6.8.4 With regards to the Economic Needs Study (ENS; 2022), the primary point to note is that overall need is low. The study concludes:

“Taking account of existing supply and planned losses we conclude there is need to find a small additional amount of land to accommodate forecast demand. This totals 5.7ha of land, including 4.1 ha for office activity and 1.6 ha for industrial activity. This however assumes plot ratios of 40% for both office and industrial activity and it would be possible to accommodate forecast demand without additional land through intensification of use.”

6.8.5 Beyond this headline conclusion, the following quotes are of relevance to the question of development density within urban areas:

- “Although a successful and reasonably well functioning town, Swanley lacks a strong centre. It would benefit greatly from active placemaking. We concur with the Town Centres Strategy that Swanley should aim for an expanded retail offer, space for small businesses and co-working, and new homes of different types and tenures...”
- “Most other town centres seem to work well and appropriately for their scale. However, New Ash Green is severely run down and would benefit greatly from active policy intervention. It needs to revitalise the commercial centre, and could also benefit by offering flexible space...”
- “We recommend a more proactive approach to the provision of start-up and grow-on office space in Sevenoaks, Swanley and perhaps Edenbridge.... Some of the space could be provided in proposed mixed-use schemes in Sevenoaks town centre...”

6.8.6 Also, the following quotes are relevant to the question of Green Belt release locally (whether for employment or mixed use schemes):

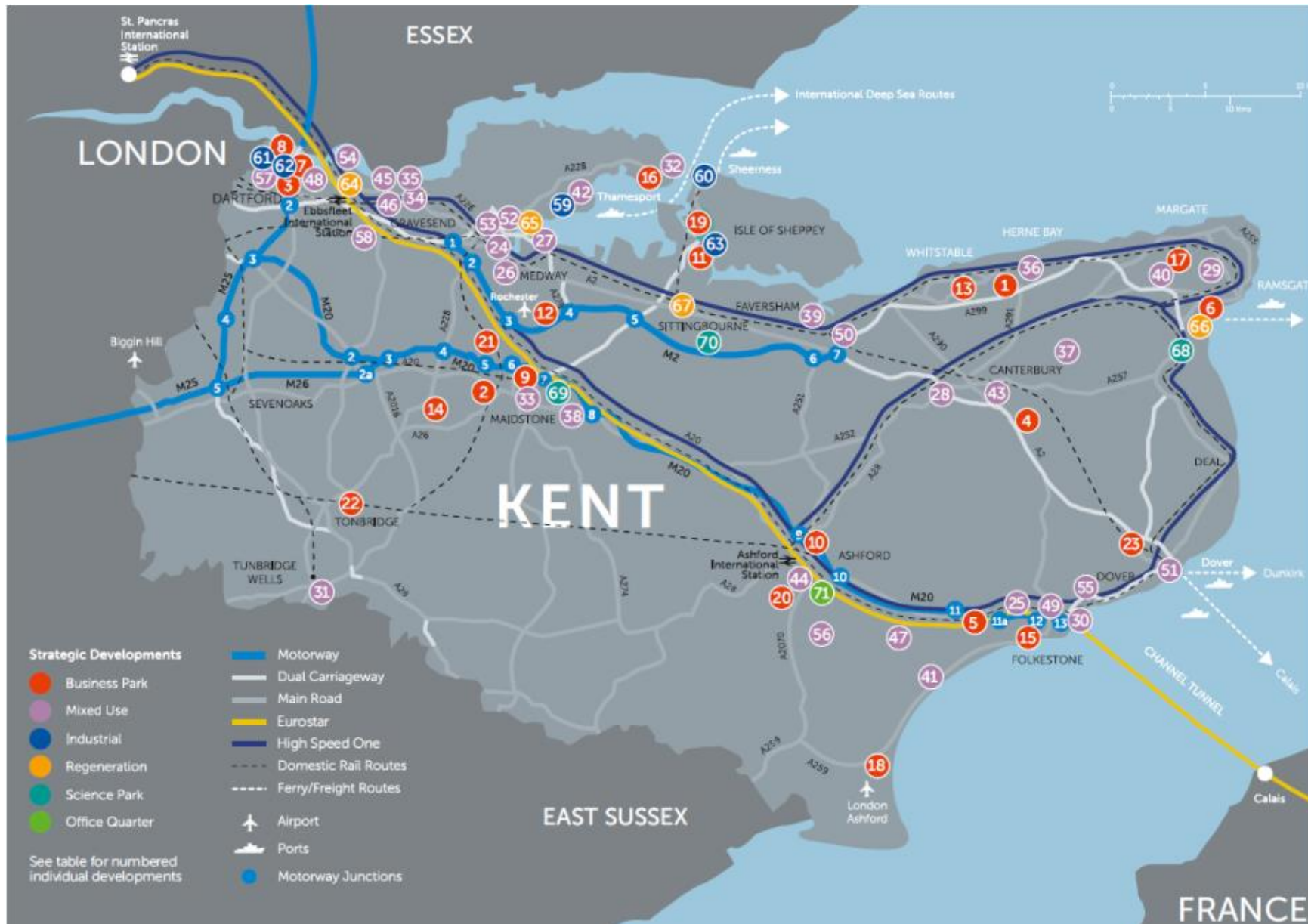
- “We recommend that the District works with neighbouring authorities to build a case of ‘exceptional circumstances’ to deal with demand for industrial and logistics space in the Green Belt in the northern part of the District in and around Swanley.”
- “The industrial market is small but successful, and it is this market that most needs new capacity, although providing that capacity means encroachment on the Green Belt. The most viable locale for this is around Vestry Road in Sevenoaks and around Swanley.”

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

- It is difficult to draw strong conclusions, at this stage, regarding the implications of higher density development in urban areas for achieving a mix of uses, to include offices and potentially also light industry.
- There is limited but not insignificant need for new employment land, and there are arguments for Green Belt release, although some needs might be met effectively within urban areas or in a neighbouring local authority.
- Sevenoaks can be supportive of aspirations for the Thames Estuary.

6.8.8 With regards to **significant effects**, there is no potential to draw conclusions with any certainty at this current stage in the process.

Figure 6.9: Recent strategic employment developments across the sub-region (from the ENS, 2022, which references Caxtons, 2021)



## 6.9 Historic environment

- 6.9.1 Higher density development in urban areas that is a departure from the typical approach to development can give rise to **clear tensions** with historic environment and wider historic / townscape character objectives. At this stage work is yet to be completed to examine specific issues (also feasibly opportunities) associated with the identified development site options, but there are likely to be significant tensions.
- 6.9.2 However, it is important to note that the historic environment sensitivity of settlements within the district does vary significantly, notably: **Swanley** subject to notably low constraint, at least in terms of listed buildings (there is just one) as a town that developed following the railway being built; the historic value of **Edenbridge** is strongly focused on its high street; and both **New Ash Green** and **Hartley**, in the northeast of the district, have quite low historic environment constraint, both being 20<sup>th</sup> century new settlements.
- 6.9.3 A District- Wide Character Study (DWCS) has recently been completed, which included identifying 32 character areas and undertaking a range of analysis for each, e.g. the figure below presents a snapshot of just a small proportion of the analysis presented for Sevenoaks town centre. There will be a clear need to take close account of the character study subsequent to the current consultation, alongside consultation responses received, with a view to addressing historic environment / heritage objectives alongside wider objectives relating to character, distinctiveness and sense of place.

*An example of analysis for Sevenoaks town centre from the DWCS (2022)*



- 6.9.4 Also, looking more broadly at those parts of the district that fall outside of the AONB, there are quite extensive areas subject to low or perhaps moderate historic environment constraint, including much of the southern corridor (bar the eastern extent, in proximity to Tonbridge), where the headline historic environment constraint is in the form of dispersed historic farmsteads, hamlets and small villages, each associated with just a small number of grade 2 listed buildings. Finally, in the north of the district, it is also the case that there are quite extensive areas with limited historic environment constraint, although it is important to note that Horton Kirby is quite highly constrained, as a settlement associated with the River Darent.
- 6.9.5 **Figure 6.10** shows historic environment designations within the district. One point to note is that the extent to which settlements have extended beyond their conservation areas varies significantly. For example, some of the small villages in the south of the district have extended little beyond their designated conservation area (which, on the one hand, highlights sensitivity, but, on the other hand, indicates limited growth over recent years / decades). The figure also highlights Swanley, New Ash Green and much of Edenbridge as having developed largely over the 20<sup>th</sup> century.
- 6.9.6 **Figure 6.11** shows historic environment designations across the sub-region. It can be seen, for example, that land in Kent outside of the AONB and Green Belt is historically quite densely settled. N.B. the map does not show conservation areas, but those within Kent can be seen [here](#).
- 6.9.7 In summary, at this stage the **key messages** are:
  - Higher density development in urban areas, where this is a departure from the typical built form, can give rise to clear tensions with historic environment and wider historic / townscape character objectives.
  - However, several settlements in the district are subject to relatively low historic environment constraint, and those parts of the district falling outside of the AONB are overall subject to limited or moderate constraint (with some exceptions, notably the River Darent corridor in the far north), such that historic environment objectives are not likely to be a significant barrier to setting the housing requirement at LHN.
- 6.9.8 With regards to **significant effects**, it is challenging to draw conclusions with any certainty at this current stage in the process, but it is fair to flag a slight risk in respect of supporting optimum + densities.



Figure 6.10: Key historic environment designations and a view of Chartwell

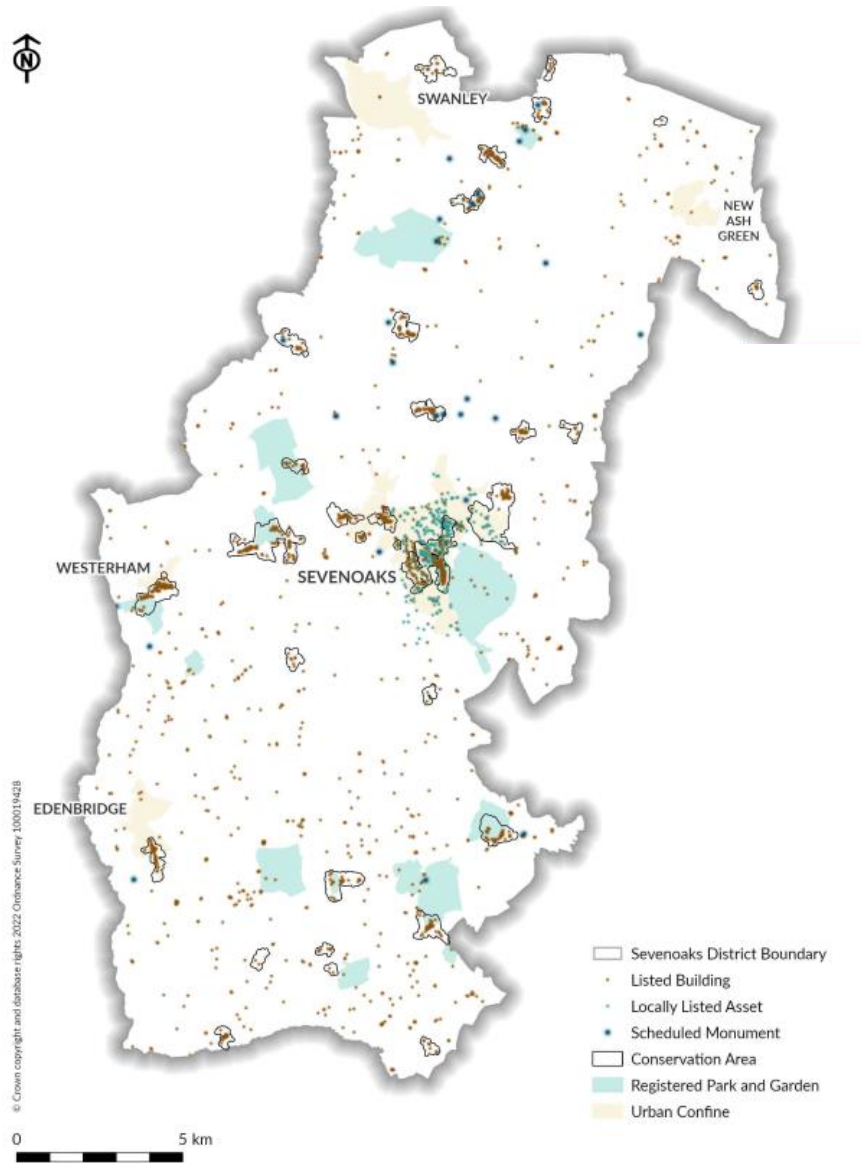
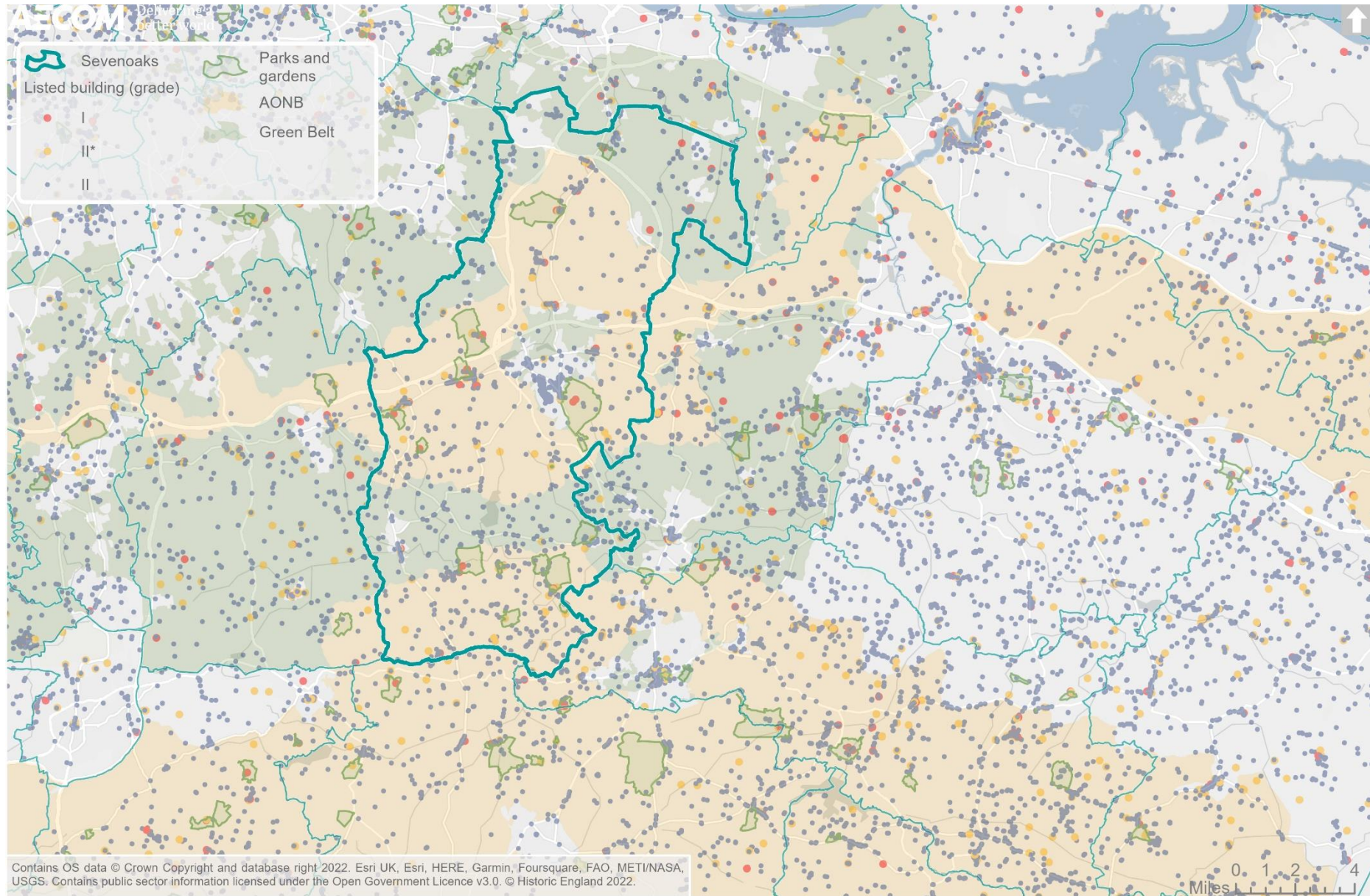


Figure 6.11: Historic environment designations across the sub-region (N.B. scheduled monuments are not shown)



## 6.10 Housing

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

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

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

6.10.3 Some specific considerations include:

- Dartford Borough – is located entirely within the Green Belt, but is not constrained by an AONB. The local plan, which is currently undergoing examination, directs growth to Ebbsfleet Garden City, which is a major strategic growth location inset from the Green Belt, hence capacity here to accommodate unmet needs from Sevenoaks is an option that could be explored. However, there is pressure to provide for unmet needs from Gravesham Borough (as discussed [here](#)), where the main urban area (Gravesend) links very closely to Ebbsfleet Garden City growth area.
- Tandridge District – is located entirely within the Green Belt, and is partially constrained by the two AONBs. The local plan, which has been undergoing examination since submission in January 2019, proposes to set the housing requirement at a figure below 'needs', and to release land from the Green Belt. In particular, the proposal is to support a new garden community; however, the inspector has raised a number of concerns, such that the examination is currently paused for further work.

- Tonbridge and Malling Borough – is at an early stage of preparing a local plan, and there is a significant area of land within the Borough that falls outside of the Green Belt and AONB. As such, there could feasibly be the potential to explore the option of providing for unmet needs from Sevenoaks. It is noted that the current [Regulation 18 consultation](#) document presents the option of setting the housing requirement at a figure above LHN, presumably with a view to providing for unmet needs from elsewhere (not necessarily just Sevenoaks, e.g. noting the proximity of the constrained Medway towns); however, the consultation document only discusses the option of 'need plus 10%'. There are a range of issues and constraints that create a challenge to providing for higher growth, e.g. around transport infrastructure, settlement gaps and flood risk.

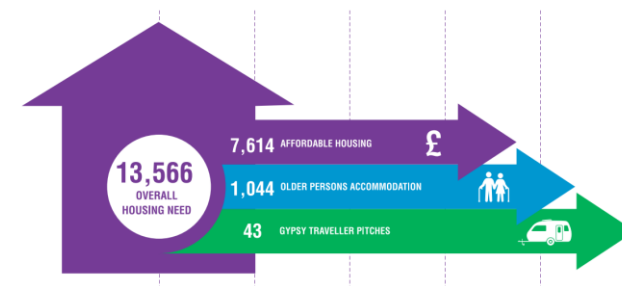
- Tunbridge Wells and Maidstone – are the other nearby local authorities with significant areas of land located outside of the Green Belt and AONB. However, in both cases the areas of land in question do not link very well to Sevenoaks District (links are reasonable to the southern part of the district) and, in both cases, there are a range of issues and constraints to consider, as discussed above. Furthermore, in both cases, the local plans are at the examination in public stage.

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

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

6.10.5 With regards to **significant effects**, the primary consideration is a risk, or even a likelihood, of significant negative effects under those scenarios that would generate high levels of unmet housing needs to be met elsewhere.

### DISTRICT-WIDE HOUSING NEEDS



## 6.11 Landscape

6.11.1 The matter of townscape character has already been discussed above, under 'historic environment'.

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

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

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

6.11.4 Sensitivity of landscape parcels around the main settlements was considered through a [Landscape Sensitivity Study](#) in 2017, serving to highlight extensive moderate and high sensitivity (notably least so around Swanley and Hextable). However, there a need to be mindful that equivalent evidence is not available for locations outside of the district. Also, there is a need to note that the study did not examine sensitivity of landscape parcels not adjacent to and existing higher order settlement.

6.11.5 A related consideration is the contribution of land parcels to the purposes of the **Green Belt**, recognising that certain of the Green Belt purposes relate closely to the question of landscape sensitivity. A [Green Belt Study](#) completed in 2017 served to highlight that the great majority of the district's land parcels contribute strongly to Green Belt purposes.

6.11.6 The Green Belt Study identifies a small number of parcels as contributing only to a 'moderate' extent; however, there is little reason to assume that these parcels would prove to be both available (also taking account of planning permissions in place) and suitable for allocation (in non-Green Belt respects), should it prove necessary to release land from the Green Belt.

6.11.7 Also, there is a need to be mindful of consistency of evidence across the sub-region. For example, the most recent review completed for [Gravesham](#) employs five categories of overall sensitivity / contribution to purposes, whilst the Sevenoaks study employs three.

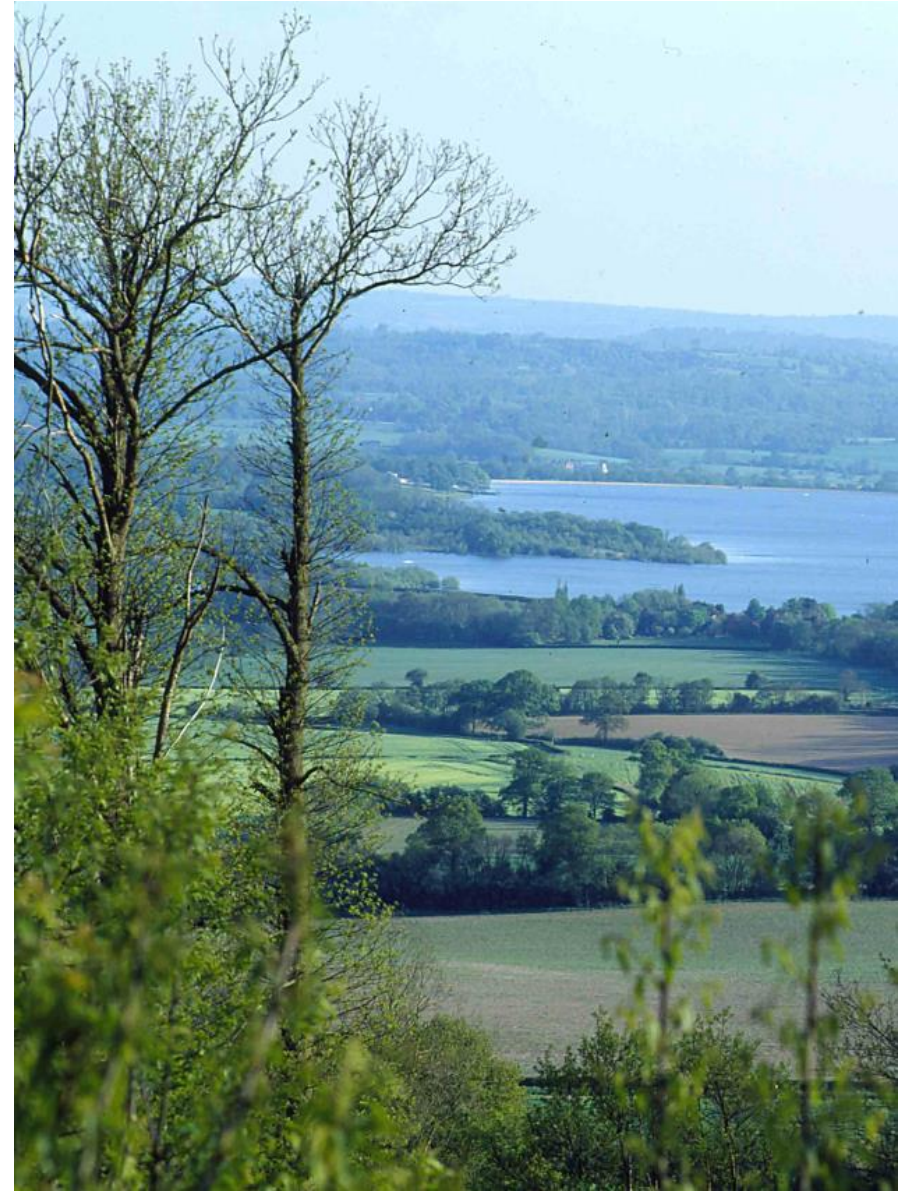
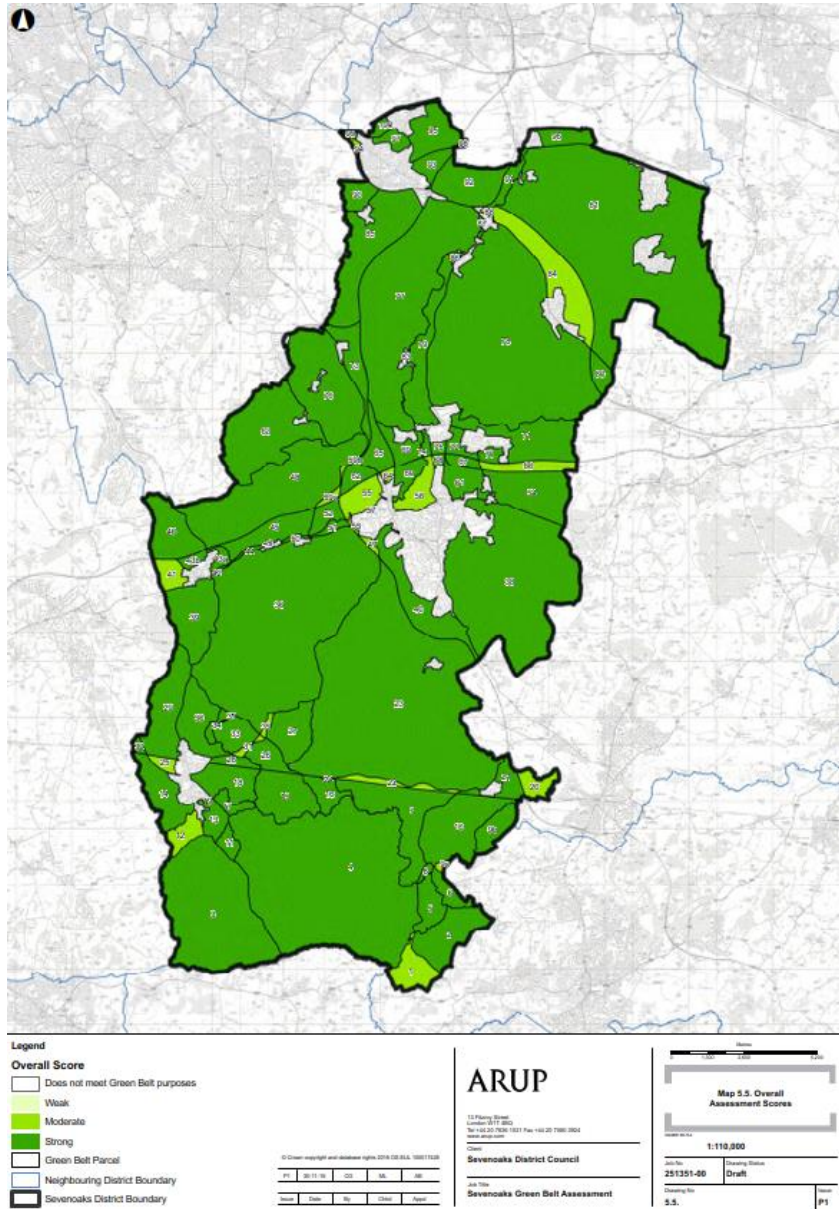
6.11.8 With regards to **surrounding areas**, the aforementioned corridor of land within central Kent that falls outside of the Green Belt and AONB is considered likely to have a degree of landscape capacity that is broadly similar to that of the southern rail corridor in Sevenoaks District. Looking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

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

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

6.11.10 With regards to **significant effects**, the primary consideration is a need to support higher densities in urban areas, as far as possible.

Figure 6.12: Contribution to GB purposes and a view of Bough Beech Reservoir



## 6.12 Land and soils

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

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

6.12.3 Elsewhere in the district, the nationally available dataset shows agricultural land to be primarily 'grade 3' quality, which may or may not be best and most versatile, according to the NPPF definition. Very little of the district has been surveyed in detail, using 'post 1988' criteria in order to differentiate between areas of grade 3a and 3b land (see Figure 6.13).

6.12.4 With regards to **neighbouring local authorities**, key points to note are:

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

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

- Focusing on avoiding the loss of best and most versatile agricultural land, there is a strong argument for maximising supply from the urban areas.
- It would likely be a challenge to evidence a conclusion that agricultural land quality serves as a reason for not setting the local plan housing requirement at LHN.

- Focusing on land outside and to the east of the district that falls outside of the AONBs and Green Belt, this area is associated with higher quality agricultural land.

6.12.6 With regards to **significant effects**, the primary consideration is a need to support higher densities in urban areas, as far as possible.

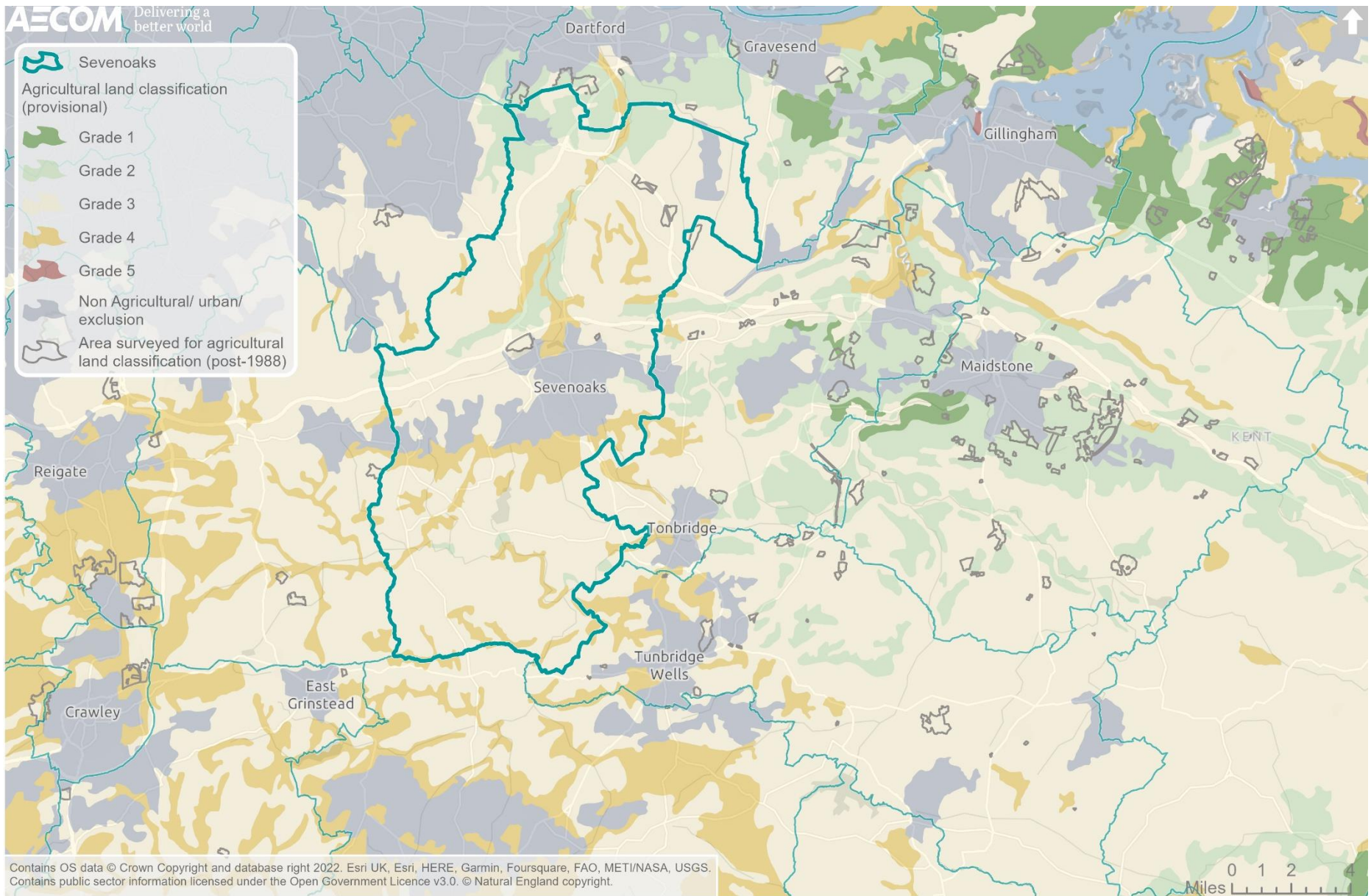
*There is a need to make best use of existing buildings and brownfield land*



*The district's rural areas are a patchwork of land uses*



Figure 6.13: Agricultural land quality across the sub-region.



## 6.13 Transport

- 6.13.1 Supporting **higher densities** at development sites that are in accessible and well-connected locations is strongly supported, as there will be the potential for modal shift away from the private car to active modes and public transport, and there will be reduced concerns regarding traffic.
- 6.13.2 It is understood that the option of higher density development at **Sevenoaks Station** is being considered, which is strongly supported. However, there is a need for further work to scrutinise the development sites that have been identified as potentially suitable for 'optimum +' densities, given that townscape character is a key factor that has influenced identification of these sites, in addition to transport connectivity.
- 6.13.3 With regards to the question of whether **residual development needs**, after having maximised supply from the urban areas, should be met within Sevenoaks District or elsewhere, high-level considerations include:
- There is a strong argument for meeting housing needs close to source.
  - Parts of the district are well-connected in transport terms, and there may be the potential to consider locations for growth in close proximity to a train station (albeit potentially with a limited service).
  - At the current time there is thought likely to be limited potential to deliver growth at scale, e.g. a new 'garden community', which can give rise to an opportunity in terms of trip internalisation and investment in transport infrastructure. In turn, this could serve as a reason for considering whether some of Sevenoaks' housing need is best met at elsewhere in the sub region. However, there is much uncertainty at this early stage.
- 6.13.4 A further consideration is distributing growth so as to support strategic transport infrastructure upgrades. Transport for the South East is currently consulting on a [Strategic Investment Plan](#) (Figure 6.13) which, for example, serves to highlight London – Burgess Hill as a strategic corridor.
- 6.13.5 In summary, at this stage the **key messages** are:
- Higher density development at Sevenoaks Station is strongly supported.
  - More generally, there is likely to be a strong argument for maximising supply from the urban areas, subject to further detailed work to consider accessibility / transport connectivity at the identified development sites.

- In the absence of a sub-regional plan identifying optimum locations for strategic growth, from a transport perspective, it would likely be a challenge to evidence a conclusion that transport factors serve as a reason for setting the housing requirement below LHN.

- 6.13.6 With regards to **significant effects**, it is fair to predict the likelihood of significant negative effects under Scenario 1, which would involve lower densities in urban areas and exporting significant unmet housing needs.

## 6.14 Water

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

- 6.14.2 With regards to the question of whether residual development needs, it is similarly unlikely that water considerations have a significant bearing:

- **Water resources** - it is likely to be the case that the entire sub-region is similarly 'water-stressed', although there will be a need for further discussions with the water companies to confirm this, as there can be significant variation between aquifers, and there is also a need to consider the water companies' long-term plans for managing water resources.
- With regards to **water quality**, the key point to note is that there appears to be no risk of growth being directed to one of the catchments that Natural England has identified as requiring 'nutrient neutrality'. The nearest such catchment is the River Stour catchment, which constrains the Canterbury area, which is some way distant from Sevenoaks.

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

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



Figure 6.14: Strategic transport links across the sub-region

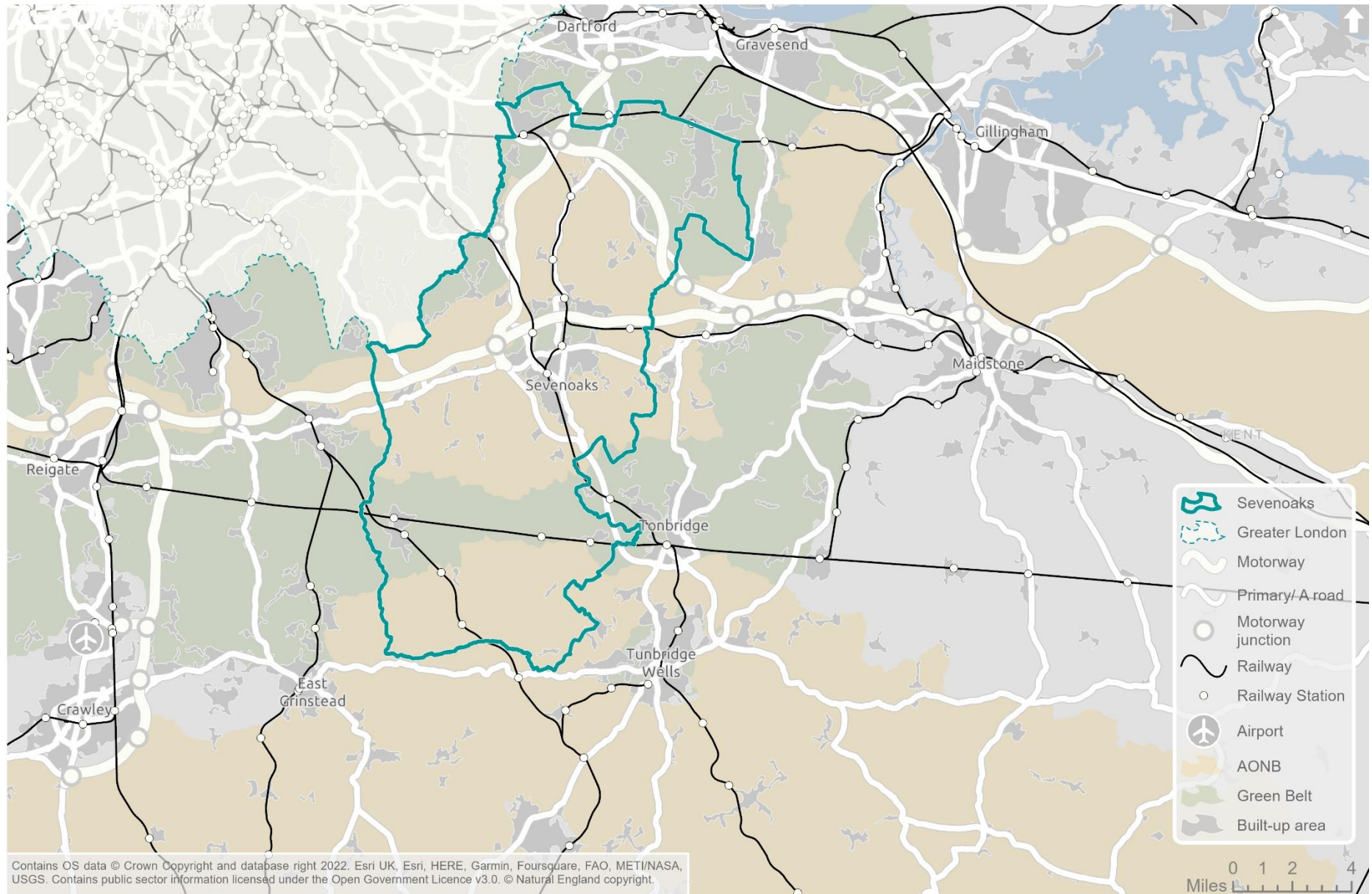


Figure 6.15: Strategic transport interventions proposed by Transport for the South East (June 2022)



## 6.15 Conclusions

6.15.1 The table below presents a summary of the conclusions on significant effects presented above, under each of the 13 topic headings that together comprise the SA framework. Under each of the topic headings, the performance of each of the scenarios is classified using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **no colour** (no significant effect, or no potential to draw a meaningful conclusion), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect). It is immediately apparent that there are three headline conclusions:

- On the basis solely of the table below, it is difficult to conclude that the option of setting the housing requirement above LHN is unreasonable. However, it is recognised that there are wide range of issues and constraints locally which could enable this conclusion to be reached ahead of the next consultation, also mindful of evidence gathered through the current consultation and subsequent detailed work to explore site and settlement / sub-area options.
- Subject to further work, setting the housing requirement below LHN, and therefore exporting unmet needs, could give rise to a range of tensions with objectives.
- There is broad support for higher density development within urban areas, although there are also certain challenges / potential tensions, e.g. historic environment.

Table 6.1: Growth scenarios appraisal summary

Topic	Housing requirement < LHN			Housing requirement = LHN			Housing requirement > LHN		
	Min uplift	Optimum	Optimum +	Min uplift	Optimum	Optimum +	Min uplift	Optimum	Optimum +
	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7	Scenario 8	Scenario 9
Accessibility	Amber	Amber	Amber						
Air and wider env quality									
Biodiversity		Light Green	Light Green		Light Green	Light Green		Light Green	Light Green
Climate change adaptation	Amber	Amber	Amber						
Climate change mitigation	Red	Red	Red						
Communities and health									
Economy and employment									
Historic environment		Amber	Amber		Amber	Amber		Amber	Amber
Housing	Red	Red	Red	Light Green	Light Green	Light Green	Dark Green	Dark Green	Dark Green
Landscape		Light Green	Light Green		Light Green	Light Green		Light Green	Light Green
Land and soils		Light Green	Light Green		Light Green	Light Green		Light Green	Light Green
Transport	Red	Amber	Amber	Amber					
Water									

## Part 3: Next steps

# 7 Preparing the draft plan

- 7.1.1 Following consultation, the Council's intention is to hold a second consultation under Regulation 18 of the Local Planning Regulations, on what will likely be a more-or-less complete draft plan. An Interim SA Report will be published alongside that presents the information required of the formal SA Report, namely: A) an appraisal of the plan and reasonable alternatives; and B) an outline of the reasons for selecting the alternatives (and reasons for selecting the preferred option, in light of the alternatives).
- 7.1.2 The centre-piece of the Interim SA Report will be an appraisal of RAs in the form (more-or-less) of alternative key diagrams (or 'growth scenarios'), with a view to ensuring that consultees are provided with a mutually exclusive choice in respect of the key matter at the heart of the plan.
- 7.1.3 Arriving at these growth scenarios will be a key task subsequent to the current consultation / ahead of the next consultation. There will be a need to go through a step-wise process, including giving consideration to: strategic issues/options ("top-down"); individual site options ("bottom-up"); and options / growth scenarios for individual sub-areas within the district.
- 7.1.4 Consideration will also be given to 'screening' DM policy reasonable alternatives, and any RAs identified will be subjected to appraisal, with the findings reported in the second Interim SA Report. See Appendix 1.

# 8 Plan finalisation

- 8.1.1 Subsequent to the second Regulation 18 consultation, the Council should be able to progress to preparing the final draft 'proposed submission' version of the local plan for publication under Regulation 19 of the Local Planning Regulations. The formal SA Report will be published alongside, again essentially presenting: A) an appraisal of (up-to-date) reasonable alternatives; and B) an outline of the reasons for selecting the alternatives.
- 8.1.2 The next step, all being well, will then be to submit the Local Plan (and the SA Report) to the Government for examination in public, alongside a summary of the issues raised at the Regulation 19 publication stage.

# Appendix 1: Development management policies

## Introduction

The aim of this appendix is to present an initial discussion of the scope of strategic choices / reasonable alternatives (RAs) in respect of development management (DM) policies. As discussed in Section 4, it is a challenge to identify DM policy RAs that are 'reasonable', in that it is possible to differentiate between them in terms of 'significant effects', however, further consideration will be given to this matter subsequent to the current consultation, taking account of consultation responses received and wider evidence.

Set out below is a discussion under select DM policy headings.

## Affordable housing

The potential to set affordable housing policy that reflects the extent of needs locally (as discussed above, e.g. page 7) will be explored in detail from a viability perspective. Setting stringent policy will have viability implications, which will mean less potential to viably require other things, including housing built to high standards in respect of space, accessibility and adaptability, and there could also potentially be implications for the potential to require family housing and/or implications for the potential to assume housing supply from challenging brownfield sites (which can be associated with challenging viability). Equally, the potential to require stringent policy in respect of affordable housing is inversely correlated with the potential to set stringent policy in respect of such matters as built environment decarbonisation / net zero, biodiversity net gain and water efficiency.

In short, the implications of setting stringent policy on affordable housing for tightened development viability are well understood, and the implications of tightened development viability for the potential to set stringent policy in respect of wider 'policy asks' is well understood. However, without further work there can be no way of knowing the implications of tightened development viability for *specific* policy asks. This is a barrier to meaningful appraisal of affordable housing alternatives. In turn, work to explore development viability, as part of the process of preparing the local plan, could potentially aim to define scenarios for appraisal, which are in the form of alternative 'packages of policy asks'.

## Gypsies and travellers

As well as setting development management policy to guide planning applications, there will be a need to take a proactive approach to meeting accommodation needs, including allocating land for pitches / plots to meet identified needs as far as possible (with a particular focus on needs over the earlier years of the plan period, as per bricks-and-mortar housing). Site selection can prove to be an involved process, and SA can assist by 'boiling down' a complicated site selection process to a mutually exclusive choice between reasonable alternative site packages (as per the 'growth scenarios' discussed above, e.g. Section 7). For example, see the reasonable alternatives recently defined and appraised as part of the process of preparing the [Surrey Heath local plan](#). As part of the process of looking at individual 'site' options there is typically a need to consider broad strategy options, for example exploring questions around such matters as: the merits of new sites versus intensification and/or expansion of existing sites; the appropriate size of sites; whether it is appropriate to deliver new sites as part of strategic housing-led developments; the extent to which needs should be met in close / very close proximity to where they arise from; and whether certain sites can be associated with delivery risk (e.g. sites within strategic development locations or employment areas). There is also inevitably a need to explore the distinction between the needs of those who meet the Planning Policy for Traveller Sites (PPTS) definition, versus those who do not, mindful of latest precedents.

## Town centres

The possibility of defining reasonable alternative approaches to town centre regeneration / change could be something to explore, including with a view to stimulating local engagement. However, the reality is that there are myriad 'moving parts', which is an inherent challenge when seeking to arrive at reasonable alternatives.

## Decarbonisation

Built environment decarbonisation, and specifically the matter of requiring individual planning applications to demonstrate emissions standards that exceed the requirements of building regulations, is something that lends itself to reasonable alternatives (both appraisal and consultation). This is due to the urgency of the issue, and because this is a fast moving policy area, with a range of different approaches being taken through local plans nationally. For example, here is an appraisal of reasonable alternatives for [Stafford](#).