

Sustainability Appraisal (SA) of the Sevenoaks Local Plan

Interim SA Report

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Quality information:

Prepared by	Checked by	Approved by
LM, Senior Planner MF, Associate Director	Ian McCluskey Associate Director	Mark Fessey Associate Director

Prepared for:

Sevenoaks District Council

Prepared by:

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

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Non-technical Summary

This report primarily aims to present an appraisal of the three options (or ‘growth scenarios’) that are a focus of the current Regulation 18 consultation. The report is structured as follows:

- Part 1 – explains how the growth scenarios were derived from a process involving A) consideration of strategic factors (including understanding of Local Housing Need, LHN); and B) consideration of site options (essentially the building blocks for growth scenarios); before C) bringing things together to consider growth scenarios for individual settlements; and then D) combining the settlement-specific growth scenarios to form growth scenarios for the District as a whole. A key aim is to demonstrate that the scenarios are ‘reasonable’ at this stage in the plan-making process (recognising that there will be further work to explore growth scenarios at the next stage).
- Part 2 – presents an appraisal of the three growth scenarios under the ‘SA framework’, which is essentially a list of sustainability topic headings and associated objectives. The appraisal is summarised in an appraisal ‘matrix’. The aim is to inform the current consultation and subsequent plan-making.

Part 2 of the report also presents commentary on the draft thematic policies that are published for consultation.

- Part 3 – briefly explains next steps. Specifically, the intention is to decide on a preferred growth scenario (essentially a preferred approach to the supply of land for development, with a view to meeting development needs and wider plan objectives), and then prepare the final draft (“proposed submission”) version of the plan for publication under Regulation 19 of the Local Planning Regulations 2012.

The growth scenarios are introduced in Table A. In addition to the three ‘reasonable’ scenarios, a ‘baseline’ scenario is also introduced but ultimately judged ‘unreasonable’ as it would involve insufficient housing growth.

Further detail on the sites behind the scenarios is available in the main report. The three reasonable scenarios can also be understood as follows: **1)** Green Belt sites plus AONB urban extensions; **2)** Green Belt sites plus a new settlement in the AONB; **3)** Green Belt sites plus AONB urban extensions plus a new settlement in the AONB.

Table A: *The reasonable alternative growth scenarios (summary)*

Scenario	Description
Baseline	Lower growth across all four variable settlements (i.e. no allocation in the AONB)
1	Higher growth at Sevenoaks, Westerham and West Kingsdown, lower at Swanley
2	Higher growth at Swanley (Pedham Place new settlement), lower elsewhere
3	Higher growth at all four variable settlements

Table B then presents the summary appraisal of the three reasonable scenarios. Within Table B the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence, and “?” used where there is fundamental uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.¹

The appraisal arguably serves to suggest that **Scenario 1** performs quite poorly overall. This is a lower growth scenario whereby the housing requirement might need to be set below Local Housing Need (LHN), hence it is unsurprising that this scenario is judged to perform relatively poorly in terms of socio-economic objectives. However, the appraisal also flags some concerns under environmental topic headings. This reflects an assumption that any unmet housing need that would have to be provided for elsewhere within a constrained sub-region.

Also, it is important to be clear that Scenario 1 is judged to perform well under the transport (in particular) and landscape topic headings, and it may be the case that the Council (as decision-makers) chooses to assign particular importance (or ‘weight’) to one or both of these topics, when reaching a decision on which of the scenarios best represents sustainable development *on balance*.

With regards to **Scenarios 2 and 3**, overall merits are finely balanced. Scenario 2 is preferable under five topics, and Scenario 3 under three, but this does not necessarily indicate an overall preference because the appraisal is undertaken without any assumptions regarding the weight that should be assigned to each topic.

¹ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Table A: The reasonable growth scenarios – summary appraisal findings

The SA framework	Scenario 1 Green Belt AONB	Scenario 2 Green Belt Pedham Place	Scenario 3 Green Belt AONB Pedham Place
Air quality	2	1★	2
Biodiversity	2	1★	2
Climate change adaptation	=	=	=
Climate change mitigation	2	1★	1★
Communities	2	1★	2
Economy & employment	3	2	1★
Historic environment	2	1★	2
Homes	3	2	1★
Landscape	1★	1★	2
Land, soils and resources	3	2	1★
Transport	1★	2	3
Water	?	?	?

The following bullet points aim to briefly explain the appraisal findings under each of the topic headings:

- Air quality – this is quite a widespread issue across the District, but there is support for Scenario 2 on balance, on the assumption that further work serves to identify the potential to address issues at Pedham Place.
- Biodiversity – there is clear support for not generating unmet need and Pedham Place gives rise to limited concerns, albeit there is a need for much further work to understand biodiversity issues and opportunities here. The other scenarios perform significantly worse, noting biodiversity constraints affecting certain of the AONB urban extension options. Biodiversity is also a constraint at certain of the constant non-AONB Green Belt sites.
- Climate change adaptation – flood risk is often a key adaptation / resilience consideration for local plans. Within Sevenoaks this is primarily an issue at Edenbridge. The Environment Agency will wish to comment further.
- Climate change mitigation – there is clear support for not generating unmet need (including because strong development viability in the District may be conducive to delivering net zero development) and Pedham Place may represent a significant built environment decarbonisation opportunity. There is a need for further work to ensure that built environment decarbonisation opportunities are realised via spatial strategy / site selection.
- Communities – Pedham Place can deliver a secondary school that would address an existing need. Higher growth at certain settlements does give rise to some tensions with communities objectives.
- Economy and employment – there is support for the additional employment land that would be delivered at Pedham Place, and there is also a need to deliver housing in support of the local / sub-regional economy.

- Historic environment – there is tentative support for Pedham Place at this stage, but this is pending comments from Historic England. There is also tentative support for setting the housing requirement at LHN, rather than exporting unmet need to a constrained sub-region.

With regards to significant effects, broadly neutral effects are predicted on balance, recalling that the baseline situation is one whereby growth comes forward in a less well-planned way, and given that a good proportion of growth is set to be directed to settlements with limited historic environment constraint, namely Swanley, West Kingsdown and Edenbridge (where constraint is focused on a small historic core).

- Homes – there is a clear need to rank the scenarios in order of total growth quantum. There is support for Scenario 3 as the housing requirement could comfortably be set at LHN with a healthy ‘supply buffer’, such that there would be confidence in the ability to provide for LHN in practice over the course of the plan period (noting recent rates of delivery, and also given inevitable challenges involved with bringing forward a new settlement). Furthermore, there would be a good mix of sites / balanced supply. However, even under Scenario 3 there remain uncertainties, including around providing for Gypsy and Traveller accommodations needs.
- Landscape – there are concerns across the board, and a need for further work in respect of measures to avoid and mitigate landscape sensitivities (design briefs for Green Belt allocations will be prepared at the next stage). There is tentative support for Pedham Place at this stage - despite being located in the Kent Downs AONB - but it is judged appropriate to flag a concern with Scenario 3 as the highest growth scenario.
- Land and soils – there is a clear concern with a housing requirement set below LHN, on the assumption that the resulting unmet need would have to be provided for elsewhere in a constrained subregion. Neighbouring local authorities to the east are associated with higher quality agricultural land than is the case for Sevenoaks.
- Transport – there is a need for further work to consider transport issues and options at Pedham Place, and there is a concern with growth here in combination with higher growth at West Kingsdown. However, there is otherwise a clear need to adopt a Local Plan with a view to effective strategic transport planning.
- Water – there is a need for further work, perhaps most notably to confirm any growth-related issues (also feasibly opportunities) in respect of wastewater treatment, including relating to Pedham Place.

Consultees are encouraged to comment on the merits of the growth scenarios. However, it is recognised that some will also wish to suggest scenarios other than those presented above. Equally, some consultees will wish to comment on specific sites. Such suggestions / comments should be informed by the discussion in Section 5 of the main report, which goes through a process to define the three growth scenarios that are a focus of appraisal above.

A final consideration is ‘cumulative effects’, that is the effect of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and larger-than-local effects. The following bullet points cover some key considerations:

- Housing needs – this is a key larger-than-local issue, as there is currently little certainty regarding where, when or even if any unmet need generated would be provided for elsewhere within a constrained sub-region, such that there is a risk that it might ultimately stay unmet. Unmet need is already a concern within the sub-region.
- Kent Downs AONB – there is a need to plan in collaboration with other authorities intersecting the AONB (one of two intersecting the District), including Tandridge District, where the Local Plan is set to be found unsound.
- The economy – the north of the District is clearly well-connected to sub-regionally and regionally important economic hubs and corridors, including London, the Thames Gateway and Maidstone.
- Transport corridors – this is a key ‘larger than local’ issue for the Local Plan. There is a need to work with neighbours to avoid/minimise traffic congestion and support delivery of strategic upgrades.
- Pedham Place – there will be a need to engage with neighbouring authorities, and there is also a need to consider the larger-than-local importance of the potential new sporting facility under consideration.
- Landscape scale nature recovery – a Kent Local Nature Recovery Strategy (LNRS) may provide important evidence to inform the next stage of plan-making. In the meantime, there is a need to ensure a focus on cross-border woodland networks and river corridors, including the defined Biodiversity Opportunity Areas (BOAs).
- Water – Strategic planning for water infrastructure / resources serves as a reason in support of defining the preferred broad growth strategy at the earliest opportunity. The Long Cross Sewage Treatment Works, located on the River Thames in Dartford Borough, serves a very extensive catchment within which there are numerous strategic growth / potential growth locations, hence there is a need for collaboration between authorities.

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Sevenoaks Local Plan (“the Plan”), which is being prepared by Sevenoaks District Council.
- 1.1.2 Once adopted, the Plan will set the strategy for growth and change for the District up to 2040, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 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.²

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 presents an appraisal of “the plan and reasonable alternatives”. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:³
- What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report

- 1.3.1 The Council is not currently consulting on a draft plan. As such, this report aims to present specific targeted information, rather than all of the information required of the SA Report. Specifically, the aim is to present an appraisal of the **alternative growth scenarios** that are a focus of the current consultation.
- 1.3.2 The aim of this Interim SA Report is to inform the current consultation and subsequent preparation of the Draft Plan. See further discussion of ‘next steps’ below.

Structure of this report

- 1.3.3 Despite not aiming to present all of the information required of the SA Report, this report is nonetheless structured so as to answer each of the **three questions** introduced above in turn.
- 1.3.4 Before answering the first question there is a need to further set the scene by setting out the scope of the plan (Section 2) and the scope of the SA (Section 3).

Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the revised strategy and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under ‘next steps’.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

³ See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2 The plan scope

2.1 Introduction

- 2.1.1 The aim here is to briefly introduce the: context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

2.2 Context to plan preparation

- 2.2.1 Plan-making began shortly after adopting the Allocations and Development Management Plan in 2015, which built upon the Core Strategy adopted in 2011. A Local Plan was submitted to the Government for examination in public in 2019 but withdrawn in 2022 after the appointed Planning Inspector found that the plan had not been prepared in accordance with the Duty to Cooperate. The Council then restarted the plan-making process and held an early consultation on issues and high-level options in 2022/2023.
- 2.2.2 Central to any local plan is identifying a ‘supply’ of land to meet development needs over the course of the plan period. Paragraph 11 of the National Planning Policy Framework (**NPPF**) is clear that local authorities should maintain an up-to-date local plan that provides for development needs, as far as is consistent with sustainable development. There is a requirement to review local plans every five years, and a local plan can also be deemed out-of-date where the rate of housing supply in practice falls significantly below that which the local authority has committed to deliver within the adopted plan (‘the housing requirement’).
- 2.2.3 The Sevenoaks **Core Strategy** dates from 2011 and so is out-of-date. That being the case, the need for housing locally is taken to be 712 dwellings per annum (dpa) when judging planning applications, in line with the Government’s objective ‘standard method’ for calculating housing need. The 712 dpa figure (referred to as Local Housing Need, LHN) contrasts to a figure of 165 dpa in the Core Strategy.
- 2.2.4 As measured against the 712 homes figure, the District has an existing supply of ‘deliverable’ housing sites sufficient to meet needs for 2.89 years, according to a statement published in September 2021 (an update is forthcoming). The NPPF requires a ‘five year housing land supply’ (5YHLS) of deliverable sites, with the presumption in favour of sustainable development (or the ‘**tilted balance**’) applying where there is not a 5YHLS.⁴ Where this applies there is reduced potential to defend against planning applications. Specifically, the Council may reject an application only for it to then be allowed at appeal, because the appointed Inspector has applied the tilted balance (known as ‘planning by appeal’, which can also be costly and time-consuming for councils). Any Inspector at appeal would give considerable weight to the Green Belt and AONB designations; however, after having applied the tilted balance, an Inspector might nonetheless allow development on balance. Also, the tilted balance can lead to planning by appeal in urban areas, potentially leading to schemes gaining permission at densities that conflict with local policy.
- 2.2.5 The above discussion introduces the ‘**stick**’ that is in place to encourage the speedy adoption of a new Local Plan. However, it is also important to state that there are many ‘**carrots**’. Focusing on housing, meeting needs is clearly of great importance in-and-of itself, but also gives rise to wide-ranging secondary benefits, for example in terms of health / well-being and supporting the local economy (and, in turn, the national economy). Also, and importantly, plan-led housing growth creates an opportunity to strategically target investment in regeneration and infrastructure. This can serve to maximise the benefits of growth, potentially delivering a ‘planning gain’ to the existing community. Growth related opportunities can and do go missed when new homes come forward in the absence of an up-to-date local plan.
- 2.2.6 Finally, by way of context, it is important to acknowledge that Sevenoaks District is not an island, but rather functions as part of a wider sub-region. Sevenoaks functions particularly strongly within a West Kent sub-region, but there are also other geographies to consider. Sharing housing needs across a sub-region is often a key issue necessitating cooperation between neighbouring authorities, but there are also wide-ranging other issues, for example around transport infrastructure. As discussed, a previous version of the Local Plan was deemed to fail the **Duty to Cooperate**, and so it will be important to ensure that account is taken of cross-boundary / larger-than-local issues, issues arising elsewhere (e.g. unmet housing needs) and issues arising locally that might have implications for elsewhere (e.g. any unmet housing need).

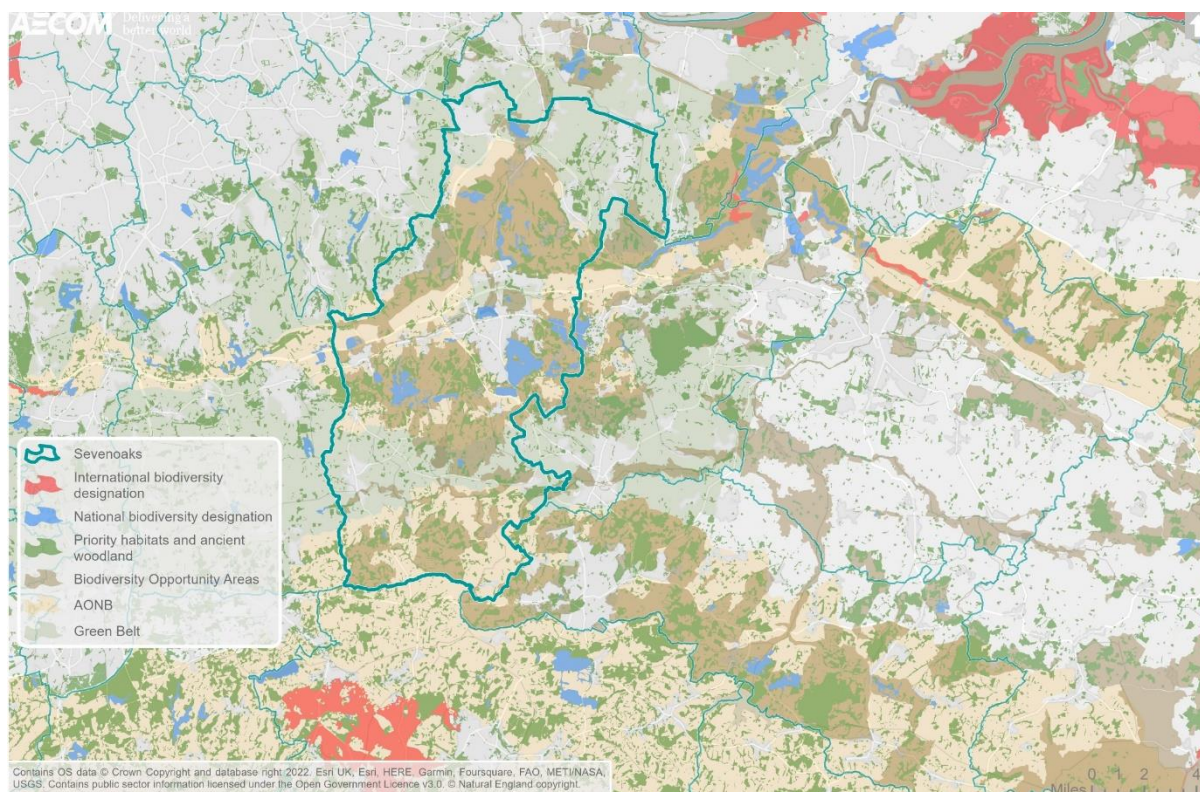
⁴ As well needing to maintain a 5YHLS, housing supply performance is also evaluated using the Housing Delivery Test (HDT).

2.3 The plan area

- 2.3.1 Sevenoaks District is located in West Kent, bordering four other Kent authorities (Dartford, Gravesham, Tonbridge & Malling and Tunbridge Wells), one Surrey authority (Tandridge), two London boroughs (Bexley and Bromley) and also an East Sussex authority (Wealden).
- 2.3.2 There are a total of 56 settlements in Sevenoaks District, as set out in the District's Settlement Hierarchy (July 2022). This includes the Principal Town of Sevenoaks, the towns of Swanley, Edenbridge and Westerham and many smaller settlements, the largest of which are designated as Local Service Centres in the settlement hierarchy, namely New Ash Green and Otford.
- 2.3.3 The population is 120,500 (2021 Census Data). 22% of residents are currently aged 65 or over, and this figure is expected to grow to 25.8% by 2043. There are areas of affluence as well as pockets of deprivation. According to the Index of Multiple Deprivation (IMD) Sevenoaks is the second least deprived local authority in Kent, behind Tunbridge Wells Borough, although there are areas that are within the 30% most deprived in the country, namely Swanley St Mary's and Swanley White Oak.
- 2.3.4 Sevenoaks District has the highest house prices in Kent, with the [ratio](#) of house prices to workplace based earnings currently at 15.39 (2022) – around 50% higher than ten years ago (10.7 in 2013). This makes the District the fourth least affordable in the South East (although it should be noted that the ratio of house prices to residence based earnings is lower (13.6) reflecting out-commuting to well paid jobs). Poor affordability makes it very difficult for first time buyers and young families to live locally. In this light there is a need to deliver market and affordable homes, and there is also a need for specialist accommodation.
- 2.3.5 The District has the lowest level of unemployment in Kent. The residents of the District are generally well qualified with only 8% of the population having no academic qualifications. There are a number of strategic employment areas, including at the Vestry Estate (Sevenoaks) and at Swanley. The majority of residents work in the West Kent area, but more than 40% work in Greater London.
- 2.3.6 The District is highly constrained in the terms set out in paragraph 11 of the NPPF, which discusses the possibility of setting a local plan housing requirement at a figure below LHN. The District is located entirely within the London Metropolitan Green Belt, 60% of the District intersects either the Kent Downs Area Outstanding Natural Beauty (AONB) or the High Weald AONB, and areas of countryside outside of the AONBs are constrained in biodiversity terms; for example, there is a high density of ancient woodland (an "irreplaceable habitat" in NPPF paragraph 11 terms) in the north east of the District. It is also important to note extensive flood risk zones associated with the River Eden constraining land in the south of the District.
- 2.3.7 There are many historic settlements in the District, as is reflected in the high number of Conservation Areas and listed buildings (and it is noted that NPPF paragraph 11 recognises heritage assets as another key constraint to growth). The District is also home to a number of nationally designated historic country estates, including the following that are categorised as Grade I on the national register (all located in an AONB): Knole, Chartwell, Hever Castle, Penshurst Place and Lullingstone Castle. Other key places of interest (again, all within the AONB) include the National Trust village at Chiddingstone, Eynsford Castle ruin, Lullingstone Roman Villa, Otford Palace and Toys Hill (the birthplace of the National Trust).
- 2.3.8 Sevenoaks District is a popular place to live, due a very high quality environment but also because of proximity to London and good transport links. There are 14 train stations, as well as others located just beyond the District border, many of which provide services into Central London in under an hour. The District is also well located to both Gatwick and Heathrow airports, as well as to the Channel Ports and both Ashford and Ebbsfleet International stations. The M25 / M26 junction is in the centre of the District.
- 2.3.9 There are two minor injury units and 21 GP surgeries within the District, but the nearest hospitals are at Tunbridge Wells, Orpington, Sidcup, Dartford and Maidstone. There are 42 primary schools, but only five state secondary schools, with a clear aspiration to boost state secondary capacity, to reduce pressure for private education and pupils having to travel outside of the District. Kent has a grammar school system.
- 2.3.10 The District has vibrant town centres with many independent shops and a good retail offering. There is, however, some strong competition from nearby areas including Tunbridge Wells, Bromley and Bluewater. Some areas are in need of regeneration, including Swanley Town Centre and New Ash Green Village Centre. Areas outside of the towns are served by local services and facilities within villages. These services are of great value to local communities and contribute to the District's rural economy.

2.3.11 In light of these points, it is clear that Sevenoaks is arguably subject to constraint that “provides a strong reason for restricting the overall scale, type or distribution of development” in line with NPPF paragraph 11 (and associated footnote 7). However, on the other hand, there is acute housing need (market and affordable) and there are clear arguments in support of growth in Sevenoaks, plus it must be recognised that other local authorities in the sub-region are struggling to progress local plans that provide for housing need (and, in turn, risk generating unmet need). Matters are explored further below, in light of A) a more in-depth consideration of high-level factors; and then B) consideration of detailed supply options.

Figure 2.1: Key biodiversity and landscape (also Green Belt) constraints to growth affecting Sevenoaks District



2.4 The plan period

2.4.1 The duration of the Local Plan is for 15 years from 2025 (the date when the plan is expected to be adopted) to 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)...”

2.4.2 There are two further points to note:

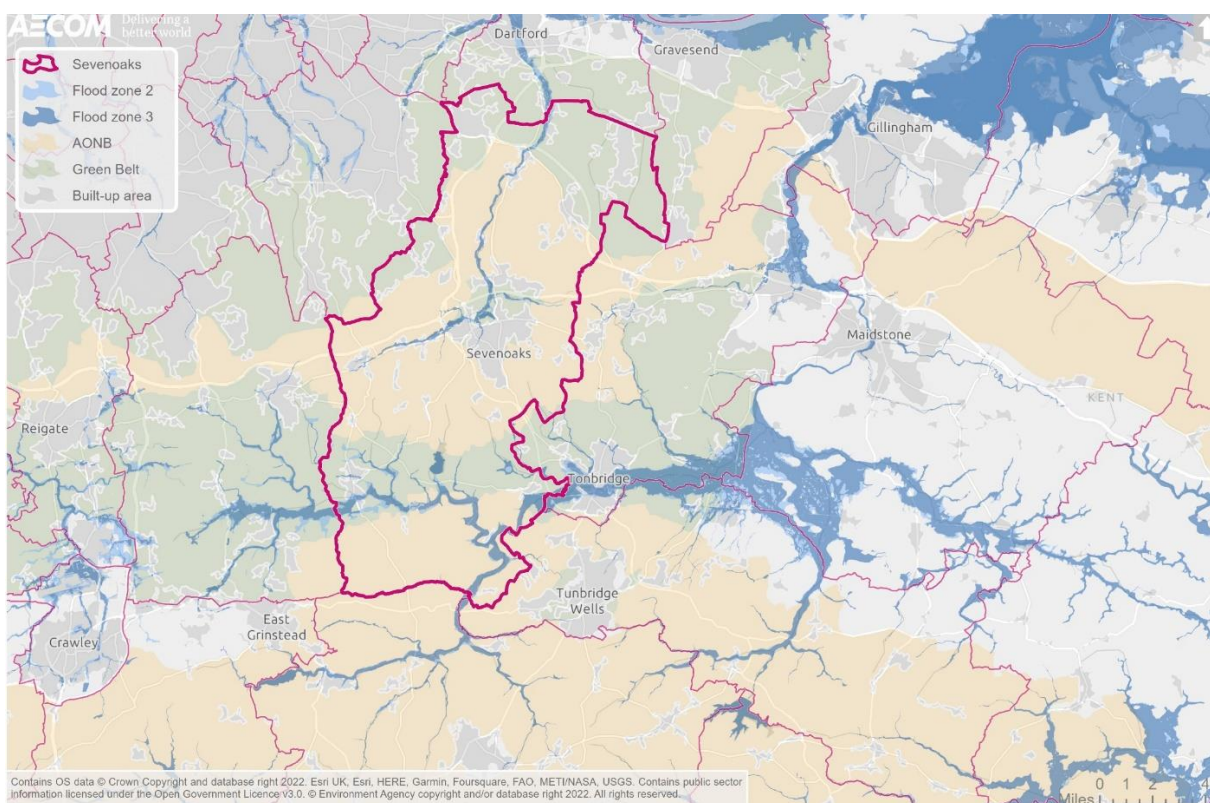
- At the start of the plan period (1 April 2025) there will be existing sites with planning permission, plus potentially other sites that are ‘committed’ in that they have an existing allocation or a resolution to grant planning permission (subject to S106). It is not possible to know for certain how many commitments there will be, but as of 1st April 2023 commitments totalled 2,970 homes, and it is fair to assume that the figure as of 1st April 2025 will be similar. The aim of the local plan is to provide for housing supply over-and-above commitments, primarily via site allocations (see NPPF paragraph 68).
- Whilst it is good practice to allocate sites to provide for the identified housing requirement (whatever that might be, as discussed below) for the entire plan period, and with a good degree of delivery certainty, there is a degree of flexibility. Paragraph 68 of the NPPF requires identification of: specific “deliverable sites” for years one to five of the plan period; specific “developable sites or broad locations for growth” for years 6-10; and, “where possible”, developable sites or broad locations for years 11-15 of the plan.

2.5 Plan objectives

2.5.1 The 2022 consultation document presented a series of vision statements and objectives to guide the plan-making process and to provide a starting point for defining reasonable alternatives through the SA process (see Section 4). Modest adjustments have been made, and the plan objectives are now as follows:

- **Healthy places and spaces, promotion of mental and physical health:**
Incorporating green space and healthy design principles, to encourage good physical and mental health. Recognition of health as a principle that cuts across all policies in the plan.
- **Achievement of Council’s climate change aspirations:**
Significantly reducing carbon emissions and adapting to a changing climate.
- **Design excellence that responds to distinctive local character and creates heritage of the future:**
Demanding well-designed spaces that deliver exceptional places to live, work and relax, provide innovative ways to support mental and physical well-being.
- **Homes to meet identified needs:**
Boosting the supply of homes including much needed affordable homes across the District.
- **Greater economic competitiveness:**
Through vital and viable, unique and flexible town centres, capitalising on the strategic location of the District and its functional economic links. Ensuring the delivery of the right type of employment space and supporting the rural economy are equally important in encouraging economic competitiveness.
- **Continued protection of natural resources:**
The District’s valuable natural and historic built environment makes an important contribution to the quality of life of residents and all who visit.
- **Delivery of sustainable, high quality and resilient infrastructure:**
To meet the needs of all: deliver a sustainable movement network, provide high quality open spaces that offer health, wellbeing and social benefits, deliver excellent education, health and sports facilities close to where people live, and ensure appropriate investment in robust utilities and digital infrastructure.

Figure 2.2: The River Darent and Eden / Medway corridors are further key considerations locally



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 (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. The aim is not to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence.

3.2 Consultation on the scope

- 3.2.1 The Regulations 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 Report], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were formally consulted on the SA scope in 2022.
- 3.2.2 The Scoping Report was updated subsequent to consultation, and is now available on the Local Plan [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.

3.3 The SA framework

- 3.3.1 The primary outcome of scoping is a list of topics/objectives that can then be utilised as a ‘framework’ under which to structure appraisal work (i.e. appraisal of “the plan and reasonable alternatives”). The aim is to ensure that appraisal is well-targeted, concise and engaging. Table 3.1 presents the SA framework.

Table 3.1: The SA framework

Topic	Objective
Air quality	Ensure that improvements to air quality are sought and delivered.
Biodiversity	Support, protect, and enhance biodiversity within and surrounding the District.
Climate change adaptation	Support resilience to the effects of climate change, including flooding.
Climate change mitigation	Reduce contribution to climate change.
Communities and health	Ensure growth in the district is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, reducing deprivation, and supporting cohesive and inclusive communities.
Economy and employment	Support sustainable economic development in Sevenoaks.
Historic environment	Protect, conserve, and enhance the historic environment at all scales.
Housing	Provide all with the opportunity to live in good quality, affordable housing.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and townscape.
Land and soils	Ensure efficient use of land; protect and enhance soil and mineral resources.
Transport	Promote sustainable transport use and active travel opportunities and reduce the need to travel.
Water	Ensure the efficient and effective use of water in addition to protecting and enhancing water quality.

⁵ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

4.1.1 The aim here is to explain work that led to the **reasonable alternatives** appraised in Part 2.

Reasonable alternatives in relation to what?

4.1.2 The legal requirement is to examine reasonable alternatives taking account of “*the objectives and geographical scope of the plan*” (see Section 2). In light of a review of the plan objectives, it was determined reasonable to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF paragraph 68), to meet objectively assessed needs and wider plan objectives.

4.1.3 In short, establishing a spatial strategy is clearly a key objective of the Local Plan,⁶ such that it is reasonable to focus efforts to explore alternatives on this policy issue (see Sections 5 and 6) in order to inform a final decision on the preferred approach (see Section 7) and to inform the current consultation.

4.1.4 The decision was made to refer to the spatial strategy alternatives as “**growth scenarios**”.

What about site options?

4.1.5 Whilst individual site options generate a high degree of interest, they are not reasonable alternatives (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 rarely the case, and is not the case for the Sevenoaks Local Plan.

4.1.6 Rather, the objective is to allocate a *package* of sites to meet needs and wider objectives, hence RAs should be in the form of alternative *packages* of sites, as far as possible.

4.1.7 Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.



In addition to Green Belt there are wide ranging significant constraints to growth that must factor-in

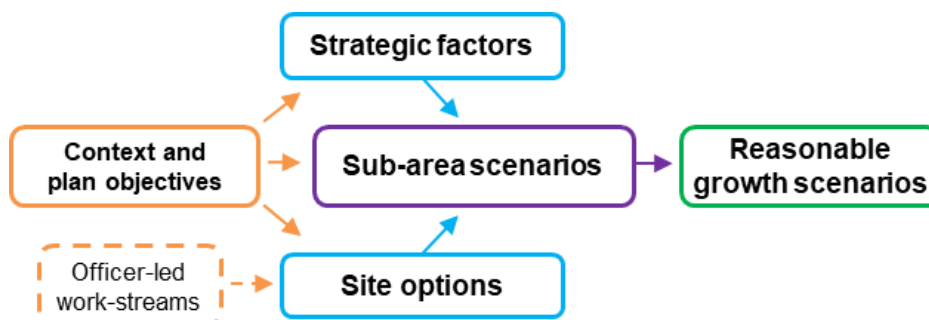
⁶ It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’. The Government’s Planning Practice Guidance (PPG) is clear that SA “*should only focus on what is needed to assess the likely significant effects of the plan*”.

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios - see Figure 5.1 for an overview. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: A process to define reasonable growth scenarios



Structure of this section

5.1.2 This section explains a process to define reasonable growth scenarios as follows:

- **Section 5.2** – explores **strategic factors** (issues / opportunities / options) that are a ‘top down’ input.
- **Section 5.3** – considers individual **site options** that are ‘bottom up’ input (or ‘building blocks’).
- **Section 5.4** – explores growth options and scenarios for **sub-areas**.
- **Section 5.5** – combines sub-area scenarios to form district-wide **reasonable growth scenarios**.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence-gathering and analysis that is proportionate, also recalling the legal requirement, which is to present an “**outline of the reasons for selecting alternatives...**” [emphasis added].

5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is to explore strategic issues, opportunities and options with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – *how many* new homes are needed (regardless of capacity to provide them)?
- Distribution – broadly *where* is more / less suited to growth and what *types* of growth are supported?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the District, before exploring *high-level* arguments for the Local Plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of the plan-making process is the need to **A)** establish housing needs; and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains: “*Assessing housing need is the first step in the process of deciding how many homes need to be planned for...*”

- 5.2.4 With regards to (A), the NPPF (2021)⁷ is clear that establishment of **LHN** should be informed by an “assessment conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals”.
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** at LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.
- 5.2.6 Box 5.1 discusses the latest national context, in light of the Draft NPPF (2022).

Box 5.1: A note on the national context in respect of LHN and setting the housing requirement

As discussed, a central tenet of plan-making involves: A) establishing LHN; and then B) developing a policy response. This is explained particularly clearly within the PPG, but the NPPF (2021) also discusses the potential to set the housing requirement at a figure below LHN at paragraph 11, whilst paragraph 35 discusses the possibility of setting the housing requirement at a figure above LHN to reflect unmet need from elsewhere.

The Government consulted on proposed changes to the Draft NPPF between December 2022 and March 2023, but it is unclear when the NPPF will be fully updated (a partial update was made in [September 2023](#)). With regards to the matter of establishing LHN and setting a housing requirement, there are several points to note:

- Firstly, an addition to paragraph 61 states that understanding of LHN is an “*advisory starting-point for establishing a housing requirement for the area.*” This is considered to be simply a clarification.
- Secondly, an addition to paragraph 66 states that: “*The ‘housing’ requirement may be higher than [LHN] if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment.*” Again, this is considered to be simply a clarification of the existing situation.
- Thirdly, several proposed changes are potentially supportive of a ‘below LHN’ housing requirement:
 - Paragraph 11 – new additional text serves to suggest that avoiding adverse effects to urban character is a factor that might influence a decision to set the housing requirement below LHN.
 - Paragraph 140 – new statement: “*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting [LHN]*”. This arguably adds weight to Green Belt as a constraint. This was preceded by the following [statement](#) made by the Secretary of State for Levelling Up Homes and Communities on 5th December: “*Green Belt protections will be strengthened, with new guidance setting out that local authorities are not required to review Green Belt to deliver homes.*”
 - Paragraph 35 – amended to say local plans should “*meet the area’s [LHN] so far as possible, taking into account the policies in this Framework*”. Additionally, reference to providing for unmet needs is deleted. This is arguably supportive of a ‘below LHN’ housing requirement and/or not providing for unmet needs.

In **summary**, the Draft NPPF (2022) does appear to increase the potential to argue for lower growth, whether in the form of a housing requirement below LHN or that does not provide for unmet needs from elsewhere.

However, the significance of the proposed changes is not entirely clear and should not be overstated. Also, and in any case, the proposed changes in the Draft NPPF may not be taken forward in full or at all.

It should be noted that a House of Commons Committee recently published a report on “Reforms to national planning policy”, for example stating: “*The Government has not provided sufficient evidence to demonstrate how the policy of removing mandatory local housing targets will directly lead to more housebuilding.*”

Sevenoaks District’s Local Housing Need (LHN)

- 5.2.7 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (the ‘cities uplift’, which does not apply to Sevenoaks).
- 5.2.8 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input must be the 2014-based projections, rather than more recent projections (with reasons set out clearly at [paragraph 5](#) of the PPG on housing needs assessment). This approach was most recently [reconfirmed](#) in December 2022.

⁷ The NPPF was updated in September 2023, but only in respect of onshore wind power.

- 5.2.9 The standard method derived LHN for the District is currently **712 dwellings per annum** (dpa), or 10,680 homes in total over the plan period. This is a ‘capped’ figure, meaning that Step 3 of the standard method (“Capping the level of any increase”) does apply. The uncapped figure is ~ 840 dpa, and it should be noted that the PPG states: “*Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered.*”
- 5.2.10 With regard to Step 2 (“An adjustment to take account of affordability”), housing affordability has worsened locally over recent years. The latest [ratio](#) of house prices to local wages is 15.4%, which is a notable increase from 2021 (14.7) and 2020 (12.43). The ratio was at 9 as recently as 2009.

Is it reasonable to explore setting the housing requirement at a figure [below](#) LHN?

- 5.2.11 In short, the answer is ‘yes’, for the reasons already set out in Section 2. More specifically, there is a case for exploring the possibility of setting the housing requirement at a figure below LHN in line with NPPF paragraph 11, which currently states (not accounting for the Draft NPPF of December 2022):

*“... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits...”* [emphasis added]

- 5.2.12 The District is heavily constrained by NPPF “*policies... that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area*”. In particular, the London Metropolitan Green Belt constrains all settlements; and the Kent Downs AONB constrains Sevenoaks and one of the three second tier settlements (Westerham), with the two other second tier settlements – Swanley and Edenbridge – located mostly outside of an AONB. However, as discussed, there are also wider key constraints relating to biodiversity, heritage and flood risk.
- 5.2.13 Also, at this point, it is important to recall proposed additions to the NPPF (December 2022) - see Box 5.1.
- 5.2.14 On the basis of the points discussed above, there is a clear strategic argument for exploring growth scenarios that would involve setting the housing requirement at a figure below LHN and, in turn, generating unmet housing needs that could then pass to one or more neighbouring or nearby local authorities.
- 5.2.15 However, on the other hand, there is a strong argument for ruling out “very low growth”. This reflects:
- The extent of housing need(s) locally, including affordable housing needs.
 - Understanding that meeting housing need is important not only in and of itself, but also due to highly significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.⁸
 - The fact that Sevenoaks sits within a constrained sub-region where unmet housing need is already an issue (discussed below), with the reality being that there is little or no confidence regarding where, when or even if any unmet need generated would be provided for. There are clear sustainability arguments for providing for unmet need close to the source of need, but this could prove very challenging in the Sevenoaks context, at least in the absence of a sub-regional or regional plan.
- 5.2.16 Finally, it should be noted that the option of setting the housing requirement below LHN was explored at a high level within the previous Interim SA Report (2022). The appraisal highlighted pros and cons to this approach (see Section 6.15), which included significant concerns under two sustainability headings: 1) housing (there are wide-ranging arguments in support of providing for housing needs, including because market housing is the primary means of delivering affordable housing via S106); and 2) climate change mitigation (providing for housing needs distant from source can lead to ‘unsustainable’ transport patterns; also, Sevenoaks is well-placed to secure built environment decarbonisation, including due to strong development viability). Less significant concerns were also flagged in terms of ‘accessibility to community infrastructure’ (there are growth-related opportunities locally that are not necessarily to be found elsewhere); and flood risk (neighbouring authorities to the east are more constrained than Sevenoaks).

⁸ This is an important consideration including in light of the following proposed addition to paragraph 140 of the NPPF (December 2022): “*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.*” This could be read as suggesting that, in order to build a case for reviewing Green Belt boundaries through a local plan, there is a need to take into account factors other than housing need.

Is it reasonable to explore setting the housing requirement at a figure above LHN?

- 5.2.17 There are number of high-level arguments potentially in support of exploring growth scenarios that would involve setting the housing requirement at a figure above LHN.
- 5.2.18 Firstly, as discussed above, the **'uncapped' LHN** figure for the District is significantly higher than the figure derived from the standard method (which involves applying a cap).
- 5.2.19 Secondly, there is a need to consider **affordable housing need**, recognising that the PPG states:
- "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."*
- 5.2.20 Affordable housing need is high locally. Specifically, the Targeted Review of Local Housing Needs (2022) explains: *"There is an annual need for 423 affordable dwellings which justifies the need for a robust affordable housing policy."* This figure is high in comparison to LHN (712 dpa), and the potential for 'robust affordable housing policy' may be limited by development viability (albeit development viability is strong in many parts of Sevenoaks) which, in turn, suggests the possibility of delivering more market homes so as to boost affordable housing. Having said this, it is not realistic to consider very high growth scenarios with a view to meeting affordable housing needs, as need/demand for market housing would limit delivery.
- 5.2.21 Furthermore, there is also a need to consider the recent rates of affordable housing delivery. Evidence comes from the District's Housing Strategy 2022-2027, which explains that 370 homes were delivered in the period since 2017 – a rate significantly below the need figure discussed above. There is also a need to consider the tenure split of affordable housing delivered. The most recent Authority Monitoring Report (2019) explains: *"71 (net 18) new affordable housing units were completed in 2018/19. 53 of the... units completed were for rent (social/affordable rented) and 18 were for shared ownership/ownership."*
- 5.2.22 Thirdly, there is a need to consider **unmet housing need** from elsewhere, recognising that the NPPF states that authorities should:
- "... establish a housing requirement figure... which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period."*
- 5.2.23 The "positively prepared" test of soundness is also clear that local plan housing requirements should be:
- "informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."*
- 5.2.24 However, there are significant draft proposed changes (December 2022; see Box 5.1) that potentially have the effect of reducing the emphasis - within the NPPF - on providing for unmet need.
- 5.2.25 Eight neighbouring authorities identified the potential for unmet need through the initial consultation on a Sevenoaks Local Plan held in 2022 (see list [here](#)). This did not include Tandridge; however, there is a clear risk of unmet need from Tandridge, given that the Local Plan submitted in 2019 (which proposed unmet need) is now set to be found unsound (discussed [here](#)). Gravesham District has also notably not consulted since 2020, and unmet need from Gravesham was recently discussed as part of the Dartford Local Plan examination ([here](#)). With regards to Tonbridge and Malling, an early consultation document published in 2022 committed to providing for LHN, and the local plan website records a key message from the consultation as "a focus on meeting the borough's housing needs in the most sustainable manner."
- 5.2.26 Fourthly, there is a need to briefly consider **growth-related opportunities**, noting that the Draft NPPF proposes the following addition to paragraph 66 [emphasis added]:
- "The [housing] requirement may be higher than [LHN] if it includes provision for neighbouring areas or reflects growth ambitions linked to economic development or infrastructure investment."*
- 5.2.27 However, such arguments are not thought to apply strongly to the District. There is an economic growth opportunity, but there is not thought to be any economic case for an 'above LHN' housing requirement.
- 5.2.28 Finally, it should be noted that the option of setting the housing requirement above LHN was explored at a high level within the previous Interim SA Report (2022). The appraisal did not conclude any clear drawbacks relative to the option of setting the housing requirement precisely at LHN. However, it is important to be clear that the appraisal was high-level. Specifically, it was undertaken without any understanding of the supply options (other than urban supply) that would need to be relied upon.

Conclusion on housing quanta options

- 5.2.29 The high level discussion above serves to suggest a need to remain open to the possibility of a range of growth quanta scenarios, which leads to an inherent challenge for plan-making. Specifically, in light of the high-level discussion above, the housing requirement might reasonably be set:
- **Below LHN** – given the extent of growth constraints affecting the District.
 - **Above LHN** – given the risk of significant unmet housing need, notably from Tandridge.
 - **At LHN** (712 dpa, or 10,680 in total over the plan period) – this is essentially the default option, and a focus on supply scenarios that would enable the housing requirement to be set at LHN could be conducive to an expedient plan-making process. It is also important to note that the plan is being prepared under the 2021 version of the NPPF that has been widely described as having its core “mandatory housing targets”. This is arguably not the case; however, the reality is that many or most local plans do set the requirement precisely at LHN.
- 5.2.30 In this light, SDC officers (in discussion with AECOM) were able to reach a conclusion that attention should focus on scenarios involving a level of supply sufficient to enable the housing requirement to be set at a figure within a **modest range either side of LHN**. The question of precise quanta figures to reflect across the growth scenarios is returned to within Section 5.5, subsequent to consideration of broad distribution factors, site options and sub-area scenarios.⁹

Box 5.3: A note on employment land need

The Sevenoaks Economic Needs Study (ENS) 2022 explores the District’s economy and commercial property market and sets out future business space requirements. The industrial and office markets are small, but in good health with minimal vacancies and robust rents. The District also links closely to key employment hubs sub-regionally and regionally (including the Thames Gateway), as well as to London and the Continent.

After taking account of forecast demand, vacancy rates and planned/unplanned losses, the ENS identifies a need for the Local Plan to allocate 5.7 ha of land for employment, which breaks down as 4.1 ha for offices and 1.6 ha for industry. The ENS also explains that: *“This however assumes plot ratios of 40%... and it would be possible to accommodate forecast demand without additional land through intensification of use.”*

There is also a need to support windfall applications for new employment land within the District’s four towns and four service settlements. The ENS highlights points including: Swanley *“would benefit greatly from active placemaking... [including] space for small businesses and co-working”*; New Ash Green is *“severely run down and would benefit greatly from active policy intervention [including a revitalised commercial centre]”*; and in Sevenoaks, Swanley and ‘perhaps Edenbridge’ the focus should be on *“a proactive approach to the provision of start-up and grow-on office space in ... [including in] mixed-use schemes in Sevenoaks town centre...”*

Another key quote is: *“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.”*

Overarching objectives relating to employment are as follows: Deliver a minimum of 5.7ha of additional land to meet needs; Retain, intensify and expand existing employment sites; Enable delivery of flexible and creative workspace and co-location where appropriate; Strengthen and diversify the rural economy; Maintain and enhance the District’s tourism offer; and Cultivate resilience of the town centres.

⁹ It is important to reiterate that there is invariably a need to provide for a supply buffer over-and-above the housing requirement. This is to ensure that the requirement is met in practice over the plan period, i.e. there is a robust supply ‘trajectory’, recognising that unforeseen delivery issues inevitably occur prior to and at the planning application stage. A “robust supply trajectory” involves a situation whereby a five-year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period, and the Housing Delivery Test (HDT) can be met when applied annually.

There is also a need to consider the question of a constant/consistent versus a stepped housing requirement. The ideal situation involves a consistent housing requirement over the entire plan period. However, under the Government’s PPG, there is flexibility to set a ‘stepped’ housing requirement (and, in turn, supply trajectory), where there is evidence to demonstrate that this is necessary. A stepped requirement / trajectory is one whereby the requirement is set at a level below the annualised total plan period housing requirement in the early years of the plan, and then compensated for in the latter years of the plan.

The following statement from the Uttlesford Local Plan Inspector’s Report (2020; available [here](#)) is indicative of the flexibility that exists in respect of committing to a stepped housing requirement through a local plan: *“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year housing land supply”... This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing. It would also create a buffer so the target of 14,000 homes is not only just being met by a narrow margin and would allow for a less steeply stepped housing trajectory”.*

Broad distribution

- 5.2.31 This is the second of two sections examining ‘strategic factors’ of relevance to the matter of defining reasonable growth scenarios for the Local Plan. The aim is to explore broad distribution issues / options as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic.
- 5.2.32 There are many factors that could potentially be discussed here, but the aim is only to present an introductory overview of key issues and opportunities, recognising the potential to explore wider matters within the sections of the report that follow. Key strategic factors are discussed below.

Settlement hierarchy

- 5.2.33 The settlement hierarchy, as understood from a study published in 2022, provides a starting point for distributing growth, recognising: locally arising housing needs; the importance of supporting accessibility (to services, facilities etc); and transport objectives around minimising the need to travel and modal shift.
- 5.2.34 There is the potential to distribute growth in a way that represents a departure from the settlement hierarchy (e.g. low growth directed to a town that is more typical of the level of growth directed to villages, or high growth directed to a village that is ‘transformational’, potentially to the extent that it moves up a place in the settlement hierarchy). However, any such decisions must be carefully justified in light of broad strategic, settlement-specific and site-specific considerations.

Strategic sites

- 5.2.35 There is a clear argument for ensuring a strong focus on strategic sites, i.e. sites delivering at least several hundred homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery of new / upgraded infrastructure alongside new housing. There is support for strategic sites within the NPPF (paragraph 73), which explains:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate... authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;
- ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;
- set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes...;
- make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation [e.g. development corporations].”

Smaller sites

- 5.2.36 A key lesson learned from the experience of local plans elsewhere, for example Uttlesford and St Albans, is that there is a need for a good mix of sites, to include smaller sites. A good mix of sites is important from a perspective of seeking to minimise delivery risk (and, in turn, ensuring that the Local Plan remains up-to-date; see Section 2), but there are also wider merits to smaller sites, notably:
- the NPPF supports smaller sites because they can allow “*opportunities for villages to grow and thrive...*”;
 - smaller sites are suited to delivery by SME housebuilders; and
 - small sites can sometimes be developed with limited Green Belt impact.

- 5.2.37 There can also be a traffic argument for dispersing growth across smaller sites; however, on the other hand, focusing growth (at strategic sites or along transport corridors) can support effective strategic transport planning, e.g. major new infrastructure or upgrades.

Development viability

- 5.2.38 There is increasingly pressure on developers to demonstrate compliance with wide ranging policy requirements, in addition to default expectations around complying with Building Regulations, delivering affordable housing and contributing to infrastructure. Key priorities locally (beyond affordable housing) include decarbonisation (given the Council's 2030 net zero [commitment](#)) and securing biodiversity net gain (the ambition across Kent is 20%), however, there are numerous other policy options to explore.
- 5.2.39 Complying with policy requirements typically comes at a cost which impacts upon development viability, hence there is a case for directing growth to locations with strong development viability. Strategic site options benefit from economies of scale that benefit viability, plus masterplanning gives rise to opportunities to deliver upon certain policy requirements; however, strategic sites can also be associated with a need for major infrastructure upgrades that can prove very costly.

Supply from urban areas and brownfield sites in the Green Belt

- 5.2.40 The initial consultation held in 2022 included a particular focus on maximising supply from the District's urban areas, and three broad density options were appraised within the Interim SA Report. There is a clear argument for maximising urban supply – namely reduced pressure on greenfield (which likely means Green Belt) sites; however, there can be issues and potential trade-offs. Considerations include:
- Delivery risk/certainty – there is a need to avoid overreliance on urban supply, given inherent delivery challenges, for example relating to complex land ownership / leaseholds and existing use values that impact on development viability. It is also important to avoid any double counting with windfall. As discussed, a local plan with high delivery risk can amount to storing up potential issues for the future.
 - Character – a key consideration is “*building at densities significantly out of character with the existing area*”, which was added to the Draft NPPF (2022; see para 11) as a key factor influencing a decision on the level of growth to support through a local plan (i.e. the level at which to set the housing requirement). Schemes seen as out of character can face opposition at the planning application stage.
 - Existing uses – there is a need to apply due caution before supporting the redevelopment of existing employment land (also potentially retail) for housing or mixed use development. Also, there is a need to consider that land currently used for non-residential uses (e.g. employment, retail, car-parking) can sometimes tend to be subject to flood risk and potentially other constraint, e.g. noise and contamination. More broadly, some urban sites currently not in residential use could lead to a poor living environment.
 - Infrastructure – there are wide-ranging infrastructure considerations around maximising urban capacity, but one issue can be around ensuring sufficient primary school capacity.
- 5.2.41 Ultimately, whilst the consultation document published in 2022 discussed the potential to deliver between 568 and 1,313 homes (within the plan period) from sites identified within the Settlement Capacity Study (2022), the current preferred option is to support the middle of the three density options published for consultation in 2022, and the number of sites identified as developable in the plan period has decreased. As such, the current assumption is 565 homes from sites identified in the Settlement Capacity Study.
- 5.2.42 There has been a notable shift over time – from the draft and then submission versions of the previous Local Plan (2018/19), to the Initial Consultation on the new Local Plan in 2022 to the current consultation (with its focus on alternative growth scenarios) – in terms of assumed supply from urban and brownfield Green Belt sites. This primarily reflects a process over time of gathering evidence regarding detailed factors at the sites in question, including in discussion with land-owners (e.g. in respect of the timetable for making sites available for housing, given existing use values, e.g. employment). However, it is also reflects shifting views on strategy, e.g. around the importance of protecting employment land and avoiding housing growth in ‘unsustainable’ locations. Matters can be explored further at the next stage.

Sevenoaks Station

- 5.2.43 This is a key opportunity for urban housing supply alongside achievement of wider objectives relating to complementing the town centre, improving the public realm and improving the arrival experience. The Station Area is one of the most accessible locations in Sevenoaks District, with fast and frequent train services to London, the south coast and across the wider county of Kent. Located approximately 750 metres to the north-west of the main retail and commercial core of Sevenoaks town, the station itself comprises a modern glass box style ticket hall to the west of London Road and a surface car park to the east. The station buildings are surrounded by an eclectic selection of land uses and underutilised sites.

- 5.2.44 Overall, the area would benefit from a clearer sense of identity and cohesion that reinforces its relationship to Sevenoaks town centre, and other nearby development opportunities. There is also a clear opportunity to formalise the role of the station as transport hub / interchange. Working with local stakeholders, including Network Rail, the Council is preparing a development strategy for the Station Area that provides a clear spatial vision, and considers factors such as the quantum and type of uses, scale and massing, and the phasing of development to minimise disruption. This work will build on existing evidence and plans, such as the Sevenoaks Neighbourhood Plan (2023) and the Town Centres Strategy (2022).

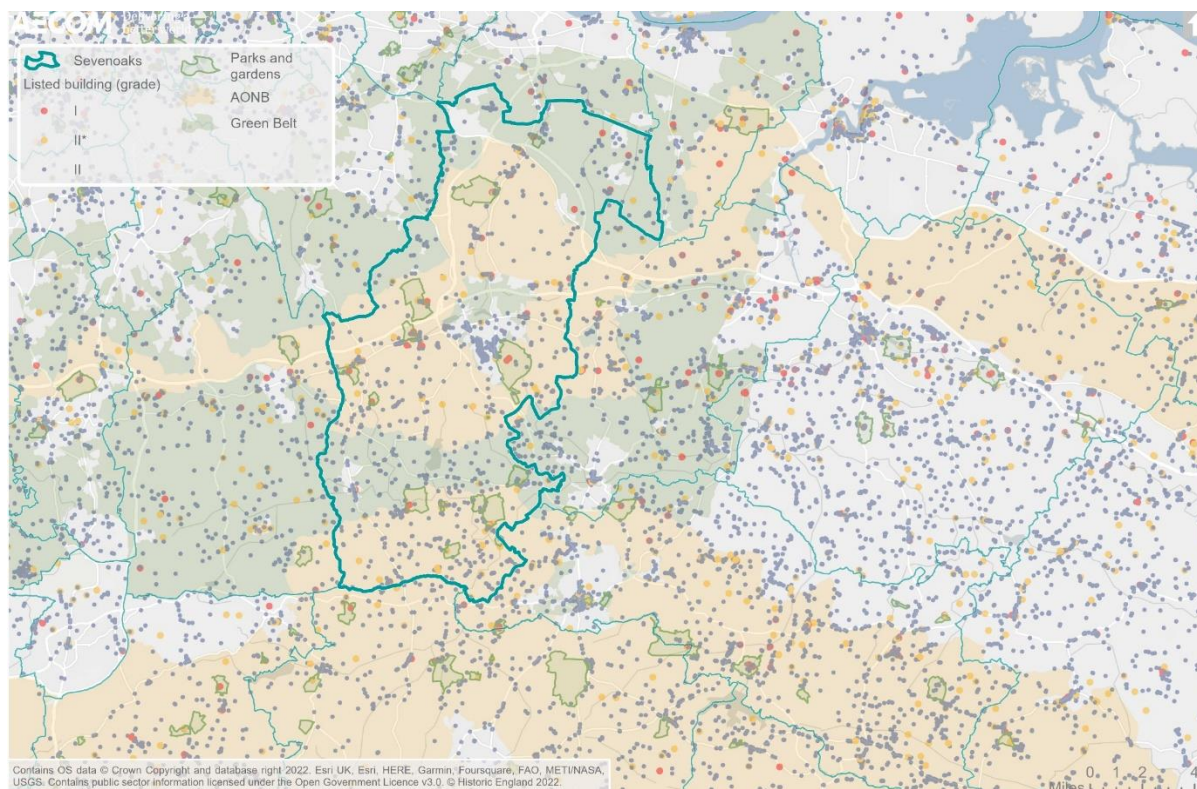
AONBs and Green Belt

- 5.2.45 The Interim SA Report published in 2022 discussed the possibility of Green Belt release but set out an expectation that there would not be a need for significant development within either of the AONBs. However, the current view is that certain options within an AONB warrant consideration. Specifically, attention focuses on sites that the Green Belt Assessment (2023) recommends for further consideration.
- 5.2.46 This new evidence provides a good starting point for considering possible sites for allocation in an AONB, subject to there being a strategic case to be made (in terms of housing needs and wider 'top down' factors). However, it is recognised that sites could well be less important in Green Belt terms but of importance in AONB terms. Specific site options are discussed below, in Sections 5.3 and 5.4.
- 5.2.47 Maintaining a focus on the AONBs, there is also a need to consider 'setting'. With regards to the three broad parts of the District outside of the AONB, there is a distinction between: A) the southern corridor, which is quite a low lying landscape, associated with the River Eden corridor, and where there are few concerns regarding the setting of the adjacent AONBs; and B) the other two areas, which are raised landscapes with greater potential for land to contribute to the setting of the North Downs.
- 5.2.48 With regards to landscape sensitivity in general, a Landscape Sensitivity Study (2017) considers the sensitivity of landscape parcels around the main settlements, serving to highlight extensive moderate and high sensitivity (notably least so around Swanley / Hextable).
- 5.2.49 With regards to the Green Belt, the Stage 2 Green Belt Assessment (2023) is discussed in Section 5.3, but background of note here is as follows: *"Since its creation in the 1950s, the Sevenoaks Green Belt has performed an important role as part of the wider... Green Belt for London preventing urban sprawl and merging of settlements and ensuring the provision of open countryside for all. The entirety of the Green Belt was assessed as part of the Green Belt Assessment (Stage 1), and it was found that the majority of the Green Belt was performing an important role in terms of the NPPF purposes. However, two areas were identified as weakly performing and 31 Recommended Areas were identified as potentially warranting further consideration. This assessment builds on the Stage 1 study..."*

Character and the historic environment

- 5.2.50 A major district-wide Character Study was prepared in 2022, 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. This is a key influence on broad distribution to the extent that decisions need to be made regarding the extent to which there should be reliance on new supply from the urban areas (discussed above); however, the study has limited bearing broad distribution in respect of greenfield housing supply.
- 5.2.51 With regards to the historic environment, this can often be a detailed matter influencing site selection and development management policy more so than broad distribution. However, there are some important broad spatial trends across the District; for example: Swanley is subject to notably low constraint, at least in terms of listed buildings as a town that developed following the railway being built; the historic value of Edenbridge is strongly focused on its high street; and both New Ash Green and Hartley, in the northeast of the district, have quite low historic environment constraint, both being 20th century new settlements.
- 5.2.52 Looking more broadly at those parts of the District that fall outside of the AONB, there are quite extensive areas subject to lower or 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.

Figure 5.2: Historic environment designations across the sub-region (N.B. scheduled monuments are not shown)



Schools capacity

- 5.2.53 This is often a key issue for local plan spatial strategy, and Sevenoaks is no exception, with Kent County Council having advised that the existing three secondary schools are at capacity with no scope to expand. In particular, a need has been identified for a new secondary school in the central/northern part of the District to be delivered within the plan period. With regards to the south of the District, there is safeguarded land for a secondary school within Edenbridge, subject to a legal agreement and sufficient demand being demonstrated in the local area. It should also be noted that permission has recently been granted to rebuild Orchards Academy in Swanley.
- 5.2.54 There is also need for additional Special Educational Needs provision in the north of the District. Kent County Council has recently secured funding to deliver a new special free school in Swanley.

Sports facilities

- 5.2.55 This is another growth-related consideration with a clear spatial dimension, recognising the potential for strategic growth locations, or concentrations of growth, to deliver new facilities. The Playing Pitch Strategy (2018) identified a need for: football pitches (demand is projected to grow by over 25%, with the greatest amount of growth attributed to the Sevenoaks area); mini football pitches (Sevenoaks area and Upper Darent Corridor); cricket pitches (largest growth is projected to be in the Darent Valley area); rugby pitches (New Ash Green Sports Pavilion is one facility that struggles to cope with demand); hockey pitches (there is set to be a significant under supply, particularly in the Sevenoaks area); and tennis courts (it is imperative to invest in community accessible tennis courts in the main urban areas).
- 5.2.56 Looking forward to 2040, the Council has an ambition to create a world class cluster of sporting facilities in the north of the District. Building on the success of Brands Hatch and the London Golf Club, planning permission has recently been granted for Millwall Football Club to build state of the art training facilities in this location. These high quality sporting facilities that are easily accessible cumulatively create a diverse range of local employment opportunities and attract visitors to the area, as well as providing world class and competition standard sporting facilities outside of London. There is significant potential to develop this ambition and for the area to grow into a wider sporting corridor.

Biodiversity and green infrastructure

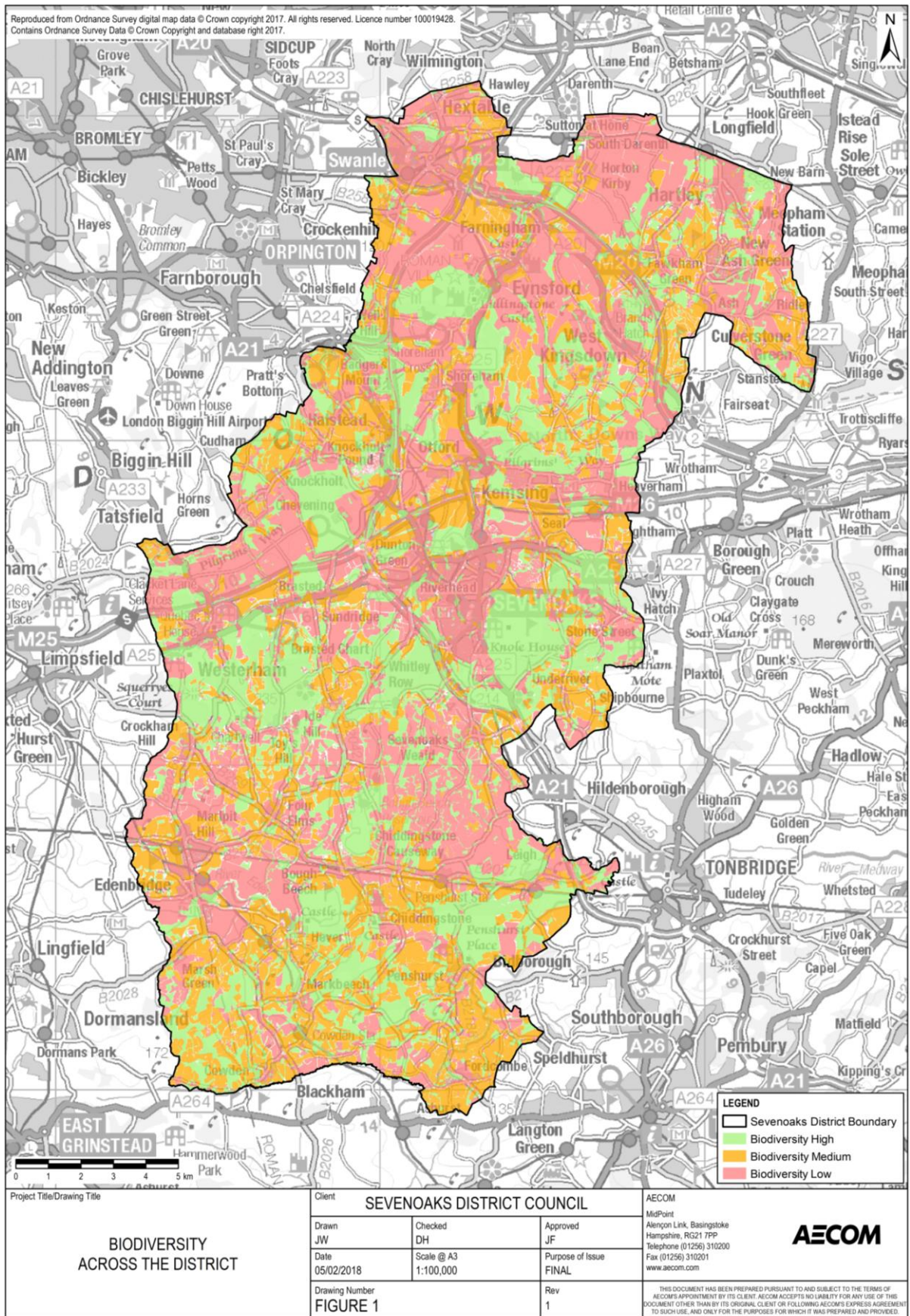
- 5.2.57 The District is overall quite highly constrained in biodiversity terms, certainly in the national context and also arguably in the regional / sub-regional context. However, much of the biodiversity constraint is concentrated within those parts of the District that fall within an AONB. With regards 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. This is evident from Figure 5.3, which is taken from a 'Biodiversity Analysis' study completed in 2020 that applied a quantitative methodology in order to indicatively differentiate between areas of higher and lower biodiversity value.
- 5.2.58 The Environment Act (2021) has led to a new national emphasis on strategic planning for biodiversity and green/blue infrastructure. Kent County Council has begun the process of preparing a Local Nature Recovery Strategy ([LNRS](#)), which will be used to inform the distribution of housing growth across the County, including with a view to the effective targeting of growth-related investment. One task will be to direct habitat enhancement aimed at creating biodiversity credits that can be purchased by developers where it is the case that the requisite level of biodiversity net gain (BNG) cannot be achieved within the development site boundary. The Government's BNG Metric incentivises off-site enhancement measures close to the development site in question, hence there is a case for directing growth to locations in proximity to priority areas for habitat enhancement, as established through the LNRS.
- 5.2.59 The LNRS is expected to be published within roughly 18 months, but in the interim it is fair to assume that priority areas will include the Biodiversity Opportunity Areas (BOAs) that intersect the District (see Figure 2.1). The Darent Valley could perhaps be a particular focus, given the established Darent Valley Landscape Recovery Project, which is seeking to create and enhance c1,500 ha of habitat and restore the natural function of the river Darent. Another established project is the Sevenoaks Greensands Commons Project, plus there are wide-ranging local scale projects that could benefit from investment of the back of housing growth nearby, for example relating to woodland management and accessibility.
- 5.2.60 Importantly, there can also be the potential to target growth / investment so as to achieve wide ranging objectives beyond biodiversity, including flood water attenuation and accessible greenspace in support of wide ranging community and health-related objectives (also, accessible greenspace can serve to reduce recreational pressure on sensitive habitats). In the south of the District, a key opportunity relates to potentially opening up Bough Beech reservoir as a community resource, linked to nearby Bore Place, and it should be noted that the south of the District is in relative proximity to Ashdown Forest Special Area of Conservation (SAC) in Wealden District, where recreational pressure is a major issue.

Transport connectivity

- 5.2.61 This is a key issue for any local plan, given implications for wide-ranging key sustainability objectives, including objectives relating to climate change mitigation / decarbonisation.¹⁰ The District has higher than average car ownership (in the majority of wards) and there are fairly limited opportunities to cycle between settlements, including given topography, settlement pattern and the nature of road links.
- 5.2.62 The Council's Movement Strategy explains key priorities for 'sustainable movement and transport' in broad terms but does not identify strategic interventions that might be facilitated or unlocked by targeted housing growth. Also, Local Cycling and Walking Implementation Plans (LCWIPs) are currently being prepared only for the main settlements, as opposed to the District as a whole. There will be a clear need to work closely with the County Council (also National Highways and Transport for the South East) to identify key issues / opportunities. One consideration is road/bus connectivity in the more rural south of the District.
- 5.2.63 Finally, a key issue locally is addressing traffic congestion hotspots and avoiding worsened congestion as far as possible, including because traffic congestion is a barrier to cycling and supporting effective bus services. Congestion hot spots include M25 junction 3, Swanley Town Centre, Sevenoaks Town Centre, the A25 and the Edenbridge by-pass. Further information is presented in Section 5 of the Initial Baseline Transport Assessment (2022) and key findings are discussed below in Section 5.4 of this report. Further transport modelling work is ongoing in support of the emerging Local Plan.

¹⁰ The 2030 net zero commitment [website](#) explains: "We have committed to working towards achieving net zero carbon emissions by 2030. This means that we have pledged to reach net zero carbon emissions produced by the Council and our assets by 2030. We also have an ambition to assist the District to become net zero by working closely with local communities to improve the resilience of the District to a changing climate. This is collectively known as our Net Zero 2030 commitment."

Figure 5.3: Key output of analysis from 2018 examining biodiversity across the District



Employment

5.2.64 The Economic Needs Study (ENS, 2023) has already been introduced. It identifies only a small demand for new industrial / logistics floorspace in the District, but there is nonetheless a need to consider broad spatial considerations. In short, there is a need to focus attention on the north of the District, in and around Swanley, given transport links and proximity to London and the Thames Gateway, although Sevenoaks is also a potential focus area. There is also a need to recognise the scale of recent, committed and potential future employment growth within the Thames Gateway area in proximity to the north of the District, although Maidstone is also a growing employment hub.

Utilities

5.2.65 Water supply, waste water treatment, waste management, the electricity grid and telecommunications can – to varying extents – sometimes be a factor with a bearing on broad distribution. In particular, a key issue can be wastewater treatment capacity, and in the Sevenoaks context there is a need to account for the Thames Water Drainage and Wastewater Management Plan. The Long Reach Catchment Plan proposes a new sewerage treatment works (STW) in the District to accommodate future growth. This needs further investigation and close engagement with Thames Water and Kent County Council.

Place-making priorities

5.2.66 The figure below is taken from the Local Plan consultation document published in 2022. The potential to direct growth so as to support the realisation of place-making priorities is further discussed in Section 5.4.

Figure 5.4: Established place-making priorities

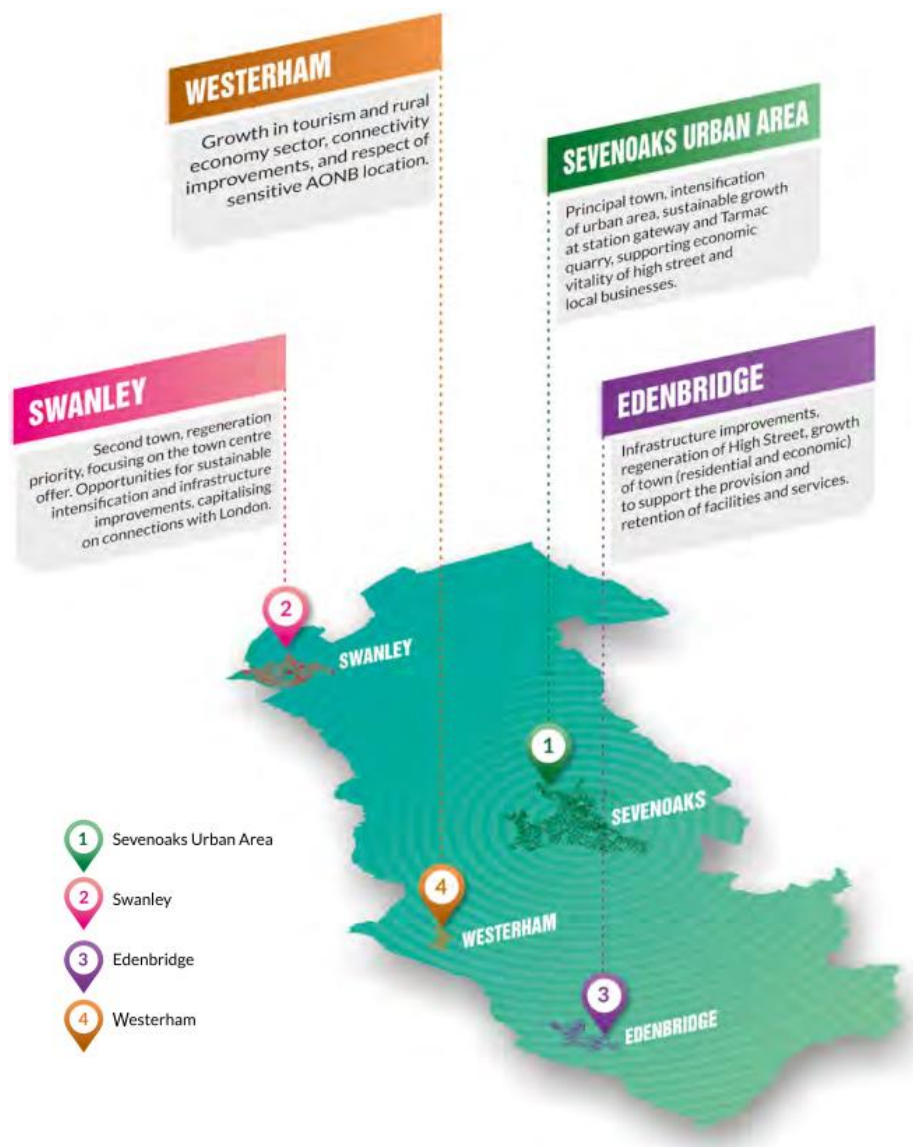


Figure 5.5: Strategic transport links across the sub-region

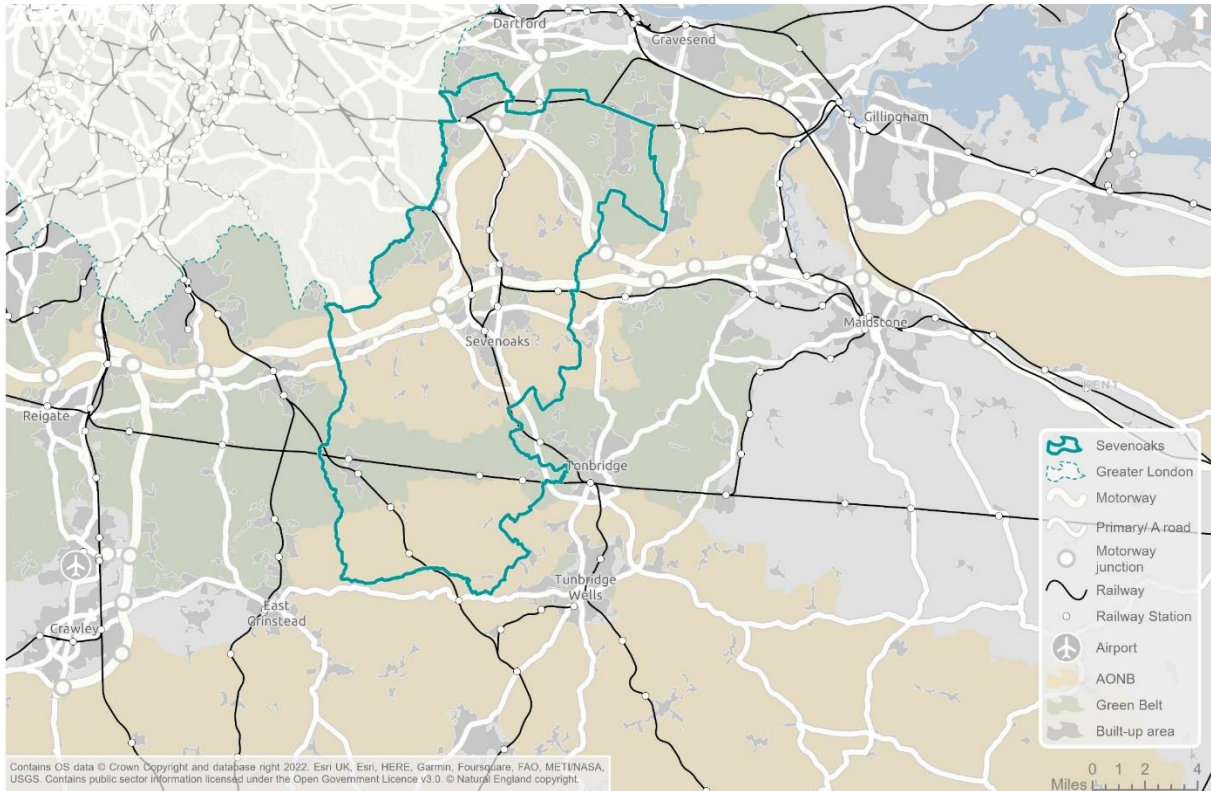
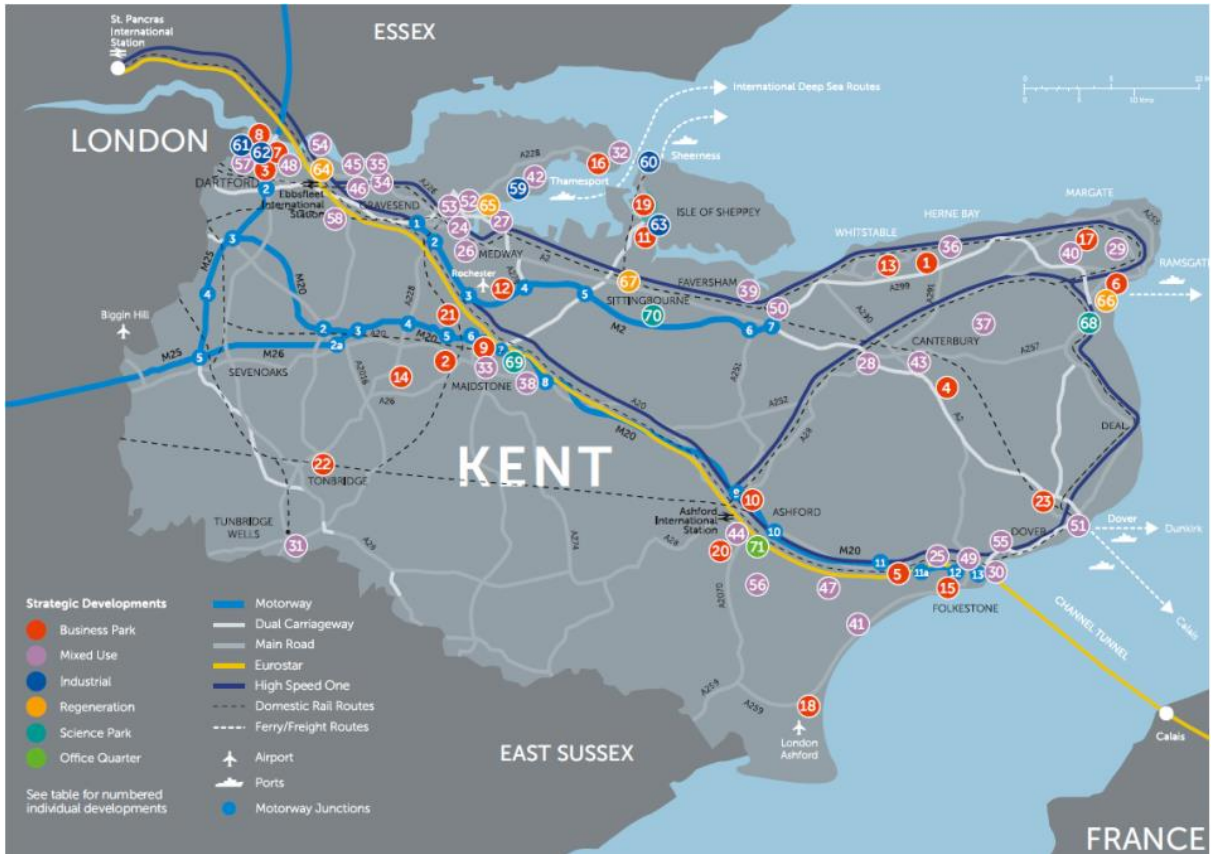


Figure 5.6: Recent strategic employment developments (from the ENS, 2022, ref. Caxtons, 2021)



5.3 Site options

Introduction

- 5.3.1 The aim of this section is to introduce the long list of available site options feasibly in contention for allocation and the work that has been undertaken to appraise and ‘sift’ site options, in order to arrive at a manageable shortlist that can then be a focus of work to explore sub-area scenarios in Section 5.4.

Green Belt Review

- 5.3.2 Green Belt Review has been undertaken in two stages:
- Stage 1 (2017) – examined the performance of 100 parcels against the four purposes of the Green Belt and reached an overall conclusion on the performance of each parcel (Section 5.1 of the report). It then identified more detailed land parcels for further detailed consideration at stage 2 (Section 5.2).
 - Stage 2 (2023) – considers 140 detailed parcels, reaching a conclusion on: A) contribution to Green Belt purposes; and B) the ‘strategic role’ of each parcel. Those parcels with a ‘less important’ strategic role are then recommended for further consideration. These sites are all mapped in Section 5.4.

SHELAA

- 5.3.3 The SHELAA process involves a sifting process to arrive at a shortlist of site options. A key input is the Stage 2 Green Belt Assessment (2023). It is also important to note that existing ADMP allocations are carried forward, as opposed to being reassessed, although capacity / yields are open for discussion.
- 5.3.4 On the basis of the SHELAA 39 sites are suitable for allocation in the plan (24 urban sites and 15 Green Belt sites). The SHELAA also identifies 10 ‘maybe’ (or ‘option’) sites, which includes one new settlement option (discussed below). The SHELAA also assigns an indicative capacity to each of these sites, although there is a need for further work to confirm capacity, working with site promoters.
- 5.3.5 The SHELAA ‘suitable’ and ‘maybe’ sites provide a reasonable starting point for defining growth scenarios. However, there is also a need to give proportionate consideration to ‘unsuitable’ sites – see Section 5.4.

New settlement options

- 5.3.6 Two new settlement options are being promoted, but one site – **Pedham Place**, south east of Swanley – is considered sequentially preferable such that it warrants being a focus of consideration in Section 5.4. It is difficult to envisage a scenario whereby the Local Plan allocates two new settlements.
- 5.3.7 The less preferable option is located at **Broke Hill Golf Club**, to the north of Halstead and also close to Orpington in London Borough of Bromley. Proposals are well-developed (with a proposed scheme previously been refused permission at appeal) and it does out-perform Pedham Place in some respects, namely: 1) it is not within an AONB (although Pedham Place is thought to have limited landscape sensitivity in the context of the wider AONB); 2) it is adjacent to a train station with a good service (although the service is not as good as that from Swanley Station, which could be an easy cycle from Pedham Place, plus Eynsford Station is also located close to Pedham Place); and it is close to M25 J4, which has capacity (whilst Pedham Place is adjacent to M25 J3, where capacity is a significant issue). However, there are two key issues. Firstly, Broke Hill Golf Club is a smaller site than Pedham Place, such that it would be difficult to deliver non-housing uses in support of trip internalisation, i.e. the site would be self-sustaining only to a limited extent and could risk being a dormitory settlement. Secondly, the County Council has not identified the need for a secondary school here, unlike at Swanley (where a new settlement closely linked to the town could also support regeneration objectives). Also, there is onsite and adjacent priority habitat, and southbound traffic could/would pass through the Halstead Conservation Area.
- 5.3.8 Looking more widely, attention focuses on Penshurst and Leigh as the other two rural stations in the District located outside of an AONB. In particular, of these two stations, attention focuses on Penshurst, given the constraints to growth at Leigh (albeit the village benefits from relative proximity to Tonbridge). However, Penshurst Station is located in a rural area (equidistant between Edenbridge and Tonbridge) with poor road connectivity, plus there are constraints to growth (e.g. nearby Chiddingstone is a renowned Tudor village) and it is important to recall that this is a branch line without a direct service to London.

5.4 Sub-area scenarios

Introduction

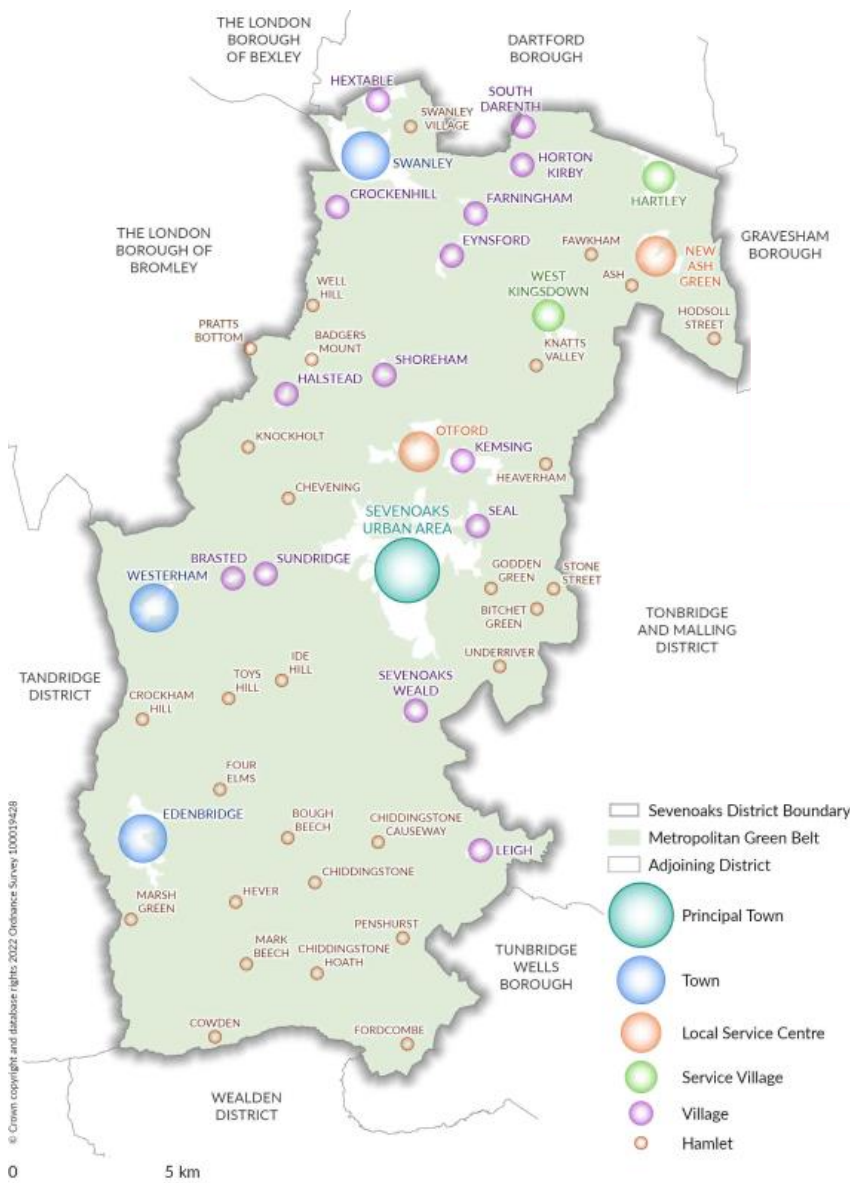
5.4.1 Discussion has so far focused on A) ‘top down’ considerations of housing quantum and broad distribution issues / options; and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the District’s sub-areas in turn, exploring how sites might be allocated/ supported in combination.

What sub-areas?

5.4.2 Consideration is given to each of the settlements within the top four tiers of the settlement hierarchy, namely: **Sevenoaks Urban Area** (including Bessels Green, Chipstead, Dunton Green and Riverhead); **Towns** (Swanley, Edenbridge and Westerham); **Local Service Centres** (New Ash Green and Otford) and **Service Villages** (Hartley and West Kingsdown).

5.4.3 With regards to **villages** within the fifth tier of the settlement hierarchy, on the one hand there is an argument for not directing new homes to these villages from an accessibility and car dependency perspective. However, on the other hand, it is recognised that smaller villages do sometimes have a need for new homes, including in order to maintain village services/facilities and generally village vitality. Also, it is recognised that the Green Belt designation leads to limited or no potential for neighbourhood plans to deliver significant housing growth. This will be a matter for further consideration at the next stage.

Figure 5.7: The settlement hierarchy



Methodology

- 5.4.4 For each sub-area the aim is to discuss the SHELAA ‘suitable’ and ‘maybe’ sites, as well as select SHELAA ‘unsuitable’ sites, with a view to concluding on reasonable sub-area scenarios that need to be taken forward to Section 5.5 of the report, where sub-area scenarios are combined to form reasonable alternative growth scenarios for the District as a whole.
- 5.4.5 The context is a need to identify sites suitable for allocation with a total combined capacity in the region of 6,000 homes, if the housing requirement is to be set at LHN (10,680 homes) and, in turn, if the District is to avoid having to export unmet housing need. However, as discussed in Section 5.2, it is also reasonable to explore modest lower and higher growth scenarios.
- 5.4.6 The ~6,000 homes figure reflects an assumption that supply from the following sources can be assumed:
- Sites with planning permission – 1,995 homes had planning permission as of 1st April 2023, and it is fair to assume that this figure will be broadly similar at the start of the plan period (1st April 2025).
 - Strategic Sites with a resolution to grant planning permission – two sites fall into this category, namely Fort Halstead (north west of Sevenoaks) and Four Elms (Edenbridge, which includes a secondary school). The combined capacity is 975 homes, and neither site is expected to deliver any homes prior to the start of the plan period, hence it is fair to assume all 975 homes will deliver in the plan period.
 - Windfall / small sites allowance – the assumption is 1,185 homes from unallocated windfall sites.
 - Future potential identified in Settlement Capacity Study – in addition to the windfall / small sites allowance, and additional 565 homes can be assumed following the Settlements Capacity Study.
- 5.4.7 As discussed in Section 5.2, there is a clear argument for distributing this ~6,000 homes figure broadly in line with the settlement hierarchy. This a key starting point for the discussion of sub-area scenarios.

Sevenoaks urban area

- 5.4.8 Beginning with **urban sites**, the following ten are supported by the SHELAA:
- HO4 Bullfinch Lane, Riverhead (5 homes)
 - HO3 Land rear of Bowerwood House, 15 St Botolphs Road (7 homes)
 - HO2 Abacus Furniture, Farm Road Garages, Greatness Lane (10 homes)
 - HO1 Pinetops, 5 Crownfields (20 homes)
 - HO5 Land at Cramptons Road (50 homes)
 - HO7 Johnsons, Oak Lane & Hoggarden Lane (54 homes)
 - HO6 School House, Oak Lane & Hoggarden Lane (56 homes)
 - MX2 Land east of High Street, Sevenoaks (300 homes)
 - MX3 Delivery & Post Office / BT Exchange, South Park (100 homes)
 - MX1 Sevenoaks Station and Car Park, Morewood Close (184 homes)
- 5.4.9 Focusing on the sites with capacity of 50 homes or more, four of these are existing allocations within the Allocations and Development Management Policies (ADMP) Local Plan (2015), such that the principle of development / redevelopment is established, albeit there remains a key question regarding development density. Also, there is a need to consider delivery risk, mindful that the sites have not yet delivered.
- 5.4.10 With regards to the remaining two sites:
- Land east of High Street, Sevenoaks (300 homes) – there is a need for further work on development density, recognising inherent challenges around reprovision of existing services such as the library, bus station and leisure centre currently onsite. Another consideration is that there is a designated Air Quality Management Area (AQMA) along the adjacent high street, although the site would likely lead to low car trip generation given very strong accessibility credentials. Sevenoaks station is within ~1km.
 - Sevenoaks Station and Car Park, Morewood Close (184 homes) – a key urban site that has been introduced above. Again, there is a need for ongoing work to confirm capacity.

5.4.11 The combined capacity of the ten urban site allocations is 786 homes, hence there is a clear case for giving consideration to Green Belt release (given district-wide LHN and the settlement hierarchy).

5.4.12 With regards to **Green Belt options**, a clear starting point is MX4 (Sevenoaks Quarry), which has a resolution to grant planning permission for 950 homes pending confirmation of S106 agreements (ref. [22/00512/OUT](#)). The site has been considered over a number of years, as discussed within the Sevenoaks Neighbourhood Plan ([2023](#)), which concluded: *“It is in a sustainable location, close to Bat and Ball station with connections to the surrounding townscape and access to local shops and services. Should the site be brought forward... the following benefits should be delivered ...”*

Figure 5.8: High level masterplan Sevenoaks Quarry (from Design and Access Statement)



5.4.13 Finally, with regards to Sevenoaks Quarry, it should be noted that the site is in the SHELAA because the planning application post-dates the site being submitted in the Call for Sites.

5.4.14 The next Green Belt sites for consideration are then the three SHELAA ‘suitable’ sites:

- HO8 Pounsley House, Pounsley Road, Dunton Green (7 homes) – located to the north west, adjacent to the railway line and the river corridor, and with some onsite vegetation. Road access is a clear constraint here, given access is via a single lane railway underpass.
- HO9 Land adjacent Seal Hollow Road (16 homes) – located to the east, the site notably forms a small part of a larger Green Belt parcel that the Stage 2 Assessment recommends for further consideration. The wider part of the parcel has not been submitted as available for development, and hence is not within the SHELAA, but there is a need to ensure a comprehensive / long term approach to Green Belt release (also noting historic environment constraint). A historic field boundary passes through the site.
- HO10 Land east of London Road, Dunton Green (235 homes) – located at the very northern extent of the Sevenoaks urban area. The site was recommended for further consideration at Stage 1 of the Green Belt Assessment and was a proposed allocation in a previous Draft Local Plan (2018/19). The site clearly benefits from a good degree of containment in Green Belt and wider landscape terms (although a footpath does pass through the site). It also benefits from a location adjacent to Dunton Green Station (on the main line to London) and a primary school, although the M25 is adjacent (there is some screening vegetation) and Sevenoaks town centre is over 3km distant. Also, there is an AQMA along the A224.

5.4.15 Moving on to the SHELAA ‘maybe’ sites, all three intersect the AONB to the west of Sevenoaks, and comprise land recommended for further consideration by the Green Belt Assessment (2023). Specifically:

- MX13 Land at Moat Farm, off Homedean Road, Chipstead (70 homes) – is the northern-most of the three sites. It is clearly constrained by the adjacent M25 / A25 / A21 junction, plus the site does not perform well in accessibility terms (although a primary school is nearby). There are limited landscape concerns (although a footpath intersects the site) but the site intersects Chipstead Conservation Area. There is also notable onsite surface water flood risk, which could well serve to reduce its capacity.
- HO28 Land between Back Lane and the A21, Bessels Green (183 homes) – is located close to the site discussed above and performs similarly in accessibility terms. However, it is likely to be more sensitive in AONB terms given rising land, a footpath intersecting the site and the likely point of access from a lane that links Sevenoaks to the AONB. The Bessels Green Conservation Area is also notably adjacent.
- HO29 Brittain's Lane, Kippington, Sevenoaks (300 homes) – performs better in terms of proximity to Sevenoaks town centre and there is limited historic environment constraint. Also, as a larger site, there would be the potential to deliver new community infrastructure alongside new homes. Furthermore, the site only partially intersects the AONB. However, there are landscape sensitivities, plus Great Britain's Wood is a large adjacent accessible ancient woodland (Forestry Commission). Whilst there are no public rights of way intersecting the site, this is rising land and Brittain's Lane – a historic lane linking to AONB high points south of Sevenoaks – is arguably appropriate as a western boundary to the town.

This site is also associated with a notably low density residential area. This is a consideration from a character and design perspective, but a step-change in local development densities can be appropriate, given the extent and nature of housing needs locally, including the need for smaller family housing.

5.4.16 With regards to SHELAA 'unsuitable' sites, attention focuses on one particular site that comprises a parcel of land recommended for further consideration by the Green Belt Assessment (2023), namely HO/21/00264 Land west of allotments, Bradbourne Vale Road. The site performs well in accessibility terms, given a location on the A25 and with Riverhead Local Centre and Knole Academy nearby. However, it is not clear that the site is available in the plan period, given an existing leaseholder. Further considerations are: the site is visible from the A25; the eastern half of the site is unsuitable due to flood risk; there is biodiversity constraint given adjacent Sevenoaks Gravel Pits SSSI and the current low intensity use; and there is an AQMA along the A25.

5.4.17 In **conclusion** and focusing on housing (see Box 5.4 for a discussion of employment options), the capacity of the SHELAA 'suitable' sites outside of the AONB may be insufficient in the context of district-wide LHN and Sevenoaks' position in the settlement hierarchy, such that there is a need to consider allocation within the AONB. It is not clear that the three sites within / intersecting the AONB can be placed in a sequential order of preference, hence it is reasonable to progress the following two growth scenarios to Section 5.5:

- Scenario 1 – SHELAA 'suitable' sites (urban and Green Belt) = 1,994 homes
- Scenario 2 – Scenario 1 plus three SHELAA 'maybe' sites (AONB) = 2,547 homes

Box 5.4: Employment site options at Sevenoaks

In addition to supporting three mixed use urban sites expected to deliver new office floorspace, the SHELAA also supports two employment (only) sites located in close proximity at the northern extent of the town, along the A225. Both sites would link well to the town's main industrial / trading estate (Vestry Estate), but neither site comprises a parcel of land recommended for further consideration by the Green Belt Assessment (2023).

- EM3 Otford Road depot (0.75ha) – a brownfield site, but adjacent to Sevenoaks Gravel Pits SSSI, and there is a need to consider whether development could lead to pressure for subsequent development of adjacent land to the south, which links strongly to the SSSI. There are also adjacent residential properties.
- EM1 Land at Bartram Farm (1.3ha) – a partly brownfield site. The site is located on Old Otford Road, there are a number of historic properties onsite and nearby (see [historic mapping](#)), but concerns would be somewhat allayed if access is achieved from Vestry Road, at the southern edge of the site. This would seemingly necessitate loss of priority habitat, but this not shown as a wooded area or field boundary on historic mapping. As per site EM/21/00015, there is also a need to consider the potential to secure a new defensible Green Belt boundary, noting an adjacent large 'unsuitable' SHELAA site. Strategic scale new employment land is feasibly an option here, but access via the Old Otford Road is likely an issue. The very limited need for new industrial land district-wide does not serve to justify further consideration of this option.

Swanley

5.4.18 Beginning with **urban sites**, the following two sites are supported by the SHELAA:

- HO11 Garages, Conifer Way (8 homes)
- HO12 Bus Garage, Kingdom Hall (30 homes)
- HO13 Bevan Place (100 homes)
- MX5 Swanley Centre (TBC)

5.4.19 The first site inherently gives rise to limited concerns as a smaller site, whilst the next two sites are existing allocations from the ADMP (2015) (such that there is a need to consider deliverability risks). With regards to MX5, the current approach is not to assume housing supply, which is a suitably cautious approach.

5.4.20 The combined capacity of these urban site allocations is 138 homes, hence there is a clear case for considering Green Belt release. However, another factor is that Swanley has a relatively high level of commitments and identified supply from the Settlement Capacity Study. On the other hand, there appears to have been limited greenfield housing growth over recent years, according to historic satellite imagery.

5.4.21 With regards to **Green Belt options**, there are two SHELAA 'suitable' sites:

- HO14 Land at Lullingstone Avenue (110 homes) – is located to the east of the town. There is a significant surface water flood risk channel, a railway line is adjacent (although in a cutting) and access requires further investigation. There will also be a need to carefully consider the long term Green Belt boundary, noting that the existing hedgerow, which will presumably be utilised as a defensible boundary, is not shown on historic mapping, and given an adjacent large 'unsuitable' site (discussed below).
- MX6 Land North and South of Maidstone Road (140 homes) / EM2 Land at Upper Hockenden Farm, Maidstone Road – a collection of linked sites located at the north west extent of the town.

Not all land here is recommended for further consideration by the Stage 2 GB Assessment. However, there are otherwise limited constraints (the key issue is potentially an AQMA along the Maidstone Road) and there is the potential to deliver a high quality mixed 'gateway' to Swanley. Services and facilities within Swanley are beyond walking distance, but there is a cycle route to the town centre (which might feasibly be enhanced). One final consideration is that the brownfield part of the site may be associated with a degree of historic environment constraint, as [historic mapping](#) shows a built form (part of a hamlet) in this area. Also, Hockenden is a historic lane that links Swanley to the countryside (and then on to Orpington), but the landscape/heritage value of the lane to the east of the A20 is likely limited.

5.4.22 Moving on to the SHELAA 'maybe' sites, there is only one such site, namely Pedham Place, which has already been introduced as having the potential to deliver a new settlement linked to Swanley. Further discussion of options for Pedham Place is presented in Box 5.2.

5.4.23 In **conclusion**, the capacity of the SHELAA 'suitable' sites is 388 homes, which is a modest number in the context of: district-wide LHN and Swanley's position in the settlement hierarchy; Swanley's very good rail service and proximity to higher order centres and the London suburbs; and a need to support town centre regeneration. However, it is not clear that there is a reasonable higher growth scenario involving one or more additional urban extensions. This serves to bolster the case for progressing the option of a new settlement at Pedham Place. As such, two scenarios are progressed:

- Scenario 1 – SHELAA 'suitable' sites (urban and Green Belt) = 388 homes
- Scenario 2 – Scenario 1 plus Pedham Place = ~2,788 homes

Box 5.3: Background in respect of the Pedham Place new settlement option

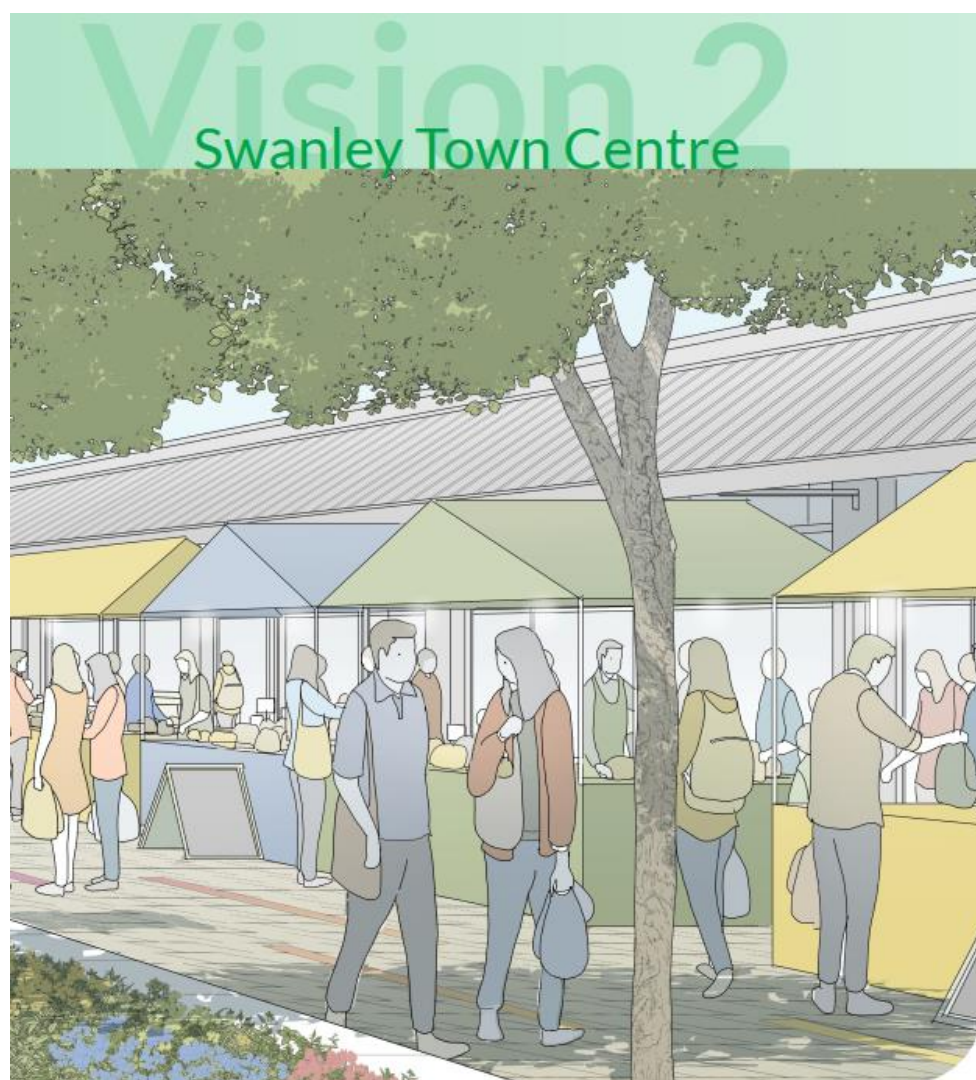
Pedham Place featured in the previous plan as a 'broad location for growth', which was agreed by full council prior to submission of the plan for examination. The site currently includes an area used for car boot sales and a golf course complex and floodlit driving range, part of which was artificially transformed in the 1990s by a landfill tipping of inert aggregates onto the site (generated from Canary Wharf and the construction of the M25) to create a links-style golf course. The potential capacity is ~2,500 units, at which scale there would be the potential to deliver a range of community infrastructure, including a secondary school, plus employment uses.

Box 5.3 continued

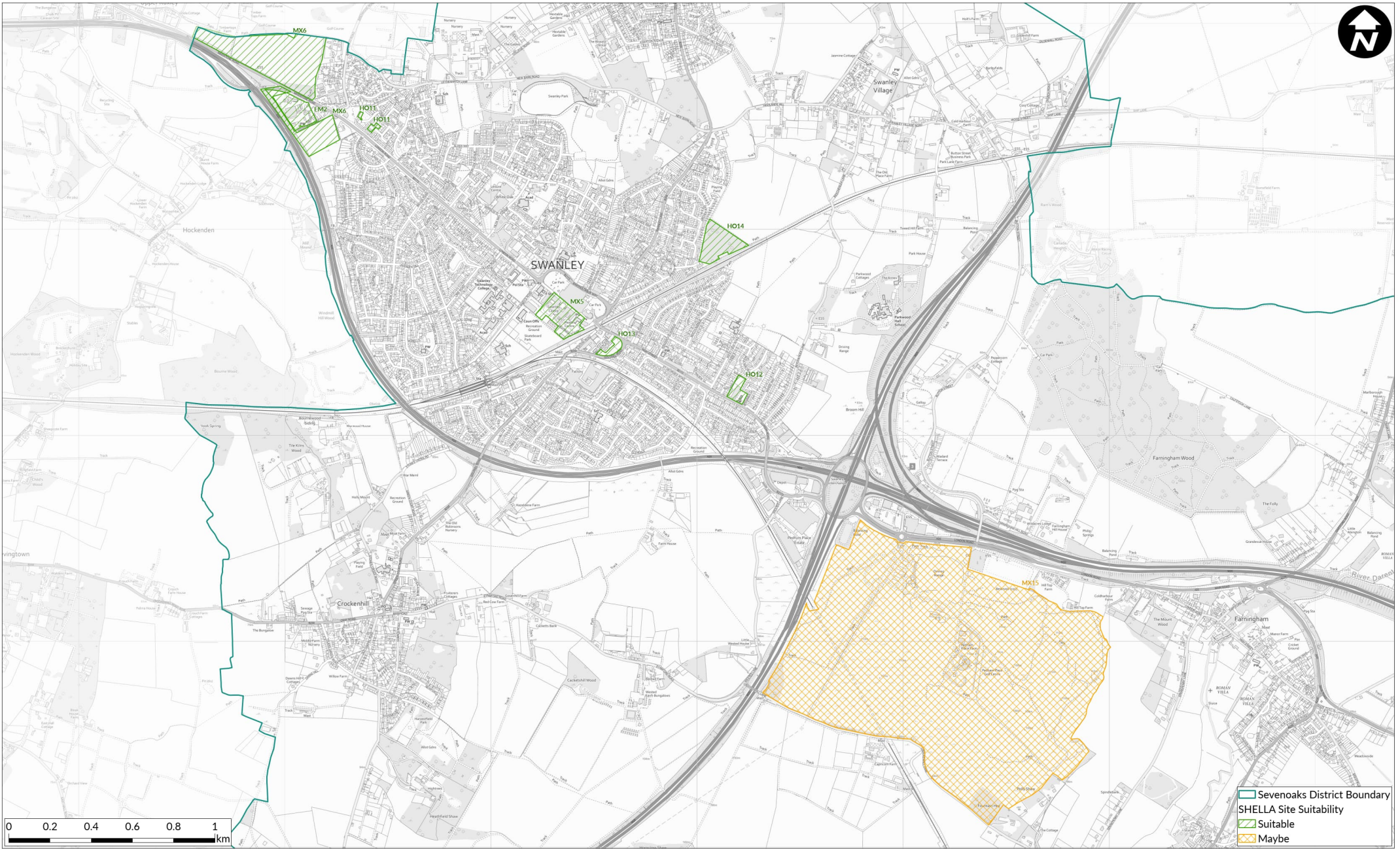
Importantly, the site is also being considered as part of a wider mixed-use masterplan, to provide a new multipurpose stadium complex (24-28,000 seats) that could host sport, concerts, conferences and events, training ground facilities and a supporting hotel (for Wasps Rugby Football Club) and a new indoor and outdoor tennis facility (as part of a wider school sports facility) in conjunction with the Lawn Tennis Association. All development would be within the Green Belt and the Kent Downs AONB. See www.sevenoaks.gov.uk/wasps.



Satellite image of Pedham Place



Swanley town centre regeneration is a place-making priority



Edenbridge

5.4.24 Beginning with **urban sites**, the following three are supported by the SHELAA:

- MX8 78-80 – 82-84 High Street and 1-2 Leathermarket (14 homes)
- MX7 Edenbridge War Memorial Hospital (34 homes)
- MX9 Open Space, Community Hall and Shop, Farmstead Drive (43 homes)

5.4.25 It is important to note that two of these sites (the MX8 and MX9) are located in a flood risk zone; however, it appears likely to be flood zone 2 in both cases. Also, housing-led redevelopment of urban sites subject to flood risk is not uncommon nationally, given good potential to mitigate flood risk, including through: avoiding vulnerable uses on the ground floor; measures to ensure safe access / egress; flood resistant / resilient design. With regards to the latter site, which is the largest of the three sites, it is noted that this site is central within an estate that is subject to a degree of multiple deprivation (in the Sevenoaks context), hence mixed use redevelopment of under-used open space may represent an important opportunity.

5.4.26 The combined capacity of these three urban site allocations is 91 homes, hence there is a clear case for considering Green Belt release (given district-wide LHN and the settlement hierarchy).

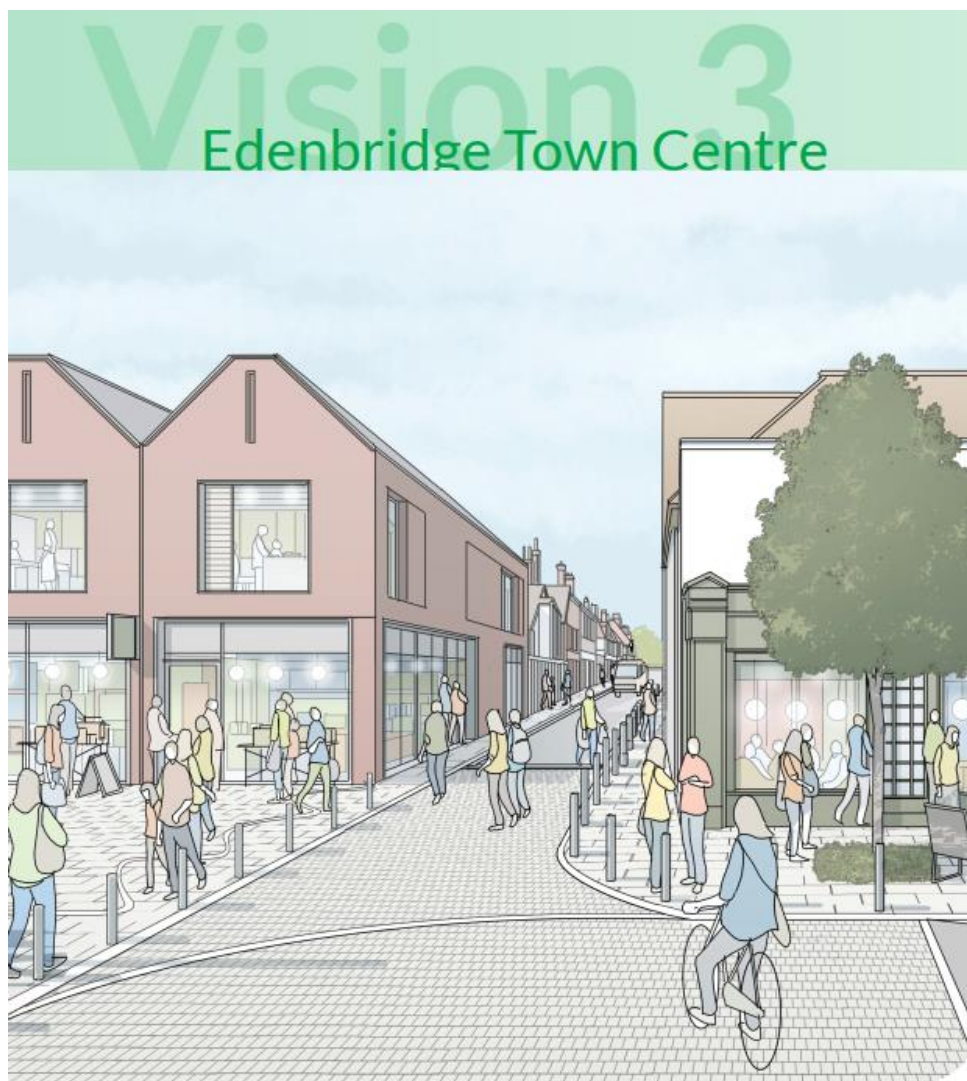
5.4.27 With regards to **Green Belt options**, the SHELAA identifies the following sites as 'suitable':

- HO15 Land west of Ashcombe Drive and Meadow Lane (80 homes) – is located in the north of the town, close to Edenbridge Station, but ~1.5km from the town centre and Edenbridge Town Station (from where there is a direct service to London). There is also currently no primary school within easy walking distance, although there is extensive employment land in the north of Edenbridge. There is some onsite/adjacent constraint in the form of mature historic field boundaries, including with TPO designation.
- HO16 Land at Crouch House Road (91 homes) – is located to the west of the town and performs well in terms of accessibility to the town centre, leisure centre and Edenbridge Town station. There are few concerns, although careful account would need to be taken of securing a defensible new Green Belt boundary, noting that this is a small part of a much larger 'unsuitable' SHELAA site (discussed below).
- MX11 Land east of Mead Road (120 homes) – is located at the southern extent of the town. This is the second site option discussed that comprises land not recommended for further consideration by the Stage 2 Green Belt Assessment. However, a relatively small proportion of the site boundary is open to the wider countryside, and there is the potential to draw upon a mature historic hedgerow as a new Green Belt boundary. Also, and importantly, the site would deliver a public Gypsy and Traveller site (which may or may not be an extension to the existing site). The town centre is accessible (~500m).
- HO17 Land north of Skinners Lane, Edenbridge (150 homes) – is located to the east of the town, and it is important to note that land adjacent to the south (south of Skinners Lane; not shown on Figure 5.8) comprises a large site discussed above as having a resolution to grant planning permission, namely Four Elms (340 homes plus a secondary school). Having accounted for the near-committed new secondary school, the site performs reasonably well in accessibility terms, and is otherwise subject to limited constraint. It will be important to ensure pedestrian accessibility through the Four Elms site.

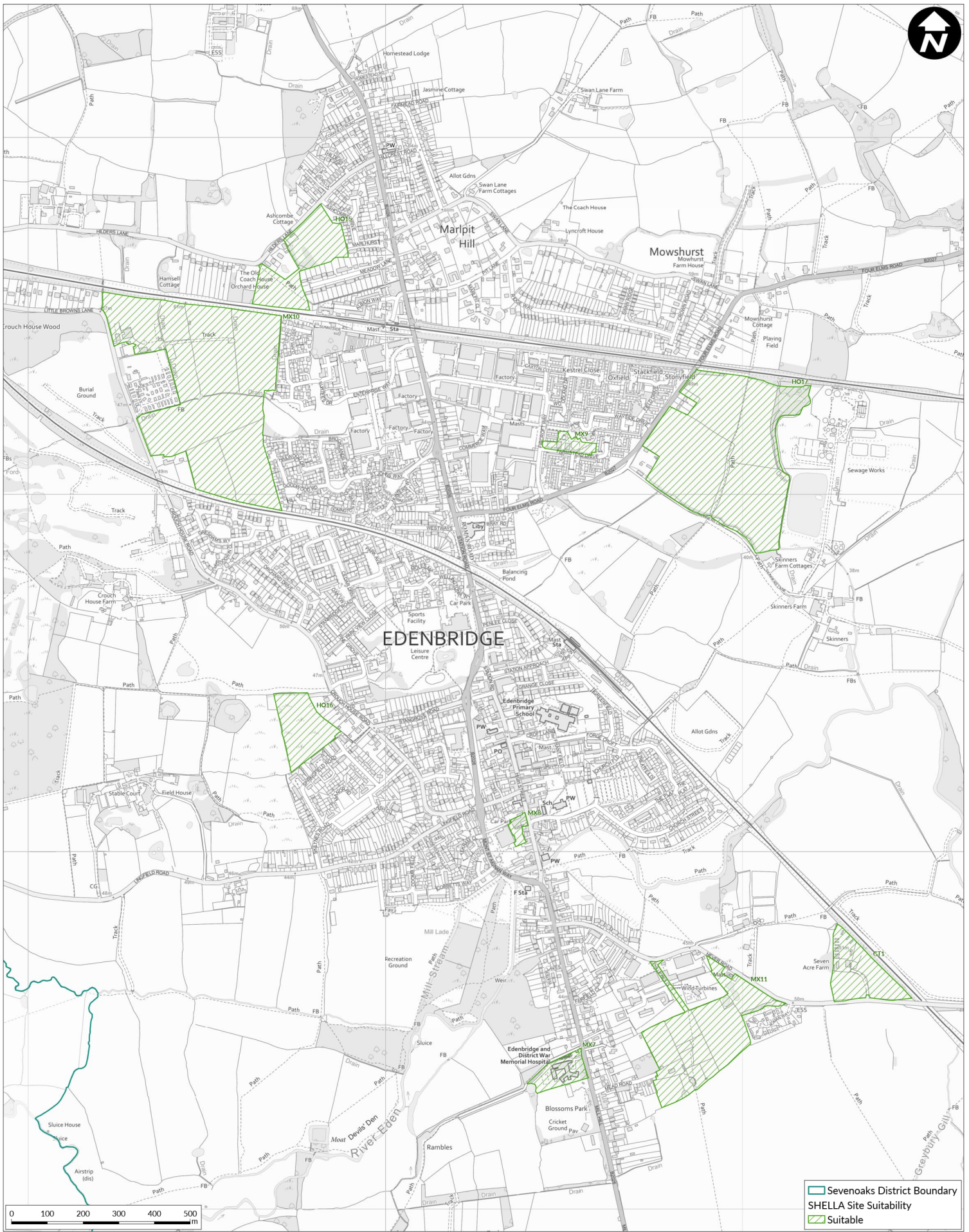
Finally, it should be noted that a combined scheme either side of Skinners Lane was previously a draft local plan proposal in 2018. This serves to highlight the importance of comprehensive planning, as far as possible, with a view to securing maximum benefits / 'planning gain' beyond new homes.

- MX10 Land at Breezehurst Farm, Crouch House Road (450 homes) – is located to the west of the town and would extend a large urban extension that is nearing completion. There is an opportunity to deliver a comprehensive urban extension to include employment land (1.4ha) and infrastructure benefits (hence avoiding the risk of further piecemeal growth with 'planning gain' opportunities missed). It appears that a comprehensive scheme in this area would be able to draw upon new defensible GB boundaries. However, a flood zone does pass through the centre of the site, and it is important to note downstream areas at risk, including an area with a degree of multiple deprivation. However, there will be good potential to avoid and buffer the flood zone. There is otherwise limited constraint, and the site performs reasonably in accessibility terms, with Edenbridge Station nearby and the town centre 1–1.5km distant.

- 5.4.28 There are no SHELAA ‘maybe’ sites at Edenbridge, reflecting the fact that no land parcels around the settlement edge intersect an AONB. However, but this does not give rise to any particular concern given the combined capacity of the sites discussed above (982 homes). Also, there is a need to recall the near-committed Four Elms site as well as the recent / near complete urban extension to the west.
- 5.4.29 The next port of call could potentially be HO/21/00228 – which includes the Land at Crouch House Road site discussed above – noting that a 250 home scheme here was previously proposed within the draft plan published for consultation in 2018 (before being removed in the subsequent version submitted in 2019).
- 5.4.30 It is also noted that a very large site is available to the north east, but the aforementioned large urban extension options to the west (Breezehurst Farm) and east (Land north of Skinners Lane) are preferable, given a better relationship to the built form of the town, the town centre and train stations.
- 5.4.31 In **conclusion**, the capacity of the SHELAA ‘suitable’ sites is 982 homes, which represents a fairly high growth strategy for Edenbridge, and it is not clear that there is any reasonable higher growth scenario. With regards to lower growth, it is not possible to pinpoint any of the SHELAA supported sites as more marginal, other than to ‘flag’ the two urban sites subject to flood risk; however, it is considered likely that these sites will be judged suitable for allocation following discussions with the Environment Agency. Also, it is important to generally recall key aspects of the strategic context, namely: the stretching nature of district-wide housing need; the position of Edenbridge in the settlement hierarchy; good train connectivity and a near-committed new secondary school; constraints to growth at Sevenoaks (discussed above) and Westerham (discussed below), including AONB-related; and uncertainty regarding the potential for high growth at Swanley. In this light, there is considered to be only one reasonable growth scenario:
- Scenario 1 – SHELAA ‘suitable’ sites (urban and Green Belt) = 982 homes



“A flourishing town centre that celebrates its history through investment and renewal...”



SHELLAA Sites Autumn 2023

Edenbridge

Scale: 1:3,400 @ A0
Date: October 2023



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Westerham

5.4.32 Beginning with **urban sites**, the following three sites are supported by the SHELAA:

- HO18 Falcon House and grounds, Black Eagle Close (9 homes)
- HO19 Land north-east of Bloomfield Terrace (10 homes)
- HO20 Currant Hill Allotments (26 homes)

5.4.33 The smaller two sites inherently give rise to limited concerns, whilst the larger site is an existing allocation from the ADMP (2015) (such that there is a need to consider deliverability risks).

5.4.34 The combined capacity of these urban site allocations is 45 homes, hence there is a clear case for considering Green Belt release. Another factor is that Westerham is associated with notably low levels of commitments and also low identified urban capacity through the Settlements Capacity Study. Also, a review of historic satellite imagery serves to suggest limited housing growth over recent years / decades.

5.4.35 However, the SHELAA does not identify 'suitable' Green Belt sites at Westerham. As such, the only option for growth beyond urban and windfall supply is to allocate one or more of the four 'maybe' sites identified through the SHELAA, which are all located in the AONB. Taking the sites in turn:

- HO30 Land south of Farley Lane (10 homes) – the site is adjacent Farley Common, which is a Local Wildlife Site (LWS), and it appears that access could be challenging without impacting a hedgerow closely linked to the common. These are important considerations given the location of the site within the AONB. However, the site appears to be otherwise subject to limited constraint.
- MX14 Land at Wolfe, 190 London Road (10 homes) – is proposed for 10 homes and 1.8ha of employment floorspace and five commercial units. As such, the site has the potential to deliver notable benefit to the village beyond new homes. There is an existing garage located centrally within the site, and the intention would be to deliver new homes to south and employment to the north, which is a logical arrangement. However, the effect of the new homes would be to isolate a small area of greenspace (Green Belt) to the south that is associated with a cluster of historic buildings one that is Grade II listed. It is noted that [historic mapping](#) shows a brickworks on part of the land that is proposed for new homes, although there is little or no evidence of this on the earliest aerial imagery (1960; see Google Earth).
- HO31 and HO32 Land east of Croydon Road (north and south parcels) (76 homes and 82 homes) – are adjacent sites that can be considered together. Indeed, there is a case for ensuring that any expansion to the north of Westerham is undertaken in a strategic and comprehensive manner, with a view to securing benefits and avoiding the risk of sub-optimal piecemeal expansion over time – see Box 5.4. One point to note is that the SHELAA records "difficult access off of Croydon Road".

5.4.36 In **conclusion**, the capacity of the SHELAA 'suitable' sites is just 45 homes, which amounts to very low growth in the context of district-wide LHN and Westerham's position in the settlement hierarchy (albeit Westerham is considerably smaller than the other towns discussed above and does not benefit from either a secondary school or rail connectivity). There is also the context of limited recent and committed growth, plus Westerham is associated with notably high house prices / poor affordability. As such, it is reasonable to consider the option of allocation within the AONB. However, it is difficult to make assumptions regarding the scale and configuration of growth, let alone the nature of the infrastructure upgrades that would be delivered alongside new homes. On balance, at the current time, it is reasonable to assume support for the three SHELAA 'maybe' sites only, resulting in two reasonable scenarios to progress to Section 5.5:

- Scenario 1 – SHELAA 'suitable' sites (urban) = 45 homes
- Scenario 2 – Scenario 1 plus three SHELAA 'maybe' sites (AONB) = 223 homes

Box 5.4: Ensuring a strategic approach to growth at Westerham

Land to the north of Westerham was the central component of a strategic scheme - known as Which Way Westerham - previously included within the draft plan published for consultation in 2018, but then removed from the subsequent version of the plan submitted in 2019. It additionally included land to the west of Croydon Road (including south of Farley Lane), as well as a large area of land to the east of the town (between the town and the A233). However, the scheme did not include the 'Land at Wolfe' site discussed above.

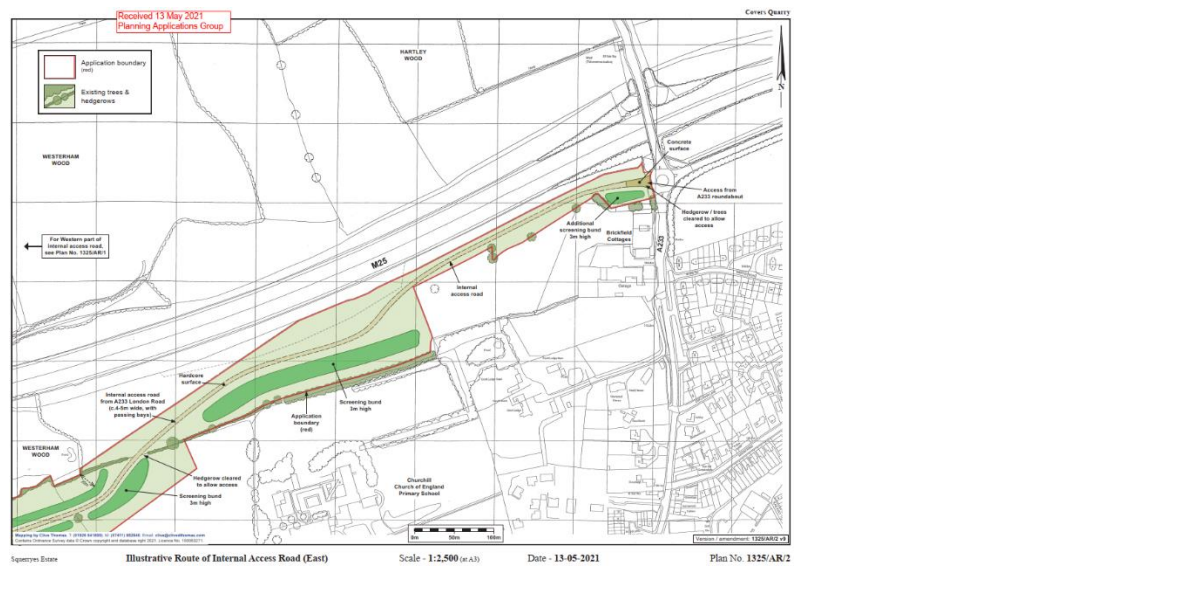
The scheme was proposed by a large landowner and would have involved ~600 homes alongside employment land, a northern relief road for the town, community facilities (a community hub associated with the current large primary school located to the north of the town) and new accessible greenspace. With regards to the relief road, the intention was for this to extend from the A233 roundabout at the north east extent of the town to the A25 west of the town via the current Covers Farm Quarry, which would be restored. As such, it would have delivered a bypass to the town, addressing the current issue of traffic and poor air quality within the historic town centre. Reduced town centre traffic could also help to boost the town's tourism / visitor economy offer. However, there are biodiversity, AONB and historic environment constraints with a bearing on any such bypass options.

Land to the east of the town is not recommended for further consideration by the Green Belt Assessment (2023). It could be considered nonetheless, recognising the importance of taking a long term approach to growth and revision of Green Belt boundaries; however, for the time being it is assumed that key options for strategic growth at Westerham focus on the sector of land to the north of the town. Specifically, the question arises as to whether a suitably comprehensive scheme could be achieved within this sector across sites MX/21/00008, HO/21/00211 and HO/21/00210 (also small aforementioned site HO/21/00214, which is in the same land ownership).

More specifically, the question is whether a scheme across these land parcels could deliver benefits to the village beyond new homes along the lines of the 'Which Way Westerham' proposal from 2018. It may be that there is limited opportunity in this respect, given the combined capacity of the component sites (under 200 homes) and the involvement of least two different landowners. However, opportunities / options should be explored. It will be important to account for the views of the County Council in respect of transport and education issues/opportunities, and it is understood that local GP capacity is another factor to consider.

In addition to the obvious constraints of the AONB and the nearby M25 (the proposal was to deliver new noise mitigation that may have benefits the existing village) and the forementioned issue of traffic and poor air quality through the town centre conservation area, other considerations within the sector of land to the north of Westerham are: Westerham Woods SSSI (a large woodland and currently not publicly accessible, hence the possibility of achieving public access could be explored); mature historic field boundaries; and a small stream that follows the Croydon Road with properties potentially subject to flood risk downstream.

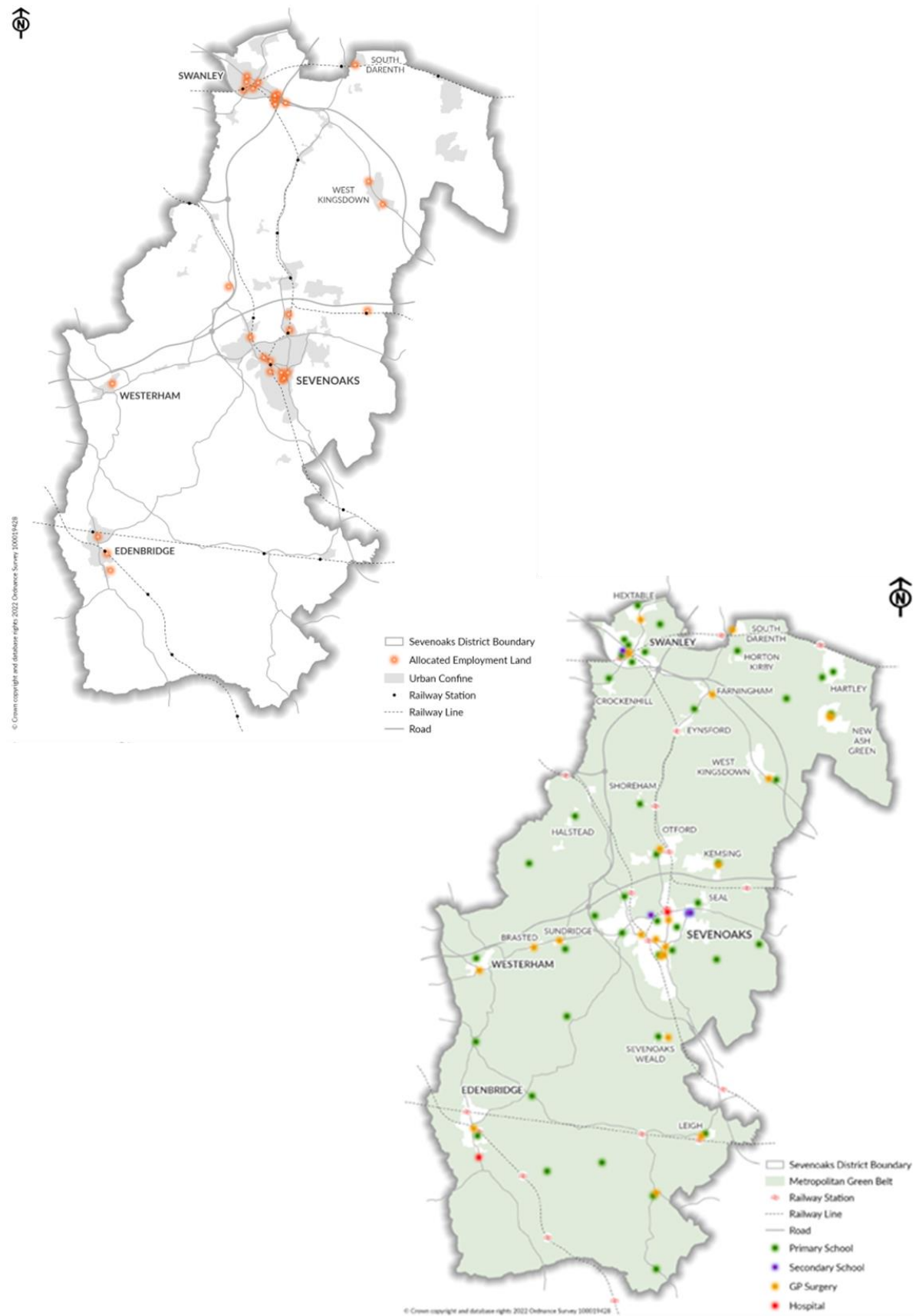
Finally, there is important recent context in the form of a pending planning application for Covers Farm Quarry, which would involve restoring the quarry by filling it with builder's spoil from South East London over a period of several years (an important waste management function). This application is currently being considered by Kent County Council (ref. KCC/SE/0495/2018). It would involve a temporary access road for HGVs (see image below) between the A233 and the Croydon Road, i.e. stretching across the sector of land north of Westerham. This serves to emphasise the importance of strategic long term planning for growth at Westerham.



New Ash Green

- 5.4.37 Beginning with **urban sites**, the following two sites are supported by the SHELAA:
- HO21 The Forge, Ash (10 homes)
 - MX12 New Ash Green Village Centre (70 homes)
- 5.4.38 The smaller site inherently gives rise to limited concerns, whilst the larger site is an existing allocation from the ADMP (2015) (such that there is a need to consider deliverability risks).
- 5.4.39 The combined capacity of these urban site allocations is 80 homes, which is potentially a reasonable quantum of homes for New Ash Green, recognising that it is a third tier settlement within the settlement hierarchy (along with Otford, discussed below). However, it is also reasonable to explore growth scenarios involving Green Belt release, given the stretching nature of the district-wide LHN and constraints to growth / limited supply options elsewhere. Other key strategic considerations for New Ash Green include:
- poor accessibility credentials (secondary school, employment) and poor transport connectivity, although, on the other hand, Dartford and the Medway Towns are in relative proximity, and there is an aspiration to boost connectivity to Sevenoaks (growth could assist);
 - a location outside of an AONB and limited historic environment constraint, but a unique position in a heavily wooded raised / undulating landscape (dip slope of the Kent Downs); and
 - a need to support village centre regeneration and also take a strategic approach that accounts for growth at nearby villages (including within Gravesham Borough) and at Swanley.
- 5.4.40 Figure 5.9 is presented to give a further flavour of the ‘accessibility’ credentials of the villages in the north east of the District beyond the AONB, notably New Ash Green, West Kingsdown and Hartley, but also smaller villages (and not forgetting nearby villages in Gravesham Borough, notably New Ash Barn).
- 5.4.41 With regards to **Green Belt options**, the SHELAA identifies just one site as ‘suitable’, namely HO22 Grosvenor, Church Road (8 specialist units), which gives rise to few concerns as a small site. Church Road is a historic lane and the western edge of the site comprises a historic field boundary.
- 5.4.42 The SHELAA does not identify any ‘maybe’ sites, hence there is a need to give proportionate consideration to the SHELAA ‘unsuitable’ sites.
- 5.4.43 There are numerous sites, but on the basis of the Green Belt Assessment (2023) attention potentially focuses on HO/21/00280, which is located to the north east of the village. However, this is a former orchard (see historic aerial imagery) adjacent to an ancient woodland, with numerous remnant orchard trees within the site (the site is shown as traditional orchards priority habitat by the national dataset). These are clustered such that the possibility of a modest housing scheme that avoids the loss of trees might be explored (potentially to include some woodland creation, to buffer the adjacent ancient woodland and secure a new Green Belt boundary), but the capacity of any such scheme would likely be limited.
- 5.4.44 The Green Belt Assessment (2023) serves to suggest that other SHELAA ‘unsuitable’ sites contribute strongly to Green Belt purposes. Attention potentially focuses on land to the west of the village (abutting the village edge), either side of Manor Lane (possibly with a new woodland planted to secure a defensible Green Belt boundary). However, not all of the land in this area comprises a SHELAA site.
- 5.4.45 In **conclusion**, in light of the above discussion there is considered to be only one reasonable scenario:
- Scenario 1 – SHELAA ‘suitable’ sites (Urban and Green Belt) = 88 homes

Figure 5.9: Designated employment land and key community facilities and across the District





Otford

5.4.46 Beginning with **urban sites**, the following two sites are supported by the SHELAA:

- HO24 Ryecroft, Ryecroft Road (7 homes)
- HO23 Otford Builders Merchants, High Street (14 homes)

5.4.47 The former sites gives rise to few concerns, with the site comprising the grounds of a single house in a residential area, and the house in question not shown on the pre-WWI OS map (the land in question is shown as a gravel pit). The latter site is located within the village centre conservation area, and there are listed buildings in proximity, including one that is Grade II* listed, but this is an existing industrial site.

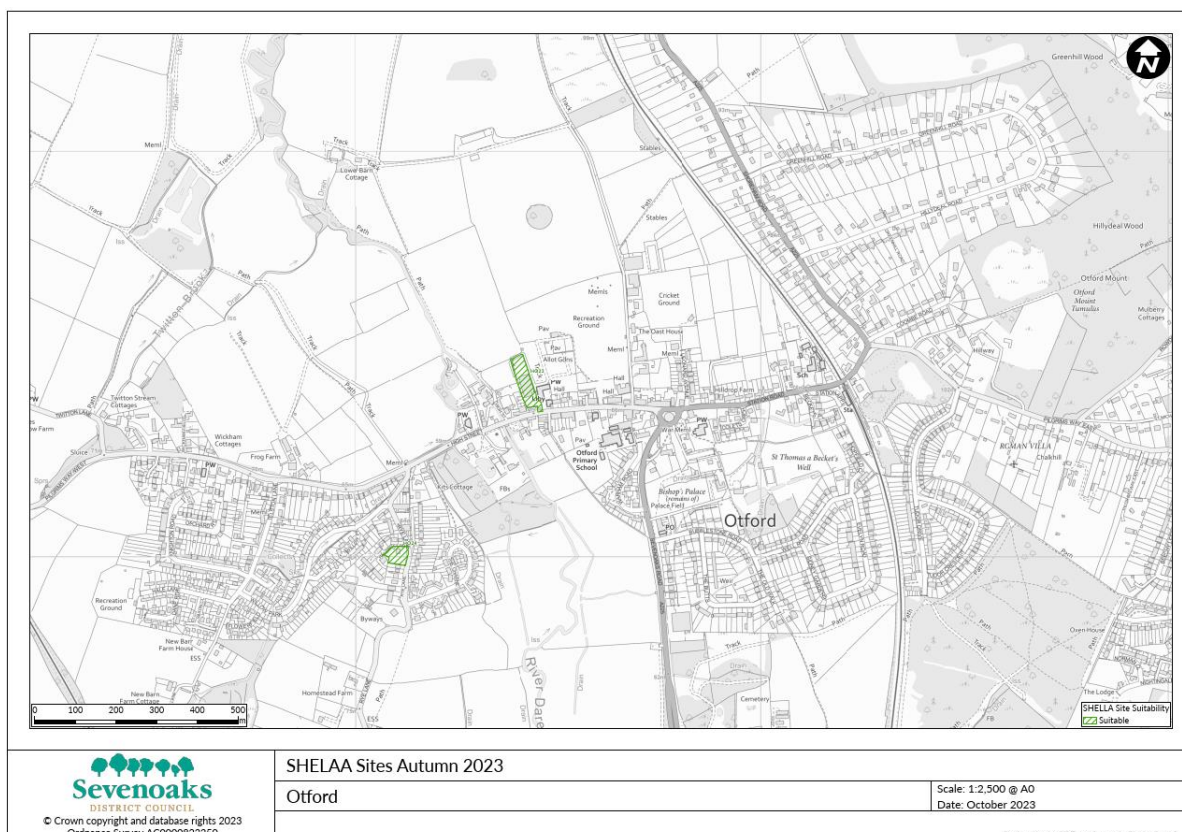
5.4.48 The combined capacity of these two urban sites is 21 homes, which is low given the position of Otford in the settlement hierarchy and constraints / limited supply options elsewhere. Otford is located within the AONB and occupies a notably sensitive location along the Darent Valley, with nearby high points within the Kent Downs. However, there is a train station and very good accessibility to Sevenoaks.

5.4.49 In this light, there is a strategic case to be made for exploring **Green Belt options**; however, in practice the SHELAA does not identify any 'suitable' or 'maybe' sites. In turn, there is a need to give proportionate consideration to the SHELAA 'unsuitable' sites.

5.4.50 The Green Belt Assessment (2023) recommends further consideration of just one very small site at the south west extent of the village (HO/21/00203), but this site is heavily wooded (it is shown as woodland on historic aerial imagery from 1990 onwards). It is also noted that the North Downs Way National Trail is nearby. Beyond this site, attention potentially focuses on land to the north of the village, to the west of the railway line. However, landscape and historic environment sensitivities are a clear constraint to strategic growth (including noting public rights of way, including Park Lane; also the North Downs Way passing through the village centre), and not all of the land that would need to be considered as part of a strategic village extension comprises a SHELAA site. There are not known to be any Otford-specific reasons for considering strategic growth (e.g. to deliver new community facilities), and it is noted that the near committed Sevenoaks Quarry site (950 homes, discussed above) is nearby.

5.4.51 In **conclusion**, in light of the above discussion there is considered to be only one reasonable scenario:

- Scenario 1 – SHELAA 'suitable' sites (Urban) = 21 homes



Hartley

- 5.4.52 The SHELAA does not identify any 'suitable' urban sites at Hartley, hence attention focuses on **Green Belt options**, if there is to be any housing growth at the village beyond planning permissions and windfall. With regards to planning permissions, these total around 78 homes, which is quite a high figure, e.g. in comparison to New Ash Green and Otford (which are higher order settlements), where the equivalent figures are 3 and 6 respectively. However, a review of historic satellite imagery serves to suggest that there has been very limited housing growth over recent years / decades.
- 5.4.53 The SHELAA identifies one 'suitable' Green Belt site, namely HO25 Land to the west of Manor Lane (25 homes). This site is subject to notable biodiversity and access constraints, namely: A) it will presumably be accessed from a narrow historic lane; and B) the site is shown on historic mapping and aerial imagery from the 1940s as comprising orchards, although aerial imagery from 1960 shows that the land had been cleared by this date. There is adjacent former orchard, and mature wooded boundaries around the perimeter of the site, including along the lane that would presumably provide access.
- 5.4.54 The SHELAA does not identify any 'maybe' sites, and the quantum of growth from the supply options discussed above is potentially suitable for a fourth tier settlement such as Hartley. However, on the other hand, there is a need to recall that the village benefits from a train station and there is limited landscape and historic environment constraint. In this light, there is a case to be made for giving proportionate consideration to SHELAA 'unsuitable' sites.
- 5.4.55 Attention focuses on two parcels of land recommended for further consideration by the Green Belt Review. However, the first parcel comprises a local nature reserve, whilst the second comprises a primary school and sports pitches. Looking more widely, it should be noted that draft plan published for consultation in 2018 did propose strategic growth to the west of Hartley (800 homes). However, this is not considered a reasonable option for consideration at the current time, given: the proposal was not taken forward to the next version of the plan published in 2019; not all of the land in question comprises a SHELAA site; and there are clear Green Belt and wider constraints.
- 5.4.56 Attention potentially focuses on 'unsuitable' SHELAA site HO/21/00062, to the west of the village, because it could deliver a significant number of homes in relative proximity to the train station; however, there would be clear concerns regarding securing a new Green Belt boundary, particularly once account is taken of the likely point of access. Also, development here would not be of a scale sufficient to deliver new community infrastructure to the benefit of the village (also recalling that Hartley links closely to New Ash Green and also villages in Gravesham Borough).
- 5.4.57 A final site that could potentially be considered is SHELAA 'unsuitable' site HO/21/00077, located at the southern extent of the village, noting that there is a degree of capacity in Green Belt terms, and also given that the site is partly brownfield. However, constraints are: land here contributes to the gap between Hartley and New Ash Green (although it is important to recall that both are primary 20th century new settlements, which arguably serves to limit concerns); this is descending land potentially indicating a degree of Green Belt and landscape sensitivity; and the site is distant from the train station (~2km).
- 5.4.58 In **conclusion**, the growth strategy for Hartley does warrant further consideration, for reasons including: constraints affecting the one SHELAA supported site; certain strategic arguments for growth, including those that led to the proposal for an 800 home village extension in 2018; and certain sites not supported by the SHELAA that are associated with a degree of merit (albeit also constraints / issues). However, it is not clear that there is a strategic choice that warrants further detailed consideration at the current time. As such, it is reasonable to progress only one growth scenario to Section 5.5:
- Scenario 1 – SHELAA 'suitable' site (Green Belt) = 25 homes



SHELLAA Sites Autumn 2023

Hartley

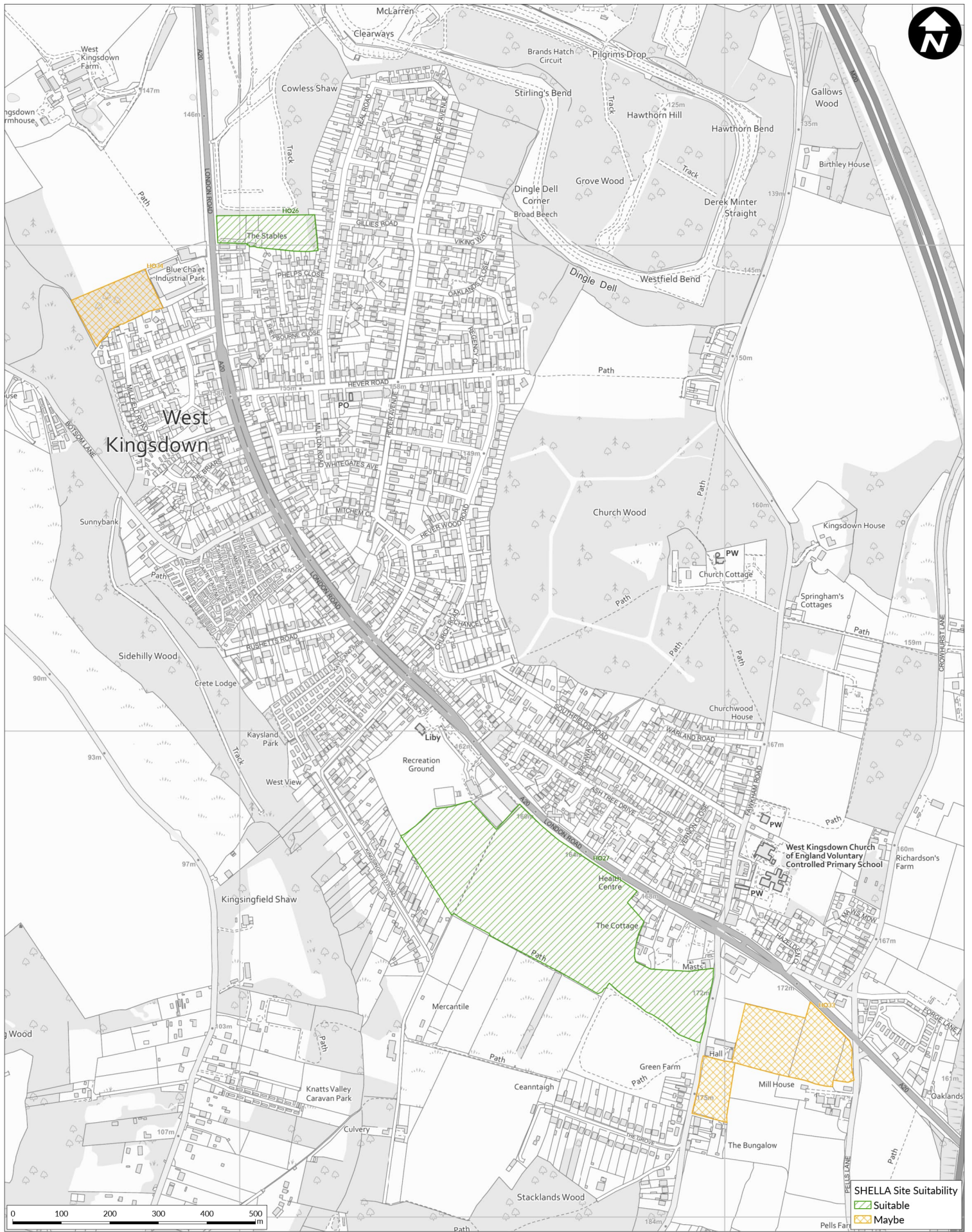
Scale: 1:2,500 @ A0
Date: October 2023



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West Kingsdown

- 5.4.59 The SHELAA does not identify any 'suitable' urban sites at West Kingsdown, hence attention focuses on **Green Belt options**, if there is to be any housing growth at the village beyond planning permissions.
- 5.4.60 The SHELAA identifies the following two 'suitable' Green Belt sites:
- HO26 Land on the east side of London Road (15 homes)
 - HO27 Land at London Road (189 homes)
- 5.4.61 The former site gives rise to few concerns, although it is noted that there could be a degree of noise pollution both from the adjacent A20 and also nearby Brands Hatch. Also, it is noted that the field boundary at the northern extent of the site, which would be drawn upon to secure a new defensible Green Belt boundary, was planted about 20 years ago.
- 5.4.62 With regards to latter site, it is recommended for further consideration by the Green Belt Assessment (2023), but there is a need to scrutinise the potential to secure a new defensible Green Belt boundary (presumably the adjacent AONB boundary will assist in this respect). Otherwise the site is subject to limited constraint, other than being strongly associated with the busy A20. The village lacks a clear centre, but this site is in proximity to all of the village facilities, hence there will be a strong argument in favour of supporting this site if it can deliver a community hub or similar to the benefit of the village.
- 5.4.63 The two sites discussed above would deliver a total of 204 homes, which represents a fairly high growth strategy for a fourth tier village such as West Kingsdown. Also, it is important to recall that the village does not benefit from a train station. However, on the other hand, the village is subject to very low historic environment constraint, is quite well connected to Swanley via the A20 and there are arguments for exploring growth options that would deliver benefits to the village, e.g. in terms of a local centre. There is also an aspiration to improve bus connectivity between West Kingsdown and Sevenoaks.
- 5.4.64 In this light, the two SHELAA 'maybe' sites located within the AONB do warrant further consideration:
- HO34 Land at Millfield Road (30 homes) – is located at the north west extent of the village and gives rise to limited concerns other than from an accessibility perspective, noting that it is located at the opposite end of the village to the primary school (~2km), although there is a nearby bus stop on the A20. The site is shown as priority woodland habitat on the national dataset, and has been wooded in the recent past, but is not shown as wooded on historic aerial imagery or mapping. It is also noted that Knatts Valley Local Wildlife Site (LWS) is adjacent to the west.
 - HO33 Land at Mill Farm (115 homes) – would extend the Land at London Road site discussed above and, as such, could assist significantly in respect of the objective of developing something of a local centre for the village. This is the historic core of the village, as shown on [historic mapping](#). However, the site is bounded on two sides by historic lanes that link the village to high points in the AONB, with one of the lanes associated with a Grade II listed windmill and the other a historic school house.
- The site boundary is thought to partly reflect this proposal to develop a rural exception housing scheme. However, even after having accounted for this, there appears to be a key parcel of land appears not to have been submitted to the Council for consideration. Also, the southern-most parcel of land within the site boundary is problematic from a perspective of defining a defensible Green Belt boundary.
- There is a need to ensure a comprehensive approach to growth in this sector of land south of the A20, north of sensitive woodlands and existing built form (isolated residential areas) and west of the M20.
- 5.4.65 In **conclusion**, it is considered reasonable to explore a high growth scenario for West Kingsdown, given: A) the strategic context; and B) the sites in question, which are both associated with a strong degree of merit (limited constraint in the case of one, and a potential opportunity in the case of the other).
- 5.4.66 As such, the following two growth scenarios are progressed to Section 5.5:
- Scenario 1 – SHELAA 'suitable' sites (Green Belt) = 204 homes
 - Scenario 2 – Scenario 1 plus two SHELAA 'maybe' sites (AONB) = 349 homes



5.5 Reasonable growth scenarios

- 5.5.1 The final step is to **combine sub-area scenarios** to form district-wide reasonable growth scenarios.
- 5.5.2 In short, Section 5.4 identifies two scenarios for four sub-areas – which can be described as simply ‘lower growth’ and ‘higher growth’ scenarios – and one scenario for the remaining four sub-areas.
- 5.5.3 It is not possible to reflect all of the possible combinations across the district-wide growth scenarios, hence it was considered pragmatic and appropriate to focus attention on the following combinations:
- Lower growth across all sub-areas
 - Higher growth at Sevenoaks, Westerham and West Kingsdown, lower elsewhere
 - Higher growth at Swanley (Pedham Place new settlement), lower elsewhere
 - Higher growth at Sevenoaks, Swanley, Westerham and West Kingsdown, lower elsewhere
- 5.5.4 However, the first of these district-wide scenarios is unreasonable, because it would deliver an insufficient quantum of growth, in light of Local Housing Need (LHN) and other strategic factors discussed above.
- 5.5.5 As such, there are **three reasonable growth scenarios** for appraisal and consultation – see Table 5.1 (summary), Table 5.2 (detailed) and Figure 5.10 (which additionally shows the unreasonable scenario).
- 5.5.6 These scenarios are considered to reflect an appropriate range in terms of **total growth quantum**, in light of the discussion of strategic factors, site options and settlement scenarios presented above. The final row of Table 5.2 indicates that total supply under Scenarios 1 and 2 is less than LHN (and significantly so in the case of Scenario 1); however, the reality is that work is ongoing all the time to identify ways of boosting supply. For example, at the time of writing, detailed design work is ongoing in respect of the Sevenoaks Train Station allocation, and the likely outcome will be a significant boost to the site capacity. Also, new sites will likely be submitted as available through the current consultation, which can then be given consideration with a view to potential allocation at the next stage of plan-making.
- 5.5.7 Final points to note are:
- Box 5.5 discusses provision for employment land and Gypsy and Traveller accommodation needs.
 - The phrase ‘all reasonable alternatives’ does not equate to all conceivable alternatives,¹¹ and there will be the potential to revisit reasonable growth scenarios subsequent to the current consultation.

Box 5.5: Summary of approach to providing for employment land and Gypsy and Traveller accommodation needs

Beginning with employment land, the first point to note is that the identified need district-wide is quite modest, as discussed in Box 5.1. It should be possible to comfortably exceed the identified need figure via:

- Mixed use urban allocations in Sevenoaks
- Two standalone employment sites at Sevenoaks (Vestry Estate) for a total of ~2ha
- A mixed use development to the north west of Swanley, also a small adjacent employment site (~3.4ha)
- A mixed use development to the west of Edenbridge (1.4 ha)

Additionally, Land at Wolfe, Westerham, would deliver an additional ~1.8 ha under Scenarios 1 and 3, and Pedham Place new settlement would deliver an additional ~4.9 ha under Scenarios 2 and 3.

With regards to Gypsy and Traveller pitches, the approach to allocation is held constant across the scenarios:

- Seven Acres Farm, Edenbridge - 5 pitches (extension to existing site of 10 pitches)
- Station Court, Sevenoaks Road, Knockholt – 12 pitches (extension to existing site of 4 pitches)
- Mead Road, Edenbridge – 5 pitches (new site)

The total need for new pitches is 47 pitches over the plan period, hence there will be a need for further work to identify additional supply prior to plan finalisation.

¹¹ This is a quote from an Inspectors Report, see www.aylesburyvaldc.gov.uk/sites/default/files/VALP/VALP%20Report.pdf

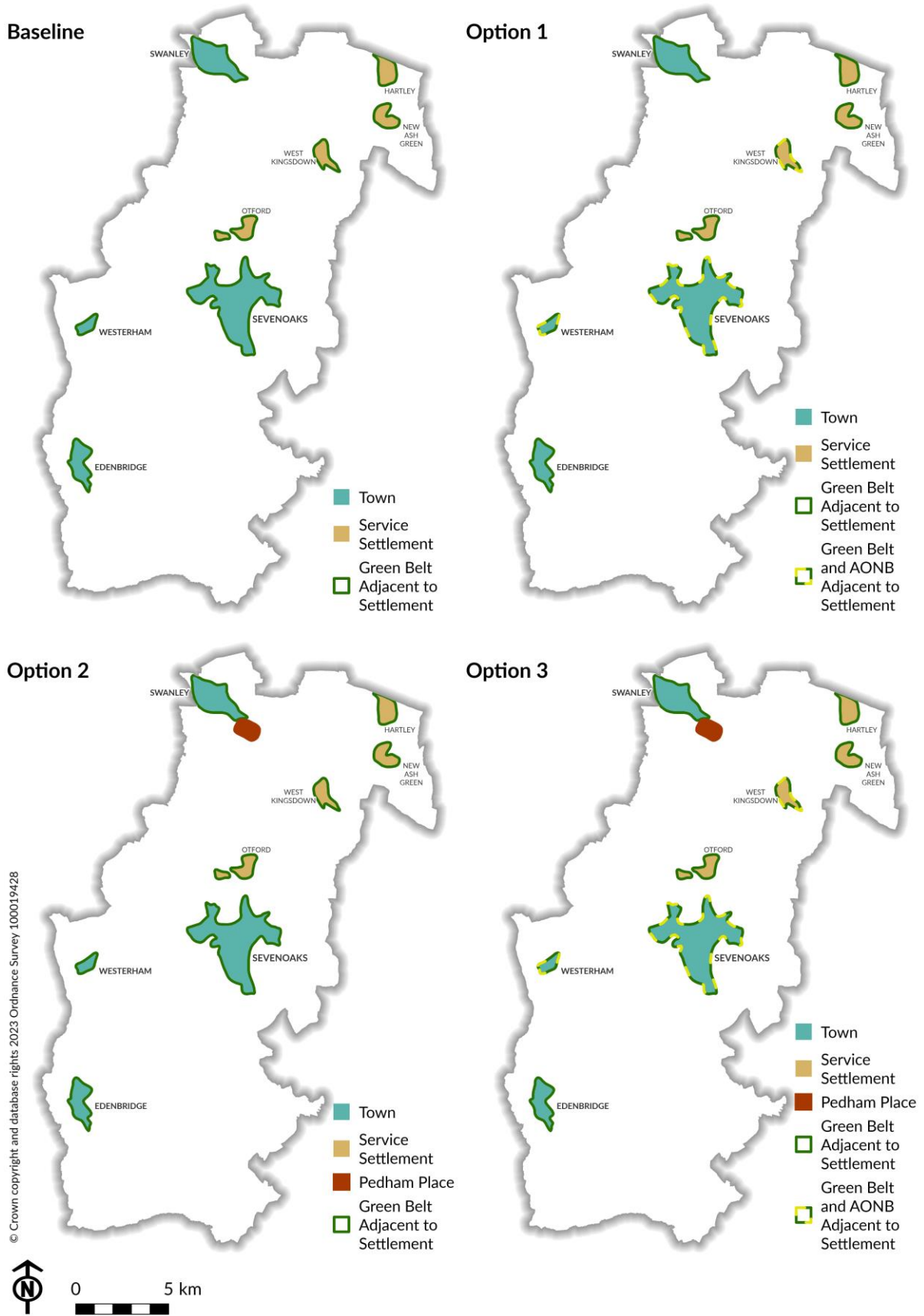
Table 5.1: The reasonable alternative growth scenarios (summary)

Supply component	Scenario 1 Green Belt AONB	Scenario 2 Green Belt Pedham Place	Scenario 3 Green Belt AONB Pedham Place
Planning permissions	1,995	1,995	1,995
Windfall allowance	1,185	1,185	1,185
Settlement Capacity Study	565	565	565
Strategic Sites with resolution to grant	975	975	975
Sites proposed for allocation	4,623	6,247	7,123
Total homes	9,343	10,967	11,843

Table 5.2: The reasonable alternative growth scenarios (detail; N.B. constants greyed-out)

Supply component		Scenario 1 Green Belt AONB	Scenario 2 Green Belt Pedham Place	Scenario 3 Green Belt AONB Pedham Place	
Planning permissions		1,995	1,995	1,995	
Windfall allowance		1,185	1,185	1,185	
Settlement Capacity Study		565	565	565	
Strategic Sites with resolution to grant		975	975	975	
Allocations	Sevenoaks	Urban	786	786	
		Green Belt	1,761	1,208	
	Swanley	Urban	138	138	
		Green Belt	250	2,750	
	Edenbridge	Urban	91	91	
		Green Belt	891	891	
	Westerham	Urban	45	45	
		Green Belt	178	0	
	New Ash Green	Urban	80	80	
		Green Belt	8	8	
	Otford	Urban	21	21	
		Green Belt	0	0	
	Hartley	Urban	0	0	
		Green Belt	25	25	
	West Kingsdown	Urban	0	-	
		Green Belt	349	204	
	Total homes		9,343	10,967	11,843
	% above/below LHN (10,680)		-14%	3%	10%

Figure 5.10: The reasonable alternative growth scenarios (or simply 'options') for the Local Plan



Part 2: What are the appraisal findings at this stage?

6 Introduction to Part 2

6.1.1 This part of the report presents an appraisal of the three reasonable alternative growth scenarios.

N.B. the appraisal focuses on the **reasonable alternative growth scenarios** because they are central to the current consultation. Also, this is appropriate given the importance of focusing on ‘significant effects’ (as understood both from the legislation and guidance) where significance is defined in the context of the plan as a whole. Furthermore, there is a need for concise SA reporting (SA has widely been criticised as poorly targeted). However, the current consultation also presents draft **development management policies** (as was the case for the Initial Consultation held in 2022). Brief account is taken of draft development management policies as part of the appraisal below, and some recommendations are made.

7 Growth scenarios appraisal

7.1 Introduction

7.1.1 This section presents an appraisal of the three alternative growth scenarios under the SA framework.

Appraisal methodology

7.1.2 The appraisal is presented under 12 headings – one for each of the topics that together comprise the SA framework (see Section 3), before a final section presents an overview ‘matrix’. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.¹²

7.1.3 It is important to be clear that there is a need to make significant assumptions, e.g. around scheme masterplanning, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness and accessibility.

7.1.4 Final methodological points to note are:

- Section 5.4 – the aim is to minimise repetition of text within Section 5.4, where all of the site options in question are discussed in turn.
- Green Belt sites – are a particular focus, but some consideration is also given to urban sites.
- Growth quantum – it is not always appropriate to conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite inevitable localised impacts. This is because low growth could either result in: unmet housing needs (if the housing requirement is set at a figure below LHN) that would have to be provided for elsewhere within a constrained sub-region; or a housing supply trajectory that lacks robustness due to the lack of a sufficient supply buffer, leading to a risk of the Local Plan becoming out-of-date such that ‘the presumption in favour of sustainable development’ applies.



The appraisal focuses on the proposed development strategy

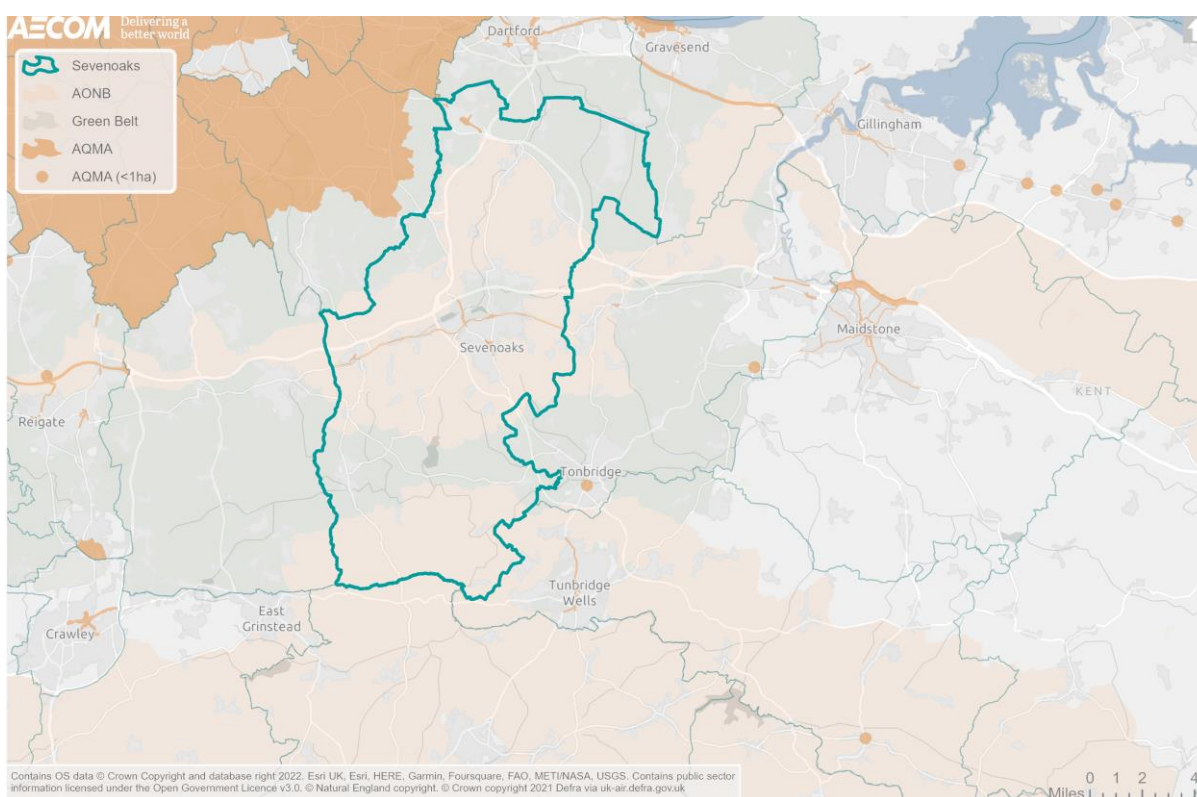
¹² **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

7.2 Air quality

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
2	1	2

7.2.1 Air quality is a significant issue in the central and northern parts of the District. Similarly, air quality is an issue across the wider sub-region, particularly across north Kent, and there is a blanket AQMA covering much of London. Air quality is set to improve significantly as the national car fleet moves away from internal combustion engine (ICE) vehicles, but air quality will remain an issue. For example, and notably, the weight of electric vehicles (EVs) leads to increased particulates from tyres, brakes and road surfaces.

Figure 7.1: Air Quality Management Areas (AQMAs) across the District and wider sub-region



7.2.2 Taking the key settlements in turn:

- **Sevenoaks and Westerham** – share the problematic A25 corridor, along which there is an AQMA for much of its length within the District and also beyond. As such, there is a concern with Scenarios 1 and 3, which would see higher growth at both settlements.

At Westerham there is the potential (albeit highly uncertain, as discussed in Section 5.4) to deliver new road infrastructure to address traffic congestion and air pollution in the town centre, but the effect could potentially be to increase traffic to the detriment of air quality along the road corridor to the east of Westerham. Growth to the north of the town could potentially perform well from an ‘accessibility’ perspective (and, in turn, from a perspective of supporting modal shift away from the private car); however, it is important to reiterate uncertainty regarding what could be achieved in practice.

At Sevenoaks, two of the three sites that would deliver higher growth under Scenarios 1 and 3 do not perform particularly well from an accessibility perspective, albeit all are within cycling distance of Sevenoaks town centre and train station. The largest of the three sites performs better, with the train station within ~1.2km.

Finally, there is a need to consider the in-combination effect of ‘variable’ growth locations with ‘constant’ growth locations at Sevenoaks, most notably Sevenoaks Quarry (950 homes), but also Land east of London Road, Dunton Green (235 homes). The latter site also gives rise to a clear concern from an air quality perspective in and of itself, given close association with two AQMAs, albeit the site benefits from an adjacent train station (it will be important to consider cycle connectivity to Sevenoaks town centre). There is also a need to scrutinise the town centre growth strategy given the extensive town centre AQMA, albeit there will be the potential to support low car and/or car free development.

- **Swanley and West Kingsdown** – share the A20 corridor, either side of the problematic M25 J3 (although the latest situation is that there is only one designated AQMA, in the centre of Swanley). As such, there is potentially a concern with Scenario 3, which would see higher growth at both settlements.

At both settlements there are certain allocation options that warrant scrutiny in terms of potential to support modal shift away from the private car, although at West Kingsdown there is potentially support for a large allocation that could assist with developing a local centre. At Swanley there is also a need to consider car trip generation affecting air quality in London Borough of Bexley.

With regards to Pedham Place (new settlement linked to Swanley), the site benefits from being well linked to a town centre and a location within fairly easy cycling distance of two train stations (with a good service). However, there is a need for much further work to generate a better understanding of the potential to achieve: A) self-containment / trip internalisation; B) offsite trips by active and public transport; and C) car movements without creating problematic traffic congestion, including at M25 J3. Topography is an issue, and road / rail infrastructure and employment land would act as a barrier to achieving an attractive and suitably high quality walking and cycling route between the site and Swanley.

- **Other settlements** – there are limited air quality concerns, although there are wider ‘transport’ issues for consideration under a separate topic heading below. At Edenbridge there are no designated AQMAs, and there is tentative support for the fairly high growth strategy (assumed as a constant), from a perspective of supporting modal shift away from the private car to active and public transport, albeit the settlement is inherently not as well connected as Sevenoaks and Swanley.

7.2.3 With regards to **growth quantum**, the previous Interim SA (ISA) Report (2022) discussed a possible air quality argument for exporting unmet needs from Sevenoaks to central Kent. However, this was always tenuous, and recent changes to AQMAs serve to reduce this argument. There is notably an extensive series of AQMAs constraining Maidstone and the adjacent Medway Gap area of Tonbridge and Malling Borough. Also, it is not known to be the case that neighbouring areas to the east are suited to supporting strategic growth locations (with potential for high trip internalisation and investment in transport links) in a way that Sevenoaks District is not.

7.2.4 Finally, it is important to be clear that exporting unmet need is generally not supported from a transport perspective and, in turn, from an air quality perspective. This is for two reasons. Firstly, providing for housing needs at locations distant from source can lead to ‘unsustainable’ transport patterns. Secondly, there is a need for early clarity regarding broad distribution of growth across counties and sub-regions from a perspective of aiming to support effective strategic transport planning.

7.2.5 In **conclusion**, there is support for Scenario 2 on balance, on the assumption that further work serves to identify the potential to address issues and realise opportunities at Pedham Place. At Westerham there are quite clear transport arguments for strategic growth, but there is much uncertainty regarding the form that growth would take in practice under Scenarios 1 and 3, and the current AQMA constraint is significant.

With regards to significant effects, it is fair to flag a risk of ‘limited or uncertain’ negative effects under all three scenarios, given the relationship between proposed/potential growth locations and AQMAs across the District. If the Council were to undertake further work to consider air quality it would likely conclude that concerns are significantly allayed on account of forecast improvements to air quality nationally, but that air quality is set to remain an issue. Finally, it is important to emphasise the importance of proactive local plan-making to enable effective strategic transport planning, and it is noted that even under Scenario 3 there would likely not be flexibility to provide for unmet housing needs from elsewhere.

7.3 Biodiversity

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
2		2

7.3.1 Biodiversity is a strategic constraint to growth within the District, as discussed. However, sensitivities / issues vary considerably between sub-areas and settlements, and can be quite site-specific. There is also a need to account for the proposal to require 20% Biodiversity Net Gain (BNG), and it is recognised that a Kent LNRS is in preparation, which will help to ensure an effective BNG regime. However, it remains the case that there is a need to direct growth in such a way that the emphasis remains firmly on avoiding impacts in the first instance rather than relying on mitigation and potentially compensation.

7.3.2 The following bullet points consider the settlements in order of biodiversity issues/concerns:

- **Sevenoaks** – focusing on the variable option of expansion to the west (across three sites):
 - The northern-most site gives rise to limited concerns.
 - The middle site potentially comprises an important location from a connectivity perspective (noting Dryhill SSSI to the west and Montreal Park to the east, albeit the A21 is a barrier to connectivity).
 - The southern-most site is clearly constrained by adjacent Great Britain’s Wood (managed for accessibility by the Forestry Commission). Woodland creation at its northern extent, where the land descends to a stream corridor/valley, could be well-targeted, including from a Green Belt perspective.
 - There could potentially be a degree of in-combination effect across the southern two sites.

With regards to the constant growth locations at Sevenoaks, it is Sevenoaks Quarry (950 homes) that stands out, from a biodiversity perspective (both issues and opportunities), but the site is near-committed (benefiting from a resolution to grant planning permission), such that it need not be a particular focus of this appraisal (although it is important to account for it as part of the baseline). It is also important to note that one of the proposed employment allocations (0.75ha) is adjacent to Sevenoaks Gravel Pits SSSI. It is a brownfield site; however, there is a need to consider whether development could lead to pressure for subsequent development of an adjacent site to the south.

- **Westerham** – is likely the next key settlement for consideration, as there are biodiversity constraints to the north (including Westerham Wood SSSI and mature historic field boundaries), north west (Farley Common) and west (woodland priority habitat that would be impacted by any new road in this area, albeit this is not ancient woodland, nor is it shown on historic mapping). It is also recognised that Westerham is located at the head of the Darent Valley in between raised landscapes to the north and south associated with very high densities of valued ancient woodland, with Westerham Wood and Farley Common potentially acting as something of a stepping stone between these raised landscapes. As per the discussion in Section 5.4, there is a need to take a strategic approach to growth at Westerham from a biodiversity perspective. It is noted that land to the east of the town is subject to low constraint.

- **Swanley** – is generally subject to relatively limited biodiversity constraint, in the Sevenoaks context. With regards to Pedham Place, this is potentially a significant opportunity to deliver new homes in an area with limited biodiversity constraint, and new strategic habitat creation onsite or nearby could prove well-targeted, noting large SSSI woodlands along the River Darent corridor to both the north and south. Farningham Wood SSSI is in close proximity (~800m) to the north, but there appears to be limited connectivity with Pedham Place (given the M20), which serves to allay recreational pressure concerns.

N.B. Farningham Wood is accessible unlike Westerham Wood. The potential to achieve some accessibility to Westerham Wood might be considered as part of the growth strategy.

- **West Kingsdown** – is the final variable growth location for consideration. The largest of the allocation options in question appears to be notably unconstrained in biodiversity terms, albeit there is good footpath connectivity to the extensive Local Wildlife Site (LWS) woodland to the west. One of the two smaller allocations in question (specifically that which is a variable across the growth scenarios, i.e. only features in Scenarios 1 and 3) is subject to notable constraint in that the aforementioned LWS woodland is adjacent (also it is noted that the site was previously wooded, as discussed in Section 5.4).

- **Edenbridge** – the approach to growth here is a constant across the scenarios, and there are limited concerns from a biodiversity perspective. A stream corridor passes through the centre of the proposed urban extension to the west (which will presumably be a central feature of the onsite green / blue infrastructure strategy), whilst the proposed urban extension to the east will likely involve impact to mature historic field boundaries. Focusing on land to the east of the town, it is noted that there are a number of small woodland patches across the landscape, and the baseline situation is one whereby there will be biodiversity impacts as a result of the committed Four Elms urban extension.
- **Hartley** – the proposal (across all three growth scenarios) is to support just one Green Belt allocation for 25 homes; however, this site is subject to notable biodiversity constraint, as discussed in Section 5.4.

7.3.3 With regards to **growth quantum**, the previous ISA Report (2023) concluded that “*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.*” Having now begun the process of giving consideration to detailed site/settlement (supply) options, there is increased confidence in this conclusion. Neighbouring authorities to the east are broadly subject to lower biodiversity constraint than Sevenoaks District, but there are growth options within the District that give rise to limited biodiversity concerns.

7.3.4 In **conclusion**, there is clear support for a growth scenario involving providing for LHN in full (i.e. not generating unmet housing need) via allocation of Pedham Place, albeit there is a need for much further work to understand biodiversity issues and opportunities associated with a new settlement here. The other scenarios perform significantly worse, noting concerns with certain of the AONB urban extension options (Scenarios 1 & 3) as well as certain of the non-AONB Green Belt allocation options (all scenarios).

7.4 Climate change adaptation

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
=	=	=

7.4.1 A key consideration is the need to avoid development - in particular new homes - encroaching on **fluvial flood risk** zones, given worsened flood risk under climate change scenarios. Surface water flood risk is another consideration (of note in Sevenoaks given topography/geology including ‘dry valleys’) but this can often be dealt with through development management. Another consideration is development impacting on water flows and, in turn, down-stream flood risk; however, it is difficult to pinpoint issues ahead of detailed work, and it is typically the case that development can achieve no net worsening of run-off rates.

7.4.2 The following bullet points consider the settlements in order of flood risk issues/concerns:

- **Edenbridge** – is a constant across the scenarios, but warrants being a focus of attention here, as the town is associated with a notably low lying vale landscape (the River Eden) and integrates closely with a series of fluvial flood risk zones. Two of the proposed urban allocations appear to intersect a flood risk zone, as does one of the proposed Green Belt allocations (and downstream flood risk is a consideration here). Ultimately, it is likely to be the case that detailed work is undertaken that serves to demonstrate that flood risk can be suitably addressed through masterplanning, design etc (subject to the agreement of the Environment Agency); however, at this stage there is a need to flag a concern.
- **Westerham** – is also associated with a degree of flood risk. Specifically, a small stream that follows the Croydon Road with properties potentially subject to flood risk downstream. Previous proposals for strategic growth (from 2018) proposed enhancements to the stream corridor, but it is not clear what could be achieved in practice. The Environment Agency (EA) may wish to comment further.
- **Sevenoaks** – onsite surface water flood risk is a constraint at the northern-most of the variable AONB sites, and could well prove to be a significant issue, given that this is the part of the site most distant from the adjacent M25 junction. The southern-most of the AONB sites is also associated with a notable adjacent surface water flood channel that follows Brittain’s Lane, but this is unlikely to be a major issue. With regards to the largest of the proposed constant Green Belt allocations, it is noted that there is a significant area of surface flood risk at the eastern extent of the site, adjacent to Dunton Green Station.
- **Swanley** – there are generally few concerns, from a flood risk perspective, and Pedham Place appears to be subject to notably low flood risk. The proposed allocation to the east is associated with a significant surface water flood channel, which could have a bearing on site capacity.

- 7.4.3 With regards to **growth quantum**, the previous ISA Report (2023) presented a detailed discussion of flood risk acting as a constraint to growth within neighbouring local authority areas to the east (also see Figure 2.2, above). The conclusion from 2022 that there is a flood risk argument for not generating unmet need holds true at the current time, albeit it is recognised that flood risk is very localised / site specific.
- 7.4.4 Finally, another climate change adaptation / resilience consideration is **overheating risk**, which is a factor for consideration as part of any strategy that seeks to direct significant growth to urban areas, e.g. there is a need to ensure sufficient space for urban green infrastructure that provides shading. It can be appropriate to require that overheating risk is given specific consideration by planning applicants, e.g. as per the emerging [Uttlesford Local Plan](#).
- 7.4.5 In **conclusion**, the key issues are at Edenbridge, hence it is not possible to differentiate between the scenarios. It is appropriate to flag a potential negative effect ahead of further consultation with the EA.

7.5 Climate change mitigation

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
2	★ 1	★ 1

- 7.5.1 The discussion here focuses on per capita greenhouse gas emissions from the **built environment**, mindful that alignment of the reasonable alternative growth scenarios with strategic transport objectives is a focus of discussion under other topic headings. In particular, a focus of discussion here is in respect of the potential for each of the scenarios to support a focus on strategic growth locations to enable ‘net zero development’ (which should be onsite if at all possible, i.e. without having to resort to offsetting).
- 7.5.2 **Larger developments** can give rise to an opportunity over-and-above smaller developments, given economies of scale and also the possibility of delivering a mix of uses onsite, which can feasibly support one or more heat networks. Also, it is simply the case that large sites will generate a high degree of attention and scrutiny (including at the masterplanning stage), and housebuilders will often be keen to demonstrate good practice or even exemplar development. However, the relationship between scale and decarbonisation opportunity is not clear-cut, e.g. because large sites can face viability challenges due to the need to deliver major infrastructure upgrades. Also, heat networks are technically challenging to deliver, and practice is not well advanced nationally, with a clear opportunity currently only seen to exist where there is very high density development and/or a good mix of uses (to allow heat to be shared across the course of the day) and/or a source of waste or ambient heat that can be sourced (e.g. a watercourse).
- 7.5.3 Another important consideration is around ensuring that ‘net zero development’ is carefully defined. There are perhaps three key points to make. Firstly, any approach to net zero development must align with the **energy hierarchy**, which means a primary focus on efficiency (‘fabric first’) followed by onsite renewable heat/power generation, with offsetting of residual needs that cannot be met onsite (over the course of a year) only as a last resort. Secondly, there are two broad approaches to calculating and monitoring / evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an **energy-based approach**. The two approaches are compared and contrasted in a recent report [here](#).¹³ Thirdly, it is important to be clear that the focus of discussion above is in respect of ‘operational’ energy/carbon, i.e. the energy used / carbon emitted as a result of the development’s occupation / use. Additionally, there is a (crucially important) need to consider the **‘whole life cycle’** of a development, to include to the emissions associated with construction, maintenance, retrofitting and demolition.
- 7.5.4 A further consideration, in respect of built environment decarbonisation, is a case for directing growth to locations that benefit from strong **viability**, with a view to ensuring funding for decarbonisation measures (recognising that there are inevitably competing funding priorities, including affordable housing).
- 7.5.5 In light of these introductory remarks there are three key points to make:

¹³ Under the Building Regulations methodology the question for any given planning application is the extent to which the development can exceed the regulatory requirement, measured in percentage terms up to a possible 100% improvement. The energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m²/yr. It has wide-spread support amongst specialists, including due to the simple fact that actual ‘as built’ performance can be monitored using a smart meter.

- **Pedham Place** – could represent a built environment decarbonisation opportunity. However, this is uncertain at this stage ahead of further work around funding and viability, including taking account of the costs that will need to be borne in respect of new and upgraded strategic transport infrastructure.
 - **Westerham** – benefits from strong development viability, hence a higher growth strategy could potentially be associated with a particular built environment decarbonisation opportunity, albeit there is much uncertainty at this stage (see discussion in Section 5.4), including given potential competing costs.
 - **Urban sites** – are typically strongly supported from a transport decarbonisation perspective (not the focus of this current discussion), and there can also be an argument for focusing growth on urban areas from a built environment decarbonisation perspective. However, there are also inherent challenges (e.g. less roof space for solar panels per home) and urban sites can face viability challenges that limit the potential to deliver net zero carbon development (onsite if at all possible) alongside delivery of affordable housing and compliance with wider policy asks. Consideration should be given to the potential to deliver a fifth generation heat network at the key urban regeneration sites / areas including Sevenoaks Station.
- 7.5.6 With regards to **growth quantum**, the previous ISA Report (2023) concluded: “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.” This conclusion holds true at the current time.
- 7.5.7 In **conclusion**, there is clear support for Scenario 2 (Pedham Place may represent a significant decarbonisation opportunity) and Scenario 3 (which would definitely not generate unmet need, and the AONB urban extensions in question are mostly well suited to delivering ambitious net zero development).
- 7.5.8 With regards to significant effects, whilst all scenarios would likely see an improvement on the baseline (a situation whereby growth comes forward in the absence of a Local Plan, whether that be in Sevenoaks or elsewhere in order to address unmet need from Sevenoaks), there is a need to reach conclusions taking account of established objectives and targets, in particular the District’s climate change [commitment](#). The commitment does not strictly set a District-wide net zero target date, but the level of ambition is clear (N.B. many of the District’s neighbours have set 2030 as an area-wide net zero target date, as set out [here](#)). In this light, there is a high bar to reach before predicting positive effects of any significance. It is hoped that it will be possible to predict significant positive effects at the next stage; however, at this current stage, there is insufficient evidence of built environment decarbonisation being integrated as a key factor with a bearing on spatial strategy and site selection to an extent that reflects the urgency of the issue. There is a need for further work to explore spatial strategy, site and scheme-specific decarbonisation opportunities.
- 7.5.9 Finally, Box 7.1 consider development management policy.

Box 7.1: Development management policy in respect of net zero development

Understanding of best practice is evolving nationally, but there is good degree of consensus across industry specialists nationally on the merits of taking an ‘energy based’ approach to measuring and monitoring performance against built environment decarbonisation / net zero objectives.


A key benefit the simplicity of this approach, which is important. This is a key policy area of interest to the public, and there is a need to ensure that planning applications can be easily and effectively scrutinised. A number of adopted and emerging local plans nationally reflect the energy based approach within policy, both area-wide and site-specific, e.g. Uttlesford, Cherwell, Wiltshire and Central Lincolnshire. In Essex there is an expectation that all authorities will follow this approach, in light of new county-wide [guidance](#). It is noted that the Kent guidance dates from 2020, and there is a need to recognise that this is an evolving policy area.

With regards to the emerging policy approach, as currently drafted, the key point to note is that there is a not a clear requirement for net zero development (onsite or otherwise). However, the requirement that major residential development (10 or more homes) achieves Passivhaus certification is supported. Having achieved Passivhaus certification it will often be possible to achieve onsite net zero with use of rooftop solar PV.

It is recommended that consideration is given to a quantified energy-based net zero policy, with it then left open to the individual applicant to determine how the policy requirement is achieved (e.g. via Passivhaus certification).

With regards to renewable energy generation, it is noted that the current policy requires: “All major development should incorporate renewable and low carbon energy production to meet at least 10% of predicted total energy requirements.” This is a common requirement (with it’s genesis in the [Merton Rule](#)) but warrants scrutiny in the context of a desire to achieve net zero development and apply a fabric first approach.

7.6 Communities and health

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
2	1 	2

7.6.1 There are clearly wide ranging issues / opportunities that might be explored under this topic heading, but a key matter that warrants being a focus of the appraisal is secondary school capacity. In this light, there is support for **Pedham Place**, which Kent County Council (it is understood) view as well-located to meet the needs of settlements where there is an existing issue in terms of access to a secondary.

7.6.2 Looking beyond secondary school capacity, further key issues and opportunities include:

- **Sevenoaks** – it is difficult to identify clear ‘communities’ arguments for three AONB urban extension options (beyond meeting locally arising housing needs), although the largest of the three sites could potentially deliver new / upgraded community infrastructure to the benefit of the existing community nearby (‘planning gain’). The northern-most site is clearly constrained by the adjacent M25 junction, in that noise pollution would likely be an issue. Noise pollution is addressed by the market to some extent (i.e. it is reflected in house prices) but not entirely (i.e. there can be insidious health issues).
- **Swanley** – Pedham Place would have the benefit of being a new settlement with very close links to Swanley town centre, where there is a need for investment and coordinated regeneration. The proposed mixed use Green Belt development at the northern extent of the village is potentially also supported, in that it should be possible to deliver a high quality ‘gateway’ to the town, and there may be an opportunity to deliver targeted enhancements to the road corridor between the site and the town centre. The other Green Belt site, to the east of the town, is also notably adjacent to a railway line (albeit in a cutting).
- **Edenbridge** – the town is set to see quite high growth via committed and new proposed developments, plus there has been growth over recent years. The committed Four Elms site to the east of the town will deliver a new secondary school, and the largest of new proposed allocations (450 homes to the north west of the town) should also deliver new strategic community infrastructure (e.g. the north of the town currently lacks a primary school). With regards to the smaller proposed allocation to the west of the town, consideration might be given to a larger comprehensive scheme in order to deliver infrastructure / planning gain (albeit a larger scheme is not supported by the Green Belt Assessment, 2023). With regards to the site east of the town, this 150 home scheme was notably previously considered alongside the committed Four Elms site. This serves to highlight the importance of supporting comprehensive growth that delivers benefits beyond housing / avoiding piecemeal growth with opportunities missed.
- **Westerham** – it is recognised that concerns have been raised with proposals for growth to the north (and east) of the village in the past. There is no clear suggestion that growth could be of a scale to deliver a secondary school, but growth to the north of the village would benefit from proximity to the large village primary school, and it may be that growth is able to support the school in some way and/or support the delivery of new community infrastructure alongside the school (e.g. a new ‘community hub’).
- **West Kingsdown** – as discussed, there appears to be a clear growth-related opportunity here.
- **Other villages** – are associated with a low growth strategy (less so the case with New Ash Green, assuming the village centre redevelopment is able to deliver). It may be that growth-related opportunities are highlighted through the current consultation, e.g. the need for growth to support primary school rolls.
- **Urban sites** – a number of the proposed urban allocations are strongly supported from a ‘communities’ perspective, most notably at New Ash Green. There is a need for further work to explore issues and potential trade-offs, with a view to maximising regeneration and communities benefits.

7.6.3 With regards to **growth quantum**, the previous ISA Report (2023) concluded: “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... locally.” However, Pedham Place is now a clear option and, more broadly, there are options for delivering strategic scale growth alongside new community infrastructure (also active transport and green infrastructure in support of health objectives).

7.6.4 With regards to the matter of supporting strategic growth locations, from a perspective of seeking to realise ‘communities and health’ opportunities alongside housing growth, Table 7.1 (which is taken from the current Local Plan consultation document) serves to clearly identify the issue / opportunity that exists.


Table 7.1: The proposed policy approach to requiring new play space within development sites

Size of Development	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)
5-10 dwellings	P	N/A	N/A
11-200 dwellings	P	P	N/A
201-500 dwellings	P	P	Considered
500+ dwellings	P	P	P

7.6.5 Another key issue is supporting access to high quality countryside and supporting strategic green infrastructure objectives. Possible opportunities (pending the Kent LNRS) are around access to Westerham Wood and improved access to the river corridors at Swanley and Edenbridge. Opportunities for Pedham Place to deliver accessible strategic greenspace to the benefit of Swanley should be explored.

7.6.6 In **conclusion**, responding to community-related objectives has clearly been a key driver of spatial strategy and site selection, hence positive effects are predicted across all of the scenarios (recalling the baseline situation is one whereby there is a risk of sub-optimal piecemeal growth). There is very strong support for Pedham Place, from a communities perspective, particularly because of the potential to deliver a secondary school that would address an existing need. However, it is recognised that higher growth at certain settlements does give rise to some tensions with communities objectives.

7.7 Economy and employment

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
3	2	


7.7.1 As discussed in Box 5.5 above:

The identified need district-wide is quite modest. It should be possible to comfortably exceed the identified need figure via: Mixed use urban allocations in Sevenoaks; two standalone employment sites at Sevenoaks (Vestry Estate) for a total of ~2ha; a mixed use development to the north west of Swanley, also a small adjacent employment site (~3.4ha); and a mixed use development to the west of Edenbridge (1.4 ha). Additionally, Land at Wolfe, Westerham, would deliver an additional ~1.8 ha under Scenarios 1 and 3, and Pedham Place new settlement would deliver an additional ~4.9 ha under Scenarios 2 and 3.

7.7.2 There is support for buffering or exceeding the identified need for employment land. The north of the District is clearly well-connected to sub-regionally and regionally important economic hubs and corridors, including London, the Thames Gateway, Maidstone and the M20 corridor linking to Dover (via the A249).

7.7.3 In **conclusion**, there is support for the additional employment land that would be delivered under Scenarios 2 and 3, and there is also a need to deliver housing in support of the local economy.

7.8 Historic environment

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
2		2

7.8.1 Taking key settlements in turn:

- **Sevenoaks** – the allocations that are a constant across the growth scenarios mostly give rise to limited concern, from a historic environment perspective, with key considerations: Land adjacent Seal Hollow Road (16 homes) is adjacent to Grade I listed Knowle Park; Land east of the High Street is clearly a sensitive town centre site; and there are also historic environment considerations in the vicinity of the Vestry Estate, where there are two modest proposed employment allocations (see Section 5.4).

However, all of the AONB allocations that feature under Scenarios 1 and 3 are subject to a degree of constraint. In particular, the northern-most site intersects the Chipstead Conservation Area, whilst the middle site is in close proximity to the Bessels Green Conservation Area.

- **Swanley** – has overall low constraint from a historic environment perspective, although the primary proposed Green Belt urban extension is subject to a modest degree of constraint (see Section 5.4). With regards to Pedham Place, there are two key issues. Firstly, Fort Farningham scheduled monument is onsite (there would presumably be the potential to preserve this as part of an open space strategy). Secondly, there are two nearby historic villages strongly associated with the River Darent corridor, namely Farningham and Eynsford. There is a need to undertake work to explore potential ways of avoiding Sevenoaks-bound traffic through these villages (particularly Eynsford).
- **Edenbridge** – all of the proposed allocations (which are all a constant across the scenarios) are associated with limited or low historic environment constraint. The southern-most allocation is in proximity to the town centre conservation area, and the potential for the land to contribute to the setting of the conservation area can be envisaged (this is an expansive low-lying landscape associated with the River Eden, and a footpath does pass through the site), but there are few listed buildings in the vicinity.
- **Westerham** – one of the proposed allocations (Scenarios 1 and 3) does give rise to a concern regarding impacts to the setting of a cluster of historic buildings including one that is Grade II listed, and another of the sites in question is adjacent to an area of registered common land. However, the largest of the potential allocations gives rise to limited concerns other than in terms of traffic through the town centre conservation area, where traffic congestion is already a significant issue. There is no reason to assume the potential for strategic growth to deliver a village bypass, but options are discussed in Section 5.4.
- **West Kingsdown** – the village as a whole is subject to limited historic environment constraint, but there is a degree of constraint to take into account under Scenarios 1 and 3, which would see a ~300 home allocation to the southwest of the village (rather than a ~190 home allocation). See Section 5.4.
- **Other villages** – assigned low growth are: New Ash Green and Hartley in the north of the District, where there is limited / low historic environment constraint; and Otford in the centre of the District, where there is high historic environment constraint. See further discussion in Section 5.4.


7.8.2 With regards to **growth quantum**, the previous ISA Report (2023) considered the distribution of historic environment designations across the sub-region (see Figure 5.2, above), before concluding: “... *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.*” This conclusion potentially still broadly holds true, in light of the consideration of site and settlement options above.

7.8.3 Finally, with regards to **archaeology**, it has only been possible to account for nationally designated scheduled monuments, but it is recognised that there will be a need to account for wider archaeological constraint at the next stage. Any guidance from Historic England would be welcomed, as it is difficult to know how to treat known or potential archaeology as a constraint to local plan spatial strategy / site selection (outside of scheduled monuments, which are a clear constraint to development).

7.8.4 In **conclusion**, there is tentative support for Pedham Place at this stage, from a historic environment perspective, but this is pending comments from Historic England. There is also tentative support for setting the housing requirement at LHN, rather than exporting unmet need to a constrained sub-region.

7.8.5 With regards to significant effects, broadly neutral effects are predicted on balance, recalling the baseline situation (one whereby growth comes forward in a less well-planned way) and given that a good proportion of growth is set to be directed to settlements with limited historic environment constraint, namely Swanley, West Kingsdown and Edenbridge (where constraint is focused on a small historic core).

7.9 Homes

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
3	2	1 

7.9.1 The headline consideration is the **housing requirement** that would be set under each of the scenarios, i.e. the number of homes that the Council would commit to delivering annually. It is also important to ensure that **supply** exceeds the requirement (at least in the early years of the plan period, given the potential to boost supply for latter years through a plan review), as failing to deliver on the housing requirement could render the Local Plan out-of-date (leading to issues as discussed in Section 2).

7.9.2 Under **Scenario 3** the housing requirement would be set at Local Housing Need (LHN) with a healthy supply buffer, which would serve to mitigate delivery risks associated with certain aspects of the proposed supply, most notably Pedham Place but also urban sites. Also, there is a need to recognise that recent rates of housing delivery locally are significantly below the rate that would be required to deliver on LHN. Having said this, numerous of the Green Belt allocations under Scenario 3 have strong deliverability credentials, including where sites are in the control of a single land owner (potentially a housebuilder).

7.9.3 In contrast, **Scenario 2** could involve the housing requirement set at LHN but with a problematically low supply buffer, whilst **Scenario 1** would necessitate a housing requirement set below LHN, such that the Local Plan generates unmet housing need. There is much uncertainty at this stage, as work is ongoing all the time to boost supply, and additional supply will likely be identified through the current consultation.

7.9.4 Generating unmet housing need is highly problematic, from a housing perspective, for two reasons. Firstly, housing need must be met as close to source as possible. Secondly, there is currently little or no certainty regarding where, when or even if any unmet need generated by the Local Plan would be provided for, such that it might ultimately stay unmet. Unmet housing need is already a concern in the sub-region.

7.9.5 Further key points for consideration are as follows:

- **Timing of delivery** – in addition to delivery risk associated with Pedham Place, there is a need to recognise that it would take a considerable amount of time to come forward, meaning that there would be a need for a good supply of small and medium sized sites to come forward in advance, with a view to a steady housing supply trajectory over time. Under Scenario 3 there would be a good mix of sites (committed and new sites) in terms of site size, type, location and timetable for development.
- **Geographical spread** – there will be settlement-specific needs within the District, albeit these are difficult to quantify. It is noted that under Scenario 2 there would be a low growth strategy for Westerham, where house prices are notably high. Also, under Scenario 2 there would be a fairly low growth strategy overall for the cluster of villages in the north of the District, albeit Pedham Place would be nearby (also settlements in Gravesham). Otford is also seen as a constant but is closely linked to Sevenoaks.

Also, there is a need to avoid over-concentrations of growth that leads to a risk of market saturation (impacting delivery). There are not known to be any issues, but attention may focus on Edenbridge.

- **Affordable housing** (and, more generally, development viability) – the District benefits from strong development viability, but there is nonetheless a need to direct new homes to locations / sites with good viability credentials, as far as possible, with a view to delivering the full policy quota of affordable homes and also ensuring a policy compliant tenure split (to include a good proportion of social rented homes).

Under emerging **Draft Policy H2** (Affordable housing) the majority of local plan allocations will be expected to deliver 40% affordable housing. As such, it seems to be the case that affordable housing is being prioritised above other policy asks (e.g. net zero development), but there will be a need for further scrutiny of the required tenure split. The current plan document also notably explains.

“The TRHLN recommends a tenure split of 65% social housing (social and affordable rented) and 35% intermediate housing... The vast majority of social housing delivered in the District in recent years has been affordable rented. Our experience however is that social rented housing generally provides the most affordable option and is affordable to a greater number of households.”

There can be potential to accept a lower number of affordable homes in order to maximise social rented.

- **Gypsy and Traveller accommodation needs** – this may prove to be a key matter for consideration at the next stage of plan-making given that, as discussed in Box 5.5, the identified supply of new pitches is significantly below the identified need. Consideration might be given to new Gypsy and Traveller pitches as part of a Pedham Place new settlement, although delivering new pitches at strategic allocations can be a sub-optimal solution, including from a delivery perspective. This could serve as a reason to explore an expanded Pedham Place scheme (see discussion in Box 5.3). Every effort must be made to meet needs, as poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and contributes to acute issues of relative deprivation, with Travellers tending to experience very poor outcomes in terms of health, education and a range of other indicators (see www.gypsy-traveller.org/our-vision-for-change).

7.9.6 In **conclusion**, there is a clear need to rank the scenarios in order of total growth quantum. There is clear support for Scenario 3 as the housing requirement would be set at LHN with a sufficient supply buffer, such that there would be confidence in the ability to provide for LHN in practice over the course of the plan period. Furthermore, there would be a balanced supply. However, even under Scenario 3 there remain uncertainties, including around providing for Gypsy and Traveller accommodation needs.

7.10 Landscape

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
★ 1	★ 1	2

7.10.1 Landscape is clearly a major constraint to growth within the District, as discussed across the earlier sections of this report. Landscape and Green Belt considerations are a focus of discussion within Section 5.4, where all of the site options in question are discussed in turn, but summary points are set out below.

Sevenoaks

7.10.2 The town is subject to a high degree of landscape constraint. Site-specific considerations include:

- Land adjacent Seal Hollow Road (16 homes) – notably forms a small part of a much larger parcel of Green Belt land that the Stage 2 Assessment recommends for further consideration, hence careful consideration should be given to ensuring comprehensive growth / avoiding development creep.
- With regards to the SHELAA 'maybe' sites that feature only in Scenarios 1 and 3, all three are located within or intersect the AONB to the west of Sevenoaks, with key concerns in respect of:
 - Land between Back Lane and the A21, Bessels Green (183 homes) – is likely to be sensitive in AONB terms given rising land, a footpath intersecting the site and also an adjacent historic lane.
 - Brittain's Lane, Kippington, Sevenoaks (300 homes) – only partially intersects the AONB; however, this is rising land and Brittain's Lane – a historic lane linking to AONB high points to the south of Sevenoaks – is arguably appropriate as a western boundary to the town. This site is also associated with a notably low density residential area, which is a consideration from a character / design perspective. However, a step-change in local development densities can be appropriate, given the nature of housing needs.
- With regards to the two proposed employment allocations, there are limited landscape concerns but there is a need to ensure the potential to form a defensible long term Green Belt boundary.

Swanley

7.10.3 The town is subject to notably lower landscape constraint but maintaining landscape / Green Belt gaps is a key consideration in this area, given proximity of the London suburbs. Key considerations include:

- Land at Lullingstone Avenue (110 homes) – there will be a need to carefully consider the long term Green Belt boundary, noting that a much larger parcel of land has previously been considered.
- Land North and South of Maidstone Road (140 homes) – includes land not recommended for further consideration by the GB Assessment. However, there is the potential to deliver a 'gateway' scheme.

- 7.10.4 With regards to the option of a new settlement at Pedham Place, the site is located within the AONB on raised ground above the Darent Valley to the east. However, this is a plateau such that there is limited intervisibility with the river corridor and other key viewpoints, albeit a footpath does pass through the site that is potentially important in terms of linking Swanley to the river corridor. Also, the site is closely associated with major road infrastructure and comprises somewhat degraded land, as discussed in Box 5.3. Importantly, the site is also being considered as part of a wider mixed-use masterplan, to provide a new multipurpose stadium complex (24-28,000 seats), as discussed in Box 5.3. A larger scheme of this nature would clearly give rise to much more significant concerns from a landscape / AONB perspective.

Edenbridge

- 7.10.5 The town is subject to *relatively* limited landscape constraint but is associated with an expansive and distinctive low-lying vale landscape (the River Eden). Considerations include:
- HO/21/00228/B Land at Crouch House Road (91 homes) – careful account would need to be taken of securing a defensible new Green Belt boundary, noting that this is a small part of a much larger ‘unsuitable’ SHELAA site, which has previously been closely considered as a strategic growth location.
 - Land east of Mead Road (120 homes) – comprises land not recommended for further consideration by the Stage 2 Green Belt Assessment. However, a relatively small proportion of the site boundary is open to the wider countryside, and there is the potential to draw upon a mature historic hedgerow as a new Green Belt boundary. Also, and importantly, the site would deliver Gypsy and Traveller pitches.
 - Land at Breezehurst Farm, Crouch House Road (450 homes) – is mostly not recommended by the Stage 2 GB assessment, but there is an opportunity to deliver a comprehensive urban extension to include employment land (1.4ha) and new/upgraded infrastructure secured alongside housing growth (hence avoiding the risk of further piecemeal expansion with commensurate opportunities missed). It also appears that a comprehensive scheme would be able to draw upon new defensible GB boundaries.

Westerham

- 7.10.6 The town is within the AONB, but land to the north of the town is associated with the M25 and relatively low-lying land associated with the upper reaches of the Darent Valley. Considerations include:
- Land south of Farley Lane (10 homes) – is adjacent to Farley Common, and it appears that access could be challenging without impacting a hedgerow closely linked to the common.
 - Land at Wolfe, 190 London Road (10 homes) – the effect of development could be to isolate a small area of greenspace (Green Belt) to the south that is associated with a cluster of historic buildings.
 - Land east of Croydon Road (Northern Parcel) (76 homes) and HO/21/00210 Land east of Croydon Road (Southern Parcel) (82 homes) – there is a case for ensuring that any expansion to the north of Westerham is undertaken in a strategic and comprehensive manner, with a view to securing benefits and avoiding the risk of sub-optimal piecemeal expansion in the long term – see Box 5.4.

New Ash Green

- 7.10.7 The village is located outside of an AONB, and there is limited historic environment constraint. However, the village occupies a unique position in a heavily wooded raised / undulating landscape (dip slope of the Kent Downs). The proposal is to primarily support growth only in the urban area.

Offord

- 7.10.8 Offord is located within the AONB and occupies a notably sensitive location along the Darent Valley, with nearby high points within the Kent Downs. However, there is a train station and very good accessibility to Sevenoaks. The proposal is to support growth only in the urban area.

Hartley

- 7.10.9 The village is located outside of an AONB, and there is limited historic environment constraint. The village also benefits from a train station, but the proposal is to allocate just one modest Green Belt site. As discussed in Section 5.4, in the past consideration has been given to options involving strategic growth.

West Kingsdown

7.10.10 The village is located outside but on the edge of the AONB, and this is a sensitive part of the AONB associated with a significant dry valley (Knatts Valley). As discussed in Section 5.4, there is a need to ensure a suitably comprehensive approach to growth within the sector of land south east of the village.


Growth quantum

7.10.11 The previous ISA Report (2022) concluded: *“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.”* This conclusion broadly holds true at the current time, in light of the discussion of site and settlement growth options presented above (also see Section 5.4).

Conclusion

7.10.12 In **conclusion**, there are concerns across the board, and a need for further work in respect of measures to avoid and mitigate landscape sensitivities. There is tentative support for Pedham Place, but it is judged appropriate to flag a concern with Scenario 3 as the highest growth scenario.

7.11 Land, soils and other resources

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
3	2	 1

7.11.1 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.

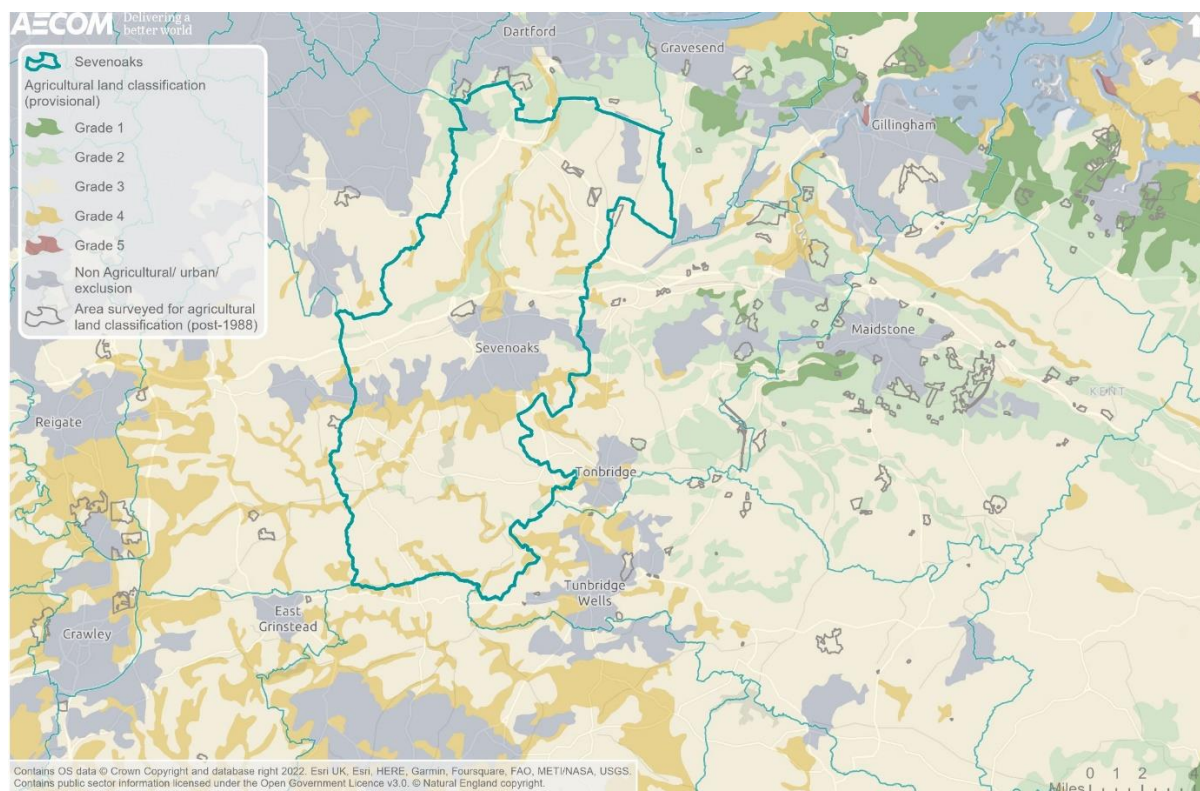
7.11.2 As can be seen from Figure 7.2, there is notable grade 2 quality land in the vicinity of Swanley; however, the nationally available dataset suggests that Pedham Place is unlikely to comprise grade 2 quality land. It should be noted that there is also another dataset available (see magic.gov.uk) that is detailed and accurate, and which differentiates between land which is grade 3a and 3b, but this dataset is very patchy and covers only a very small proportion of the District.

7.11.3 From Figure 7.2 it is also clear that neighbouring local authorities to the east of the District, which could potentially come into consideration in respect of providing for any unmet housing need, are generally more constrained in terms of agricultural land.

7.11.4 Finally, it is recognised that aligning the Local Plan with the **Kent Minerals and Waste Local Plan** is a further important consideration. The Key Diagram is available here, but it is difficult to conclude that this is a significant constraint to growth at any of the site options currently in question. It is important to note that safeguarding is not absolute (particularly where safeguarding areas are very extensive), but Kent County Council will wish to comment further through the current consultation. One consideration is at Westerham, where it is understood that there is current proposal to fill a quarry to the west of the town with waste from the building industry (see discussion in Section 5.4).

7.11.5 In **conclusion**, there is a clear concern with a housing requirement set below LHN, on the assumption that the resulting unmet need would have to be provided for elsewhere in a constrained subregion. With regards to Scenario 3, there is an argument for suggesting a negative effect given the potential scale of BMV agricultural land loss. However, there is no clear guidance in respect of judging the significance as part of local plan-making. The available [guidance](#) focuses on planning applications.

Figure 7.2: Agricultural land quality across the District and wider subregion



7.12 Transport

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
★ 1	2	3

7.12.1 This is another key issue locally, as discussed in Section 5.2. Transport considerations are a focus of discussion within Section 5.4, but summary points are set out below.

Sevenoaks

7.12.2 Generally there is a clear transport argument for focusing growth at Sevenoaks. However, two of the three proposed sites within the AONB that feature under Scenarios 1 and 3 are located on the outskirts of the town. Also, Land east of London Road, Dunton Green (235 homes), which is a constant across the growth scenarios, is located more than 3km from the town centre.

Swanley

7.12.3 The larger of the proposed Green Belt allocations is beyond easy walking distance of key services and facilities, but there is a cycle route to the town centre (which might feasibly be enhanced).

Edenbridge

7.12.4 The town has an unusual configuration, including reflecting two train lines and two train stations and, in turn, there is a need for careful consideration of growth options from a perspective of ensuring the ability to walk and cycle to key destinations, and also access bus services. See discussion in Section 5.4.

7.12.5 In general, there is a need to scrutinise the proposed growth strategy from a transport perspective. On the one hand growth is delivering / will deliver / should deliver new strategic community and transport infrastructure, and the town benefits from good rail connectivity. However, on the other hand, this is a rural area and the town is not located on an A-road corridor (with implications for bus connectivity).

Westerham

- 7.12.6 This is a smaller town (without a secondary school) without rail connectivity. However, there are growth options that would relate notably well to the town centre (also the primary school) and there is also feasibly the possibility of growth delivering major new transport infrastructure, as discussed in Section 5.4.
- 7.12.7 Traffic congestion within the town centre and also along the A25 corridor to the east (including through Sevenoaks) is a key consideration, as discussed above under ‘air quality’.

New Ash Green and Hartley

- 7.12.8 The proposal across all the growth scenarios is to support a low growth strategy, although: the proposal under all scenarios is to redevelop New Ash Green village centre; Scenarios 2 and 3 would see a new secondary school at Pedham Place, which would be accessible to New Ash Green and Hartley; under Scenarios 1 and 3 there would be significant growth at nearby West Kingsdown; and there is a need to consider the possibility of growth at locations nearby in Gravesham Borough. Hartley benefits from a train station, and New Ash Green is ~3.5 km from this station. It is noted that consideration has previously been given to options involving strategic growth to the west of Hartley, in walking distance of the station.

Offord

- 7.12.9 Offord benefits from a train station and close proximity to Sevenoaks, but a low growth strategy is proposed in light of strategic constraints relating primarily to landscape and the historic environment.

West Kingsdown

- 7.12.10 Does not have rail connectivity, but presumably there is the potential to support a frequent bus service along the A20, particularly under a scenario involving higher growth at both West Kingsdown and Swanley (Pedham Place). Under such a scenario (Scenario 3) traffic congestion at M25 J3 would be a key concern.

Growth quantum

- 7.12.11 The previous ISA Report (2022) concluded: *“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.”*
- 7.12.12 Having now given consideration to settlement and site-specific growth options there is potentially now a greater degree of concern regarding traffic congestion, including in respect of Pedham Place. However, there is much uncertainty ahead of further work, including detailed transport / traffic modelling.

Conclusion

- 7.12.13 In **conclusion**, there is a need for further work to consider transport issues and options at Pedham Place, and there is a concern with growth here in combination with higher growth at West Kingsdown. However, there is otherwise a clear need to adopt a Local Plan with a view to effective strategic transport planning.

7.13 Water

Scenario 1 Green Belt, AONB	Scenario 2 Green Belt, Pedham Place	Scenario 3 Green Belt, AONB, Pedham Place
?	?	?

- 7.13.1 In the absence of a Water Cycle Study it is not possible to elaborate on the conclusion from the previous ISA Report (2022). Specifically, the report concluded: *“Water resource and water quality objectives, whilst important considerations... are unlikely to have a significant bearing on... whether the local plan should provide LHN in full or, alternatively, provide for lower growth and therefore export unmet needs.”*
- 7.13.2 Water Cycle Studies typically give consideration to: wastewater management (sewer network and capacity at wastewater treatment works (WwTWs); water resources / supply; water quality; and the specific issue of protecting chalk streams (which relates to water quality and water levels).

- 7.13.3 However, it is **wastewater treatment** that is typically a key issue for local plan spatial strategy and site selection, and this is also an issue high on the agenda nationally at the current time. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works, with the other consideration being the biological and chemical capacity of the receiving water course to accept an increase in treated water). However, there are major cost and lead-in time implications, and a risk of unforeseen issues and delays. As such, there is a need to provide the water companies with early certainty regarding growth locations. Also, strategic growth locations can be conducive to planning for strategic infrastructure upgrades (also measures aimed at water efficiency).
- 7.13.4 There will be a clear need to consider waste water treatment in support of a new settlement at **Pedham Place**. If it transpires that wastewater would need to drain to the Long Reach sewage treatment works in Dartford Borough, on the River Thames, then there is a need to consider that this works already serves a population of 837,000 and includes within its catchment significant growth / potential growth locations. Thames Water's Long Reach Catchment Plan proposes a new treatment works in the District.
- 7.13.5 With regards to **water supply**, this can be a key issue within problematic water resource zones (as established by the work of water companies and the Environment Agency). As well as leading to impacts for potable water supply, 'water stress' also affects the natural environment, particularly riverine and wetland habitats. However, water companies put in place long term plans to balance water supply and demand, and there are not currently any water resource zones that are known to be problematic to the extent that there is a clear constraint to strategic growth. South East Water recently consulted on a draft Water Resource Management Plan ([WRMP](#)), but it is difficult to draw implications for the Local Plan.
- 7.13.6 With regards to **development management policy**, it is noted that the proposal is to adopt the national 'optional' standard of 110 litres per person per day. This is likely to be appropriate in the absence of specific local issues in respect of water stress. The emerging Uttlesford Local Plan is looking to go further on the basis that there is a specific local issue, in the form of sensitive chalk streams. The draft Uttlesford Local Plan policy on water efficiency states that: *"All new residential development [must achieve] at least the water efficiency of 110 litres per person per day described in the Building Regulations... A standard of no more than 90l/p/d must be achieved in the sensitive chalk stream catchments."*
- 7.13.7 In **conclusion**, there is a need for further work, perhaps most notably to confirm any growth-related issues (also feasible opportunities) in respect of wastewater treatment, including relating to Pedham Place. At this stage it is not possible to differentiate between the scenarios, but it is appropriate to flag a 'limited or uncertain' negative effect ahead of receiving consultation responses from the Environment Agency and the water company. Comments on the relative merits of the growth scenarios would be welcomed.

7.14 Appraisal summary

- 7.14.1 Table 7.2 presents a summary of the appraisal above. The table aims to **1)** rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence, and "?" used where there is fundamental uncertainty at this stage); and then **2)** categorise performance in terms of 'significant effects' using **red / amber / light green / green**.¹²
- 7.14.2 The appraisal arguably serves to suggest that **Scenario 1** performs quite poorly overall. This is a low growth scenario whereby the housing requirement might need to be set below LHN, hence it is unsurprising that this scenario is judged to perform relatively poorly in terms of socio-economic objectives. However, the appraisal also flags some concerns under environmental topic headings. This reflects an assumption that any unmet housing need that would have to be provided for elsewhere within a constrained sub-region. However, in practice this assumption might not hold true.
- 7.14.3 Also, it is important to be clear that Scenario 1 is judged to perform well under the transport (in particular) and landscape topic headings, and it may be the case that the Council (as decision-makers) chooses to assign particular importance (or 'weight') to one or both of these topics, when reaching a decision on which of the scenarios best represents sustainable development *on balance*. It is important to be clear that the appraisal is undertaken without any assumptions regarding the weight that should be assigned to each of the SA topics, nor is it correct to assume that the scenarios have equal weight.
- 7.14.4 With regards to **Scenarios 2 and 3**, overall merits are finely balanced. Scenario 2 is preferable under five topics, and Scenario 3 under three, but this does not necessarily serve to indicate that Scenario 2 is preferable overall because (to reiterate) the topics cannot be assumed to hold equal weight.

Table 7.2: The reasonable growth scenarios – summary appraisal findings

	Scenario 1 Green Belt AONB	Scenario 2 Green Belt Pedham Place	Scenario 3 Green Belt AONB Pedham Place
Air quality	2	1★	2
Biodiversity	2	1★	2
Climate change adaptation	=	=	=
Climate change mitigation	2	1★	1★
Communities	2	1★	2
Economy & employment	3	2	1★
Historic environment	2	1★	2
Homes	3	2	1★
Landscape	1★	1★	2
Land, soils and resources	3	2	1★
Transport	1★	2	3
Water	?	?	?

7.14.5 The following bullet points aim to briefly explain the appraisal findings under each of the topic headings:

- **Air quality** – this is a widespread issue within the District, but there is support for Scenario 2 on balance, on the assumption that further work serves to identify the potential to address issues at Pedham Place.
- **Biodiversity** – there is clear support for not generating unmet need and Pedham Place gives rise to limited concerns, albeit there is a need for much further work to understand biodiversity issues and opportunities here. The other scenarios perform significantly worse, noting biodiversity constraints affecting certain of the AONB urban extension options. Also, certain of the non-AONB Green Belt allocation options that are a constant are subject to a notable degree of biodiversity constraint.
- **Climate change adaptation** – flood risk is often a key climate change adaptation consideration for local plans. Within Sevenoaks this is primarily an issue at Edenbridge. The EA will wish to comment further.
- **Climate change mitigation** – there is clear support for not generating unmet need (including because strong development viability in the District may be conducive to delivering net zero development) and Pedham Place may represent a significant built environment decarbonisation opportunity. There is a need for further work to ensure that built environment decarbonisation opportunities are realised via spatial strategy / site selection.
- **Communities** – Pedham Place can deliver a secondary school that would address an existing need. Higher growth at certain settlements does give rise to some tensions with communities objectives.
- **Economy and employment** – there is support for additional employment land delivered at Pedham Place, and there is also a need to deliver housing in support of the local / sub-regional economy.

- **Historic environment** – there is tentative support for Pedham Place at this stage, but this is pending comments from Historic England. There is also tentative support for setting the housing requirement at LHN, rather than exporting unmet need to a constrained sub-region.

With regards to significant effects, broadly neutral effects are predicted on balance, recalling the baseline situation (one whereby growth comes forward in a less well-planned way) and given that a good proportion of growth is set to be directed to settlements with limited historic environment constraint, namely Swanley, West Kingsdown and Edenbridge (where constraint is focused on a small historic core).

- **Homes** – there is a clear need to rank the scenarios in order of total growth quantum. There is clear support for Scenario 3 as the housing requirement could comfortably be set at LHN with a healthy ‘supply buffer’, such that there would be confidence in the ability to provide for LHN in practice over the course of the plan period (e.g. noting recent rates of delivery, and also the inevitable challenges involved with bringing forward a new settlement). Furthermore, there would be a good mix of sites / balanced supply. However, even under Scenario 3 there remain uncertainties, including around providing for Gypsy and Traveller accommodations needs.
- **Landscape** – there are concerns across the board, and a need for further work in respect of measures to avoid and mitigate landscape sensitivities (design briefs for Green Belt sites will be prepared at the next stage). There is tentative support for Pedham Place - despite being located in the Kent Downs AONB - but it is judged appropriate to flag a concern with Scenario 3 as the highest growth scenario.
- **Land and soils** – there is a clear concern with a housing requirement set below LHN, on the assumption that the resulting unmet need would have to be provided for elsewhere in a constrained subregion. Neighbouring local authorities to the east are associated with higher quality agricultural land.
- **Transport** – there is a need for further work to consider transport issues and options at Pedham Place, and there is a concern with growth here in combination with higher growth at West Kingsdown. However, there is otherwise a clear need to adopt a Local Plan with a view to effective strategic transport planning.
- **Water** – there is a need for further work, perhaps most notably to confirm any growth-related issues (also feasibly opportunities) in respect of wastewater treatment, including relating to Pedham Place.

7.14.6 Consultees are encouraged to comment on the merits of the growth scenarios. However, it is recognised that some will also wish to suggest scenarios other than those presented above. Equally, some consultees will wish to comment on specific sites. Such suggestions / comments should be informed by the discussion in Section 5, which goes through a process to define the three growth scenarios that are a focus of appraisal above.

7.14.7 A final consideration is **cumulative effects**, meaning the effect of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and larger-than-local effects. Key issues include:

- **Housing needs** – this is a key larger-than-local issue, as there is currently little certainty regarding where, when or even if any unmet need generated would be provided for elsewhere within a constrained sub-region. Unmet need is already a concern within the sub-region.
- **Kent Downs AONB** – there is a need to plan in collaboration with other authorities intersecting the AONB, including Tandridge District to the west, where the Local Plan is set to be found unsound.
- **The economy** – the north of the District is clearly well-connected to sub-regionally and regionally important economic hubs and corridors, including London, the Thames Gateway and Maidstone.
- **Transport corridors** – this is a key ‘larger than local’ issue for the Local Plan. There is a need to work with neighbours to avoid/minimise traffic congestion and support delivery of strategic upgrades.
- **Pedham Place** – there will be a need to engage with neighbouring authorities, and there is also a need to consider the larger-than-local importance of the potential new sporting facility under consideration.
- **Landscape scale nature recovery** – a Kent Local Nature Recovery Strategy (LNRS) may provide important evidence to inform the next stage of plan-making. In the meantime, there is a need to ensure a focus on cross-border woodland networks and river corridors, including defined Biodiversity Opportunity Areas (BOAs).
- **Water** – Strategic planning for water infrastructure / resources serves as a reason in support of deciding on a broad growth strategy at the earliest opportunity. The Long Cross Sewage Treatment Works, located on the Thames near Darford, serves an extensive catchment covering a number of authorities.

Part 3: What are the next steps?

8 Selecting a preferred scenario

- 8.1.1 Subsequent to the current consultation the Council will be in a position to select a preferred growth scenario (which may be an amalgam), and then undertake further work in respect of detailed site selection and refining site capacity assumptions. As well as taking account of consultation responses, account will be taken of the appraisal findings presented in Section 7 of this report. There will also be a need for further work in respect of development management policy, both plan-area wide (noting that the Government has committed to publishing National Development Management Policies) and area / site-specific.

9 Plan finalisation

Publication of the Proposed Submission Local Plan

- 9.1.1 The intention is for the next formal stage to involve publication of the proposed submission version of the Local Plan under Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound'. The formal SA Report will be published alongside the Proposed Submission Local Plan, providing all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 9.1.2 Once the period for representations on the Proposed Submission Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 9.1.3 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).

10 Monitoring

- 10.1.1 Within the SA Report (N.B. this is not the SA Report, but rather an "Interim" SA Report), the requirement is to present "measures envisaged concerning monitoring". The question of an appropriate monitoring framework will be revisited prior to plan finalisation, but it is suggested that monitoring might cover:
- Pedham Place – a bespoke monitoring framework could be established.
 - Biodiversity – there will be a need to monitor whether implementation of the biodiversity net gain regime through planning applications aligns with the emerging Kent Local Nature Recovery Strategy.
 - Climate change mitigation – there is a need for clear criteria to enable scrutiny of the extent to which developments exceed the minimum emissions standards set out in the Building Regulations.
 - Homes – a detailed monitoring framework is already in place, but could potentially be enhanced, for example with figures broken down by settlement.
 - Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see [here](#)).
 - Transport – there is a clear need for targeted detailed monitoring. As well as road traffic and air quality, there is a need for improved data on bus patronage and use of cycle routes.
 - Agricultural land – Natural England may wish to comment on potential approaches to monitoring.
 - Historic environment – a typical approach is only to monitor the number of assets at risk, but Historic England may wish to propose additional performance measures through the current consultation.
 - Water – indicators / performance measures in respect of water resources and the water environment could warrant further consideration in collaboration with the Environment Agency.