

Organisational Responses

Neighbouring Authorities	Response
Tunbridge Well Borough Council	TWBC responded with a preference for Option 3 (combined) as this does not result in any unmet development needs. They noted that although Option 3 could cumulatively have more impact on the setting and landscape character of the AONB (now National Landscape) and on the openness of the Green Belt, it would provide a larger buffer than Option 2 in helping SDC meet its housing need. The responses notes that the ambition and approach to meeting all of the identified development needs is generally supported. TWBC also provided specific comments on policies and strategic objectives.
Tandridge District Council	TDC notes the location and quantum of development within Edenbridge and Westerham and that these are most likely to impact infrastructure provision and use within Tandridge. In terms of infrastructure, they express an eagerness to work closely with us on our Infrastructure Delivery Plan to ensure opportunities for collaboration for the provision of infrastructure for these settlements are harnessed. They highlight the highway issues in Edenbridge, including predicted increases in traffic flows within and beyond Edenbridge, stressing that transport capacity is a significant issue within Tandridge and that a collaborative approach is needed to ensure development at Edenbridge does not create an unsustainable intensification of use within Tandridge, including on its rural highways. Tandridge notes that it is not currently in a position to help achieve our housing needs, that it is heavily constrained and that their emerging Local Plan and its policies can be given no weight due to the Inspector's findings that it cannot be found sound. As a consequence, they are currently working hard to update their five-year housing land supply. Tandridge confirms that it is committed to working closely with us.
Dartford Borough Council	Dartford Borough Council (DBC) acknowledged the significant increase in Sevenoaks District Council's (SDC) housing requirement and the challenges this presents when coupled with the district's highly constrained nature. DBC considered that density options need to be carefully examined so that provision can be maximised within existing urban areas. To this end, the proposal to optimise the use of land around Sevenoaks train station was strongly supported by DBC. However significant concern was raised in relation to the options which include Pedham Place, particularly with regard to infrastructure provision, employment, and the impact upon Junction 3 of the M25 and the local highways network towards Dartford. In relation to the Duty to Cooperate, the strong relationship between the 2 authorities was noted, and continued dialogue welcomed. Their response also provided some more detailed comments relating to the overall employment strategy.
Wealden District Council	WDC supports us meeting as much of our need as possible, welcoming our consideration of land within the Green Belt and the AONB. They confirm that they will continue to work collaboratively with us in relation to strategic cross boundary matters e.g. transport, economic development, infrastructure, housing, Gypsy and Traveller accommodation and in confirming the level and distribution of identified needs. They note that their comments in relation to the previous consultation remain relevant. These include support for Sevenoaks in meeting its own identified Gypsy and Traveller needs, our transport policies, our chapter on climate change, including the new climate change policy, the update to the sustainable design and construction policy and our policy on biodiversity net gain. In terms of the latter, they note that potential opportunities for providing net gains for development on or close to our shared administrative boundary, could be explored. Finally in relation to Ashdown Forest, they note our participation and involvement in relation to the SAMMs partnership, including as signatories to the legal agreement covering the collection of developer contributions, and in relation to air quality issues. In terms of additional or improved greenspace, they note that it will be a matter for us to consider through our HRA and discussion with Natural England, noting that they are unable to offer any capacity to us from their two SANG sites.

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Tonbridge and Malling Borough Council	The response notes that TMBC and SDC are both preparing a new Local Plan along similar timescales. TMBC intends to publish a second consultation (Regulation 18B) in mid-2023 and TMBC will engage with SDC throughout the preparation of Local Plans on matters of strategic importance. TMBC's response supports SDC's strategic approach to prioritise opportunities to meet projected future housing and business land needs within existing built-up areas. At the previous consultation (Jan 2023), TMBC indicated that it was unable to assist SDC in meeting any unmet needs and TMBC's position has not changed in this regard. TMBC is currently in the process of developing its own spatial growth strategy, but welcomes SDC's in-principle commitment to fully meet its projected future housing need through pursuing spatial growth options that includes opportunities to allocate Green Belt land, and potentially land subject to landscape protections (provided SDC works alongside relevant bodies to ensure appropriate protection). TMBC supports Development Strategy Options 2 and 3 as these either meet or exceed SDC's projected need over the Local Plan period.
London Borough of Bromley	London Borough of Bromley provided a general response to the Regulation 18 Part 2 consultation, which was in broad support of the Plan 2040 Strategic Issues, Vision and Objectives. Importantly, in relation to the Duty to Cooperate, LB Bromley faces many of the same constraints as Sevenoaks and therefore does not have capacity to meet any unmet housing need from Sevenoaks. Their response also provided more detailed comments relating to the Development Strategy, Housing Supply and Gypsy and Traveller Provision. It was also highlighted that previous comments submitted by LB Bromley, as part of the Regulation 18 Part 1 consultation in autumn 2022, remain applicable.
London Borough of Bexley	In relation to the Duty to Cooperate, London Borough of Bexley's response to the Plan 2040 Regulation 18 Part 2 consultation reiterated that, as agreed by both parties in a recent Statement of Common Ground (SoCG), SDC and LB Bexley do not share a housing market area (HMA) and any unmet need for housing in SDC would more appropriately be met in the West Kent HMA. Additionally, LB Bexley is not in a position to help meet need from elsewhere and are therefore supportive of SDC's attempt to identify housing capacity within its own boundaries. Although LB Bexley support the principle of a new settlement at Pedham Place, the response highlights some initial concerns regarding the strategic road networks and highlights that cross-boundary impacts on services in Bexley should be considered.
Gravesham Borough Council	Gravesham Borough Council (GBC) provided a general response which acknowledged the development needs, issues and options set out within Plan 2040. GBC noted that there is not a significant amount of development being proposed or considered close to their area at this time and therefore raised no significant strategic cross-boundary issues, although were keen that impacts upon Junction 3 of the M25 are considered appropriately. In relation to the Duty to Cooperate, GBC faces many of the same constraints as Sevenoaks District Council (SDC), particularly in relation to the Green Belt, and therefore considered it unlikely that they will have capacity to meet any unmet need from SDC. Their response also considered the need to carefully review any implications of the updated NPPF and provided some more detailed comments relating to Gypsy and Traveller provision, biodiversity net gain and National Landscapes.
Kent County Council	Kent County Council provided a comprehensive response, which understands the challenges faced by SDC in delivering against development needs in a constrained environment. The response supports the early delivery of infrastructure and joint-working to support the delivery of new housing and development. KCC has previously raised concerns re the CIL process and will continue to engage with SDC to find resolution to the funding of infrastructure, particularly in relation to strategic sites. A statement of common ground will be updated in due course. KCC is supportive of the approach to locate development where it is possible to cycle/walk to key facilities and use public transport. KCC Highways express a preference to Option 1 where

Neighbouring Authorities	Response
	<p>the sites on the edge of settlements can be well served by sustainable transport options. If this is not the case, then Option 2 would be preferable where the stand-alone settlement is of sufficient scale and mix of land uses to fund significant investment in infrastructure to enable the development to meet sustainable objectives. KCC Education would prefer the development of areas of the district where the combined quantum of development sites will more adequately support the future development of education infrastructure whereas small, disparate development sites can lead to difficulties in the planning and development of education infrastructure.</p> <p>Detailed comments are provided in relation to highways and transport, minerals and waste, older person's housing, public rights of way, SuDs, heritage and waste management. In relation to education, if Option 2 (Pedham) progresses, a new 5FE-6FE secondary school will be required and a site of approximately 5 hectares. Safeguarded land for a secondary school in Edenbridge is welcomed but the school would need to be viable - currently the planned new housing in Edenbridge is only just sufficient to indicate that a 4FE school would be viable, whereas a 5FE school is more feasible.</p>

Statutory Consultees / other consultation bodies	Response
Natural England	<p>The comments noted their previous response on the Green Belt and focused on Protected Landscapes. It referred to Table 1.2 (Development Strategy Options) and noted that Option 2: 'Settlement' would appear to involve the least impact by area on protected landscapes, although it noted that the Pedham Place lies entirely within the designated area, whereas the 'Adjoining Opportunity Site', is only partly within the Kent Downs National Landscape. NE state a preference for new development to focus on the latter site, to maximise avoidance of loss of the Kent Downs National Landscape.</p>
Historic England	<p>Comments relate to matters focused on the historic environment and heritage assets. HE welcome the inclusion of policies for the historic environment which form a positive strategy, but that all policies through the plan should be tested to consider their impact on heritage assets. The response refers to the potential use of masterplans/briefs for major sites and development management policies for assets. No specific plan-related comments.</p>
Environment Agency	<p>The response provides comments in relation to the following environmental issues: 1. Flood risk, 2. Groundwater and contaminated land, 3. Water quality, 4. Water resources, 5. Biodiversity, 6. Waste management and 7. Pollution prevention.</p> <p>The EA is pleased to note that the proposed sites mostly avoid areas at high risk of flooding and that the Sequential Test will be used to prioritise development in areas of lower flood risk. Additional policies are recommended in relation to groundwater and contamination, and the addition of water quality to existing policy W2 (Sustainable drainage). The more stringent water resources consumption limit (maximum of 110 litres per person per day) within Policy W3 (water management) is supported. In relation to Biodiversity, the inclusion of the Biodiversity Net Gain (BNG) policy is supported (at 20%) and it is recommended that as Climate change and biodiversity loss are inextricably linked, they must be tackled together and this should be emphasised in the strategic objectives. EA also recommend referencing the waste hierarchy and comments are also provided on specific sites.</p>

Statutory Consultees / other consultation bodies	Response
National Highways	<p>The response does not support or object to any of the options but considers potential cumulative impacts of all sites on the SRN and highlights junctions which may experience significant increases in traffic. It notes that multiple key SRN routes run directly through the District (M25, M20, M26 and A21) and highlights specific junctions of concern - the M25 J3, the A21 southbound off-slip with A25 and the A21 / B245 southbound off-slip. The response requests that an updated Strategic Transport Assessment is provided to allow NH to fully assess the implications of the proposed options, in relation to the Duty to Co-operate (and this will be shared with them by the end of February 2024). In relation to Pedham Place, NH requests ongoing co-operation with the site promoters to understand the highways implications of the scheme.</p>
Sport England	<p>Sport England (SE) acknowledged and supported the work currently underway to update the Playing Pitch and Built Facilities Strategies which form part of the evidence base for the emerging plan. This will help ensure that there is continued adequate provision of playing fields and indoor leisure for the anticipated increase in population. Their response also supported the various references to active travel throughout the draft plan, particularly in relation to town and local centres, the co-location of uses, the use of the design review panel, health impact assessments, the protection of existing facilities and the development of a sustainable movement network. SE recommended including reference to community use agreements to increase the availability of facilities to the wider community. In relation to specific sites, proposed allocations HO10 (Land east of London Road, Dunston Green), MX2 (Land east of High Street, Sevenoaks) and MX4 (Sevenoaks Quarry) were identified as having the potential to impact/prejudice the use of playing fields which will need further investigation. It was requested that SE be further consulted on potential allocation MX15 (Pedham Place) as they will be keen to see sufficient provision of facilities to enable a sustainable community.</p>
Kent Downs National Landscape Unit	<p>The Unit expresses strong objections to all three options. They set out that the AONB designation should influence the plan in terms of the strategic location of development, and where allocated, they should be small scale. They consider that it should not be assumed that general housing needs must be met within the AONB and that robust evidence is needed, including exploring all options outside the AONB. If other reasonable options are not found, Sevenoaks should not be seeking to fully provide for its Objectively Assessed Need. The Unit expresses concern in relation to: the identification of Westerham as a location for development; the majority of the proposed site allocations within the Kent Downs and significant concerns with respect to Pedham Place, which they state makes a positive contribution to local and National Landscape character. Concerns are also raised with respect to: the Development Strategy in relation to the strengthened duty; the lack of a protected landscape specific objective; the National Landscape not being an influential factor across the whole plan and insufficient weight being afforded potential impacts through the Sustainability Appraisal. Responses in relation to a range of policies are broadly supportive but include some suggested amendments e.g. policy SL1: Sport and Leisure Facilities. Attention is also drawn to the name change.</p>
High Weald National Landscape Unit	<p>The Unit draws attention to the name change and the strengthened duty, recommending that this is reflected in both the content and language of the Local Plan. Responses in relation to a range of policies are generally supportive, including policy NE1: Landscape and Areas of</p>

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	Outstanding Natural Beauty, but include some suggested amendments e.g. they request that reference to the High Weald AONB is made in relation to policy BW2: Biodiversity in New Development; to the High Weald Design Guide within policy DE2: Ensuring Design Quality and that public realm features are added to the non-designated heritage assets list in policy HEN1: Protecting and Enhancing the Historic Environment.
NHS / NHS Kent and Medway / NHS property Services	The NHS commented on policies H2 (provision of affordable housing), HW1 (health and wellbeing), IN1 (infrastructure delivery), and COM1 (retention of community uses). Additional comments were provided for policy ST2 (Housing and Mixed Use Site Allocations). NHS Property Services would welcome mention of affordable housing for key workers or local essential workers. It is noted that housing is an important consideration for staff and thus affects NHS recruitment and retention of its workforce. To be able to forward plan, they request to be consulted in viability discussions when it is argued that viability is an issue for infrastructure delivery. Some policy amendments are suggested to enable flexibility within the NHS estate.
Network Rail	Network Rail commented on policies IN1 (Infrastructure Delivery) and sites MX15 (Pedham Place), HO10 (Land east of London Road, Dunton Green) and MX10 (Land at Breezehurst Farm, Crouch House Road, Edenbridge). Network Rail encourages infrastructure to be a golden thread through all future development to meet housing needs, combat climate change, and reduce car dependence. Options 2 and 3 are endorsed to meet full housing requirements. They encourage the density option of 150dph in town centre areas to be extended to transport hubs to maximise the site's opportunities. The enhancement of Sevenoaks Station Area is endorsed, and Network Rail will continue to work with the Council on this. They encourage the Council to engage with relevant stakeholders early on when transport improvements are required for strategic sites, for example, Pedham Place would create increased demand at Swanley and Eynsford stations. Furthermore, it is noted that site allocations HO10 and MX10 will need some improvements which should be included in the draft allocation.
Southern Water	Southern Water commented on policy HW2 (Noise) and site HO17 (Land north of Skinners Lane, Edenbridge). Southern Water expressed concern about the potential housing near the Edenbridge wastewater treatment works and its potential impact on future occupants' amenity. This may include odour, noise and vibration. They suggest including odour in policy HW2 or creating a new policy.
National Grid	National Grid commented on policy DE3 (Design Codes). They identified two National Grid Electricity Transmission assets in the North of the district. They reiterated the need for a high quality and creative approach to design for new development around high voltage overhead lines and NGET assets.
National Gas	National Gas commented on policy DE3 (Design Codes). They identified a National Gas Transmission asset running through the North West of the district. They reiterated the need for a high quality and creative approach to design for new development around underground gas transmission pipelines and other National Gas Transmission assets.
Thames Water	Thames Water commented on policies W1 (Flood Risk), W2 (Sustainable Drainage), W3 (Water Management, Stress and Efficiency), HW2 (Noise), and UD1 (Utilities and Digital Infrastructure). They stated it is preferable to provide infrastructure for a small number of larger defined sites than a large number of small sites. They noted that new developments may not be affected by flood risk but can contribute towards this risk elsewhere. Further to this, they reiterated the

Statutory Consultees / other consultation bodies	Response
	need to increase water efficiency in new development and support for new development to improve the environmental health of watercourses.
Transport of London	Transport for London noted that large sites, particularly Pedham Place, may have a highways impact on the A20 or A21 within London. They further noted there may be some mitigation needed on the Transport for London Road Network or its junctions as well as for public transport. Sustainable and active travel for local trips was supported with the suggestion of extending the Mayor's strategic transport policy objectives to the District, for example, Healthy Streets.
Laura Trott MP	The response noted the publication of the new NPPF and suggested this should relieve pressure to build on the Green Belt without 'community consent'. It noted that the housing figure is now an advisory starting point, which should enable the constraints of the district (i.e. 93% Green belt and 60% AONB) to be taken into account, in order to justify a lower housing figure. In relation to Pedham Place, the response supported the representations from Eynsford, Crockenhill and Farningham Parish Councils, and raised issues in relation to traffic, public transport, pollution and environmental concerns and Green Belt / AONB designation. The response also provided detailed commentary on a number of other sites, in Sevenoaks, Swanley, Westerham and West Kingsdown.
Kent Wildlife Trust	Kent Wildlife Trust note that their remit and expertise only covers biodiversity and wildlife issues but also the difficulty at this stage of assessing impacts to biodiversity due to the level of information being available. They advise that each option should be mapped alongside environmental constraints, as well as highlighting features missing from the map of constraints in neighbouring authorities e.g. SSSIs and LWSs. They highlight that some site allocations are adjacent to ancient woodland and the buffer requirements. The relationship between Pedham Place and the opportunity area for the Darent Valley Landscape Recovery project is noted and clarification and further information regarding a number of matters requested, as well as consideration being given to threats and impacts posed to the project by all three options.
The Woodland Trust	The Woodland Trust objects to site allocations that could adversely affect ancient woodland, requesting their removal or for boundaries to be redrawn and use of precautionary buffer of 50m. If not removed or withdrawn, they request strengthened conditions. Their response also includes commentary and requests for amendments in relation to a number of policies. Recommendations include use of a local metric such as the Urban Greening Factor and adopting policy standards pertaining to access to the natural environment. Their response highlights their own Woodland Access Standards and their Planners Manual.
CPRE	The CPRE objects to all three growth options on the grounds that the Green Belt and National Landscapes should be given priority in terms of setting housing requirement and the strategy is predicated on meeting arbitrary housing target, with unrealistic delivery expectations. They state that the Local Plan should be acknowledging the clear direction of travel towards a system able to take account of opportunities and constraints and should re-visit the preferred development options accordingly. They raise objections to the fact that the baseline was not included as a development strategy option, and they consider that an insufficiently robust or proactive approach has been taken with respect to ensuring use of brownfield land is maximised. They set out objections with respect to several sites, setting out detailed objections to some of the sites, including Pedham Place. These objections cover a number of matters e.g.

Statutory Consultees / other consultation bodies	Response
	Green Belt, AONB, loss of agricultural land. They have also commented on a number of policies, some of which are supportive but request clarification, more detailed requirements, additional explanation, and amendments to align with changes in legislation. One of the concerns they raise is that policy SL1 Sport and Leisure Facilities is insufficiently evidenced or justified, with the need for a new sports stadium and for new sports pitches not evidenced.
National Trust	Response expressed strong support for the Green Belt and that development in these areas must be carefully managed and there are limited instances where development is acceptable. Site specific comments in relation to MX2 (land east of High Street, Sevenoaks), supporting the associated development brief and the need to minimise visual impact and increase connectivity to Knole Park. Support for Policy H7 (Housing Density) to make efficient use of land, but would not recommend a blanket application of higher densities which give no consideration to local character - therefore welcome the Council's District Wide Character Study and the more flexible wording within Policy H7 requiring developers to 'explore the opportunities' to achieve higher densities where it can be achieved without a detrimental impact on local character or amenity.
English Heritage	Response English Heritage Trust (Lullingstone Roman Villa), opposing development at Pedham Place, due to the impact of the development on Lullingstone and Eynsford Castle, on the overall hydrology of the Darent Valley and the increase in traffic in the area.
Sevenoaks Society	Response expressed preference for Option 2 (Pedham). Notes that within the SA, Pedham Place preferred on grounds of air quality, biodiversity, climate change mitigation, communities and schools, economy and employment, historic environment, land, soils and resources. Response refers to the manufactured golf-course landscape at Pedham. Concern about traffic impacts of Option 1. Comments on policies related to housing viability, support for low carbon development, concern about the timely delivery of supporting infrastructure (including schools and GP capacity) and site specific comments on sites within and around Sevenoaks town. Concerned about the level of growth and change across the district (need for a change management unit) and queries whether new NPPF changes the approach, but understands the case for trying to meet (but not exceed) housing need.
Upper Medway Drainage Board	The Upper Medway Internal Drainage Board response notes that Sevenoaks District partially lies within the Internal Drainage District of the Upper Medway Internal Drainage Board and is within the Board's watershed catchment. To avoid conflict between the Local Plan and the Board's regulatory regime, they refer to circumstances where consents are needed under their byelaws. The Board identifies development around and near Edenbridge as a point of interest due to its propensity for flooding and board-maintained watercourses.
Kent SME Developers Network	The Kent SME Developers Network provided a detailed response to the consultation and considered that Option 3 (a combined approach) would present the best opportunities for SME Housebuilders. The response focused on the delivery of small sites in line with national policy and acknowledged the inclusion of Policy H6 in this regard. However, it was considered that Policy H6 would not be effective enough to encourage and support sites for SME Housebuilders. The reference to the Settlement Capacity Study as the basis to support the policy was questioned. Alternative policy wording was suggested to sit alongside, or in a separate policy to, the specific site allocation of sites no larger than 1ha.

Statutory Consultees / other consultation bodies	Response
Home Builders Federation	The Home Builders Federation (HBF) provided a detailed response to the consultation, particularly with regards to the development management policies on housing, climate change, health, infrastructure, transport, and biodiversity. These comments are dealt through the policy specific summaries. In terms of the overarching development strategy, it was considered that Option 3 (a combined approach) would present the best opportunities for meeting development needs through a mixture of small and larger sites, and that 712 dwellings per annum should be the minimum number of homes planned for. The HBF considered it unlikely that the plan would be adopted in 2025 and that the plan period should be extended by a year.

Town Councils	Response
Sevenoaks Town Council	Response supports the need for a plan-led development and understands the current implications of not meeting housing need. No development strategy option is selected but comments support the sites identified in option 2 for the town, including the quarry. Green belt release to the west of the town at Brittain's Lane or Seal Hollow Road is not supported. The response highlights the need to bring vacant sites (e.g. Farmers Pub Site on London Road, Edwards Electrical Site on High Street, former Tesco site on High Street, No 7 Pembroke Road) back into use. Detailed comments on a number of sites within the town council area. Comments on policies in relation to down-sizing and homes for older people, frontloading infrastructure and affordable housing, concern about densification and local character, justification for Green Belt employment sites, joint-working in relation to the town centre, waste management and drainage infrastructure, active travel, infrastructure funding/CIL and sports and leisure.
Westerham Town Council	Westerham TC express a preference for Option 2 (Pedham). Westerham Town Council is very strongly opposed to Options 1 and 3 due to their inclusion of development sites upon Green Belt/AONB land around Westerham and do not believe that fully evidenced and justified exceptional circumstances have been identified to necessitate these developments. WTC note the latest changes to the NPPF, and query whether a plan needs to be submitted which fully meets need, due to constraints such as Green Belt and AONB. The response notes that around 250 to 300 dwellings have been constructed per year over the last decade and the Plan requires around 700 dwellings to be constructed per year, which could potentially allow developers to 'cherry pick' which sites to develop. Option 1 is potentially viewed as under-delivery, and Option 3 is viewed as over-delivery. Detailed site comments objecting to the Option 1 (Green Belt/AONB) sites and Bloomfield Terrace and neutral on Wolfe Garage.
Swanley Town Council	Response refers to disappointment in the consultation process due to timing (over Christmas) and lack of direct letter notification. Recognises the need to have a plan in place to meet local housing needs. Raises concerns regarding existing pressure on infrastructure, particularly M25 J3, road congestion and access to GPs, school places and public transport. Future development, particularly Pedham Place, will need to be supported by a coherent transport strategy, which outlines how commuters will reach Swanley station during the AM peak. Response notes the recent NPPF publication and queries whether all Green Belt sites are required. Commentary on baseline sites (no objection) except for Lullingstone Avenue which is not supported due to access, flooding, and agricultural land quality. STC does not object to Pedham Place, and express a preference for this site over the previous 'garden village' proposals to the NE of Swanley, subject to number of considerations, including junction improvements, improved access to Swanley station, curbing rat-running and confirmation of access to health and education. STC object to the emerging Wasps proposals for a 28k seat stadium, due to traffic/transport and amenity concerns.

Town Councils	Response
	Response in relation to support for 'gradual' town centre development and retention of car parking. Comments on policies in relation to climate change, flooding and noise.
Edenbridge town Council	Edenbridge Town Council considers that the proposed distribution of new development represents an excessive focus on Edenbridge and an excessive loss of Green Belt around the town. The Town Council notes that Sevenoaks and Swanley are larger and have a wider range of services and facilities than Edenbridge and are in more accessible locations with access to the motorway network and faster and more frequent rail services, and are more sustainable locations for siting new development. ETC is concerned that the result of the proposed allocations is a percentage growth much higher than any of the other towns. The amount of Green Belt land proposed for release around Edenbridge, both in the draft plan and with committed Green Belt release at Four Elms Road, is considered disproportionate when compared to other towns in the District. ETC also notes that it would have been preferable if the GB sites in Edenbridge were included as options, rather than as baseline sites. Detailed comments on Edenbridge sites (MX7; MX8; MX9; HO15; HO16; HO17; MX10; MX11) – the town council supports the urban sites and objects to the Green Belt sites (except Ashcombe Drive, to which it states no objection). ETC also provide detailed comments on a number of policies, including Provision for Gypsy and Travellers, rural housing, employment land (Breezehurst) and Edenbridge Town Centre, particularly in relation to the Leathermarket site. Additionally, the Town Council also commented on policies relating to flood risk and drainage, infrastructure, (including education and sports, utilities and digital infrastructure) and sustainable movement.

Parish Councils	Responses
Seal Parish Council	Seal Parish Council has commented on the site MX4 - Sevenoaks Quarry site and have raised concerns on the infrastructure that needs to be provided if the site goes ahead. To ensure that the existing community, as well as the new community isn't adversely affected. They also feel it's a wonderful opportunity to address pedestrian and bicycle routes for those not travelling by car.
Dunton Green Parish Council	Dunton Green Parish Council support none of the options however do recognises the need Sevenoaks district has for houses and the uphill battle we have with being largely greenbelt but adamantly rejects the idea of the two baseline sites in Dunton green and believes we should exhaust all brown fields sites before considering building on the green belt. They feel the amount on new development in Dunton Green is disproportional compared to elsewhere in the district. They also raise concerns on how the affordable housing is calculated using the Ryewood development as an example, stating although affordable housing was offered it was still unattainable for local residents and its needs to be more affordable. The also reject the classification of Dunton Green declaring that it is a village not a suburb of Sevenoaks Town. They highlight the need for better infrastructure in the area whilst pointing out the lack of parking and the negative impact this has on residents. They also question why is more not being done to ensure that empty houses are being used to address the shortfall in housing numbers and meet housing needs? Why can't Brownfield sites be exhausted before attention is turned to Green Belt sites? Furthermore, they raise concerns on air quality in their area as the increased traffic volumes from development will inevitably have a detrimental effect on the village. To combat this, they suggest provision of regular, reliable public transport needs to be addressed now, not just when a new development is constructed. They strongly object to

Parish Councils	Responses
	sites HO10 and HO8 for a smorgasbord of concerns such as flood risk, access, being in the green belt, SSI and site access issues.
Chevening Parish Council	Support option 2 Pedham Place as it will bring a prestigious arena to the District which will benefit many groups and due to its key transport links and as the site is a golf course so no vital agricultural land will be lost, plus it will be supported by new infrastructure. However, they strongly disagree with sites HO28 Back Lane & MX13 Land at Moat Farm for various reasons including air quality concerns, transport links, parking, noise issues, traffic, schools, flooding and wildlife. They also strongly disagree with HO29 Brittain's Lane, which they acknowledge isn't in their parish however they feel the knock-on effect from this site would be detrimental to their parish as any issues with Brittain's Lane cause significant traffic build up through Chevening releasing harmful emissions to their residents.
West Kingsdown Parish Council	Support none of the above, they feel development in West Kingsdown is not sustainable it should be focused in the four towns. It has no supporting infrastructure with most journeys by private cars creating more carbon emissions. West Kingsdown is not a sustainable location, on high ground, homes cost more to heat and located farthest from important infrastructure. Parish Council objects to HO27 and HO33 as located in Green Belt and AONB taking account of the NPPF statement, HO27 allocated 189 dwellings would represent 50% of existing built-up area on the south side of London Rd and completely change the character of the village. This site is subject of severe flash flooding. HO33 allocated 115 dwellings in AONB as well as Green Belt plus the housing density would be out of keeping with green belt and AONB location; development on this site would destroy the setting of the windmill, the iconic building with which West Kingsdown identifies. Development on this site would also add to the sewerage problems.
Kemsing Parish Council	Support none of the above, this is because building on Green Belt is something which the Parish Council objects to in the strongest possible terms (in line with the Parish Council's Planning Statement). Have concerns about the Sevenoaks Quarry development for 950 units and its impact on the existing infrastructure, traffic, Doctor's Surgery and schools. Feel there is a need for more affordable homes in Sevenoaks and the Parish Council would urge Sevenoaks District Council to ensure that development schemes contribute to the affordable housing provision required. Feel housing for older people is desperately needed. Believe there is a need for existing drainage systems to be improved and they hope that proposals will demonstrate clear and improved drainage arrangements. Note that the Movement Strategy will reduce the need for travel, but no details have been given of how this will be achieved. They understand that some improvements are proposed to promote active travel, but how will, for example, the cycle network, be improved further? There are improvements proposed to electrical charging points - where are these to be located? What further public transport improvements have been clearly identified?
Eynsford Parish Council	Believe that Option 1 is the fairest option that more or less meets SDC's housing requirement as development is spread throughout the district. However, we would like SDC to readjust its housing target taking into account the revised NPPF 2023 guidelines and reduce building in green belt wherever possible. Support SDC's assertion that "the need to protect our green and natural spaces for current and future populations has never been greater". They ask SDC to recalculate and suggest that in the new figures there will be no more requirement for a standalone settlement such as Pedham Place. Support that SDC plan to "provide homes built to high sustainability standards." Regarding affordable housing quotas, where possible they would prefer to see the percentage at the higher end, 40%. Support the protection and

Parish Councils	Responses
	<p>promotion of our local tourist and visitor economy. Object to policy SL1 in the strongest possible terms. They strongly question the benefits the transitory and seasonal visitors these facilities bring to the district and its economy. Eynsford Parish Council strongly objects to the inclusion of site MX15 (Pedham Place) in the Local Plan. This site is not a sustainable location as it would be heavily dependent on private cars and is separated from the nearest town by a busy motorway.</p>
Chiddingstone Parish Council	<p>Support is shown for option 2 due to the minimal impact on green belt and AONB, the Parish Council feels overall proposition of the development adjoining towns and other service settlements is the right way forward. Strongly feels that even development of small sites within the parish would be detrimental and would only add pressure on the already strained infrastructure that exists within the parish. Although they feel no need for further development of affordable housing in their parish as there are two schemes that already satisfy the demand for affordable housing in the parish. Mixed uses of residential and employment are encouraged whilst town and village centres need to be retained and vibrant. Ideally new developments must all have photo-voltaic panels or tiles on their roof whilst continuing to retain and improve village greens and open spaces for recreation and sport. They believe 20% biodiversity net gain is the correct level and all new development must have adequate and future-proof infrastructure in place as bus services in rural areas are essential.</p>
Halstead Parish Council	<p>Halstead Parish Council wishes to protect the Green Belt in and around their village and feels that using sites next to large settlements best protects the valuable opens spaces in the District and our rural Parish so support option 1. Halstead Parish Council appreciates the value placed on Green Belt; they are a village offering open space to their residents and those in the District. Halstead is sited on the edge of the London Metropolitan border, therefore the green belt is of great importance for everyone's health and well-being, protecting the District from urban sprawl. They feel the proposed housing in Fort Housing must be accompanied by improved infrastructure in there road networks to support the additional associated traffic during construction and long term. The provision of other services such as doctors, dentists, schools, transport links, chemists, post office and water supply, all of which are in shortage at present, must be addressed to support the scale of development within this rural area.</p>
Crockenhill Parish Council	<p>Broadly supportive of Sevenoaks District Council's Draft Local Plan 2040 in terms of its strategic priorities which include addressing climate change, promoting healthy communities, and building homes to meet local need. Furthermore, as a robust impact assessment has yet to be carried out on the Pedham Place proposal, and with uncertainty around proposed infrastructure provision, it is again their view that the Local Plan does not meet the 'soundness' test. With the removal of mandatory national government housing targets, a version of the plan which protects the Green Belt and AONB would be sufficient to meet local need, they also believe that the changes to the National Planning Policy Framework (NPPF), updated December 2023 have already outdated this Plan and SDC needs to reflect on the changes and revise its Local Plan accordingly. It is important to note that Crockenhill Parish Council is not opposed to development per se. The proposals for Pedham Place in particular, are in their view, unfeasible and the effects such a largescale development would have on this part of the country are far-reaching and potentially devastating. They would like to see more emphasis on the District Council working more closely with Parish and Town Councils. Strongly disagree with policy SL1. They strongly oppose site MX15 for a multitude of reason the absence of a feasibility study, misrepresented, it is in the green belt and AONB, falls</p>

Parish Councils	Responses
	<p>within strongly performing green belt, impact on local town/villages and residents, the road network in the surrounding area, not addressing current traffic issues which will only be worsened by the development, public transport provisions are woeful and the fact the air quality is already poor in the area due to the M25 being in close proximity and this will only be exacerbated by the development of 2,500 homes in the area.</p>
Leigh Parish Council	<p>Support option 2, as the district's housing needs are met but the AONB and Green Belt is protected as much as possible. Leigh Parish Council has experienced a high degree of development over recent years, and their infrastructure has suffered, in particular drainage and highways. They support the Plan's which aim to address this. Disagree to policy H2 because overall these figures seem reasonable but when applied to a small village for small developments the provision of affordable housing is not delivered. Feel there needs to be a strategy that allows for small developments to have a higher percentage of affordable housing. In rural areas desire to replace businesses with valuable private housing has eroded the local rural economy - this must be protected and helped to survive to ensure a mixed, vibrant community. Welcome the inclusion of Village Design Guides in the effort to ensure design quality. Adequate infrastructure is essential for all new developments, both at the time of provision but also to future-proof the new development. Strong opinion that prior to the approval of new development adequate consideration must be given to the provision of both primary and secondary school places. There must also be adequate public transport provision for children to get to school. There is real concern over drainage and highways and school and medical resources in Leigh. An adequate bus service is essential in the rural area, both for school children and for the elderly in particular. They would welcome policies to protect rural bus services for the future. There must be adequate parking provision in new developments.</p>
Horton Kirby & South Darenth Parish Council	<p>Support option 1, recognise the three principles that underpin the vision of Plan 2040; the creation of healthy communities, tackling climate change and seeking design excellence for all new developments, it does not support the extensive use of Green Belt and/or Natural Landscape (AONB) for housing and/or mixed-use development. They feel the proposals for Pedham Place do not show the necessary 'exceptional circumstance' for release of green belt land, and do not demonstrate minimum expectations for 'Sustainable Development,' that meets identified local need. They strongly, object to the inclusion of site MX-15 Pedham Place to be included further in the 'Plan 2040, A New Local Plan for Sevenoaks District' proposals as a suitable site for mixed use development for multiple reason some of which are protecting the green belt, environmental concern, air/noise/light pollution, flooding and the local road network which they state is already over stretched without the addition of a new housing development which will inevitably exacerbate the situation. They believe that any perceived benefits from development of site MX-15 cannot justify release from national Green Belt Policy, or damage to the Kent Down Natural Landscape (Area of outstanding national beauty). In contrast they believe that development as proposed is inappropriate and in contrary to the National Planning Policy Framework. They wish to also formally object to the continued development and associated consultation of the 'Plan 2040, A New Local Plan for Sevenoaks District' currently, as it does not reflect relevant changes to National Planning Policy Framework (updated December 2023).</p>
Hartley Parish Council	<p>The Parish Council strongly supports the areas identified as strongly performing Green Belt purposes. However, the Parish Council disagrees with some of the findings of The Green Belt Assessment, 2023, particularly some of the sites to the west of Hartley. The Parish Council</p>

Parish Councils	Responses
	<p>strongly objects to the allocation for 25 dwellings at Land to the west of Manor Lane, Hartley but strongly supports the omission of housing allocations within Fawkham Parish. The Parish Council seeks greater clarity and firmer definitions for a number of other draft policies which apply to the Parish, as well as alterations to policy wording. The Parish Council supports the inclusion of a historically supported small sites windfall allowance. Whilst the Parish Council supports densities in excess of 150 dwellings per hectare in highly sustainable locations and densities of 50-150 dwellings per hectare in existing built-up areas, the edge of settlement density of 40-60 dwellings per hectare is entirely inappropriate. The Parish Council strongly objects to Policy ST1 as currently worded as not justified. The Parish Council strongly objects to the allocation of HO25 Land to the west of Manor Lane as the site performs strongly against the NPPF. Supports the principle of the policy H2. The Parish Council supports optimising existing employment land, strengthening and diversifying the rural economy and maintaining and enhancing tourism. The Parish Council strongly support the policy which seeks to resist the loss of shops and services where they are serving a local need. The Parish Council support the use of a Design Review Panel. The Parish Council strongly supports retention of the existing sport and leisure provision within the district. Strongly objects to the policy T1 as now expressed as it is insufficiently specific to guide development to sustainable locations and assist with climate change objectives as sought by the NPPF. Strongly objects to Policy T2 as currently worded as it is imprecise in its requirements. The Parish Council supports the need to meet on site parking requirements.</p>
Hever Parish Council	<p>Support Option 2, and proposed development numbers but, strictly and only on the basis that, building on Green Belt and the creation of additional housing should not go ahead without additional infrastructure first being created including: a new secondary school and sufficient primary school places, highways improvement (road capacity and safety), pavements and lighting, public transport links such as busses. Support the provision of affordable housing but, strictly and only on the basis that, additional infrastructure is provided ahead of the development being built. Hever Parish Council would like to question if 20% of builds as affordable housing is enough to meet demand. Should it be a higher percentage? Hever Parish Council do not object to the increase in number of units, however would like the number of units on site, currently and in the future, to be in line with the number permitted Fully support the regeneration of Edenbridge Town Centre with the focus for it to become a flourishing centre. Have concerns over concreting over Green Belt land including the impact this will have on excess surface water. Supports the provision of primary and secondary school places in the area with appropriate public transport links. The provision of additional schools and education spaces is essential before further building and development occurs. Support sustainable movement and expect that transport networks are put in place with correct infrastructure to meet the increased needs.</p>
Farningham Parish Council	<p>Have selected option 1 though they believe the Local Plan is unlikely to meet the test of soundness due to the release of the new NPPF which was released halfway through the consultation period. It is their belief that the local plan does not reflect relevant changes to the NPPF as the 10,680 target is no longer mandatory but rather advisory so no greenbelt should be released in order to hit this target and SDC should concentrate on gently densifying proposed sites which are in sustainable locations and not in the green belt. They strongly reject to MX15 Pedham Place stating that the perceived benefits do not justify exceptional circumstances and it is inappropriate because it does not meet local need nor will it benefit its</p>

Parish Councils	Responses
	<p>residents. According to them it is failing to meet SDC proposed policies as it is labelled as a garden community but isn't backed by the government as one of their 43 Garden towns/villages. They feel the site with further burden the local schools and GP's which are already at compacity and only add to the traffic issues that Swanley already face which in turns increases the level of air pollution, worsening the health of their residents.</p>
<p>Ash-cum-Ridley Parish Council</p>	<p>Support option 2 due to its well-placed location and the additional facilities it brings to the area which can only be beneficial. They recognize the necessity to meet housing needs however question several proposed developments sites HO21 the potential impact on local business, MX12 with concerns of loss of parking, HO22 over access issues as Church Road is unsuitable for access in their eyes and they would like to highlight the lack of public transport and overcapacity in local doctor's surgeries. Agreement with the focus points is expressed for Policy NAG1, emphasising the importance of retaining adequate parking provisions. Town centre and internal enhancements are welcomed but the new development must take into consideration the unique history and built character of the area. Support is expressed for retaining existing sport and leisure facilities in the Parish, yet concerns are raised about inadequate maintenance of the New Ash Green rugby pitches.</p>
<p>Fawkham Parish Council</p>	<p>Option 2 Pedham Place is felt on balance to be the preferable option. Supports densities in excess of 150 dwellings per hectare in highly sustainable locations and densities of 50-150 dwellings per hectare in existing built-up areas, the edge of settlement density of 40-60 dwellings per hectare is entirely inappropriate. Supports development within the boundaries of existing settlements, including building at higher density and optimising the use of previously developed 'brownfield land'. However, the use of brownfield sites for housing is only supported where the existing use is no longer viable. Strongly support the omission of all 11 sites put forward in the Parish. Supports optimising existing employment land, strengthening and diversifying the rural economy and maintaining and enhancing tourism. Supports the policy which only permits development where it can be demonstrated that it would not result in the deterioration of the quantity or quality of ground and surface water resources. Supports the use of a Design Review Panel particularly for smaller developments which have significant impact on the surrounding area. Strongly supports a policy which protects designated sites and the District's Blue Green Infrastructure (BGI). Strongly supports the provision of 20% biodiversity net gain in all proposals for new qualifying development. Strongly objects to the policy T1 as now expressed as it is insufficiently specific to guide development to sustainable locations and assist with climate change objectives as sought by the NPPF. Also strongly objects to Policy T2 as currently worded as it is imprecise in its requirements.</p>
<p>Hextable Parish Council</p>	<p>Were surprised that the three sites, contained in the earlier Local Plan, that Hextable Parish Council supported, have not been included this time. They are aware of the housing survey that identifies the need for smaller (2/3 bedroomed and affordable dwellings) which our village needs. Two of these sites, being on previously developed land provide an opportunity for the village to contribute to the overall district housing supply with minimal impact on the village. Fully support the comments made in section 9.19 concerning the need for a new secondary school in the north end of the district, which we recognise as an important provision – given that so many children currently have to travel to secondary schools. Believe that as a key part of the local plan, reliable and frequent bus services, with real time service updates at key bus stops, will help to contribute to a more sustainable means to travel. Want to see an increase in the provision of local buses linking the village to the adjoining</p>

Parish Councils	Responses
	<p>settlements. Also want to see the local plan concentrating on promoting the necessary infrastructure and alternative transport solutions to reduce congestion and the effects this has on our communities. Feel there is a need for this plan to address the lack of a safe cycling route between Dartford and Swanley, through Hextable.</p>
<p>Badgers Mount Parish Council</p>	<p>Endorse Option 2 due to several factors: meeting housing need, minimal impact on the greenbelt, comes with its own infrastructure, well located with easy transport links, and introduces a much-needed arena to the district benefiting various groups. However, they feel careful consideration must be made to address increased traffic in the area. Given the updated NPPF they believe a reassessment of the national housing targets for the districted may be warranted. They support the construction of homes in appropriate areas aligned with local needs and existing infrastructure. Support is expressed for the affordable housing policy however they have reservations about its workability. They affirm our commitment to the principles of sustainable living for all communities however they have strong reservations regarding the proposed expansion of station court from 4 to 12 pitches which they deem excessive. They put high focus on making sure that the correct infrastructure is put into place alongside any new development across the district ensuring that GP's, schools and walking/cycling facilities are put into place to deal with increased population. They Wholeheartedly endorse the integration of sustainable practices into developments throughout the district. Additionally, they suggest a reconsideration of the waste management policy, urging a shift towards increased recycling and away from burning waste for power generation.</p>