

Sustainability Appraisal (SA) of the Sevenoaks Local Plan

Interim SA Report

October 2025

Quality information

Prepared by	Checked by	Approved by
Mark Fessey Associate Director	Ian McCluskey Associate Director	Nick Chisholm-Batten Technical 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 is the third Interim SA Report published as part of a consultation held on the emerging Sevenoaks District Local Plan. This report presents an appraisal of five ‘growth scenarios’ defined as essentially alternative key diagrams, i.e. alternative approaches to the supply of land to provide for development needs alongside delivering on wider plan objectives. Within this report:

- Part 1 – explains a detailed process to **define growth scenarios**.
- Part 2 – presents the **appraisal** of growth scenarios.
- Part 3 – discusses **next steps**.

Part 1 ultimately defines the following growth scenarios:

- Scenario 1 – SHELAA supported sites bar Pedham Place
- Scenario 2 – Scenario 1 plus select National Landscape (NL) urban extensions
- Scenario 3 – Scenario 1 plus Broke Hill Golf Course new settlement
- Scenario 4 – Scenario 1 plus Pedham Place new settlement
- Scenario 5 – Scenario 1 plus all variable sites.

Scenarios 1 and 4 are those that are a focus of the current Local Plan consultation document, i.e. such that the aim here is to explore these alongside wider growth scenarios. It can also be noted that the scenarios are in ascending order of growth quantum, where Scenario 1 is the lowest growth scenario (total supply over the plan period would likely be below Local Housing Need, LHN) and Scenario 5 is the highest growth scenario (total supply would be above LHN, such that the housing requirement could be set at LHN with a healthy ‘supply buffer’ or, alternatively, the requirement might be set modestly above LHN).

Part 2 of the report presents an appraisal of the five growth scenarios under the ‘SA framework’, which primarily comprises a list of 12 sustainability topics. The appraisal concludes with a summary appraisal ‘matrix’ with a column for each of the SA topics and a row for each of the scenarios. The summary matrix is presented below, where each row 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 uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red / amber / light green / green**.¹

The appraisal shows a very mixed picture, although one clear message is that Scenario 2 is not shown to perform well. Scenario 4 is the best performing scenario under the greatest number of sustainability topic headings, and is also predicted the fewest negative effects, but this should not be taken as a clear indication that it is the best performing scenario overall, because the appraisal is not undertaken without any assumptions made regarding the degree of importance (‘weight’) that should be assigned to each of the topics as part of decision-making (rather, it is for the Council to assign weight and reach a decision ‘on balance’). Also, it is important to state that many of the topic specific appraisal conclusions are reached on balance or otherwise with limited certainty.

Focusing on Scenario 1, this is a lower growth scenario whereby the housing requirement would likely need to be set below LHN, hence it is unsurprising that this scenario is judged to perform relatively poorly in socio-economic terms. However, the appraisal also flags some concerns under environmental topic headings given an assumption that unmet housing need would have to be provided for elsewhere within a constrained sub-region (an assumption that may not hold true in practice). Also, it is important to be clear that Scenario 1 is judged to perform relatively well in terms of ‘transport’ and ‘landscape’, and it may be the case that the Council (as decision-makers) chooses to assign particular ‘weight’ to one or both of these topics, when reaching a decision on which of the scenarios best represents sustainable development on balance.

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.

Part 3 discusses next steps. Specifically, the next step is to prepare the final draft ('proposed submission') version of the Local Plan, which will then be published under Regulation 19 of the Local Planning Regulations (the current consultation is under Regulation 18) alongside the formally required SA Report, which must present an appraisal of "the plan and reasonable alternatives". Again, the intention will be to present reasonable alternatives in the form of 'growth scenarios'.

Following Regulation 19 publication the intention will be to submit the plan for an Examination in Public overseen by the Planning Inspectorate alongside all of the representations received.

The reasonable growth scenarios – summary appraisal findings

	Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Pl.
Air quality	2	2	1★	1★	3
Biodiversity	2	3	2	1★	2
Climate change adaptation	=	=	=	=	=
Climate change mitigation	2	2	2	1★	1★
Communities	2	2	2	1★	2
Economy & employment	=	=	=	=	=
Historic environment	2	2	1★	1★	1★
Homes	5	4	3	2	1★
Landscape	1★	4	2	3	5
Land, soils and resources	3	2	2	2	1★
Transport	1★	2	1★	2	3
Water	?	?	?	?	?

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Sevenoaks District 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 2042, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3. SA is a process for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives.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 full draft plan. Rather, at the heart of the current “Regulation 18 consultation – Autumn 2025” is a choice between alternative ‘**growth scenarios**’. As such, this Interim SA (ISA) Report is focused on presenting an appraisal of alternative growth scenarios (as per the ISA Report in 2023) aimed at informing the current consultation and subsequent plan-making.

Structure of this report

- 1.3.2. Despite not aiming to present all of the information required of the SA Report (because the focus is on growth scenarios, as opposed to a full draft plan), this report is still structured so as to answer each of the **three questions** introduced above in turn.
- 1.3.3. 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).

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; 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 initial Regulation 18 consultation 2022/23.
- 2.2.2. A key focus of the initial consultation was on exploring options for maximising the supply of land for new homes within settlements, and then this was followed by a second Regulation 18 consultation in 2023/24. That second consultation proposed greenfield (Green Belt) allocations and explained that there was a key choice to make regarding whether to support allocations that would extend settlements into the Kent Downs National Landscape (NL) and/or support a new settlement at Pedham Place, which is also located in the Kent Downs NL.
- 2.2.3. 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').
- 2.2.4. 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 1,145 dwellings per annum (dpa) when judging planning applications, in line with the Government's 'standard method' for calculating housing need (March 2025). The 1,145 dpa figure (referred to as Local Housing Need, LHN) contrasts to a figure of 165 dpa in the Core Strategy and also the previous standard method figure of 712 dpa from the time of the Regulation 18 consultation in 2023/24.
- 2.2.5. 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 As measured against the 1,145 figure, the District is not able to demonstrate a five year housing land supply (i.e. is not able to demonstrate a pipeline of 'deliverable' sites for $5 \times 1,145 = 5,725$ homes plus a buffer as per NPPF para 78) such that planning applications must be considered in the context of the presumption / tilted balance. In practice, this means there is reduced potential to defend against planning applications, in that any refusal might then be over-turned at appeal by a Planning Inspector ('planning by appeal'). Any Inspector at appeal would give considerable weight to policy designations including Green Belt and the NL; 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. Finally, it can be noted that fighting planning appeals can be very resource intensive and costly for local authorities.

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

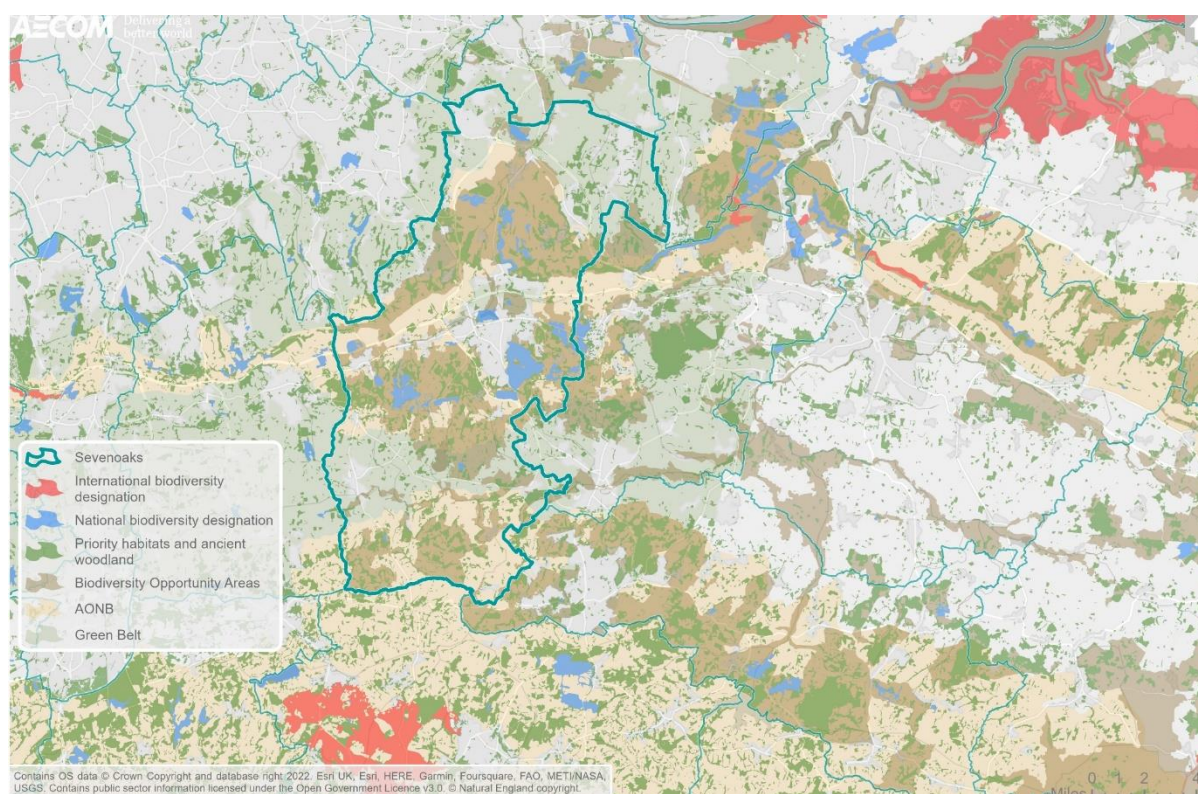
- 2.2.6. The above discussion introduces the ‘stick’ that is in place to encourage the speedy adoption of a new Local Plan. However, it is also important to state that there are many ‘carrots’. Focusing on housing, meeting needs is clearly of great importance in-and-of itself, but also gives rise to wide-ranging secondary benefits, for example in terms of health / well-being and supporting the local economy. Also, and importantly, plan-led housing growth creates an opportunity to strategically target investment and policy ‘asks’ of developers (in the context of development viability parameters), thereby maximising the benefits of growth and potentially delivering ‘planning gain’. Growth related opportunities can and do go missed when new homes come forward in the absence of an up-to-date local plan.
- 2.2.7. 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, including but not limited to any risk of unmet need arising in the sub-region.

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 one East Sussex authority (Wealden). There are a total of 97 settlements, as set out in the District’s Settlement Hierarchy (2025). 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 primary service settlements, namely Hartley, Otford and New Ash Green.
- 2.3.2. The population is 120,500 (2021 Census Data) and within this 22% of residents are aged 65 or over, with this figure expected to grow to 25.8% by 2043. 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. The District has the highest house prices in Kent, with the ratio of house prices to workplace based earnings over 13 and it was almost 16 in 2022. This makes the District one of the least affordable in the South East (see link above), although it should be noted that the ratio of house prices to residence based earnings is lower 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.
- 2.3.3. The District has the lowest level of unemployment in Kent and residents are generally well qualified with only 8% of the population having no academic qualifications. There are a number of strategic employment areas, including at Sevenoaks and Swanley. 40% of residents commute to work in Greater London.
- 2.3.4. 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 Green Belt, 60% of the District intersects either the Kent Downs NL or the High Weald NL, and areas of countryside outside of the NL are constrained in biodiversity terms; for example, there is a high density of ancient woodland in the northeast of the District. It is also important to note extensive flood risk zones associated with the River Eden around Edenbridge.

- 2.3.5. There are many historic settlements in the District, as is reflected in the high number of conservation areas and listed buildings. The District is also home to a number of nationally designated historic country estates, including the following that are Grade 1 on the national register (all located in an NL): Knole, Chartwell, Hever Castle, Penshurst Place and Lullingstone Castle. Other key places of interest (again, all within the NL) include the National Trust village at Chiddingstone, Eynsford Castle, Lullingstone Roman Villa, Otford Palace and Toys Hill (the birthplace of the National Trust).
- 2.3.6. Sevenoaks District is a popular place to live, including due a high quality environment, 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.
- 2.3.7. 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 in order to reduce pressure for private education and pupils having to travel outside of the District. Kent has a grammar school system.
- 2.3.8. The District has vibrant town centres with a good retail offering including many independent shops. There is, however, 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.
- 2.3.9. 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. However, on the other hand, there is a clear local case for growth, plus it must be recognised that other local authorities in the sub-region are struggling to progress local plans that provide for housing need such that unmet need is already an issue. Matters are explored further below, in light of A) a more in-depth consideration of high-level factors; and then B) detailed supply options.

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



2.4. The plan period

- 2.4.1. The duration of the Local Plan is for 15 years from 2027 (the date when the plan is expected to be adopted) to 2042. 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.... Where larger scale developments... form part of the strategy for the area, policies should be set within a vision that looks further ahead...”

- 2.4.2. There are two further points to note:

- At the start of the plan period (1 April 2027) 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 2025 commitments totalled 3,978 homes, and it is fair to assume that the figure as of 1st April 2027 will be similar (although in practice it could well be higher because the District is subject to the presumption in favour of sustainable development, as discussed). The aim of the Local Plan is to provide for housing supply over-and-above commitments, primarily via site allocations (see NPPF paragraph 72). It can also be noted that commitments will deliver earlier in the plan period whilst new allocations will tend to deliver later and taken together the aim is to ensure a smooth trajectory of housing delivery across the plan period.
- 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; however, there is some flexibility. In particular, NPPF paragraph 72 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. This is in recognition of the requirement to review local plans at which time new supply can be identified.

2.5. Plan vision and 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 then been made, and the plan document now presents 20 objectives covering (abridged):

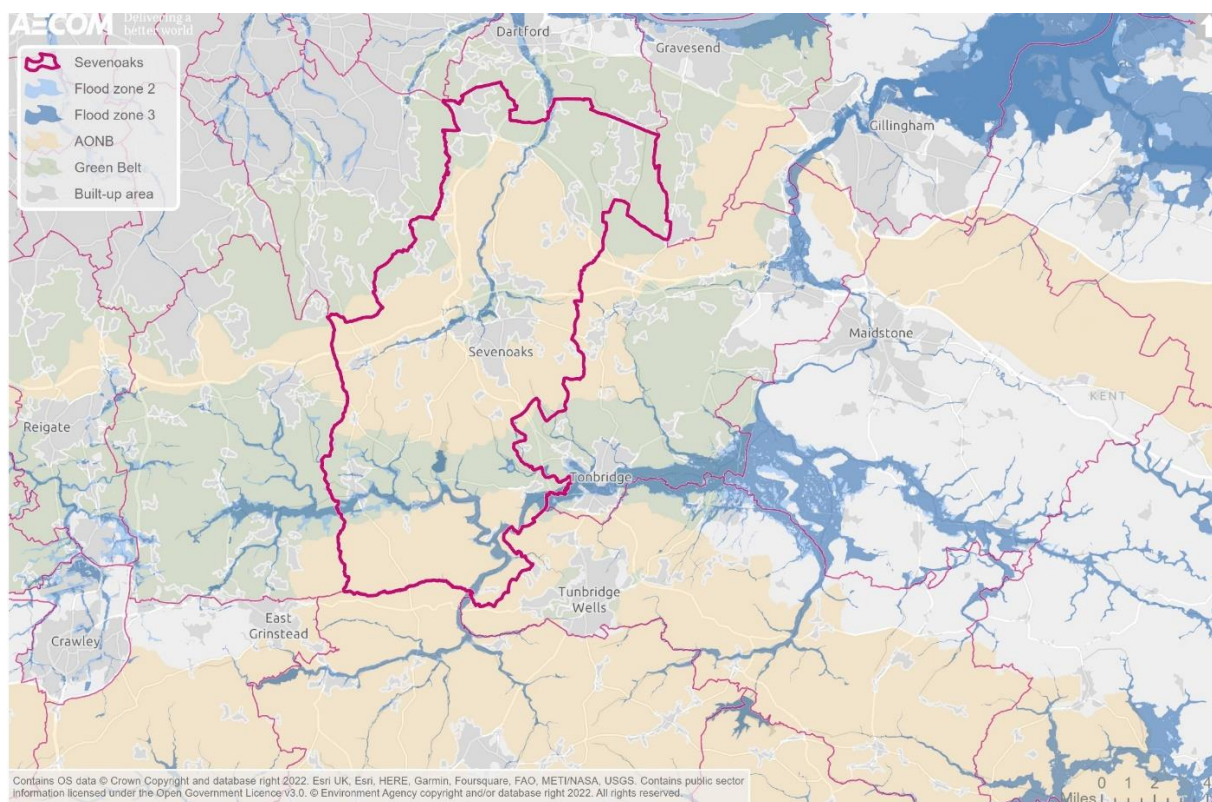
- Promoting healthy communities – incorporating green space and healthy design principles, to encourage good physical and mental health; recognising health as a principle that cuts across all policies.
- Tackling climate change – minimising carbon emissions and adapting to a changing climate.
- Delivering design excellence in our built environment – responding to our distinctive local character and creating the heritage of the future; demanding well-designed spaces that deliver exceptional places to live, work and relax; providing innovative ways to support mental and physical well-being.
- Supporting the delivery of strategic infrastructure to meet the needs of all residents, businesses and visitors – delivering a sustainable movement network; providing high quality open spaces that offer health, wellbeing and social benefits; delivering excellent education, health and sports facilities close to where people live; ensuring appropriate investment in robust utilities and digital infrastructure.
- Homes to meet local needs – boosting the supply of homes including much needed affordable homes.

- Agile and competitive economy and resilient town centres – supporting 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; supporting the rural economy.
- Protecting the natural and historic environment – recognising that the district’s valuable natural and historic built environment makes an important contribution to the quality of life of residents and visitors.

2.5.2. Also, the current consultation identifies four key ‘drivers’ of the local plan relating to:

- Healthy communities
- Climate change
- Design excellence
- Delivery of strategic 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). 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. 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. 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 around 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 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/enhance soil and mineral resources.
Transport	Promote sustainable transport and reduce the need to travel.
Water	Ensure the efficient and effective use of water in addition to protecting and enhancing water quality.

Part 1: Work to date

4. Introducing Part 1

4.1. Overview

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

4.2. Reasonable alternatives in relation to what?

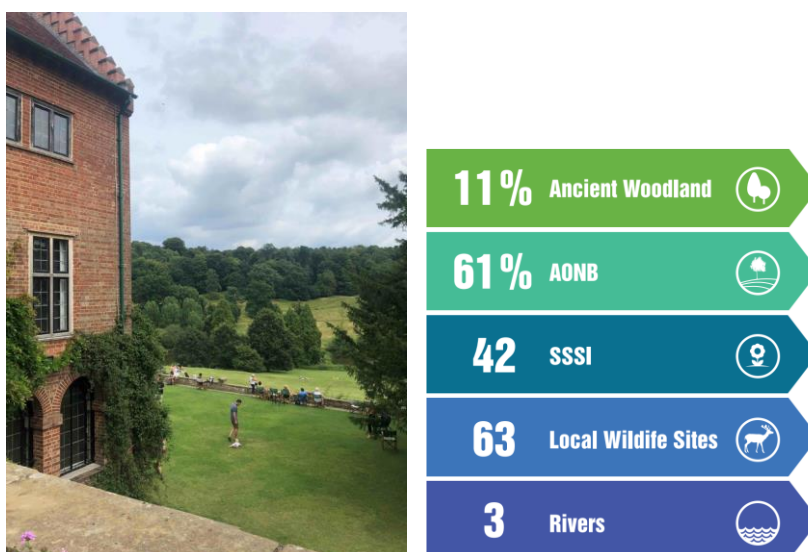
4.2.1. The legal requirement is to examine reasonable alternatives (RAs) that go to the very heart of the plan (“*the plan and reasonable alternatives*”) and specifically RAs that reflect “*the objectives and geographical scope of the plan*” (see Section 2). In light of a review of the plan objectives, it was determined reasonable to focus on the **spatial strategy**, i.e. providing for a supply of land, including by **allocating sites** (NPPF paragraph 72), to meet objectively assessed needs and wider plan objectives.

4.2.2. Establishing a spatial strategy is clearly at the heart of the Local Plan and, indeed, the current consultation document explains: “*Meeting development needs, particularly housing needs, within a constrained environment is clearly a defining factor for this Plan.*” It is common practice to focus work to explore RAs on this matter and this was the approach taken in 2023. Also, the Consultation Summary in respect of the 2023 consultation explains that this matter generated by far the greatest interest.⁵

4.2.3. The decision was made to refer to the spatial strategy RAs as “**growth scenarios**”. In short, these are alternative key diagrams where the key diagram is a visual summary of the matter at the heart of the plan (housing requirement/ spatial strategy/ sites/ supply).

What about site options?

4.2.4. Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case. Rather, the key 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, in so far as possible. Nonetheless, consideration is naturally given to the merits of individual site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.



There are wide ranging constraints to growth that must factor-in

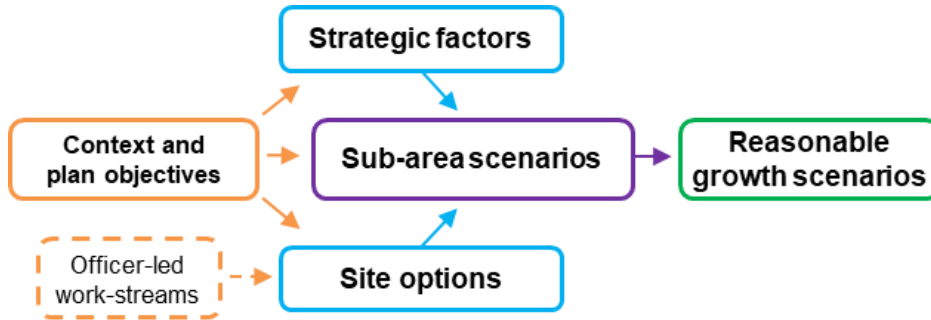
⁵ It was also considered appropriate to focus on ‘spatial strategy’ given the potential to define “do something” alternatives associated with meaningfully different ‘significant effects’ (specifically varying significant effects in terms of more than one sustainability topic). Guidance is clear that SA “*should only focus on what is needed to assess... significant effects...*”

5. Defining growth scenarios

5.1. Introduction

5.1.1. The aim here is to discuss the process that led to the definition of growth scenarios. To reiterate, growth scenarios equate to **reasonable alternatives**.

Figure 5.1: Summary of the process leading to growth scenarios



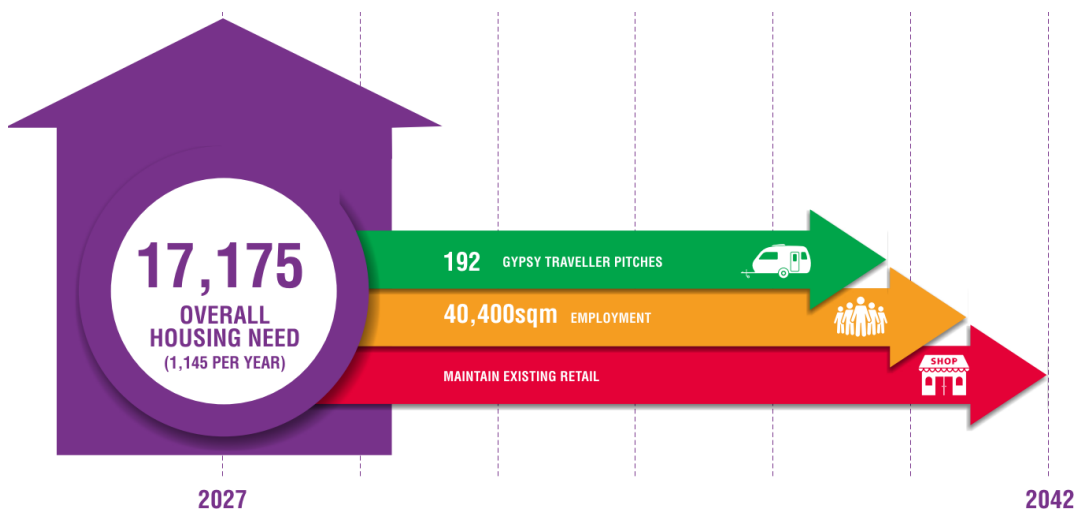
Structure of this section

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

- **Section 5.2** – explores **strategic factors** that are a ‘top down’ input.
- **Section 5.3** – considers **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 **growth scenarios**.

A note on limitations

5.1.3. The aim here is to describe the *process* that led to the definition of reasonable alternatives (growth scenarios) 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].



Understanding of development needs is a key ‘strategic factor’

5.2. Strategic factors

Introduction

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

- Quantum – *how many* new homes are needed (regardless of capacity)?
- 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 states that local housing need (LHN) should be established via an assessment “*conducted using the standard method*”.

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**. However, it can also be appropriate (‘justified’) to set a housing requirement that *departs* from LHN.

Sevenoaks District’s Local Housing Need (LHN)

5.2.6. As discussed above, the Government’s standard method provides an LHN figure of 1,145 dwellings per annum (dpa). This is calculated using a simple algorithm that uses existing dwelling stock as its starting point and then also factors in the local affordability ratio, i.e. ratio of house prices to local salaries (which is very high locally, as discussed).

Is it reasonable to explore a housing requirement below LHN?

5.2.7. 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 states:

*“... 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]

5.2.8. 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 Green Belt constrains all settlements; and the Kent Downs NL constrains Sevenoaks and one of the three second tier settlements (Westerham). The two other second tier settlements – Swanley and Edenbridge – are located mostly outside of a NL but there are wider constraints to factor in, including relating to biodiversity, heritage and flood risk.

- 5.2.9. Also, there is a need to recognise that any local authority must only ever commit to a housing requirement that is deliverable, because failing to deliver means that the local plan is judged out of date (such that the presumption in favour of sustainable development applies), and there are concerns regarding delivering 1,145 dpa. Whilst Sevenoaks is a buoyant housing market, the simple fact that 1,145 dpa is more than quadruple the number of homes that have been delivered on average over the past ten years serves to suggest a degree of delivery risk. It is recognised that an up-to-date local plan is an opportunity to support a step-change in delivery. Also, it is recognised that there can be flexibility for a 'stepped' housing requirement whereby the housing requirement is lower in the early years of the plan and then commensurately higher in the latter years (to allow strategic allocations time to deliver). However, overall there is a high level delivery concern that must factor in (ahead of much further detailed work).
- 5.2.10. On the basis of the points discussed above, there is a clear *high level* argument for exploring growth scenarios that would involve a housing requirement below LHN and, in turn, unmet housing needs that may then pass to one or more neighbouring areas.
- 5.2.11. 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 significant secondary benefits, for example in terms of supporting communities, health and wellbeing, strategic infrastructure delivery and the local economy.
 - 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, at least ahead of a sub-regional Spatial Development Strategy (SDS) under the devolution agenda.
- 5.2.12. Finally, it should be noted that the option of setting the housing requirement below LHN was explored at both of the previous Regulation 18 consultation stages in 2022 and 2023 including within the respective Interim SA Reports. Appraisal findings and consultation responses from the two preceding Regulation 18 stages feed into work to define reasonable alternative growth scenarios at the current time.

Is it reasonable to explore a housing requirement above LHN?

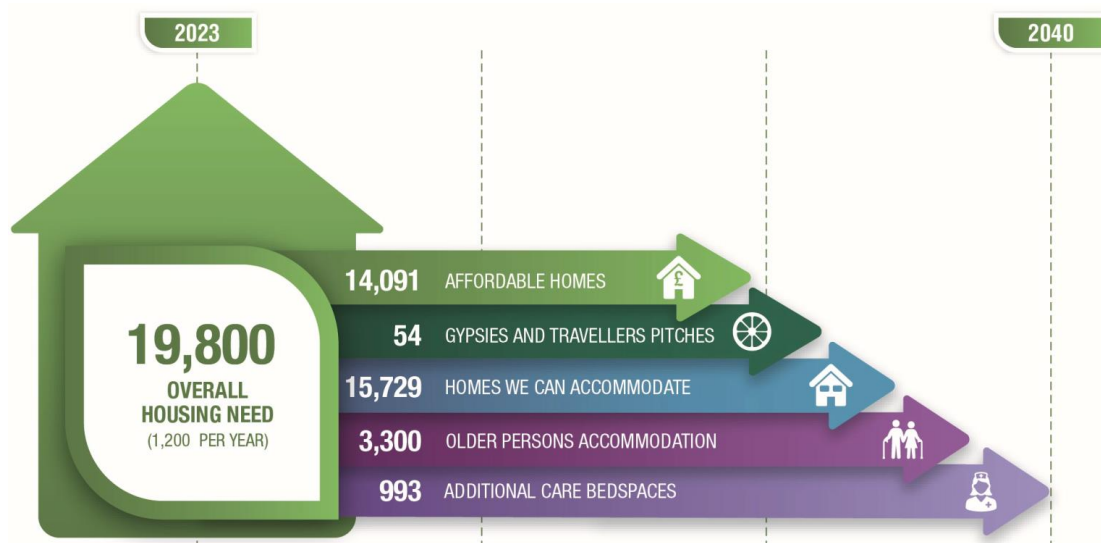
- 5.2.13. NPPF paragraph 69 states (emphasis added) that local authorities:
- "... should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need... can be met over the plan period. **The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.**"*
- 5.2.14. The matter of 'growth ambitions linked to economic development or infrastructure investment' is not considered to be a significant factor in the Sevenoaks context. However, the matter of 'provision for neighbouring areas' is significant.
- 5.2.15. Eight authorities identified the potential for unmet need through the Regulation 18 consultation in 2022 (see list [here](#)). With regards to the second Regulation 18 consultation in 2023, the Consultation Report (March 2024) discusses the following neighbouring and nearby local authorities in turn:

- Tunbridge Wells BC – the Consultation Report explains: *“TWBC have recently consulted on a revised development strategy, which... removes the strategic allocation at Tudeley. This would reduce their plan period to 10 years, and therefore TWBC is not in a position to assist with any unmet need from SDC, due to difficulties meeting TWBCs own housing need.”* Given that the Local Plan is likely soon to be adopted it is difficult to suggest a risk of unmet need, notwithstanding the short plan period. It is also noted that LHN increased by 66% following the new standard method in 2024.
- Tonbridge and Malling BC – the Consultation Report explains: *“TMBC... intends to publish a second consultation in mid-2024... TMBC indicated that it was unable to assist SDC in meeting any unmet needs.”* The latest situation is that a Draft Local Plan is set for consultation that proposes a housing requirement set at LHN (although without any supply buffer, i.e. supply is precisely the requirement). The plan explains that there is no capacity to additionally provide for unmet needs from elsewhere.
- Wealden DC – a Draft Local Plan was published for consultation in early 2024 that proposed a housing requirement of 15,729 homes in the context of a 19,800 home LHN figure, i.e. the proposal was to generate 4,071 homes unmet need (see Figure 5.2). Also, again, it can be noted that no supply buffer was proposed. A Consultation Report was then published in 2025 that presents limited discussion of unmet need, but does state that two neighbouring authorities raised concerns (including Eastbourne BC who stated that they will themselves generate unmet need). It is also noted that LHN increased by 21% following publication of the new standard method in late 2024.
- Tandridge DC – a Local Plan was submitted for examination in 2019 that proposed to generate unmet need, but this was then found unsound and withdrawn in early 2024. The Inspector’s Report set out reasons for the plan being found unsound, notably explaining: *“There is no clear evidence that any of the neighbouring authorities could take on unmet need from Tandridge, even if they were agreeable to do so and in terms of [Housing Market Areas], it would be relevant and appropriate to do so. Taking these considerations together, I am therefore satisfied that the Council has cooperated with the DtC bodies in respect of unmet need.”* The withdrawn plan had proposed a housing requirement of 303 dpa whilst the latest standard method LHN figure is 843 dpa. Delivery averaged 261 dpa from 2021/22 to 2023/24.
- Gravesham BC – the Consultation Report explains: *“Gravesham BC are at an earlier stage in the plan-making process, with a lot of their resources currently being focused on the Lower Thames Crossing. Through their response to the recent consultation however, it was made clear that they are unlikely to be able to assist with any unmet need from Sevenoaks District, due to their own highly constrained nature.”* The last consultation was in 2020, and the risk of unmet need is discussed within the Dartford Local Plan Inspector’s Report (2024). On the plus side, Gravesham did not see a significant increase to LHN following the new standard method; however, recent delivery of 378 dpa (2021/22 to 2023/24) is well below their LHN figure of 672 dpa.
- Dartford BC – a Local Plan was adopted in 2024 that provides for housing need in full, albeit only to 2037. Indeed, the decision was taken to set the housing requirement 40 dpa above LHN as a proactive step (not necessarily in response to unmet need from elsewhere, although the Inspector’s Report explains: *“the Council had confirmed that the door had not been closed to providing assistance”*). It is also noted that Dartford’s LHN *decreased* by 10% following publication of the new standard method in late 2024.
- LB Bromley and LB Bexley – Bexley has an up-to-date Local Plan and Bromley recently published a high level consultation document within which they commit to providing for the ‘housing target’ set by the London Plan (2021). Specifically, Bromley propose to deliver 774 dpa in the context of recent delivery of 229 dpa (2021/22 to 2023/24). It can also be noted that the standard method LHN is 3,001 dpa, although LHN is dealt with through the London Plan rather than individual boroughs.

In this regard, it can be noted that the adopted London Plan (2021) generated unmet need that has not been provided for. Also, a new London Plan is now in preparation and a commitment has been made to providing for standard method housing need in full, whether that be within London or with some unmet need provided for outside of London via the Duty to Cooperate. If the new standard method LHN were to be provided for in full *within London* this would mean a major step change in delivery, with LHN 88,000 dpa compared to delivery of 32,000 homes in 2023/24 (and, within this, the number of affordable housing starts fell by 88% compared to the previous year; discussed [here](#)). Furthermore, in Q1 2025 construction started on only 1,210 new homes, with 23 boroughs recording zero starts. Overall, unmet need from London is a risk, but this cannot be quantified ahead of work on the new London Plan.

- 5.2.16. Overall, the bullet points above serve to demonstrate significant risk of unmet need that must factor into work to define reasonable growth scenarios at the current time. It can also be noted that there are numerous other local authorities arguably within the sub-region that are at risk of generating unmet need, particularly across Surrey and Sussex but also East Kent where nutrient neutrality is an issue.
- 5.2.17. However, transferring unmet need from one local authority to another is very challenging in the absence of a sub-regional plan to guide the process, because there is a high bar to evidencing unmet need ('no stone left unturned') and then careful consideration must be given to where the unmet need should go. Also, the fact that local plans are all on different timescales creates a challenge, notwithstanding the NPPF states the following under the heading 'effective and on-going joint working': *“Plans come forward at different times, and there may be a degree of uncertainty about the future direction... authorities... will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.”*
- 5.2.18. Finally, the current Draft Ashford Local Plan (August 2025) is of note as a case study. It aims to provide for LHN in full but a supporting Duty to Cooperate Statement presents the following response (dated July 2024) to an unmet need request from Rother District: *“Consequently, and whilst we understand that your Authority may also have significant challenges, the Borough Council is not in a position to assist you in meeting your housing need and currently cannot envisage a scenario where this position will change.”*

Figure 5.2: Wealden’s proposed approach to setting a housing requirement (2024)



- 5.2.19. One other high level consideration, in respect of possible scenarios involving a housing requirement set above LHN, is **affordable housing need**, given 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.” Affordable housing need is high, as understood from the Targeted Review of Local Housing Need (2025), which explains: “There is an annual need for 353 affordable dwellings which justifies the need for a robust affordable housing policy.” Also, recent delivery has been very low, with just 21 affordable homes completed in 2022/23 (and 15 consented). However, strong development viability should mean good potential for a step-change in affordable housing delivery, and potentially provision for the identified need figure in full, under scenarios with the housing requirement set at LHN (1,145 dpa).
- 5.2.20. Finally, it should be noted that the option of setting the housing requirement above LHN was explored in the previous two Interim SA Reports. Focusing on the 2023 report, one of the growth scenarios appraised involved supply totalling LHN + 10%, although the report was clear that this would not *necessarily* allow for a housing requirement above LHN, because there is a case for a ‘supply buffer’, i.e. a situation whereby supply is higher than the housing requirement as a contingency for unforeseen delivery issues.

Conclusion on housing quanta options

- 5.2.21. 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 defining growth scenarios and plan-making in general. Specifically, in light of the high-level discussion above, the housing requirement might reasonably be set:
- **Below LHN** – given the extent of constraints, noting delivery risk and notwithstanding the very ‘high bar’ to evidencing unmet need where there is a risk of it staying unmet.
 - **At LHN** – 1,145 dpa or, at least (given the possibility of justifying a stepped requirement), 17,175 over the plan period) – this is essentially the default option.⁶
 - **Above LHN** – given the risk of significant unmet housing need from elsewhere.
- 5.2.22. The matter of precise growth quanta figures to reflect across the growth scenarios is returned to in Section 5.5 following consideration of spatial strategy issues/options (the remainder of this section), available site options (Section 5.3) and reasonable sub-area growth scenarios (Section 5.4). It is important to be clear that a range of factors must be taken into account and, in this regard, it is important to note that paragraph 146 of the NPPF must be read in the context of the NPPF and also the PPG as a whole.⁷

Box 5.1: A note on employment land need

Employment land needs are understood from the Sevenoaks Economic Needs Study Update (ENS; 2025). Having accounted for the pipeline of existing committed supply the residual needs identified by the ENS are low, specifically: 3.7 ha for industrial land (use classes B2/B8); and 2.6 ha for office floorspace (use class E). Furthermore, this figure for industrial land includes a 20% buffer to account for delivery uncertainties at two key committed sites (Broom Hill, Swanley and Fort Halstead).

Box 5.2: A note on Gypsy and Traveller accommodation need

Delivering pitches to meet needs is highly challenging for many local authorities and Sevenoaks is no exception. It has been established that there is a need for 192 pitches (GTAA), but the emerging preferred approach identifies sites for just 23 pitches. This is a key issue discussed further below.

⁶ The requirement would ideally be LHN from the start of the plan period, but there can also be the potential to argue for an upward stepped requirement, i.e. a situation whereby the requirement is set below LHN over early years of the plan period and then commensurately higher in later years, with the net effect that LHN is provided for in full over the plan period.

⁷ Paragraph 146: “If [exceptional circumstances for Green Belt release exist] authorities should review Green Belt boundaries... and propose alterations **to meet these needs in full**, unless the review [shows] that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”

Broad spatial strategy

- 5.2.23. This is the second of two sections examining ‘strategic factors’ of relevance to the matter of defining growth scenarios. 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 sites.
- 5.2.24. There are many factors that could potentially be discussed here, but the aim is only to present an introductory overview, recognising the potential to explore wider matters within the sections of the report that follow. Key strategic factors are discussed below.

Settlement hierarchy

- 5.2.25. The settlement hierarchy, as understood from a recent study (2025), 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.
- 5.2.26. 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 more typical of the level of growth directed to towns, potentially with a view to the village becoming a town). However, any such decisions must be carefully justified.

Strategic sites

- 5.2.27. 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. NPPF [paragraph 77](#) supports strategic sites.

Smaller sites

- 5.2.28. A good mix of sites, to include smaller greenfield sites, is key to minimising delivery risk and, in turn, ensuring that the Local Plan remains up-to-date and the District avoids the presumption in favour of sustainable development (see Section 2).
- 5.2.29. 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; small and medium sized greenfield sites can tend to benefit from strong development viability and, in turn, good potential to deliver on affordable housing and wider policy objectives (e.g. net zero development); and small sites can sometimes be developed with limited Green Belt impact.
- 5.2.30. There can also be a traffic argument for dispersing growth across smaller sites; however, on the other hand, focused growth can support effective strategic transport planning, e.g. major new infrastructure or upgrades.

Development viability

- 5.2.31. 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 infrastructure delivery and decarbonisation (given the Council’s climate change [commitments](#)); however, there are numerous other policy options to explore, e.g. around biodiversity net gain.
- 5.2.32. 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 sites benefit from economies of scale, but they can also be associated with a need for major infrastructure upgrades that can prove very costly.

Previously Developed Land (PDL)

- 5.2.33. There is a clear need to maximise PDL (or ‘brownfield’), in order to minimise pressure on greenfield, but this must be *within reason* acknowledging potential issues, including:
- Delivery risk/certainty – there is a need to avoid overreliance on urban supply, given inherent delivery challenges, for example relating to new Building Regulations, complex land ownership / leaseholds and existing use values that impact on 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 – whilst urban areas will always evolve and regenerate, building at densities significantly out of character with the existing area can lead to opposition at the planning application stage. A Character Study was published in 2022, and this must feed in when considering site capacities / yields.
 - Existing uses – there is a need to apply due caution before supporting the redevelopment of existing employment land 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 notably around ensuring sufficient primary school capacity.
- 5.2.34. The Regulation 18 consultation in 2022 included a particular focus on maximising supply from urban areas and, in turn, proposed three broad density options. In turn, it proposed a total supply of between 568 and 1,313 homes from sites identified within the Settlement Capacity Study (2022). However, by the time of the consultation in 2023 a number of sites had been confirmed as unavailable or otherwise not developable, and the decision was taken to support the middle of the three density options.
- 5.2.35. At the current time, the emerging preferred approach is (non-committed sites) involves: 2,110 homes from urban (i.e. non-Green Belt) sites identified through the Settlement Capacity Study and/or submitted to the Council by the landowner; 610 homes from PDL sites in the Green Belt; and 572 homes from partial PDL sites in the Green Belt.
- 5.2.36. Overall, it is clear that understanding of what is reasonable to assume in terms of PDL supply has evolved considerably over time (there is also the context of a high PDL growth strategy previously proposed through the withdrawn local plan). This reflects a process of gathering evidence regarding detailed factors across specific sites (e.g. the timetable for sites becoming available for development given existing commercially viable uses). However, it is also reflects shifting views on strategy, including around the benefits of supporting a strong element of greenfield supply (e.g. affordable housing).

Green Belt and the National Landscapes

- 5.2.37. The Interim SA Report in 2022 discussed the possibility of Green Belt release but set out an expectation that there would not be a need for significant growth in either of the NLs. Subsequently in 2023 the consultation document and its accompanying Interim SA Report proposed a ‘baseline’ series of Green Belt allocations and then explained that the key choice at hand related to building upon this baseline by additionally allocating:
- a series of Green Belt urban extensions in the Kent Downs (KD) NL;
 - a new settlement at Pedham Place (linked to Swanley) also within the KD NL; or
 - *both* a series of Green Belt urban extensions in the KD NL *and* Pedham Place.
- 5.2.38. The situation has now moved on in three regards.
- Understanding of LHN has increased significantly such that there is considerable ‘top down’ pressure for additional Green Belt allocations (in the context of limited non-Green Belt supply, as discussed).

- There is a new duty on local authorities to “seek to further” the purposes of NLs following the Levelling Up and Regeneration Act 2023, which is a notable evolution from the previous duty which was to “have regard to” such purposes. Recent legal cases have found that the implications of the new duty must not be over-stated;⁸ however, the duty lends weight to avoiding allocations in the NL if possible.
- The 2024 NPPF introduced the concept of grey belt and para 148 now states that grey belt should be considered for growth ahead of “*other Green Belt locations.*” The Council has now completed an assessment of the Green Belt to identify grey belt, and this finds that a very high proportion of the District’s Green Belt is grey belt, or at least provisional grey belt (ahead of giving consideration to NPPF footnote 7 constraints recognising that grey belt excludes land where such constraints would “*potentially provide a strong reason for refusing or restricting development*”).

5.2.39. All this being the case, there is now a clear argument for: A) boosting supply from Green Belt allocations outside of the NL relative to the previous strategy in 2023 (N.B. NLs are a footnote 7 constraint); and B) avoiding allocations in the NL as far as reasonably possible. In respect of (B), there remains an important distinction between: 1) a new settlement at Pedham Place (in the KD NL close to Swanley); and 2) urban extensions.

5.2.40. A final important consideration is then the Landscape and Visual Evidence Study (‘Landscape Study’; 2024), which examines the ten site options within the NL that were previously a focus of consultation and SA in 2023, namely: A) Pedham Place; and B) nine urban extension options located at Sevenoaks, Westerham and West Kingsdown. It differentiates between the ten sites in terms of landscape sensitivity – see Table 5.1 – and also considers potential ‘in combination’ impacts on the NL. It concludes that, assuming a choice between either allocating Pedham Place (~2,500 homes) or the nine urban extension (total capacity ~880 homes), then there is a preference for allocating Pedham Place, broadly because: 1) there is good potential for mitigation; 2) certain of the nine urban extensions are located in proximity to one another and would have in combination impacts; and 3) there is a case for concentrating impacts in one location.

Table 5.1: Landscape assessment of ten NL site options

Site code / settlement	Site name	Potential significance of effects	Potential significance of effects with additional mitigation <small>(n/a indicates additional mitigation would not reduce significance of effects)</small>
HO28 (Sevenoaks)	Land between Back Lane and the A21, Bessels Green	High	Medium
HO29 (Sevenoaks)	Brittains Lane, Kippington, Sevenoaks	High	Low-medium
MX13 (Sevenoaks)	Land at Moat Farm, off Homedean Road, Chipstead	Medium	n/a
HO30 (Westerham)	Land south of Farley Lane, Westerham	Medium-high	Low-medium
HO31 (Westerham)	Land east of Croydon Road (southern parcel), Westerham	Medium	n/a
HO32 (Westerham)	Land east of Croydon Road (northern parcel), Westerham	Medium	n/a
MX14 (Westerham)	Land at Wolfe Westerham, 190 London Road, Westerham	Low-medium	n/a
HO33 (West Kingsdown)	Land at Mill Farm, West Kingsdown	Medium	n/a
HO34 (West Kingsdown)	Land at Millfield Road, West Kingsdown	Low-medium	n/a
MX15	Pedham Place, London Road, Swanley	High	Low-medium

⁸ In a recent legal case CPRE Kent argued that planning permission must be refused “for any development of land which is found to be in any way harmful to the natural beauty of a protected landscape, however limited and temporary...” However, the judge found that: “The qualified duty... is simply incapable of being read in that way. Nor is it possible to discern in the qualified terms in which the section 85(A1) duty is expressed, a legislative intention to displace the essentially evaluative basis for determination of planning applications... in the way in which the claimant contends.” The judge added that the “socio-economic consequences of the claimant’s approach... would be truly remarkable” and that the planning authority’s function of evaluating the planning balance “would be reduced to a single determining factor...” The case followed a similar case from June 2025.

Transport connectivity

- 5.2.41. 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.⁹ There is a new national emphasis on 'vision-led' transport planning, but it is difficult to evidence specific spatial strategy-related issues / opportunities. 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.
- 5.2.42. The District has high car ownership and there are fairly limited opportunities to cycle between settlements, given topography, settlement pattern and the nature of road links. However, there is excellent rail connectivity in many areas, and this must be a key 'driver' of spatial strategy. Also, Local Cycling and Walking Implementation Plans (LCWIPs) are currently being prepared for Sevenoaks, Swanley and Edenbridge. There is a clear need to work closely with the County Council and others to identify key issues / opportunities. Road/bus connectivity in the more rural south is a key issue.
- 5.2.43. 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 transport modelling work is ongoing in support of the emerging Local Plan, but it is invariably the case that modelling must come late in the process.

Schools capacity

- 5.2.44. 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, hence this is a key spatial strategy consideration. 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.
- 5.2.45. There is also need for Special Educational Needs provision in the north of the District and the County Council has recently secured funding for a new school in Swanley.

Sports facilities

- 5.2.46. This is another growth-related consideration with a clear spatial dimension, recognising the potential for strategic growth locations to deliver new facilities.
- 5.2.47. The Council has published a series of needs assessments and strategy documents for both indoor facilities and outdoor facilities, with considerations including: there is a need for full size 3G sports pitches; and there is a specific need to plan for the long-term refurbishment or replacement of the leisure centres at Sevenoaks and Edenbridge.
- 5.2.48. Also, the Council has a long term 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 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.

⁹ 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."

Utilities infrastructure

5.2.49. Water supply, waste water treatment, waste management, the electricity grid and telecommunications can – to varying extents – sometimes be a factor with a bearing on spatial strategy. 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) to accommodate future growth. This needs further investigation and close engagement with Thames Water and Kent County Council.

Place-making priorities

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

Figure 5.3: Established place-making priorities



Biodiversity and green infrastructure

5.2.51. The District is overall quite highly constrained in biodiversity terms, at least in the sub-regional context. However, much of the biodiversity constraint is concentrated within those parts of the District that fall within a NL. With regards to the sectors of land outside of the NL, 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. A ‘Biodiversity Analysis’ study was completed in 2018 (see summary maps in the previous Interim SA Reports) that applied a quantitative methodology in order to indicatively differentiate between areas.

- 5.2.52. The Environment Act (2021) has led to a new national emphasis on strategic planning for biodiversity and green/blue infrastructure, and Kent County Council has now consulted on a draft 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 units 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.
- 5.2.53. LNRS investment/enhancement priority areas align closely with the long-established Biodiversity Opportunity Areas (BOAs) that intersect the District (see Figure 2.1); for example, the Darent Valley which is already a focus of the Darent Valley Landscape Recovery Project aimed at creating and enhancing 1,500 ha of habitat and restoring river function. Another recent project was the Sevenoaks Greensands Commons Project, plus numerous local scale projects could benefit from investment off the back of housing growth nearby, for example relating to woodland management and accessibility.
- 5.2.54. Importantly, there can also be the potential to target growth / investment so as to achieve objectives beyond biodiversity, including flood water attenuation and accessible greenspace in support of community and health objectives (also, accessible greenspace can mitigate recreational pressure on sensitive sites). In the south of the District, one possible opportunity relates to Bough Beech reservoir, and it can 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.

Figure 5.4: A summary of the draft Kent Local Nature Recovery Strategy (2025)

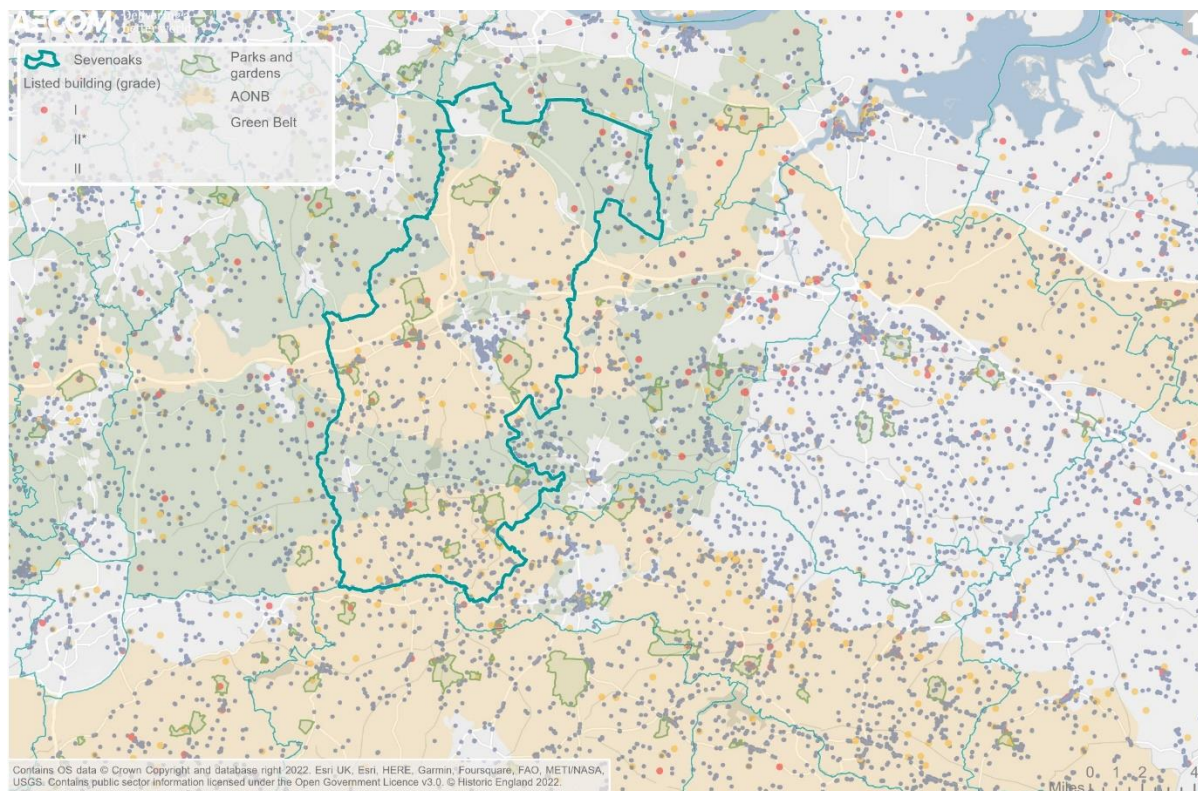


The historic environment

- 5.2.55. 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.

5.2.56. Looking more broadly at those parts of the District that fall outside of the NL, 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 5.5: Select historic environment designations across the sub-region



Employment land

5.2.57. The ENS (2025) identifies that office floorspace should be delivered in town centres whilst industrial floorspace should be focused on Junction 3 of the M25 at Swanley and at the Vestry employment area in Sevenoaks, which are both well linked to regional growth areas. Providing need is relatively straightforward, i.e. the situation is very different to that for housing. Sites have been identified that can comfortably exceed the need figures, such that there is no question of failing to meet needs.

Conclusion on broad spatial strategy

5.2.58. This section has sought to introduce a range of high level / broad spatial strategy considerations that are a 'top down' influence on work to define reasonable growth scenarios. Whilst in practice the selection of sites for inclusion in the growth scenarios is heavily influenced by 'bottom up' consideration of site options (discussed below) it is still very important to 'take a step back' and consider broad strategy options.

5.2.59. There are few 'headline' choices between broad strategy options – for example, growth at towns versus villages, brownfield versus greenfield or strategic sites versus small sites – because the reality is that a balanced strategy is required. However, one broad strategy choice is around the approach to growth within the (NL).

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 shortlist that can then feed into Section 5.4.

5.3.2. This section covers:

- The Strategic Housing and Economic Availability Assessment (SHELAA) – this is the key officer led workstream that has assessed individual site options.
- Strategic site options – there are five strategic site options that warrant being introduced here.

SHELAA

5.3.3. The SHELAA is an iterative process for assessing known sites that are potentially available for development and for each one reaches a conclusion on whether the site is ‘deliverable’ (able to deliver within 5 years) or ‘developable’ (within the plan period) after having determined that the site is both:

- Available and achievable – meaning there is a reasonable prospect of development accounting for financial viability and assuming that the site will deliver on standard policy asks. This is not always clear cut, particularly for complex urban sites.
- Suitable – the aim is to reach a conclusion using a set of standard criteria. There is a recognition that sites deemed suitable through the SHELAA will not always be suitable for allocation in light of more detailed analysis including consideration of the effects of developing the site in combination with others (as discussed in Sections 5.4 and 5.5).

5.3.4. The SHELAA considers around 500 site options, but around 70 are easily discounted, e.g. because they have been superseded or withdrawn by the landowner. It can also be noted that within this list of discounted sites are 7 sites that were supported in 2023 but now either have planning permission, have been withdrawn or are now superseded.

5.3.5. ~45 sites are then judged ‘unsuitable’ for relatively clear cut reasons, although 6 sites at Edenbridge judged unsuitable because they would represent ‘an unnatural extension to the settlement’ warrant further consideration in Section 5.4. It can also be noted that within this list of unsuitable sites are four sites that were previously supported in 2023 but are now unsuitable due to access issues.

5.3.6. ~270 sites are then ‘contrary to strategy’ after having accounted for:

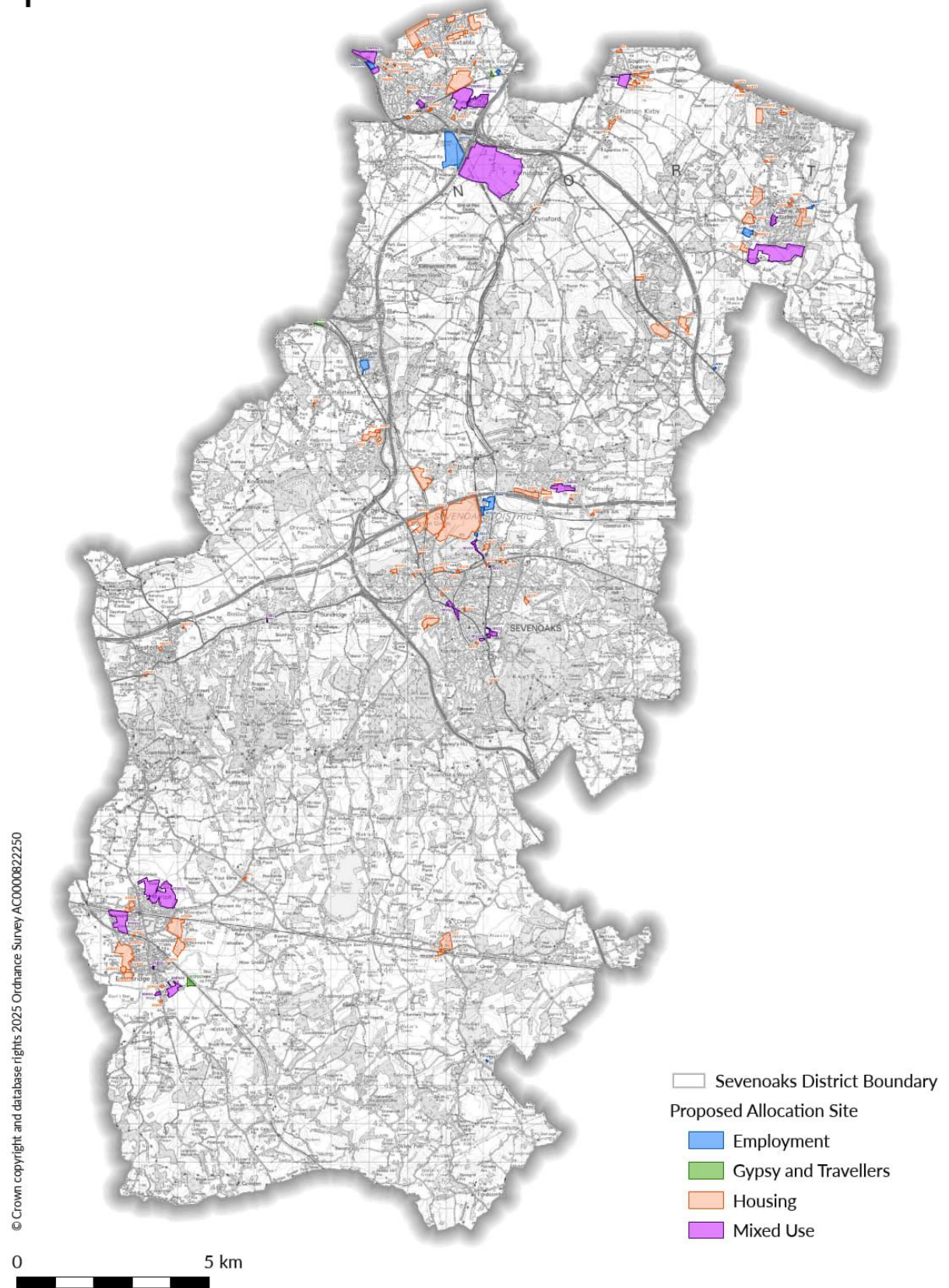
- National Landscape – around 120 sites are not supported because they are within the NL. Within this are the 9 sites within the NL that were a focus of appraisal and consultation in 2023, as discussed above in Section 5.2.
- Settlement hierarchy – a further ~90 sites are not supported because they are not adjacent to a settlement; and a further ~60 sites are not supported because they are adjacent to a lower tier settlement. Only supports select PDL sites not adjacent to a higher order settlement are supported by the SHELAA.

5.3.7. The remaining ~130 sites are categorised as ‘suitable’ within the SHELAA and henceforth are discussed as ‘supported’ by the SHELAA. See Figure 5.6.

5.3.8. This includes the great majority of sites previously proposed for allocation in 2023 under the ‘baseline’ scenario plus 97 new sites (some of which are newly submitted).

5.3.9. At this point it is important to state that the Green Belt Assessment (GBA) has fed into the SHELAA, including work to identify grey belt (see discussion in Section 5.2).

Figure 5.6: The SHELAA supported sites



Strategic site options

5.3.10. There is a shortlist of five strategic site options that warrant being introduced here:

- **Pedham Place** (2,579 homes) – is supported by the SHELAA but there is a clear recognition that this does not necessarily mean that it is suitable for allocation.

The site is currently a golf course, located at the junction of the M25 and M20 close to Swanley (the District's second town), although it sits within the parishes of Farningham and Eynsford. It was a 'broad location for growth' in a previous Draft Local Plan subjected to examination in 2019 before being withdrawn and then was a focus of appraisal and consultation in 2023, in that it featured in two of the three growth scenarios at that time. It remains a clear option for consideration but there are a range of issues not least relating to its location within the Kent Downs NL. Major development in NLs requires "exceptional circumstances" and so allocation would need to be based on a clear understanding of the benefits that it would bring. Making a large contribution towards meeting housing needs would be part of this, but of course there are many other options outside of the NL within Sevenoaks (albeit there are clear limits including as evidenced by the SHELAA), plus there is feasibly the option of the Local Plan not providing for housing needs in full (but there is a high bar to doing so, as discussed in Section 5.2). In turn, there is a need to focus on the specifics of impacts and potential for mitigation (e.g. see discussion of the Landscape Study in Section 5.2) and the potential to deliver benefits over-and-above new homes. On the latter point, there is an established opportunity to deliver education, leisure, recreation, employment and community uses alongside new homes, and the Landscape Study also discusses the possibility of targeted benefits to the NL.

Through the consultation in 2023/24 there was mixed support/objection from across the District with concerns focusing on local infrastructure capacity, particularly traffic congestion, and visual impacts. As discussed in Section 5.2, the situation has moved on in respect of national policy such that there is a new focus on avoiding sites within the NL including accounting for the definition of 'grey belt'.

- **Land North of Sevenoaks, West of Otford Road** (1,500 homes) – is also supported by the SHELAA. It is a new option that was not previously consulted on in 2023 (although a small part was considered by the SHELAA and judged unsuitable). As an initial point, it is important to say that taking a comprehensive approach to growth to the north of Sevenoaks is important, as opposed to a piecemeal approach (noting the permitted Sevenoaks Quarry to the east and a smaller proposed allocation from 2023 to the west), with a view to avoiding issues and maximising benefits ('planning gain').

The site is bounded by the motorway (M26) to the north, Otford Road to the east, the train line and Dunton Green station to the west and Sevenoaks Gravel Pits SSSI (accessible as a nature reserve) to the south. It is well contained in Green Belt terms, well-related to Sevenoaks, outside the NL and has good accessibility credentials particularly noting that Dunton Green station lies immediately to the west (and Bat and Ball station is to the east). The scale of development would enable delivery of a local centre and other community uses and there is also potentially a transport opportunity around improved east-west connectivity. However, the land has clear environmental sensitivity in that the River Darent runs through the site in the context of the adjacent large SSSI to the south (albeit upstream). There would be good potential to address flood risk through masterplanning, but there are potentially concerns in respect of the potential to effectively masterplan the site in such a way that does not result in the SSSI being enveloped within the Sevenoaks urban area, i.e. with a view to retaining functional connectivity with the wider countryside in line with Kent LNRS objectives.

- **Land around Broke Hill Golf Course** (1,400 homes) – is not supported by the SHELAA but is potentially an important option to consider nonetheless given the strategic context. It has a long planning history and was carefully considered in 2023 (see Section 5.3 of the Interim SA Report) before a decision was taken not to include the site within the reasonable growth scenarios at that time. The situation has now evolved, including in light of the District's new higher LHN figure and the new emphasis on avoiding sites in a NL, such that there is now a stronger case for allocation.

However, unlike Land North of Sevenoaks, West of Otford Road, the site is not considered to be grey belt despite falling outside of the NL, specifically because it is judged to make a strong contribution to Purpose A of the Green Belt (prevent the unrestricted sprawl of large built-up areas) given its proximity to Orpington and, in turn, London. The site benefits from a location adjacent to a train station and also close to M25 J4, which has capacity (whilst M25 J3 has significant capacity issues). Also, it is a former golf course with some hard standing. However, there are a range of issues, including relating to the fact that as a smaller new settlement option there is less potential to deliver non-housing uses and new infrastructure relative to Pedham Place. Also, the site is being promoted as three sites rather than as a single scheme.

- **Sevenoaks Station** (420 homes) – is supported by the SHELAA. It is a smaller site in terms of housing delivery but is a ‘strategic site’ because of its importance to the wider strategy for Sevenoaks. In 2023 it was one of the ‘baseline’ sites that featured across all three reasonable growth scenarios and at that time the assumed capacity was 184 homes (plus other uses). However, the Interim SA Report in 2023 explained: “... *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.*”

It represents a key opportunity for urban housing supply alongside achievement of wider objectives relating to the town centre, the public realm and the role of the station as a transport interchange. Located approximately 750m to the north-west of the Sevenoaks retail and commercial core, the station comprises a modern glass box style ticket hall to the west of London Road and a surface car park to the northwest. The station is surrounded by an eclectic selection of land uses and underutilised sites, and options for more efficient land uses include car park decking and building above the car park and the station. Working with stakeholders, the Council has prepared a development brief that provides a clear spatial vision and considers factors such as the quantum and type of uses, scale and massing and development phasing. This work builds on existing evidence including the Neighbourhood Plan for Sevenoaks Town and the Town Centre Strategy. The Neighbourhood Plan considers the site’s potential for a new urban quarter involving ‘compact mixed-use development including retail and food and drink around the station, office, petrol station and new residential units’ and supports typically four to six storey with taller building marking the station.

- **Wasps Stadium** – is supported by the SHELAA and is a new site since 2023, although it was discussed within the 2023 Interim SA Report. It is located near adjacent to Pedham Place but importantly is being considered as a standalone proposal. A new multipurpose stadium complex (24-28,000 seats), training ground facilities and a hotel could host sport, concerts, conferences and events. The land is greenfield but grey belt under the Government’s definition and there is good potential for NL impacts to be avoided or mitigated. The sites would require new access points and further details need to be provided to demonstrate suitability in highways terms.

- 5.3.11. There are also three large SHELAA supported sites located at Edenbridge (two sites for 600 and 450 homes respectively) and New Ash Green (580 homes) but these can be discussed in Section 5.4. Finally, with regards to the possibility of wider new settlement options (over-and-above the Pedham Place and Broke Hill Golf Course), the equivalent section of the previous Interim SA Report discussed the possibility of exploring options in proximity to Penshurst Station and that discussion still broadly holds true.

Conclusion on site options

- 5.3.12. This section has introduced the sites supported by the SHELAA and then introduced the shortlisted strategic site options in more detail (whether supported by the SHELAA or not). These sites are a focus of attention in Section 5.4, as well as select other sites not supported by the SHELAA.
- 5.3.13. With regards to SHELAA supported sites, it is important to note a distinction between Pedham Place and wider SHELAA supported sites, given the scale of Pedham Place and its location in the NL.

5.4. Sub-area scenarios

Introduction

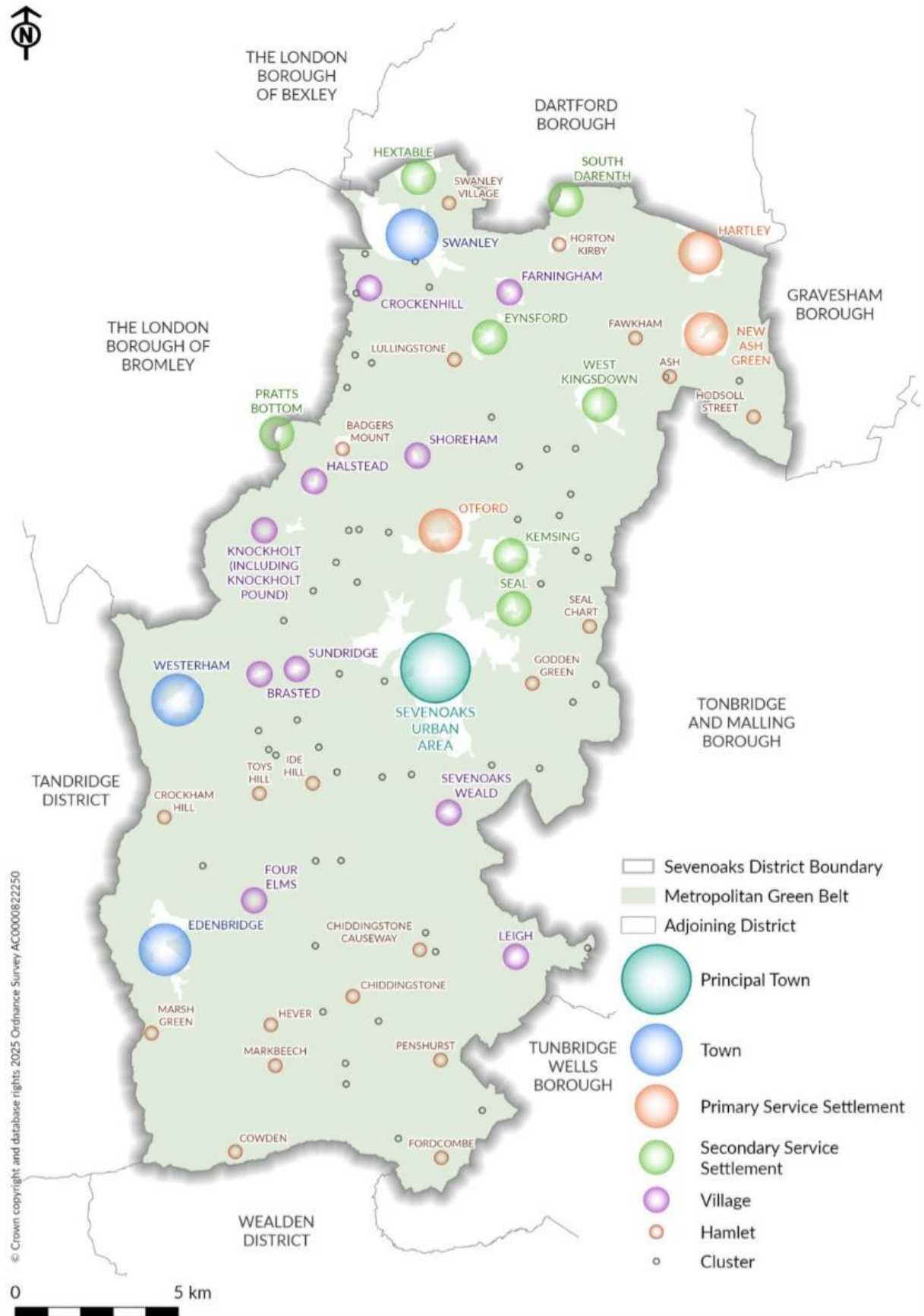
- 5.4.1. Discussion has so far focused on A) ‘top down’ considerations relating to quantum and broad spatial strategy; and B) ‘bottom-up’ consideration of site options. The next step is to consider sub-areas in turn, exploring how sites might be allocated in combination in a way that aligns with strategic objectives. Site combinations are referred to as ‘growth scenarios’ and the aim is to identify one or more growth scenarios for each sub-area.

What sub-areas?

- 5.4.2. There is primarily a need to consider individual settlements in turn. Specifically, the focus is on all settlements that fall within the top four tiers of the settlement hierarchy, as defined by the Settlement Hierarchy Study (2025), plus select villages. Specifically:
- Sevenoaks Urban Area
 - Towns – Swanley, Edenbridge and Westerham
 - Primary service settlements – Hartley, Otford, New Ash Green
 - Secondary service settlements – West Kingsdown, Eynsford, Seal, Kemsing, South Darenth, Pratts Bottom, Hextable
 - Villages – select villages are discussed where there are SHELAA supported sites.
- 5.4.3. Also, a stand-alone discussion is presented for Pedham Place. The new settlement, were it to be allocated, would likely take the form of a ‘primary service settlement’.
- 5.4.4. For each sub-area, the aim is to:
- Introduce the SHELAA supported sites and consider whether any stand-out as more challenging (alone or in combination).
 - Discuss select sites not supported by the SHELAA and consider which if any stand-out as more strongly performing (alone or in combination).
 - Conclude on sites to hold ‘constant’ across growth scenarios versus sites that should be a ‘variable’ and then conclude on sub-area (settlement) growth scenarios.
- 5.4.5. Finally, it is important to reiterate key aspects of the strategic context:
- Housing need – without allocation of Pedham Place the capacity of SHELAA supported sites is ~11,500 homes which, in combination with permissions (3,978 homes) and a windfall assumption (900 homes) would mean a total supply of ~16,400 homes which compares to an LHN figure of 17,175 homes (1,145 dpa). This suggests a possible unmet need figure of *at least* ~800 homes and there is little possibility of this being provided for elsewhere.¹⁰ Furthermore, there is a high level argument for remaining open to a higher housing requirement (as discussed).
 - SHELAA supported sites – the stretching nature of housing need means that there is a strategic case for allocating all SHELAA supported sites. However, Pedham Place clearly warrants scrutiny, followed by ‘new’ sites and sites that were not previously supported or shortlisted in 2023, notably including Land North of Sevenoaks.
 - Sites not supported by the SHELAA – in many instances it is difficult within the scope of this report to question the conclusion reached by the SHELAA. However, on the basis of the discussion above it is reasonable to focus on: A) Broke Hill GC; B) the nine urban extension options within the NL that were shortlisted in 2023 (i.e. explored through growth scenarios at that time); and C) urban extension options at Edenbridge.

¹⁰ This is an ‘at least’ figure because it will not necessarily be possible to set the housing requirement precisely in line with the housing requirement. Rather, there could be a need to set the housing requirement at a figure below supply as a contingency for unforeseen delivery issues (a ‘supply buffer’). However, on the other hand, it is acknowledged that by the start of the plan period in 2027, supply from permissions could well be higher, such that total supply increases and unmet need decreases.

Figure 5.7: The settlement hierarchy



Sevenoaks urban area

- 5.4.6. In 2023 the conclusion was that there were two growth scenarios, namely: 1) 1,994 homes from SHELAA supported sites; and 2) 2,547 homes from SHELAA supported sites plus three sites in the NL.
- 5.4.7. At the current time there are 25 SHELAA supported sites with a combined capacity of 3,123 homes. Also, it can be noted that one of the SHELAA supported sites from 2023 is now removed from the SHELAA because it has planning permission for 950 homes.
- 5.4.8. Beginning with **urban sites**, key points to note include:
- 6 sites for a total of 187 homes are unchanged since 2023.¹¹
 - SEV13 Land east of High Street has been increased from 300 to 350 homes.¹²
 - SEV12 Sevenoaks Station and Car Park has increased from 184 homes to 420 homes, with this site already having been introduced above in Section 5.3.
 - 7 new sites are proposed: SEV9 Land off Morewood Close (69 homes); SEV8 DG Autos off Bradbourne Vale Road (28 homes); SEV15 109-119 St Johns Hill (18 homes); SEV6 Garages off Hillingdon Avenue (11 homes); SEV7 Garage court off Hillingdon Avenue (8 homes); SEV10 9 Clare Way (8 homes); SEV11 6 Pounsley Road / Darenth Lane and 20 London Road, Dunton Green (6 homes). Focusing on the largest of these (SEV9) the site has recently been used for car parking and benefits from good proximity to the train station although the train line is adjacent.
 - 2 sites previously proposed for 110 homes in total have now been withdrawn. These are both existing allocations within the ADMP Local Plan (2015), which does serve to highlight the challenge of relying on supply from urban allocations.
- 5.4.9. Another new proposed allocation is a **partial PDL Green Belt** site, namely SEV16 Rye Cottage, Rye Lane, Dunton Green (30 homes). This site is located in a rural area along Rye Lane, which is associated with landscape sensitivity, but relates well to adjacent built form and would relate well to strategic site option SEV24 discussed below, assuming this comes forward. If the strategic site does not come forward then this site will warrant ongoing scrutiny, including noting the limited onsite PDL.
- 5.4.10. Finally, the **greenfield Green Belt** SHELAA supported sites are as follows:
- SEV24 Land north of Sevenoaks, west of Otford Road (1,500 homes) – a new site since 2023 and has already been introduced in Section 5.3. There are some significant constraints / sensitivities, particularly relating to the River Darent and an adjacent SSSI, but the site also has distinct merits and there are growth opportunities.
 - SEV19 Land east of London Road, Dunton Green (250 homes) – was previously proposed for 235 homes and the Interim SA Report flagged a range of pros and cons.¹³ One additional point to note at this stage is a significant area of surface water flood risk adjacent to Dunton Green Station.
 - SEV17 Land west of Brittain's Lane (65 homes) – a new site since 2023 that is relatively well contained and benefits from relative proximity to the town centre and train station. A planning application was dismissed at appeal in 2023 (21/04236/OUT) including noting a “localised” adverse impact on the setting of the Kent Downs NL, but the situation has now moved on given an evolved strategic context.

¹¹ Current reference numbers SEV1, 2, 3, 4, 5 and 14,

¹² The 2023 ISA Report stated: “There is a need for further work on development density, recognising inherent challenges around re-provision 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.”

¹³ The 2023 ISA Report stated: “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... 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.”

- SEV22 Land west of allotments, Bradbourne Vale Road (60 homes) – previously SHELAA unsuitable but flagged within the Interim SA Report as having merit.¹⁴
 - SEV25 Bakers Yard, Otford Road (50 homes) – previously SHELAA unsuitable. This is a sensitive site on account of adjacent Sevenoaks Quarry SSSI, but Bat and Ball Station is nearby. Employment uses are being considered which might affect capacity.
 - SEV23 Land to the rear of 34 Chipstead Park (32 homes) – previously SHELAA unsuitable. It relates well to the settlement edge, but the River Darent is adjacent. A surface water flood risk channel runs through the east of the site, but it appears likely that development/infrastructure can avoid this area.
 - SEV20 Land north of Barnett Field, Blackhall Lane (10 homes) – a new site since 2023. A potential concern is around securing a defensible Green Belt boundary / avoiding sprawl in this area, including noting nearby biodiversity and historic environment constraint (Knole Park). This was a matter previously discussed in 2023 at which time a different site was proposed for allocation in this area.
 - SEV21 Land West of the Croft, Bradbourne Vale Road (10 homes) – a new site since 2023. The site is well contained and performs quite well in transport terms including noting adjacent bus stops on the A25.
 - SEV18 Land behind the Croft, Bradbourne Vale Road (6 homes) – a new site since 2023 and located adjacent to SEV21. Taking the two sites together it appears that development will need to consider mature trees onsite and access onto the A25.
- 5.4.11. With regards to **sites not supported by the SHELAA**, it is important to firstly recall the strategic context, which is that there is a need to explore options for boosting supply given matters relating to housing need (as discussed) and because Sevenoaks is clearly suited to growth in the District context. Whilst total supply from SHELAA supported sites is now set to be significantly higher than the previous proposal in 2023, there is little reason to suggest a strategic case for ruling out higher growth options.
- 5.4.12. With regards to specific sites, firstly it can be noted that two previously proposed allocations from 2023 (23 homes in total) are now unsuitable due to access constraints (HO/21/00124 & HO/21/00254).
- 5.4.13. In turn, attention focuses on the three sites within the NL that were previously appraised and consulted on in 2023 as a means of delivering higher growth, namely:
- HO/21/00248 Brittain's Lane, Kippington, Sevenoaks (300 homes) – landscape sensitivity is high but as a larger site there is good potential for mitigation and with this sensitivity could be 'low-medium'. It is reasonably well located in terms of proximity to Sevenoaks town centre and there is limited historic environment constraint. Another consideration is proximity to site SEV17 discussed above.
 - HO/21/00247 Land between Back Lane and the A21, Bessels Green (183 homes) – is more sensitive in landscape terms in that mitigation could reduce sensitivity to 'medium'. It is more peripheral to the town / less well located in accessibility terms relative to 'Brittain's Lane'. The Bessels Green Conservation Area is adjacent, this is a low density residential area, the site comprises rising land, a footpath intersects the site, and the likely point of access is from a lane that links Sevenoaks to the NL.
 - MX/21/00040 Land at Moat Farm, off Homedean Road, Chipstead (70 homes) – is clearly constrained by the adjacent M25 junction, plus the site does not perform well in accessibility terms (although a primary school is nearby). There are relatively limited landscape concerns ('medium' sensitivity; a footpath intersects the site) but the site intersects Chipstead Conservation Area. There is also surface water flood risk.

¹⁴ The 2023 ISA Report stated: "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... 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."

5.4.14. It is then not possible to pinpoint further sites not supported by the SHELAA that stand-out as warrant being taken forward, but there will be potential for further work in this regard at the next stage.

5.4.15. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites. This is in recognition of the strategic context, which is one whereby there is pressure to allocate sites at higher order settlements in order to provide for district-wide housing needs. SEV24 clearly warrants ongoing scrutiny, but there will be good potential to mitigate impacts (and explore opportunities) through masterplanning such that, on balance, it is progressed to Section 5.5 as a ‘constant’. It is then reasonable to explore a higher growth scenario involving allocations in the NL, as per 2023. Brittains Lane appears the strongest performing of the three sites but, on balance, it is appropriate to test the option of allocating all three. In summary:

- Scenario 1 – SHELAA supported sites = 3,123 homes
- Scenario 2 – Scenario 1 plus three NL sites (553 homes) = 3,676 homes

Figure 5.8: Concept masterplan for Land north of Sevenoaks



Box 5.3: Employment site options at Sevenoaks

There are three proposed employment allocations at the current time, with two forming northern extensions to the town's main industrial / trading estate (Vestry Estate) and the other one nearby.

Beginning with the two sites to the north, the smaller of the two was a proposed allocation in 2023 (SEV26) and comprises PDL,¹⁵ whilst the larger site was previously SHELAA unsuitable (SEV28). There are some constraints in this area and a clear case for a comprehensive approach to growth.

The third proposed allocation is then SEV27 Otford Road Depot, Otford Road, in respect of which the previous Interim SA Report (2023) explained: "... 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." It is also now the case that there is a new residential-led proposed allocation nearby, namely SEV25.

In **conclusion**, given the limited identified need for new employment land these sites warrant ongoing scrutiny. On the other hand, there is a case for comprehensive growth with a long term perspective that accounts for constraints including transport, biodiversity and historic environment related.

Swanley

5.4.16. In 2023 the conclusion was that there were two growth scenarios, namely: 1) 388 homes from SHELAA supported sites; and 2) Scenario 1 plus Pedham Place for a total of 2,788 homes. However, it is now considered appropriate to consider Pedham Place separately as opposed to under the Swanley heading.

5.4.17. There are now 15 SHELAA supported sites with a combined capacity of 1,943 homes.

5.4.18. Beginning with **urban sites**, key points to note include:

- 1 site is unchanged, namely SWAN2 Bus Garage, Kingdom Hall (30 homes).
- The capacity of SWAN10 Swanley Centre was 'TBC' in 2023 but is now 450 homes.
- SWAN3 Bevan Place is reduced from 100 to 36 homes, and this is an existing allocation within the ADMP Local Plan. Also, SWAN8 is reduced from 8 to 5 homes.
- 6 new sites are proposed: SWAN9 Media House, Azalea Drive (180 homes); SWAN5 Whiteoak Garage off London Road (17 homes); SWAN1 Garages, Conifer Way (8 homes); SWAN6 Garages off Russett Way (8 homes); SWAN7 Garages south of Alder Way (6 homes); SWAN4 Gulf Petrol Station off London Road (5 homes). Focusing on the largest of the new proposed sites (SWAN9) this comprises a dated office building and benefits from a location adjacent to the train station.

5.4.19. The next sites for consideration are then **partial PDL Green Belt** sites, namely:

- SWAN11 Land north & south of Maidstone Road (253 homes including C2 older persons housing and employment land) – was also supported in 2023, at which time it was proposed for a lower quantum of growth. The site can deliver a mix of uses and there is also a separate adjacent proposed employment allocation (SWAN16). The Interim SA Report (2023) was broadly supportive of this site.¹⁶

¹⁵ The 2023 ISA Report stated: "*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... This would seemingly necessitate loss of priority habitat, but this not shown... on historic mapping. [T]here is also a need to consider the potential to secure a new defensible Green Belt boundary, noting an adjacent large 'unsuitable' SHELAA site [now proposed for allocation]. 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.*"

¹⁶ The 2023 ISA Report stated: "*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.*"

- SWAN12 Parkwood Hall Co-operative Academy, Beechenlea Lane, Swanley (165 homes) – a new site since 2023. It is a challenging site as it does not relate well to the settlement edge and comprises a historic building (not listed but shown on historic mapping) now used as a special needs school and set within heavily wooded grounds. However, there may be potential to uplift the educational capacity.

5.4.20. Finally, the **greenfield Green Belt** SHELAA supported sites, all to the east of the town, are as follows:

- SWAN15 Land north of Moultain Hill (370 homes) – a much smaller version of this site was SHELAA unsuitable in 2023. This is a sensitive site in landscape terms but must be considered in the context of nearby / adjacent sites SWAN12 (discussed above) and SWAN14 (below). There is the potential to deliver ~0.4 ha of employment land.
- SWAN14 Land north of railway line and west of Beechenlea Lane (300 homes) – previously SHELAA unsuitable. The site is adjacent to the north of SWAN15 but separated by the train line. It would significantly impact the gap to Swanley Village.
- SWAN13 Land at Lullingstone Avenue (110 homes) – this is unchanged from 2023, at which time the Interim SA Report explained: *“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... a defensible boundary, is not shown on historic mapping, and given an adjacent large ‘unsuitable’ site.”* The site previously identified as unsuitable is now a proposed allocation (SWAN14) which serves to highlight the importance of ensuring a strategic / comprehensive approach to the eastwards expansion of Swanley.

5.4.21. With regards to **sites not supported by the SHELAA**, all appear to be unsuitable for quite clear cut reasons, including noting that land between Swanley and Hextable is not grey belt as land here makes a strong contribution to Green Belt Purpose B (prevent neighbouring towns merging). At this point it is important to note that there are numerous SHELAA supported sites at Hextable (discussed below), plus there is the option of supporting a new settlement at nearby Pedham Place (discussed below).

5.4.22. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites. This is in recognition of the strategic context, as discussed.¹⁷ However, the four proposed Green Belt allocations to the east of Swanley (945 homes in total) do warrant further scrutiny, including to ensure comprehensive growth that avoids issues and realises opportunities. It is then not possible to pinpoint a higher growth scenario but see discussion below regarding Pedham Place. In summary:

- Scenario 1 – SHELAA supported sites = 1,943 homes (inc. C2)

Box 5.4: Employment site options at Swanley

There are two proposed employment allocations. Firstly, SWAN16 Land at Upper Hockenden Farm, Maidstone Road is a Green Belt PDL site that links closely to SWAN11 discussed above. It currently comprises a range of uses that could suggest a delivery challenge. Secondly, SWAN17 Petham Court Farm (west of M25) is the site under consideration for a new Wasps Stadium, as discussed in Section 5.3. There are a range of sensitivities, but it also represents a major opportunity for the District and the wider area. At the current time it is not clear that not supporting the site represents a reasonable alternative for appraisal and consultation, but matters can be revisited at the next stage at which time there will also be greater clarity on nearby Pedham Place.

¹⁷ The 2023 ISA Report explained that there was a strategic case for additional allocations at Swanley given *“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.”*

Edenbridge

- 5.4.23. In 2023 the conclusion was that there was one reasonable scenario involving 982 homes from SHELAA supported sites. At the current time there are 16 SHELAA supported sites with a capacity of 2,081 homes.
- 5.4.24. Beginning with **urban sites**, key points to note include:
- 2 sites are unchanged since 2023, namely EDEN5 and EDEN6 (44 homes in total).
 - 1 site is now permitted namely MX/21/00038 Open Space, Community Hall and Shop, Farmstead Drive. The Interim SA Report (2023) had flagged a degree of flood risk but also highlighted that there was a good opportunity to deliver targeted regeneration.
 - 6 new sites are proposed: EDEN4 Land north of Springfield Road (8 homes); EDEN1 Garage courts to the north of The Plat (5 homes); EDEN2 Land to the rear of Stanholm, Mill Hill (5 homes); EDEN3 Land east of Cedar Drive (5 homes).
- 5.4.25. Also, there is a new **Green Belt PDL** site, namely EDEN7 (Gabriels Farm; 10 homes). It does not relate well to the settlement edge and ongoing development creep is a risk.
- 5.4.26. Finally, the **greenfield Green Belt** SHELAA supported sites are as follows:
- EDEN16 Land at Swan Lane, Edenbridge (wider site) (600 homes) – previously SHELAA unsuitable in 2023. There are limited headline constraints, and the potential to deliver a well-rounded settlement edge can be envisaged that somewhat reduces concerns around development creep/sprawl in the context of a low-lying and quite expansive landscape with limited boundary features. Section 5.4 of the previous Interim SA Report (2023) ‘noted’ this site, stating: *“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.”* Finally, it is important to note that this site is distant from the town centre, which highlights the importance of a strategic scheme able to deliver new facilities etc.
 - EDEN14 Land at Breezehurst Farm, Crouch House Road (450 homes) – unchanged from 2023. The equivalent comment from 2023 still holds true: *“... 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... 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.”*
 - EDEN10 Land at Crouch House Road (350 homes including C2 older persons housing) – part of this site was SHELAA supported for 91 homes.¹⁸ The previous Interim SA Report (2023) noted that careful consideration would need to be given to a defensible Green Belt boundary noting a wider and much larger SHELAA unsuitable site, and that wider site is now supported by the SHELAA. Having said this, the wider site (current EDEN10) was flagged in Section 5.4 of the previous Interim SA Report as the ‘next port of call’ for Edenbridge.¹⁹

¹⁸ The 2023 ISA Report stated: *“... 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.”*

¹⁹ The 2023 ISA Report stated: *“The next port of call could potentially be HO/21/00228 [now EDEN10] 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).”*

- EDEN12 Land south west of Skinners Farm (155 homes) – previously SHELAA unsuitable in 2023. It would extend a committed strategic urban extension (discussed below), which is clearly not ideal from a perspective of seeking comprehensive planning with issues addressed and opportunities realised. However, this site is logical in that it would take the urban extension as far as a large flood zone.
- EDEN9 Land north of Skinners Lane (150 homes) – unchanged from 2023. The equivalent comment from 2023 still holds true: “... located to the east of the town, and it is important to note that land adjacent to the south comprises a large [permitted] site namely Four Elms (340 homes plus a secondary school). Having accounted for the... 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’.”
- EDEN15 Land east of Mead Road (120 homes) – unchanged from 2023. The equivalent comment from 2023 still holds true: “... located at the southern extent of the town... comprises land not recommended... 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... boundary. Also, and importantly, the site would deliver a public Gypsy and Traveller site.... The town centre is accessible (~500m).”
- EDEN8 Land west of Ashcombe Drive and Meadow Lane (80 homes) – unchanged from 2023. The equivalent comment from 2023 still holds true: “... 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 [TPOs].”
- EDEN11 Land at Lingfield Road (75 homes) – previously SHELAA unsuitable. This site would extend and likely extend EDEN10 discussed above (also noting adjacent EDEN13). There are few headline constraints and this is a logical addition to EDEN10, although historic mapping shows the field boundary that separates this site with EDEN10. This site benefits from good proximity to the town centre.
- EDEN13 Land west of Lingfield Road Recreation Ground and East of Skeynes Farm Cotts, Lingfield Road (70 homes) – previously SHELAA unsuitable. Adjacent to EDEN10/11 hence there is a need to ensure comprehensive planning within this south-east sector of Edenbridge, accounting for the broad flood zone of the Eden Brook.

5.4.27. With regards to **sites not supported by the SHELAA**, as discussed in Section 5.3 there are several sites that do warrant ongoing consideration, namely:

- MX/25/00006 Former Kent & Surrey Golf Club, Crouch House Road and HO/21/00162 Skeynes Land adjacent to Kent & Surrey Golf Course, Crouch House Road – these are adjacent large sites to the west of the town. These are large sites that would further extend the town to the west, over-and-above the recent and proposed western urban extensions discussed above. Whilst there is a clear need to ensure a strategic and comprehensive approach to growth at Edenbridge with a long-term perspective, it is difficult to see a clear case for additionally allocating this site, given its relationship to the town and noting proposals for other strategic extensions to the north, east and (less strategic) south. It is also noted that there is extensive woodland in this area, albeit much is not priority habitat and only a small portion is ancient woodland. This suggests a possible environmental planning opportunity.

- HO/21/00110 Kent and Surrey Golf Driving Range, Crouch House Road and HO/25/00080 Derelict land to the west of Crouch House Road – these sites relate closely to the two sites discussed above but are smaller sites more closely related to the settlement edge. The possibility of further growth here is an option, including noting the proposals for a strategic urban extension to the south (EDEN 10, 11 & 13) but a headline concern is around piecemeal development creep / sprawl to the west. There is also significant surface water flood risk constraint affecting these sites.
- MX/21/00048 Land between Hartfield Road and Hever Road – this would extend EDEN15 to deliver a much larger strategic urban extension to the south of the town. This appears to be the sequentially least preferable direction for strategic expansion, in the context of alternative options for strategic expansion to the west, north and east, as discussed above. There would be a risk of further development creep / sprawl towards Hever station and (not unrelated to this) there are historic environment sensitivities.

5.4.28. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites. It is evident that a high growth strategy is now proposed and there are some concerns around ensuring comprehensive growth; however, the strategic context is such that it is difficult to envisage lower growth.²⁰ With regards to higher growth, this is ruled out on balance but warrants ongoing consideration. Edenbridge is a unique context in a number of respects, including around good rail connectivity (but relatively poor road connectivity) and limited ‘headline’ constraints to growth (but a concern regarding sprawl across an expansive vale landscape). In summary:

- Scenario 1 – SHELAA supported sites = 2,081 homes (inc. C2)

Westerham

- 5.4.29. In 2023 the conclusion was that there were two growth scenarios, namely: 1) 45 homes from SHELAA supported sites; and 2) Scenario 1 plus three NL sites for 223 homes.
- 5.4.30. There are now 3 SHELAA supported sites with a combined capacity of 37 homes.
- 5.4.31. Beginning with **urban sites**, key points to note include:
- 1 site is unchanged since 2023, namely WEST1 Currant Hill Allotments (26 homes). This is an existing allocation from the ADMP (2015).
 - 1 new site is proposed namely WEST2 Garage courts off Ash Road (5 homes).
 - 1 site is now unsuitable on access grounds, namely HO/21/00282 North-east of Bloomfield Terrace and another site is withdrawn namely HO/21/00001 Falcon House and grounds, Black Eagle Close.
- 5.4.32. Also, there is a new proposed **Green Belt PDL** site located adjacent to the settlement, namely WEST3 Pitts Car Park, High Street (6 homes), which is a new site submitted since 2023. This site appears to be affected by flood risk and so will require careful consideration notwithstanding it is PDL. The site has historically been used for car parking presumably in the knowledge that there is flood risk.
- 5.4.33. With regards to **sites not supported by the SHELAA**, it is important to firstly recall the strategic context, which is that there is a need to explore options for boosting supply given housing need (as discussed) and given 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). Also, it is noted that Westerham is associated with notably high house prices and there are low levels of recent completions (indeed, there has been little growth over decades) and current commitments. However, Westerham is washed over by the Kent Downs NL.

²⁰ The 2023 ISA Report stated: “... 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.”

- 5.4.34. With regards to specific sites, attention focuses on the four sites within the NL that were previously appraised and consulted on in 2023 as a means of delivering higher growth:
- HO/21/00210 & HO/21/00211 Land east of Croydon Road (south and north parcels) (82 homes and 76 homes) – landscape sensitivity is ‘medium’ and there is no clear potential for significant mitigation. The previous Interim SA Report (2023) explained: *“... 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... avoiding the risk of sub-optimal piecemeal expansion... One point to note is that the SHELAA records “difficult access off of Croydon Road”.”*
 - HO/21/00214 Land south of Farley Lane (10 homes) – landscape sensitivity is ‘medium-high’ but could be reduced to ‘low-medium’. The previous Interim SA Report explained: *“... the site is adjacent Farley Common, which is a Local Wildlife Site, and it appears that access could be challenging without impacting a hedgerow closely linked to the common.... However... otherwise subject to limited constraint.”*
 - MX/21/00008 Land at Wolfe, 190 London Road (10 homes) – has relatively limited landscape sensitivity (‘low-medium’). The previous Interim SA Report explained: *“... 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 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).”*
- 5.4.35. It is then not possible to pinpoint further sites not supported by the SHELAA that stand-out as warrant being taken forward, but there will be potential for further work subsequent to the current consultation. However, the previous Interim SA Report presented a discussion on *“ensuring a strategic approach to growth at Westerham”* and that discussion is re-presented with updates below as Box 5.5.
- 5.4.36. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites and it is then reasonable to also explore a higher growth scenario involving allocations in the NL, as per 2023. This is on the basis of the strategic context regarding district-wide housing needs and despite the fact that: A) 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; and B) the two largest (adjacent) sites are now known to be constrained in landscape terms. In summary:
- Scenario 1 – SHELAA supported sites = 37 homes
 - Scenario 2 – Scenario 1 plus four NL sites (178 homes) = 215 homes

Box 5.5: 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, NL 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) and is not considered to be grey belt on account of falling within the NL. 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 Westerham 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 NL and the nearby M25 (the proposal was to deliver new noise mitigation) and the aforementioned 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 recently approved scheme for Covers Farm Quarry (Ref SE/18/3435 (KCC/SE/0495/2018)) which will 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). It will involve a temporary haul road for HGVs 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.

New Ash Green

- 5.4.37. In 2023 the conclusion was that there was one reasonable scenario involving 88 homes from SHELAA supported sites. At the current time there are 9 SHELAA supported sites with a capacity of 1,189 homes.
- 5.4.38. Beginning with **urban sites**, key points to note include:
- 2 sites are unchanged since 2023, namely NAG3 New Ash Green Village Centre (70 homes) and NAG1 The Forge (10 homes). NAG3 is an existing allocation from the ADMP (2015).
 - 1 new site is proposed namely NAG2 The Royal Oak car park (9 homes).

- 5.4.39. Also, a new **Green Belt PDL** site is now proposed (a new site submitted since 2023), namely NAG4 Heaver Trading Estate & Swan Meadows Farm, Ash Road (80 homes). This appears to represent an opportunity to make best use of PDL well linked to a local service centre but is one of a series of new proposed allocations to the west and south of the settlement that must be planned for strategically.
- 5.4.40. The **greenfield Green Belt SHELAA** supported sites are then as follows:
- NAG9 Land South of Redhill Road, New Ash Green (580 homes) – previously SHELAA unsuitable in 2023. This site is of a scale such that it could deliver targeted new infrastructure alongside new homes, potentially to the benefit of the settlement ('planning gain'). However, there are significant constraints in terms of the historic environment (an adjacent important cluster of listed buildings including a grade 1 listed church) and biodiversity / ancient woodland (an important cluster associated with the adjacent valley-side). There are also landscape sensitivities noting the aforementioned valley, but the potential to draw upon the historic environment and ancient woodlands for containment can be envisaged.
 - NAG6 Land west of New Ash Green (280 homes) – previously SHELAA unsuitable in 2023. This site would extend the settlement to the west and there appear to be fewer issues/constraints relative to NAG9 (which is to the south) but, as a smaller site, there would be less potential to deliver a mix of uses and infrastructure alongside new homes. There is reasonable potential to draw upon features in the landscape for containment, and it is noted that the previous Interim SA Report (2023) had flagged the southern part of this site as potentially one of the better performing expansion options.
 - NAG7 Land at Slides Farm, North Ash Road, New Ash Green (150 homes) – previously SHELAA unsuitable in 2023. Whilst this site was unsuitable / not proposed for allocation in 2023, it was flagged by the Interim SA Report as potentially the best performing strategic expansion option.²¹
 - NAG5 Grosvenor, Church Road, Hartley (5 homes) – this was previously proposed for 8 specialist units in 2023, with the Interim SA Report stating: *"[the site] 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."*
 - NAG8 Melsetta, Church Road, Hartley (5 homes) – a new site since 2023. This is a small backland site with mature trees, although not wooded on historic mapping.
- 5.4.41. The above sites in combination will deliver a high growth strategy for New Ash Green, such that there is limited strategic case for considering **sites not supported by the SHELAA**. There is a notable large site to the west that is available, which does warrant ongoing consideration given a need to ensure a comprehensive approach to growth to the west of New Ash Green that accounts for key factors such as the dip slope topography (New Ash Green is a raised settlement between dry valleys) and transport connectivity (New Ash Green is not linked by minor roads such that strategic upgrade options might be considered). However, at the current time there is little case for higher growth with it reasonable to focus attention on the new proposed southern strategic expansion plus the western expansions. The previous Interim SA Report discussed the possibility of westward expansion bounded by new woodlands.

²¹ The 2023 ISA Report stated: *"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 (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."*

5.4.42. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites. It is evident that a high growth strategy is now proposed and there are challenges, namely: A) constraints affecting southern expansion; and B) ensuring comprehensive western expansion. However, the strategic context is such that it is difficult to envisage lower growth. It is also recognised that there are settlement-specific strategic factors for ongoing consideration.²² With regards to higher growth, whilst this is ruled out there should be an ongoing focus on ensuring strategic growth with issues addressed / opportunities realised including in transport terms. In summary:

- Scenario 1 – SHELAA suitable sites = 1,189 homes

5.4.43. It can also be noted that there is a proposed employment allocation, namely ASH1 Beechcroft Farm Industries, Chapel Wood Road. This site is partial PDL in the Green Belt and is quite modest in size. However, it is located at the southwest extent of New Ash Green in between proposed residential expansion areas to the north and east, which highlights the need to consider all proposed allocations in combination.

5.4.44. Figure 5.9 is presented to further introduce the ‘accessibility’ credentials of New Ash Green and other settlements in the north east of the District beyond the NL.

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



²² The 2023 ISA Report stated: “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.”

Otford

- 5.4.45. In 2023 there was one reasonable scenario involving 21 homes from SHELAA supported sites. There are now 2 SHELAA supported sites for 157 homes.
- 5.4.46. Beginning with **urban sites**:
- 1 site is unchanged since 2023, namely OT1 Ryecroft, Ryecroft Road (7 homes). There are 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).
 - 1 site from 2023 is now permitted, namely HO/21/00080 Otford Builders Merchants.
- 5.4.47. The one **greenfield Green Belt** SHELAA supported site is then OT2 Land west of Hale Lane (150 homes), which was previously judged unsuitable in 2023. The site has reasonable containment in Green Belt terms but there is landscape sensitivity given the adjacent NL, e.g. views from Telson Lane along which runs the North Downs Way. Also, this part of Otford is most distant from the centre, and it is not entirely clear how the site would link effectively to the village in transport terms. Finally, it is noted that the low resolution national dataset shows this site to comprise grade 2 agricultural land.
- 5.4.48. The combined capacity of the SHELAA suitable sites at Otford (157 homes) is significantly lower than at New Ash Green which suggests a need to remain open to higher growth scenarios for Otford. It is also the case that Otford performs better than New Ash Green in transport and accessibility terms. However, Otford is partially within the NL and occupies a sensitive location along the Darent Valley, with nearby high points. Also, there are not known to be any Otford-specific reasons for considering strategic growth (e.g. community infrastructure), and it is noted that permitted Sevenoaks Quarry (950 homes) is nearby.
- 5.4.49. With regards to **sites not supported by the SHELAA** that could potentially deliver higher growth, the previous Interim SA Report (2023) explained that *“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.”* At the current time, given the new focus on avoiding impacts to the NL and also the proposed allocation of OT2, it is considered that the focus might be on ensuring a comprehensive approach to growth outside of the NL, i.e. to the west and south of Otford, accounting for clear sensitivities (NL setting and the river corridor) alongside potential growth-related opportunities, e.g. improved access to the river corridor.
- 5.4.50. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites, albeit the new proposed greenfield allocation warrants ongoing scrutiny particularly from a landscape perspective (e.g. see guidance [here](#) on accounting for the setting of NLs, which might factor in when reaching conclusions on grey belt). With regards to higher growth, the approach taken in 2023 was to rule out the possibility of allocation in the NL and the same conclusion is reached at the current time, whilst outside of the NL it is difficult to suggest a clear higher growth option. In summary:
- Scenario 1 – SHELAA supported sites = 157 homes

Hartley

- 5.4.51. In 2023 there was one reasonable scenario involving 25 homes from one SHELAA suitable site. There are now 5 SHELAA suitable sites with a capacity of 234 homes.
- 5.4.52. Beginning with **urban sites**:

- HART2 Land at Brambledown and Wellfield, Hartley (40 homes) – a new site since 2023. This is an estate regeneration opportunity and hence there is a need to apply caution in respect of assumptions about delivery, given the need to accommodate existing residents.
- 5.4.53. There is then one **PDL Green Belt** site, namely HART3 Fawkham Business Park (31 homes) which was previously SHELAA unsuitable in 2023. It would extend Hartley west beyond Fawkham Road in the context of a recent development to the east.
- 5.4.54. There are then two **partial PDL Green Belt** sites:
- HART5 Orchard Farm, Fawkham Road, Longfield (40 homes) – previously SHELAA unsuitable. It is located adjacent to HART3 and, in turn, does not relate well to the settlement edge, plus the train line is adjacent and there is a narrow railway bridge with only a very narrow footway. However, it benefits from proximity to the train station and there is a reasonable degree of containment in Green Belt terms noting a field boundary shown on [historic mapping](#). Partly under construction ([23/01164/FUL](#)).
 - HART4 Land at Ash Road (9 homes) – previously SHELAA unsuitable. This is a smaller site to the west of Hartley that is well contained and gives rise to limited concerns (an adjacent footpath is noted). Whilst the site appears heavily vegetated it is shown as an open field on historic aerial imagery. There is a current planning application for 9 custom build homes ([25/01356/FUL](#)).
- 5.4.55. The one **greenfield Green Belt** SHELAA supported site is then:
- HART6 Land adjacent to Banckside and Downs Valley (114 homes) – previously SHELAA unsuitable. This was discussed in the previous Interim SA Report as follows: *“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).”* It is important that this site is considered with a long term perspective, including noting that a larger parcel of land to the west comprises a steep valley side and appears to be in the same landownership (seemingly part of a property investment conglomerate).
- 5.4.56. With regards to **sites not supported by the SHELAA**, attention focuses on HO/21/00137/B Land to the west of Manor Lane, which was previously supported by the SHELAA in 2023. It is now discounted on account of access and capacity issues.²³
- 5.4.57. Another site that could potentially be considered is then SHELAA ‘unsuitable’ site HO/21/00177, located at the southern extent of Hartley, 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 primarily 20th century settlements which perhaps limits concerns); this is descending land potentially indicating a degree of Green Belt and landscape sensitivity; and the site is distant from the train station.
- 5.4.58. Finally, it is noted that the draft plan published for consultation in 2018 did propose strategic growth to the west of Hartley (800 homes). However, the proposal was not taken forward to the next version of the plan in 2019, not all of the land comprises a SHELAA site and there are clear Green Belt and wider constraints.

²³ The 2023 ISA Report stated: *“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. There is adjacent former orchard, and mature wooded boundaries around the perimeter of the site, including along the lane that would presumably provide access.”*

5.4.59. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites recalling the strategic context, including the fact that Hartley benefits from a train station and has relatively limited sensitivity in landscape and historic environment terms compared to other settlements discussed above. However, the new proposed sites do warrant ongoing scrutiny, plus there is a need to consider the effects of growth at Hartley in combination with growth at New Ash Green from a transport perspective. With regards to higher growth, this is ruled out on balance. Attention potentially focuses on higher growth options that would serve to ensure comprehensive to growth to the west Hartley. In summary:

- Scenario 1 – SHELAA supported sites = 234 homes

Pedham Place new settlement

5.4.60. As discussed, Pedham Place new settlement option is supported by the SHELAA but there is a clear recognition that it requires further consideration ahead of any decision to allocate. In summary:

- Scenario 1 – nil homes
- Scenario 2 – 2,579 homes (including 79 C3 units)

West Kingsdown

5.4.61. This is the first of seven secondary service settlements for discussion.

5.4.62. In 2023 there were two growth scenarios, namely: 1) 204 homes from SHELAA supported sites; and 2) Scenario 1 plus two NL sites to deliver 349 homes in total.

5.4.63. There are now 4 SHELAA supported sites for 300 homes; all **greenfield Green Belt**:

- WK2 Land at London Road (189 homes) – unchanged from 2023 in terms of the number of homes proposed, although the site boundary is now reduced to exclude land within the NL at the eastern extent of the previously proposed site. The previous Interim SA Report explained:

“... 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 [NL] 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.”

- WK3 Land East of Fawkham Road (75 homes) – previously unsuitable in 2023. The site relates well to what might be described as the centre of the settlement, and is well contained, but there are sensitivities given a nearby grade 1 listed church, adjacent woodlands and also an adjacent modern Catholic church.
- WK4 Richardsons Farm (21 homes) – a small site located adjacent to WK3. It will be important to consider the in-combination traffic effects of the two sites noting an adjacent primary school.
- WK1 Land on the east side of London Road (15 homes) – unchanged from 2023. The previous Interim SA Report explained: *“...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.”*

- 5.4.64. With regards to **sites not supported by the SHELAA**, it is important to firstly recall the strategic context, which is that there is a need to explore options for boosting supply given housing need (as discussed). Also, West Kingsdown is subject to very low historic environment constraint, is quite well connected to Swanley via the A20 and there are arguments for growth to deliver benefits to the existing community, e.g. a local centre. There is also an aspiration to improve bus connectivity between West Kingsdown and Sevenoaks. However, the SHELAA supported sites discussed above would deliver a fairly high growth strategy for a fourth tier settlement without a train station.
- 5.4.65. With regards to specific sites, attention focuses on the two sites within the NL that were previously appraised and consulted on in 2023 as a means of delivering higher growth / closing the gap to LHN:
- HO/21/00220 Land at Millfield Road (30 homes) – is assigned 'low medium' sensitivity by the Landscape Study (2024). The site otherwise give rise to few concerns other than from an accessibility perspective, noting that it is located at the opposite end of the settlement 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.
 - HO/21/00041 Land at Mill Farm (115 homes) – is assigned 'low medium' sensitivity by the Landscape Study (2024) and there is no identified potential for mitigation despite being a larger site. It would extend the Land at London Road site discussed above (if it extended east to School Lane as per the proposal in 2023) and, as such, could assist in respect of the objective of developing a local centre. This is the historic core of West Kingsdown, as shown on [historic mapping](#). However, the site is bounded on two sides by historic lanes that link to high points in the NL (above the Knatts Valley), with one of the lanes associated with a Grade II listed windmill and the other a historic school house. The site boundary partly reflects the location of a rural exception housing scheme that is under construction, and land ownership could be complex. Also, the south of the site is problematic from a perspective of defining a new Green Belt boundary. Overall, there is a case for testing an option that would deliver comprehensive growth in this sector south of the A20, north of sensitive woodlands and built form (isolated residential areas) and west of the M20.
- 5.4.66. In **conclusion**, a reasonable low growth scenario involves allocation of the SHELAA supported sites and it is then reasonable to also explore a higher growth scenario involving allocations in the NL, as per 2023. This is on the basis of the strategic context regarding district wide housing needs and because it is important to explore options for comprehensive growth / maximising planning gain. In summary:
- Scenario 1 – SHELAA supported sites = 300 homes
 - Scenario 2 – Scenario 1 plus four NL sites = 445 homes

Eynsford

- 5.4.67. This is the second of seven secondary service settlements for discussion. Eynsford was previously classified as a village in 2023 and, accordingly, there were no SHELAA supported sites.
- 5.4.68. There is now 1 SHELAA supported **urban site**, namely EYN1 Land adjacent to Little Mote, High Street (5 homes). There are sensitivities relating to the historic environment and the River Darent but the site benefits from permission in principle ([25/01968/PIP](#)).
- 5.4.69. With regards to **sites not supported by the SHELAA**, there are no stand-out options given clear sensitivities relating to the NL and the historic environment and given Eynsford's position in the settlement hierarchy and notwithstanding that Eynsford benefits from a train station. It is also noted that the Pedham Place new settlement option, as discussed above and below, is located in close proximity to the west.

5.4.70. In conclusion:

- Scenario 1 – SHELAA supported site = 5 homes

Seal

5.4.71. This is the third of seven secondary service settlements for discussion. Seal was previously classified as a village in 2023 and, accordingly, there were no SHELAA supported sites.

5.4.72. At the current time there are no SHELAA supported sites, nor do any **sites not supported by the SHELAA** represent clear options for consideration given clear sensitivities relating to the NL and the historic environment and recalling Seal's position in the settlement hierarchy. Seal benefits from linking very closely to Sevenoaks, and the possibility of consolidating the built form between Seal and Sevenoaks could feasibly be explored, but no such options are readily apparent at the current time.

5.4.73. In conclusion:

- Scenario 1 – nil homes from allocations

Kemsing

5.4.74. This is the fourth of seven secondary service settlements for discussion. Kemsing was previously classified as a village in 2023 and, accordingly, there were no SHELAA supported sites.

5.4.75. There are now 5 SHELAA supported sites for 333 homes. This includes one **urban site**, namely KEM1 Land west of Park Lane (5 homes), which generates few concerns.

5.4.76. With regards to **greenfield Green Belt** SHELAA supported sites, the four sites are: KEM5 Land at West End (181 homes), KEM4 Land to the west of Childsbridge Lane (120 homes), KEM3 Land at Childsbridge Lane (20 homes) and KEM2 Land on the south side of West End (7 homes). These are all located to the south of Kemsing hence it is important to consider them in combination with a view to comprehensive growth that maximises benefits. Indeed, there may be an opportunity to 'complete' the expansion of Kemsing such that it extends to natural boundaries to the west (a large woodland that includes the historic (part ancient) woodland of Oxenhill Shaw), to the north (the NL), to the east (the historic core of Kemsing and the NL) and to the south (the M26). It is not possible to confirm at the current time that any such realistic options for comprehensive growth exist, but this warrants ongoing consideration.

5.4.77. Finally, with regards to land south of Kemsing, whilst overall constraints to growth appear to be limited, it is important to note a degree of biodiversity constraint. Three main areas of woodland are shown on historic mapping (with the easternmost an ancient woodland and the western most partly ancient woodland) but the nationally available dataset shows other woodland as 'priority habitat'.

5.4.78. In **conclusion**, there is one reasonable scenario involving SHELAA supported sites for 333 homes. This represents a high growth strategy for a fourth tier settlement, but Kemsing has reasonable transport and accessibility credentials, most of the proposed sites appear to perform well when viewed in isolation (one is subject to biodiversity constraint) and there is potentially an opportunity to deliver benefits to the existing community, particularly if comprehensive growth can be achieved. With regards to higher growth, this warrants ongoing consideration, as discussed, but it is not possible to pinpoint a reasonable higher growth scenario at the current time. In summary:

- Scenario 1 – SHELAA supported sites = 333 homes

South Darenth

- 5.4.79. This is the fifth of seven secondary service settlements for discussion. South Darenth was previously classified as a village in 2023 and, accordingly, there were no SHELAA supported sites.
- 5.4.80. There are now 8 SHELAA supported sites for 329 homes which includes five sites for C2 units (older persons housing).
- 5.4.81. Within this there is one **partial PDL Green Belt** site, namely SD1 The Cottage and associated land, Holmesdale Road (20 homes). There are few concerns, but the capacity of this site may require ongoing consideration noting access onto an unmarked road with existing junctions in the vicinity.
- 5.4.82. The two **greenfield Green Belt sites** proposed for C2 (residential) are then as follows:
- SD8 Land at Horton Road (200 homes) – is notably located to the south of the railway whilst the settlement is focused to the north, but this need not necessarily be a major issue, including noting that there is a primary school nearby in Horton Kirby, to the south. There is reasonable containment in Green Belt and landscape terms, and the train station is nearby, but access could possibly be challenging, noting the steep railway embankment and the River Darent flood zone. Also, it is noted that this land comprise grade 2 quality agricultural land. The site can deliver community uses.
 - SD4 Land north of Rabbits Road (40 homes) – is also located to the south of the railway and is less well related to the settlement, such that it is a challenging site in accessibility terms (given South Darenth is a fourth tier settlement). There is an adjacent bridge over the railway but there is no footway.
- 5.4.83. Finally, there is a cluster of five small sites proposed for C3, namely SD2, SD3, SD5, SD6 and SD7. The cluster is associated with an existing retirement village but the largest of the sites would involve developing a part of a field, i.e. would not draw upon existing field boundaries for containment.
- 5.4.84. In **conclusion**, there is one reasonable scenario involving SHELAA supported sites for 260 homes (also five sites for C2 units). This represents a high growth strategy for a fourth tier settlement, but South Darenth benefits from a train station and both Dartford and Swanley are nearby. It will be important to take a strategic approach to planning for growth to the south of the settlement, including aimed at delivering benefits to the existing community as far as possible (albeit the scale of growth suggests limited potential). There is little reason to suggest a case for higher growth, although consideration might be given to the possibility of directing growth to the field located adjacent to the train station. In summary:
- Scenario 1 – SHELAA supported sites = 329 homes (inc. C2)

Pratts Bottom

- 5.4.85. This is the sixth of seven secondary service settlements for discussion. Pratts Bottom was previously classified as a village in 2023 and, accordingly, there were no SHELAA supported sites.
- 5.4.86. There are currently no SHELAA supported sites. However, there are three adjacent sites not supported by the SHELAA that could deliver a new settlement (linked to Pratt Bottom), namely the Broke Hill Golf Course new settlement option that has already been introduced in Section 5.3.
- 5.4.87. Specifically, the SHELAA sites are: MX/21/00047 Broke Hill Golf Course, Halstead (800 homes plus 150 C2 units); HO/21/00265 Land west of Stonehouse Lane, Halstead (400 homes); and HO/21/00163 Stonehouse Farm, Stonehouse Lane, Halstead (50 homes).

- 5.4.88. These three sites are not supported by the SHELAA (nor is the new settlement option as a whole) having given weight to the findings of Green Belt Assessment, which finds that this land does not comprise grey belt (in contrast to the great majority of land within the Sevenoaks Green Belt outside of a NL). Specifically, that is because the land is judged to make a 'strong' contribution to Purpose A of the Green Belt (see criteria [here](#)), where Purpose A deals with preventing the unrestricted sprawl of "large built-up areas". Whilst Pratts Bottom is a lower order settlement in the settlement hierarchy, it shares a Green Belt inset boundary with Orpington which itself shares a Green Belt inset boundary with Greater London, such that it is reasonable to conclude that Pratts Bottom is the far extent of a large built-up area in Green Belt terms such that Purpose A is engaged.
- 5.4.89. The NPPF is clear that grey belt within the Green Belt should be favoured for allocation ahead of Green Belt land that is not grey belt. However, there does remain potential to favour 'non-grey belt' ahead of grey belt accounting for wider factors. In terms of wider factors there are clear pros and cons to the option of supporting a new settlement here, and these have been explored over the years including through a planning application for 800 homes that was dismissed at appeal ([19/02616/OUT](#)).
- 5.4.90. A headline 'pro' is a train station and also good access to the strategic road network, plus the site benefits from a degree of containment in landscape terms (or could do subject to masterplanning). However, drawbacks include impacts to the historic village of Halsted to the south and the limited scale of growth, plus it is important to note that three land-owners / site submissions suggests a delivery challenge or, at least, a challenge in respect of effective masterplanning and maximising the benefits of growth.
- 5.4.91. In **conclusion**, whilst the option of a new settlement here was ruled out as unreasonable in 2023 it is now reasonable to explore the option further through appraisal of / consultation on growth scenarios, recognising that the strategic context has evolved significantly since 2023. In the past the focus has been on the option of a new settlement for 800 homes on MX/21/00047 (i.e. the golf course itself) but now it is considered appropriate to focus on the three adjacent sites in combination with a view to a suitably comprehensive scheme that maximises benefits. In summary:
- Scenario 1 – nil homes from allocations
 - Scenario 2 – Broke Hill Golf Course new settlement = 1,400 homes (inc. C2)

Hextable

- 5.4.92. This is the seventh of seven secondary service settlements for discussion. Hextable was previously classified as a village in 2023 and, accordingly, there were no SHELAA supported sites. There are now 10 SHELAA supported sites for a total of 945 homes.
- 5.4.93. This includes one large **PDL Green Belt** site namely HEX1 Former Oasis Academy, 37 Egerton Avenue (178 homes). This appears to be a strongly performing option recognising that the school closed in 2016.
- 5.4.94. There are then 9 greenfield Green Belt sites, namely:
- HEX10 Stanhill Farm, north west of Hextable, Puddledock Lane (250 homes) – must be considered in combination with HEX3 and HEX4 discussed below. The combined scheme for ~313 homes would extend Hextable to the northwest and potentially the key consideration here is ensuring a comprehensive approach to growth working in collaboration with Dartford Borough that realises growth-related opportunities including in transport terms. There are limited boundary features in this area and there is Green Belt sensitivity given the proximity of Greater London (it will also be important to collaborate with Dartford Borough on the question of whether this land is grey belt), and it is also noted that this land comprises grade 2 quality agricultural land.

- HEX2 Meadow View (aka Fen's Farm), Top Dartford Road (200 homes) – would extend Hextable to the east. Again there are potentially some challenges around securing a defensible Green Belt boundary / avoiding the risk of sprawl and there are some landscape sensitivities given longer distance views across the site from the B258 and a footpath along the edge of the site, but a location on the B258 is a benefit.
- HEX8 Land south of Lower Road (198 homes) – would extend Hextable to the south. This site relates relatively well to the settlement edge and topography provides a degree of containment, although not all of the site boundary is a field boundary.
- HEX4 Land rear of College Cottages (40 homes) – has been discussed above.
- HEX9 Land adjacent Puddledock Lane (30 homes) – located in close proximity to the centre of Hextable. The field is overgrown but clear on historic aerial imagery.
- HEX3 Land west of College Cottages (23 homes) – has been discussed above.
- HEX6 Land adjacent 72 Lower Road (9 homes) and HEX7 Land at 70 Lower Road (9 homes) – adjacent sites also located adjacent to HEX8. These sites appear to be quite unconstrained, and they are well contained and well linked by road, but an adjacent large Gypsy and Traveller site is noted.
- HEX5 Land south of Egerton Avenue (8 homes) – located adjacent to a housing site under construction to the east and HEX1 is near adjacent to the west, which serves to highlight the importance of strategic planning aimed at securing comprehensive growth to address issues / maximise benefits. The site comprises the eastern extent of a field that was historically used for orchards (see 1940 aerial imagery on Google Earth) and there appear to be mature trees onsite. The site was recently permitted under the presumption in favour of sustainable development ([24/03178/FUL](#)).

5.4.95. In **conclusion**, whilst one reasonable scenario involves the SHELAA supported sites for 950 homes, there is a clear need for further work to examine the approach to growth at Hextable, including ensuring good links to Swanley, Dartford Borough and Greater London. It could be that lower growth is an option, but it is not possible to pinpoint a lower growth scenario at the current time. Also, it is important to recognise that Hextable is suited to growth in some respects, for example there is very low historic environment constraint and there are good links to higher order settlements albeit there is no train station. In summary:

- Scenario 1 – SHELAA supported sites = 945 homes

Villages and clusters

- 5.4.96. There is a need to consider allocations at villages (the fifth tier in the settlement hierarchy) and clusters (the sixth tier) because the total capacity of the SHELAA supported sites bar Pedham Place is well below Local Housing Need (LHN; which is 17,175 homes over the plan period). Also, even if the Local Plan were to allocate new settlements at both Pedham Place and Broke Hill Golf Course there would still be a strategic case for exploring allocation options at villages, because: A) there can be a case for ensuring that total supply not only equals LHN but exceeds it (such that there is a 'supply buffer' as a contingency for delivery issues); and B) there is a need for a balanced portfolio of sites including small sites able to deliver early in the plan period (such that there is not a requirement for a stepped housing requirement).
- 5.4.97. At the villages and clusters tiers of the settlement hierarchy the primary focus is on urban sites and PDL Green Belt sites. However, it is also appropriate to consider the possibility of greenfield Green Belt sites in select locations, which in practice means locations linked to a train station. In turn, this specifically means sites in proximity to Penshurst Station, where the possibility of supporting strategic growth has been recognised as an option for some time (discussed above in Section 5.3).
- 5.4.98. In light of these introductory comments, the following bullet points consider those villages and clusters with one or more SHELAA supported sites in turn:

- Chiddingston Causeway – is the location of Penshurst Station, but this is a small and very rural village located equidistant between Edenbridge and Tonbridge. There are three SHELAA supported sites comprising a greenfield site for **300 homes** (CC3) alongside a partial PDL site for **43 homes** (CC2) and a PDL site for **8 homes** (CC1). A key question is whether the sites in combination could deliver a primary school for the village, which might well not be the case hence there could be a case for considering higher growth, which would likely mean a comprehensive strategic scheme that expands CC3. As well as the headline transport and accessibility constraint to growth, another consideration is an adjacent grade 2* listed church (built in the late 19th century following the railway) that does benefit from a rural setting, plus there are some other historic environment assets in proximity to the church.
- Fort Halstead – is a committed strategic growth location for 650 homes and strategic employment land within the Kent Downs NL, for example discussed [here](#). The SHELAA supports four Green Belt PDL sites (HAL2, HAL3, HAL4, HAL5) that are clustered to the north of the committed scheme and would together deliver **201 homes**. On the one hand it is unfortunate that the sites could not have been planned for comprehensively alongside the committed strategic scheme, and it is noted that they are mostly separated from the committed scheme by a narrow ancient woodland. However, on the other hand, additional allocation at Fort Halstead could help to secure the delivery of a primary school.
- Horton Kirby – is a village in the northeast of the District close to South Darenth. Two adjacent Green Belt PDL sites are proposed for a total of **90 homes** (HK1, HK2) that relate well to the existing built form of the village. However, there is a risk of development creep and there is a need to question this level of growth in a village of this size, albeit there is a primary school and a train station at South Darenth.
- Noah's Ark – is a 'cluster' closely linked to Kemsing but separated by the M26. The SHELAA supports a PDL Green Belt site for **40 homes** that falls within the NL (NOA1). As well as the NL constraint there is also historic environment constraint given an adjacent listed building and other historic buildings (shown on [historic mapping](#)) but the existing use of the site potentially suggests few concerns. It will be important to scrutinise the level of growth given the constraints and also because the settlement does not perform well in transport and accessibility terms (although there is a good footway linking to the Kemsing). There is also a need to consider the risk of development creep (notwithstanding the NL) albeit there is little reason to suggest that comprehensive growth (e.g. to deliver a primary school) is an option given the NL constraint (there is also the context of potential strategic growth at Kemsing).
- Four Elms – is a village around 4km to the east of Edenbridge. The SHELAA supports one Green Belt PDL site for **12 homes** (FE1) that generates limited concerns. A primary school is located nearby.
- Swanley Village – is located close to Swanley including proposed urban extensions discussed above. The SHELAA supports one Green Belt PDL site for **9 homes** (SV1) that potentially generates limited concerns, but there is extensive historic built form in this area and access challenges accordingly. A primary school is located nearby, although the available data suggests it may be over capacity.
- Brasted – is a village located on the A25 between Westerham and Sevenoaks. The village is within the NL and traffic through the historic core is a clear issue, in a similar fashion to Westerham. The SHELAA supports one partial urban / partial Green Belt PDL site for **7 homes**. The site has planning permission for conversion of the existing building for four apartments and construction of one new dwelling. The site includes a grade II listed building and another is adjacent.
- Halstead – one urban site is proposed for a total of **7 homes** (HAL1) that comprises land currently used for parking / garages in a housing estate. It is noted that there is a primary school within walking distance that appears to have a very low roll (37 pupils compared to a capacity of 195 as set out [here](#)). However, there is a need to recall Halstead's proximity to both Fort Halstead and Broke Hill Golf Course.

- 5.4.99. In **conclusion**, the proposed approach to growth at all or most of the villages and clusters warrants ongoing scrutiny given the importance of directing growth in line with the settlement hierarchy. Most notably, there is a need for careful ongoing consideration of the proposed high growth strategy for Chiddingston Causeway notwithstanding that the village benefits from a train station. The question of whether there are reasonable alternative growth scenarios for the ‘villages’ sub-area is returned to below.

Conclusion on sub-area scenarios

- 5.4.100. This section has discussed site options at sub-areas (primarily settlements) in turn and considered how they might be allocated in combination in order to deliver an appropriate strategy at the sub-area level, informed by the discussion of higher level strategy in Section 5.2, including in respect of housing need (LHN and risk of unmet need).
- 5.4.101. For each sub-area the aim is to define one or more growth scenarios that are then taken forward to Section 5.5, which aims to combine sub-area scenarios to form reasonable alternative growth scenarios for the District as a whole, i.e. the formal reasonable alternatives (RAs) for appraisal and consultation.
- 5.4.102. For the majority of sub-areas the conclusion is that there is one reasonable growth scenario to take forward to Section 5.5. Specifically, for the majority of sub-areas it is reasonable to assume allocation of the sites supported by the SHELAA.
- 5.4.103. However, two scenarios are identified for the following sub-areas:
- Sevenoaks, Westerham and West Kingsdown – in addition to a scenario involving allocation of the SHELAA supported sites, it is reasonable to test a higher growth scenario involving additional allocation sites in the National Landscape (as per 2023).
 - Pedham Place new settlement – either support a new settlement or not (as per 2023).
 - Pratts Bottom – in addition to a scenario involving nil allocations, it is reasonable to test a higher growth scenario involving additional allocation of a new settlement comprising three sites where the primary site is Broke Hill Golf Course.
- 5.4.104. It is important to note that for a number of sub-areas the conclusion on reasonable scenarios to take forward to Section 5.5 was reached *on balance* and in the context of a pragmatic need to minimise the number of variables (‘moving parts’) and individual sub-area scenarios taken forward to Section 5.5 (in order to keep the number of RAs growth scenarios to a manageable number for consultees).
- 5.4.105. The following are sub-areas where the conclusion reached is finely balanced:
- Sevenoaks – Land north of Sevenoaks, west of Otford Road (1,500 homes) is held constant across the two sub-area scenarios on balance. Also, there are feasible scenarios involving support for certain but not all of the three shortlisted NL sites that all feature in the defined higher growth scenario.
 - Swanley – the four proposed Green Belt allocations to the east of the town are held constant on balance, including noting nearby Hextable and Pedham Place.
 - Edenbridge – the decision to define just one growth scenario is finely balanced. On the one hand, a notably high growth strategy is now proposed (in the context of Edenbridge being smaller and more rural than Sevenoaks and Swanley) that represents a significant increase on that previously proposed in 2023 (although the situation is not dissimilar for Sevenoaks and Swanley). However, on the other hand, there is also a case for exploring higher growth as there is potentially a strategic growth opportunity given limited constraints and rail connectivity and a need for comprehensive growth that maximises benefits / planning gain.
 - Westerham – there are feasible scenarios involving support for certain but not all of the three shortlisted NL sites that all feature in the defined higher growth scenario. Also, and as discussed, there are identified infrastructure opportunities that might feasibly be realised through a high growth strategy.

- New Ash Green – total supply from SHELAA supported sites is now more than 10 times the equivalent figure from 2023, which serves as a reason to remain open to lower growth scenarios. Also, the main proposed allocation is associated with some notable constraints, and New Ash Green is a challenging location for growth from a transport and accessibility perspective. However, there are limited constraints to growth in some respects and there are growth-related opportunities to explore.
- Otford – is a notable contrast to New Ash Green, with much better transport connectivity but also more readily apparent constraints, as a historic village on the River Darent in the context of the nearby North Downs escarpment. The new proposed Green Belt allocation warrants ongoing scrutiny from a landscape perspective, but it is not clear that there is a strategic choice in respect of growth.
- Hartley – benefits from a train station and there are limited constraints hence it is difficult to suggest a feasible lower growth scenario, but ongoing consideration should be given to higher growth scenarios that would secure comprehensive growth / avoid sub-optimal piecemeal growth to the west of the village.
- West Kingsdown – there is confidence in the two growth scenarios defined. The appraisal in 2023 explored the possibility of more comprehensive growth to the south of the West Kingsdown and it is considered important to explore this again at the current time notwithstanding this is the edge of the NL.
- Secondary service settlements – of the seven discussed it is Kemsing, South Darent and Hextable that stand-out as feasibly associated with alternative growth scenarios. Higher growth at Kemsing warrants ongoing consideration, whilst at Hextable both lower and higher growth scenarios might be envisaged. Following the current consultation it is hoped that there will be a clearer picture regarding specific growth opportunities (e.g. new community and/or transport infrastructure) and the broad strategic case for a step change in growth directed to secondary service settlements.
- Villages and clusters – see discussion above. It will be very important to gather views through the current consultation on the new proposed approach of directing significant growth to select villages and clusters. Whilst these sites are likely grey belt and might be considered ‘sustainably located’ in the terms set out in the NPPF, there is a clear transport and accessibility case for limiting growth (although, on the other hand, some villages can be in need of growth e.g. to maintain the local primary school).

5.4.106. In **conclusion**, the two identified growth scenarios for Sevenoaks, Westerham, West Kingsdown, Pedham Place and Pratts Bottom are discussed further below, whilst ongoing consideration will be given to the possibility of alternative growth scenarios for other sub-areas/settlements at the next stage.

5.4.107. Finally, the two boxes below summarise the situation in respect of employment land and sites for Gypsies and Traveller pitches.

Box 5.6: Conclusion on employment land options / scenarios

In total the SHELAA supports sites that can deliver 42 ha of employment land, plus one other employment site is supported where the quantum of employment land is 'TBC' and a further 13 sites that are supported to deliver residential alongside some employment land that is 'TBC'.

This compares to an identified need for ~6.3 ha of employment land, as discussed in Box 5.1. However, this does not necessarily suggest concerns regarding 'over supply', for two reasons. Firstly, 32 ha of the 42 ha identified supply comes from SWAN17 Petham Court Farm (west of M25), which would deliver a new regional sports facility and so deliver a very specific type of employment land to meet a larger-than-local need. Secondly, it is appropriate to ensure a 'buffer' between identified supply and identified need plus there is a clear case for a supported a good mix of sites in terms of type and geographic location.

Aside from SWAN17, there are only four SHELAA supported sites with capacity for more than 1ha of employment land, and all of these have already been discussed above, specifically: two sites at Sevenoaks (SEV26 and SEV28); a housing led site at Swanley (SWAN11); and a housing led site at Edenbridge (EDEN14). The SHELAA supported sites with an identified employment land capacity less than 1 ha are then as follows: SEV13; SEV27; SWAN15; SWAN16; ASH1; WK5; HART7; SV2; PEN1. Certain of these have already been discussed above, and remaining sites of note are: HART7, which does not relate well to the settlement edge of Hartley but is a PDL site and only 0.2 ha in size; and PEN1, which is associated with a sensitive NL location and is only partially PDL but is only 0.2 ha in size. The final SHELAA supported site is then BM1, where capacity is 'TBC'. This is a sensitive site in the NL and closely associated with ancient woodland but again is a PDL site.

Finally, two site options not supported by the SHELAA but identified above as a site that should be taken forward to Section 5.5 would deliver employment land, namely:

- Pedham Place (linked to Swanley) – would deliver 4.9 ha.
- Land at Wolfe, Westerham, would deliver 1.8 ha

There is limited strategic case for this additional employment land because the identified supply from SHELAA supported sites discussed above is well in excess of the identified need; however, and as discussed, that is not to say that additional employment land at either site would not bring benefits.

As such, and **in conclusion**, in addition to a scenario involving SHELAA supported sites, there are also higher growth scenarios involving additional supply from Pedham Place and/or Land at Wolfe.

Box 5.7: Conclusion on Gypsy and traveller pitch provision options / scenarios

The SHELAA supports four sites for a total of 23 pitches, specifically:

- HAL6 Station Court, Knockholt Road (12 pitches) – would extend an existing site of four pitches as per the proposal in 2023. This is a rural area, bar adjacent Knockholt Station (and assuming that Pedham Place is not allocated) and this is a linear site adjacent to a train line. It will also be important to confirm whether the existing site is generating a need and that the extended site would not become too large (smaller sites, e.g. for extended families, tend to be appropriate).
- EDEN15 Land east of Mead Road, Edenbridge (5 pitches) – this is a residential led site that would also deliver pitches. This was previously a proposal in 2023 and is broadly supported, although there can be a risk of pitches within strategic sites not being delivered in practice.
- EDEN17 Seven Acres Farm (5 pitches) – would extend an existing site of 10 pitches as per the previous proposal in 2023. This is a greenfield site but there are limited concerns assuming that the existing site is suitable for expansion and the resulting site would not be too large.
- SV3 Park Lane Farm, Park Lane, Swanley Village (1 pitch) – a new site since 2023 but very small.

There is a clear need to identify additional supply, if possible, given a need for 192 pitches (Box 5.2) but there are no clear options for new sites or extensions of existing sites. Certain sites proposed for residential could feasibly be well-placed to deliver pitches, but the issue is that the landowner will often not agree to making land available for this use. Through the current consultation the hope is that new land will be made available, e.g. within sites currently not supported by the SHELAA.

In conclusion, there is only one reasonable scenario at the current time.

5.5. Reasonable growth scenarios

- 5.5.1. The final step is to **combine sub-area scenarios** to form district-wide growth scenarios.
- 5.5.2. In short, Section 5.4 identifies two scenarios for five sub-areas – ‘lower growth’ and ‘higher growth’ scenarios – and one scenario for the remaining sub-areas.
- 5.5.3. It is not possible to reflect all of the possible combinations across the growth scenarios; hence it is pragmatic and appropriate to focus attention on the following combinations:
- Lower growth across all sub-areas (SHELAA supported sites)
 - Higher growth at Sevenoaks, Westerham & W. Kingsdown (NL sites), lower elsewhere
 - Higher growth at Pratts Bottom (Broke Hill GC new settlement), lower elsewhere
 - Higher growth Pedham Place (i.e. a new settlement), lower elsewhere
 - Higher growth at Sevenoaks, Westerham, W. Kingsdown, Pratts Bottom & Pedham Pl., lower elsewhere
- 5.5.4. These are the **RA growth scenarios**, and can be described in summary as:
- Scenario 1 – SHELAA supported sites bar Pedham Place
 - Scenario 2 – Scenario 1 plus select NL sites (the same sites tested in 2023)
 - Scenario 3 – Scenario 1 plus Broke Hill Golf Course new settlement
 - Scenario 4 – Scenario 1 plus Pedham Place new settlement
 - Scenario 5 – Scenario 1 plus all variable sites.
- 5.5.5. Table 5.2 sets the scenarios out in detail. It can be seen that total supply is problematic across Scenarios 1, 2 and 3, because total supply would be below LHN or only modestly above LHN across the plan period as a whole, but these are still considered reasonable scenarios on the basis of the evidence/process set out above. Similarly, Scenario 5 is considered to be a reasonable high growth scenario on the basis of the evidence/process and despite high level arguments for higher growth (Section 5.2).
- 5.5.6. Finally, and to reiterate, whilst there are other feasible combinations of sub-area scenarios, on balance it is considered appropriate to limit the number of scenarios to five with a view to ensuring that the appraisal is accessible and engaging to the widest audience, and because there would be relatively little to be gained by formally exploring other combinations. Other combinations are informally discussed in the appraisal below and it can be noted that the phrase ‘all reasonable alternatives’ does not equate to all conceivable alternatives. Also, it can be noted that there will be the potential to revisit reasonable growth scenarios subsequent to the current consultation.
- 5.5.7. With regards to Table 5.2 below, points to note are as follows:
- Employment land supply would be higher under Scenarios 2, 4 and 5 (see Box 5.6).
 - Gypsy and Traveller pitch supply is held constant across the scenarios (see Box 5.7).
 - ‘Baseline’ sites are those supported by the SHELAA bar Pedham Place.
 - ‘Urban’ sites are non-Green Belt sites.
 - ‘GB’ sites are Green Belt sites and this includes numerous Green Belt PDL sites.
 - The figures include C2 older persons housing (398 units) without a conversion ratio.
 - LHN is 1,145 homes per annum or 17,175 homes in total (2027 to 2042)
 - Because the plan start date is in the future supply from permissions is inherently uncertain (N.B. it is likely that supply from permissions will be higher by 2027).
- 5.5.8. Finally, it can be noted that Scenario 4 is shown above as Figure 5.6.

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

		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
		Baseline sites	Baseline sites NL sites	Baseline sites Broke Hill GC	Baseline sites Pedham Pl.	Baseline sites NL sites Broke Hill GC Pedham Pl.
Housing supply component						
	Permissions	3,978	3,978	3,978	3,978	3,978
	Windfall	900	900	900	900	900
Sevenoaks	Urban	1,110	1,110	1,110	1,110	1,110
	GB	2,013	2,566	2,013	2,013	2,566
Swanley	Urban	795	795	795	795	795
	GB	1,148	1,148	1,148	1,148	1,148
Edenbridge	Urban	71	71	71	71	71
	GB	2,060	2,060	2,060	2,060	2,060
Westerham	Urban	31	31	31	31	31
	GB	6	184	6	6	184
New Ash Green	Urban	89	89	89	89	89
	GB	1,100	1,100	1,100	1,100	1,100
Otford	Urban	7	7	7	7	7
	GB	150	150	150	150	150
Hartley	Urban	48	48	48	48	48
	GB	186	186	186	186	186
Pedham Place	Urban	-	-	-	-	-
	GB	-	-	-	2,579	2,579
West Kingsdown	Urban	-	-	-	-	-
	GB	300	445	300	300	445
Eynsford	Urban	5	5	5	5	5
	GB	-	-	-	-	-
Seal	Urban	-	-	-	-	-
	GB	-	-	-	-	-
Kemsing	Urban	5	5	5	5	5
	GB	328	328	328	328	328
Pratts Bottom	Urban	-	-	-	-	-
	GB	-	-	1,400	-	1,400
South Darenth	Urban	-	-	-	-	-
	GB	329	329	329	329	329
Hextable	Urban	-	-	-	-	-
	GB	945	945	945	945	945
Villages / clusters	Urban	14	14	14	14	14
	GB	703	703	703	703	703
Total		16,321	17,197	17,721	18,900	21,176
% LHN		-5%	0%	3%	9%	19%

Part 2: SA findings at this stage?

6. Introduction to Part 2

- 6.1.1. This part of the report presents an appraisal of the five reasonable growth scenarios.

N.B. the appraisal focuses on the **reasonable 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 (DM) policies (as per the previous consultations) and brief account is taken of these 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 five 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**.²⁴
- 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 from Section 5.4.
 - Constants versus variables – a focus is on what varies across the scenarios (bold text in Table 5.2), but consideration is also given to supply components held constant.
 - 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 could 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 (i.e. sufficient supply over-and-above the housing requirement), leading to a risk of the Local Plan becoming out-of-date such that ‘the presumption in favour of sustainable development’ applies.
 - Comparison to 2023 – there is a focus on explaining changes to appraisal conclusions relative to 2023. Inevitably there are significant changes, recognising that the 97 new proposed allocations.
 - Limitations – it is inevitably the case that some evidence emerges late in the process of defining and appraising growth scenarios, such that there is limited potential to feed in. As part of this, it can be noted that there has been limited potential to account for the site specific development briefs that have been prepared. These will be scrutinised through the current consultation and then feed in fully when defining and appraising growth scenarios at the next stage.

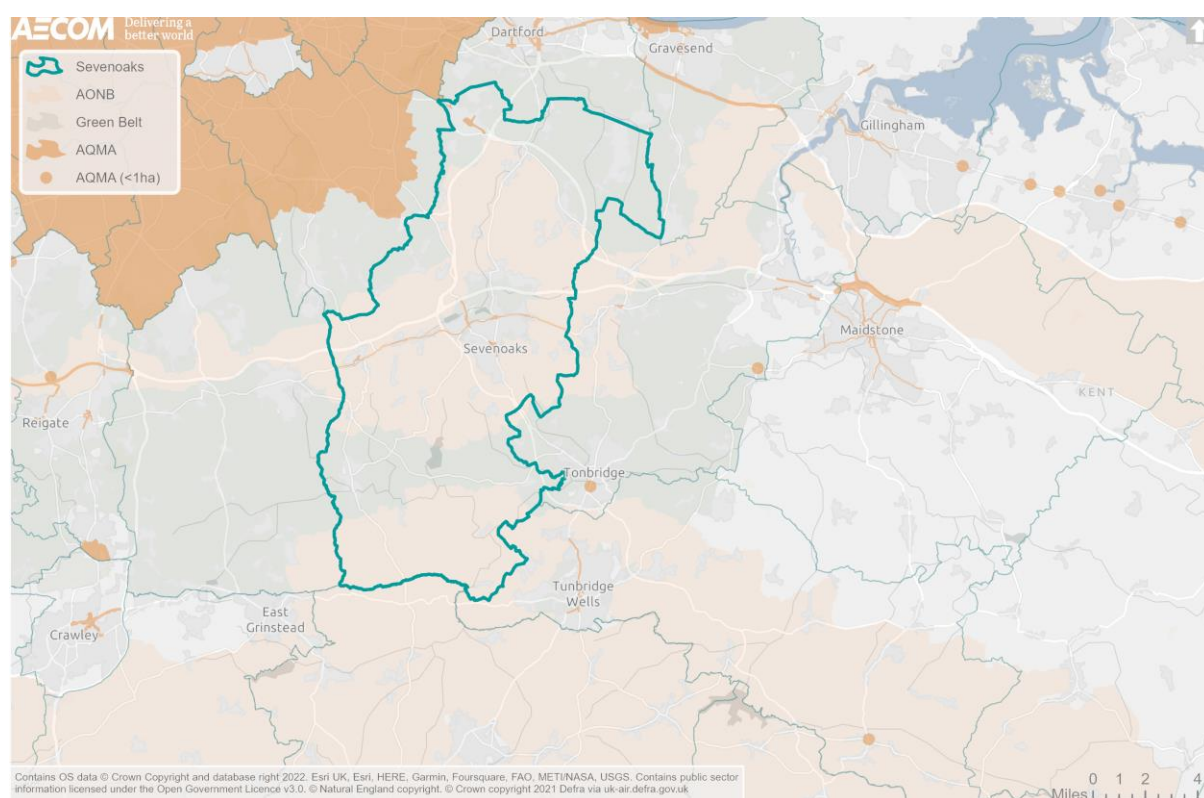
²⁴ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

7.2. Air quality

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
2	2	★1	★1	3

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 roads.

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



7.2.2. Taking the scenarios in turn:

- **Scenario 1** – generates concerns not only on account of the baseline proposed allocations (discussed below) but also because unmet need is problematic in transport and therefore air quality terms (unless it is known that unmet need would be provided for in somewhere that performs well in these regards).²⁵
- **Scenario 2** – performs on a par with Scenario 1 accounting for: A) unmet need would be reduced; B) the sites in question perform reasonably well in transport and accessibility terms; and C) higher growth at Westerham is likely challenging in air quality terms (unless there is a strategic transport solution).

²⁵ 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.

- **Scenario 3** – performs better because Broke Hill Golf Course perform reasonably well in transport terms (adjacent to a train station) and unmet need would be reduced.
- **Scenario 4** – performs on a par with Scenario 3 because, whilst high growth in the north of the District generates a clear concern, Pedham Place performs reasonably well in transport and accessibility terms and the effect would be to reduce unmet need (also Pedham Place would deliver in the longer term).
- **Scenario 5** – whilst uncertain, there could potentially be major transport and, in turn, air quality challenges. On balance it is appropriate ‘flag’ a significant concern.

7.2.3. Further considerations in respect of differentiating the growth scenarios include:

- **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. At Westerham there is the potential (albeit highly uncertain, as discussed in Section 5.4) for higher growth 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 do not perform particularly well in accessibility terms, albeit they are within cycling distance of Sevenoaks town centre and train station. The largest of the sites performs better, with the train station within ~1.2km. Finally, at Sevenoaks proposed ‘baseline’ growth locations are in proximity to an AQMA but also have very good access to a train station. It is also understood that growth north of Sevenoaks has the potential to deliver infrastructure upgrades to the benefits of east-west flows of traffic. It will also be important to consider what can be achieved in terms of strategic upgrades to cycle infrastructure.
- **West Kingsdown and Pedham Place** – 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). Focusing on Pedham Place, 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. 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. At West Kingsdown poor transport accessibility credentials (a fourth tier settlement) serve as an argument against higher growth from an air quality perspective, but there is potentially support for a large allocation that could assist with developing a local centre.

7.2.4. Further considerations regarding the baseline sites/strategy (Scenario 1) include:

- **Swanley, Hextable and South Darenth** – a much higher growth strategy is proposed relative to 2023 in the context of nearby AQMAs and limited work to date around vision-led transport planning.
- **Edenbridge** – there are no designated AQMAs, and there is tentative support for a 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 not as well connected as Sevenoaks and Swanley.
- **Smaller settlements** – there is a need for further scrutiny of the proposal to direct a considerable amount of growth to lower tier settlements, but it is not necessarily the case that any concerns from a transport and accessibility perspective translate into concerns from an air quality perspective.

- 7.2.5. In **conclusion**, whilst the previous appraisal in 2023 predicted a ‘moderate or uncertain’ negative effect for all scenarios, there are now clearly greater concerns because of the higher growth strategy proposed for Sevenoaks and the north of the District under all scenarios, aligned with the fact that work is at an early stage regarding how growth might align with objectives around vision-led transport planning. However, it is still difficult to predict a ‘significant’ negative effect with any certainty, e.g. without detailed modelling and given that air quality nationally is improving. Where detailed air quality work is undertaken in support of local plans outside of major cities the conclusion is typically that there are no major concerns.
- 7.2.6. To end, the following quote from the 2023 Interim SA Report is of note: *“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.”* It is important to be recognise that the current reasonable growth scenarios represent a major change of tack from 2023 primarily as a result of a new much higher LHN figure and the introduction of grey belt. This creates a major challenge for strategic transport planning and, in turn, a challenge in terms of planning for good air quality.

7.3. Biodiversity

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
2	3	2	1 ★	2

7.3.1. Biodiversity is a strategic constraint to growth within the District, e.g. see Figure 2.1. However, constraint varies considerably between sub-areas and can be quite site-specific. It is also recognised that there is a national requirement for development sites to achieve a 10% Biodiversity Net Gain (BNG), and the Kent LNRS will help to ensure an effective BNG regime. However, despite the BNG regime, 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 / compensation.

7.3.2. Taking the scenarios in turn:

- **Scenario 1** – certain of the baseline proposed allocations are challenging in biodiversity terms, most notably a cluster of sites north of Sevenoaks proposed to deliver strategic growth, but also Land South of Redhill Road, New Ash Green. Also, sites south of Kemsing are of note, as discussed in Section 5.4.



- **Scenario 2** – performs worse than Scenario 1 because a number of the NL sites are subject to notable and potentially significant constraint. Matters were discussed in the previous Interim SA Report.²⁶
- **Scenario 3** – performs on a par with Scenario 1 because Broke Hill Golf Course is subject to limited biodiversity constraint. There is quite extensive tree cover, reflecting use of the land as a golf course, and it is noted that historic mapping and aerial imagery shows extensive orchards, but there are few concerns regarding designated sites, and the site is located outside (but close to) a Biodiversity Opportunity Area (which is considered to be a positive). There are ancient woodlands to the east and west and there is an area with a blanket TPO located near adjacent to the train station.
- **Scenario 4** – the Interim SA Report (2023) stated in respect of Pedham Place:

“... 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.”
- **Scenario 5** – on balance, it is considered appropriate to rank Scenario 5 on a par with Scenario 1. Whilst it would involve allocation of NL sites subject to a degree of constraint, it would avoid generating unmet need that might have to be provided for elsewhere in a constrained sub-region and/or allow for a healthy ‘supply buffer’ over-and-above the housing requirement which, in turn, would minimise the risk of the District being subject to the presumption in favour of sustainable development.

7.3.3. Further considerations regarding the baseline sites/strategy (Scenario 1) include:

- **Sevenoaks** – the high urban growth strategy is supported (developed iteratively via consultations and via detailed workstreams) but proposed baseline allocations to the north of the town are challenging given the River Darent corridor and Sevenoaks Gravel Pits SSSI. However, the degree of constraint must not be overstated, for example noting that outside of the SSSI there is only one small locally designed Local Wildlife Site (LWS) which is a cemetery. The river corridor is a Biodiversity Opportunity Area (BOA) which is an indication of both constraint and opportunity. However, the River Darent is a chalk stream such that it is associated with a distinct set of potential sensitivities, and a distinct range of potential impact pathways must be considered.
- **Swanley and Hextable** – this area is generally subject to relatively limited biodiversity constraint and, again, the high urban growth strategy is supported. The baseline growth strategy generates limited concern, but one of the proposed allocations is clearly constrained, namely Parkwood Hall Co-operative Academy, Beechenlea Lane, Swanley (165 homes). Moving forward a green infrastructure strategy for the area might be considered accounting for assets including Swanley Park, Swanley Village, Parkwood Hall, the extensive ‘Woods at Wilmington’ LWS and Joydens Wood.

²⁶ At Sevenoaks the ISA Report (2023) explained: *“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); and the southern-most site is clearly constrained by adjacent Great Britain’s Wood (managed for accessibility by the Forestry Commission), with woodland creation at its northern extent perhaps something to consider. There could potentially be a degree of in-combination effect across the southern two sites.”*

At Westerham the ISA Report (2023) explained: *“... 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. [Overall] 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.”* It was also suggested that: *“The potential to achieve some accessibility to Westerham Wood might be [explored].”*

At West Kingsdown, the ISA Report (2023) explained: *“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. [The smaller site to the north west] is subject to notable constraint in that the aforementioned LWS woodland is adjacent (also it is noted that the site was previously wooded).”*

- **Edenbridge** – this area is subject to notably low biodiversity constraint, but it will still be important to consider biodiversity issues and opportunities as part of the proposed high growth strategy. Perhaps most notably, to the west of the town there is a need to consider a strategy that accounts for the stream corridor and concentrations of woodland priority habitat. Finally, to the east of the town whilst there is limited priority habitat there is an important network of historic field boundaries (see [historic mapping](#)), and whilst this is mainly associated with the permitted urban extension rather than the two current proposed allocations, this does remain a matter for consideration.
- **New Ash Green** – whilst located outside of the NL, this is the dip slope of the Kent Downs and there is a high density of ancient woodlands accordingly, particularly along the sides of dry valleys, although there are no designated LWSs around the edge of New Ash Green. The new proposed strategic urban extension to the south must be very carefully considered in the context of adjacent ancient woodlands, but land to the west of New Ash Green is subject to notably low constraint in the local context.
- **Otford** – is a constrained location in a number of respects but not particularly in terms of biodiversity. The proposed baseline allocation to the west of Otford is subject to notably low biodiversity constraint.
- **Hartley** – shares similar characteristics to New Ash Green, with a high density of ancient woodland and wider woodland priority habitat surrounding the town reflecting historic land uses linked to geology and topography. The proposed greenfield allocation is overall subject to limited constraint, but sensitivities are adjacent to both the north and south, namely ancient woodlands, TPOs and an LWS. The site was woodland, as shown on historic mapping and aerial photography from the 1940s.
- **West Kingsdown** – is constrained but the baseline allocations generate few concerns.
- **Kemsing** – see discussion above. There are sensitivities but there is also potentially an opportunity.
- **South Darent** – is sensitive in biodiversity terms given the Darent valley in proximity to Dartford, but the proposed growth locations to the southeast generate few concerns. Achieving access could involve the loss of mature trees and potentially some priority woodland habitat.
- **Villages & clusters** – at Chiddingstone Causeway there is low biodiversity constraint, and the village falls within an extensive BOA. At Halstead and Badgers Mount several PDL allocations are proposed that relate very closely to ancient woodland and will need to be carefully considered accordingly.

7.3.4. In **conclusion**, there are some significant site and settlement-specific biodiversity concerns over-and-above those raised through the equivalent appraisal in 2023. However, it is still not clear that significant negative effects will arise, even under a higher growth scenario involving NL sites. It remains the case that it is difficult to suggest a case for lower growth / generating unmet housing need from a biodiversity perspective.²⁷ Finally, it is noted that the proposal is no longer to require 20% Biodiversity Net Gain (BNG), with the Officers Report feeding back on the 2023/24 consultation explaining: *“Plan 2040 currently includes a policy option to seek 20% BNG, based on local evidence from KCC and the Kent Nature Partnership – this will be reviewed before the plan is finalised, including the impact on development viability.”*

²⁷ The ISA Report (2023) stated: *“With regards to growth quantum, the previous ISA Report (2022) 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.”*

7.4. Climate change adaptation

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC 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 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. Taking the scenarios in turn:

- **Scenario 1** – several of the baseline allocations are flagged in Section 5.4 as being subject to a degree of flood risk constraint, but in most cases, there is clear potential to avoid and mitigate risk through layout / masterplanning. The sites warranting closest scrutiny appears to be: A) Land North of Sevenoaks (1,500 homes), which is strongly associated with the River Darent but where there is excellent potential to avoid and buffer the flood risk zone through masterplanning (Figure 5.8), and the possibility of a flood risk betterment might feasibly be explored; and B) WEST3 Pitts Car Park, High Street, Westerham (6 homes), recognising that site may have historically been used for car parking in the knowledge that there is flood risk.
- **Scenario 2** – beginning with Sevenoaks, onsite surface water flood risk is a constraint at the northern-most of the NL 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 NL 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. 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, e.g. in terms of strategic flood water attenuation.
- **Scenarios 3 and 4**– neither of the new settlement options give rise to significant concerns from a flood risk perspective. In terms of wider climate change adaptation considerations the potential to deliver green and blue infrastructure including aimed at mitigating future risk of heatwaves can be envisaged.
- **Scenario 5** – as discussed within previous Interim SA Reports from 2022 and 2023, flood risk is a significant constraint to growth within neighbouring local authority areas to the east (see Figure 2.2) such that there is a clear argument for Sevenoaks District not generating unmet need (albeit where any unmet need would be provided for is unknown and flood risk is a very localised / site specific issue).

7.4.3. Finally, **Edenbridge** warrants being a focus of attention here, as the town is associated with a low lying vale landscape and integrates closely with a series of fluvial flood risk zones. There is a high proposed growth strategy (and the possibility of further growth still can be envisaged, as discussed in Section 5.4) and whilst there will be every potential to avoid / mitigate flood risk, including accounting for downstream flood risk affecting existing areas of built form within the town, this requires careful consideration.

7.4.4. In **conclusion**, it is not possible to differentiate between the growth scenarios, but it is appropriate to flag a ‘moderate or uncertain’ negative effect ahead of further consultation with the Environment Agency.

7.5. Climate change mitigation

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
2	2	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 sites well suited to delivering ‘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. It can be suggested that the most important factor is simply directing growth to locations and sites with the strongest **viability** credentials, recognising that there are typically many policy ‘asks’ of developers over-and-above decarbonisation / net zero development. This can mean medium-sized greenfield sites.
- 7.5.4. 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 performance / evaluating proposals, namely 1) the methodology applied under the Building Regulations; and 2) an **energy-based approach**, with strong support amongst specialists for the latter approach specialists, and the potential to require this approach recently having been confirmed through a legal case following a Written Ministerial Statement in 2023 (discussed [here](#)). 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, but there is also a need to consider the **‘whole life cycle’** of a development, to include to the emissions from construction, maintenance, retrofitting and demolition.
- 7.5.5. Taking the scenarios in turn:

- **Scenario 1** – the baseline allocations include a large focus on urban and PDL sites that could face challenging development viability (the changes to urban/PDL allocations over the years is evidence of this) such that it is difficult to deliver the full policy quota of affordable housing (indeed, it is not unusual for challenging urban sites to deliver no affordable housing), let alone the full quota of affordable housing alongside the achievement of built environment decarbonisation standards that go beyond the minimum requirements set out in building regulations. However, there are also numerous small and medium sized greenfield sites likely to have strong viability (including at villages with high housing need/demand) plus there are several strategic urban extensions where there will be the potential to put built environment decarbonisation at the heart of the vision and ensure this is a focus of scrutiny as masterplans develop.

A specific consideration is the following recommendation from Interim SA Report (2023): *“Consideration should be given to the potential to deliver a fifth generation heat network at the key urban regeneration sites / areas including Sevenoaks Station.”*

- **Scenario 2** – the sites in question are likely to benefit from strong development viability, e.g. Westerham is likely a location with strong development viability including relating to high need / demand.
- **Scenario 3** – as a smaller new settlement option associated with three separate landowners there could be less potential to deliver net zero development to an exacting standard relative to Pedham Place.
- **Scenario 4** – the following statement from 2023 still holds true: *“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... infrastructure.”*
- **Scenario 5** – as per the conclusion reached in the previous Interim SA Reports, there is support for providing for LHN in full / not generating unmet need from a decarbonisation perspective, both in terms of the built environment and transport.

7.5.6. In **conclusion**, it is difficult to differentiate between the scenarios with any certainty, but on balance it is considered appropriate to flag support for the higher growth scenarios that would ensure that LHN can be provided for in full with a supply buffer, such that the District does not generate unmet need and there is confidence about being able to avoid the presumption in favour of sustainable development in the future.

7.5.7. With regards to significant effects, the previous Interim SA Report predicted ‘moderate or uncertain’ negative effects for all scenarios, explaining:

“... 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... 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.”²⁸

²⁸ 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](#)).

7.5.8. Concerns do remain and it is noted that the proposal is not to set a development management (DM) policy requirement for net zero development unlike many emerging local plans nationally recognising development viability limitations²⁹ and competing policy objectives including affordable housing and infrastructure delivery.³⁰ Local authorities in Essex are arguably leading the way in line with evidence and guidance prepared by the County Council: www.essexdesignguide.co.uk/climate-change/essex-net-zero-policy. However, it is also recognised that built decarbonisation was not a major focus of consultation responses received in 2023/24. On balance, it remains appropriate to continue to predict a ‘moderate or uncertain’ negative effect across all of the scenarios. Even if built environment decarbonisation is not one of the key challenges for the local plan there is also a need to factor in transport decarbonisation.

7.6. Communities and health

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
2	2	2		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 could deliver a new school to address an existing capacity issue in the Swanley area / north of the District. However, primary school capacity is also a key issue, and there is a need to scrutinise proposed growth locations in terms of potential to deliver new capacity via school expansions or new schools. It is understood that the baseline growth (Scenario 1) will likely require new capacity in the planning areas of Sevenoaks, Swanley, Edenbridge, Sevenoaks Rural North and Hartley New Ash Green.

7.6.2. Taking the scenarios in turn:

- **Scenario 1** – there are concerns around the new proposed significantly higher growth strategy in the north of the District in terms of secondary school capacity. It could be that one of the strategic growth locations could deliver a secondary school but there is currently no certainty. Also, there will be a need to carefully consider primary school capacity issues and opportunities across the District, as discussed.
- **Scenario 2** – the NL sites in question are mostly small or medium sized sites that would deliver little in the way of strategic community infrastructure. The northern-most site at Sevenoaks is also clearly constrained by the adjacent M25 junction, in that noise pollution would likely be an issue. However, there is support from a ‘communities’ perspective for comprehensive growth to the south of West Kingsdown. Also, at Westerham there is potentially a strategic growth opportunity to explore, as discussed in Section 5.4 and as previously discussed in the Interim SA Report (2023):

“... 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’).”

²⁹ Viability was a significant focus of consultation responses received in 2023/24. For example, the consultation summary reports: “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.”

³⁰ The Interim SA Report (2023) recommended “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).”

- **Scenario 3** – the 800 home Broke Hill Golf Course scheme that was previously refused at appeal included a single form entry primary school and also Specialist Resource Provision (SRP). The appeal decision noted: *“Given the size of the scheme, the primary school would be an essential component but the inclusion of the SRP would be of particular benefit to the district.”* However, single form primary schools can be challenging to run viably, with it often the case that there is a preference for two form entry schools. At the current time there is a degree of uncertainty regarding what could be delivered in terms of primary school capacity and wider community infrastructure and, whilst it is noted that there is now the potential to deliver a larger new settlement of 1,250 homes, there are three separate landowners which could create a challenge in terms of maximising community infrastructure benefits.
- **Scenario 4** – as discussed, Pedham Place is considered to represent a key opportunity in terms of delivering community infrastructure alongside new homes, including noting the near adjacent proposal for a new multipurpose stadium complex (Wasps RFC). The Consultation Report from the previous consultation notes: *“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.”* There is also a green/blue infrastructure opportunity to explore noting that the nearby river corridor is not currently accessible.
- **Scenario 5** – there could be particular challenges in terms of secondary school capacity. Also, there is a need to recognise general community concerns regarding a much higher growth strategy compared to recent levels of growth and that previously proposed in 2023, which would likely be significant. However, this scenario would avoid unmet need and help to ensure that the District is not subject to the presumption in favour of sustainable development, under which development tends to come forward in a relatively piecemeal way that is sub-optimal in terms of strategic planning for infrastructure capacity. The previous two Interim SA Reports discussed the theoretical possibility of unmet need being provided for at strategic growth locations elsewhere, but no such opportunities have materialised in practice.

7.6.3. Further considerations regarding the baseline sites/strategy (Scenario 1) include:

- **Sevenoaks** – strategic growth to the north should represent a good opportunity to deliver strategic community infrastructure alongside new homes, but there are also a range of wider factors that will need to feed into masterplanning including around planning for biodiversity and flood risk, which could limit what can be achieved.
- **Swanley and Hextable** – as discussed in Section 5.4, there is a need for further work aimed at ensuring a strategic approach to growth with a long term perspective, including aimed at delivering community infrastructure, including new schools capacity, and maximising planning gain in the broadest sense. Strategic urban extensions must also be considered in the context of needing to support town centre regeneration and also in the context of proposed (Wasps Stadium) and potential (Pedham Place) strategic growth to the south of the town. There is also potentially a growth related opportunity around developing/delivering a green infrastructure strategy.
- **Edenbridge** – the equivalent section of the previous Interim SA Report (2023) explained: *“... 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... comprehensive growth...”*

At the current time a significantly higher growth strategy is proposed relative to that previously proposed in 2023. One important consideration is around green / blue infrastructure strategy given the network of flood zones.

- **New Ash Green** – as discussed in Section 5.4, this is another settlement with a need to ensure a strategic focus on maximising benefits to the local community.
- **Otford** – the proposed extension to the west of the settlement is around 1.5km from the primary school and there is a need to confirm the potential for safe vehicular access to the site and good walking / cycling links between the site and the village. The site is adjacent to a recreation ground and it is also noted that there appears to be significant capacity at the primary school (see data [here](#)).
- **Hartley** – the importance of ensuring a strategic approach to growth to the west has been discussed above. Another consideration is proposed new homes adjacent to the railway line, and these sites also appear to be constrained in access terms given a narrow railway bridge with a very narrow footway. Finally, at Hartley there is a need for careful consideration delivery assumptions at HART2 Land at Brambledown and Wellfield, which involves an estate regeneration (40 homes is assumed).
- **West Kingsdown** – with the new proposed allocation added to the strategy since 2023 the potential for coordinated growth to the east to develop this part of the settlement as a community hub and potentially even deliver a new local centre is very apparent. The new proposed allocation is adjacent to the local primary school, although it is noted that there appears to be limited spare [capacity](#).
- **Kemsing** – as discussed in Section 5.4, this is another settlement with a need to ensure a strategic focus on maximising benefits to the local community.
- **South Darenth** – one of the proposed allocations is flagged in Section 5.4 as not relating very well to the settlement and there is no primary school in walking distance.
- **Villages & clusters** – the primary consideration is around the potential to deliver a primary school at Chiddingstone Causeway, plus the proposal to deliver 40 homes at Noah's Ark, which is a 'cluster' in the settlement hierarchy, is questionable from an accessibility perspective. Elsewhere the village allocations potentially generate limited concerns and could potentially be associated with some benefits to the village, e.g. in terms of maintaining schools rolls and potentially village vitality in general. At Fort Halstead additional growth might help with securing a primary school.

7.6.4. Finally, on the specific matter of health infrastructure, NHS Kent & Medway ICB has engaged very proactively, and it is understood that key issues include: A) there is currently no GP coverage in the Pratts Bottom area (Broke Hill Golf Course); B) capacity is currently constrained in the Swanley & Hextable area; and C) the New Ash Green & Hartley area would require new capacity under the baseline growth scenario.

7.6.5. In **conclusion**, in some respects the equivalent conclusion still holds true:

"... 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... However, it is recognised that higher growth at certain settlements does give rise to some tensions with communities objectives."

7.6.6. However, there are a range of issues and uncertainties associated with the new proposed higher growth strategy, such that it is now considered appropriate to flag a risk of 'moderate or uncertain' negative effects other than under Scenario 4.

7.6.7. It is recognised that a range of important DM policies have been iteratively developed aimed at ensuring that growth-related communities issues are addressed and opportunities realised, but there is a need to focus on spatial strategy and site selection. Also, in respect of DM policy, there is a need to recognise that issues / opportunities vary greatly across settlements and sites.

Figure 7.2: A draft DM policy highlighting the benefits of supporting larger sites

Policy OS2
Children and Young People's Play Space

1) All major residential development proposals, but excluding proposals for older persons accommodation, must include provision for children and young people's play space. Proposals will be expected to apply, as a minimum, the below Fields in Trust requirements for the inclusion of equipped play space, unless it can be clearly demonstrated that this is not feasible or viable, in which case a lower level of provision can be provided as agreed with the Council.

Fields in Trust Children and Play Space Standards				
Size of Development	Informal play space	Local areas of play (LAPs)	Local equipped areas of play (LEAPs)	Neighbourhood equipped areas for play (NEAPs)
10-20 homes	✓	N/A	N/A	N/A
21-100 homes	✓	✓	N/A	N/A
100-500 homes	✓	✓	✓	To be considered, where appropriate
Over 500 homes	✓	✓	✓	✓

2) All new children and young people's play space must be of high quality, include multiple pieces of attractive and engaging equipment including natural play, be accessible and inclusive to all users including those with special educational needs and disabilities, and appropriate to the location and the local community it serves to enable effective use.




3) In cases where it can be demonstrated that it better meets local need, provision may be secured through the improvement and expansion of existing facilities within the local area, rather than new provision. This will be considered on a case by case basis for minor developments only.

7.7. Economy and employment

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
=	=	=	=	=

7.7.1. As discussed in Section 5.4, a notably proactive approach is being taken to the delivery of new employment land / floorspace, both in terms of total quantum and mix / spread of sites. As part of this, there is support for proactively supporting the Wasps RFC stadium scheme, which is of larger-than-local significance. Higher growth scenarios would deliver some additional employment land, and there is also support for providing for housing needs from a perspective of wishing to support the local and sub-regional economy; however, on balance it is considered appropriate to rank the alternatives on a par. New employment land at Pedham Place is likely supported recognising that this part of the District is well linked to London, the Thames Gateway and elsewhere via the M25 and M20. However, in theory there can be issues associated with over-supply of employment land that might require further investigation.

7.8. Historic environment

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
2	2			

7.8.1. Taking the scenarios in turn:

- **Scenario 1** – the equivalent appraisal from 2023 concluded overall limited concerns and it is noted that Historic England did not raise any specific concerns through the consultation.³¹ Focusing on the new proposed baseline allocations, there is a clear focus on areas subject to limited historic environment constraint; however, a number of potential concerns are raised in Section 5.4 and discussed below.
- **Scenario 2** – certain of the NL sites additionally allocated under this scenarios are subject to a degree of constraint. In particular, at Sevenoaks, the northern-most site intersects the Chipstead Conservation Area, whilst the middle site is in close proximity to the Bessels Green Conservation Area. Also, at Westerham, one of the sites is close to a cluster of historic buildings including one that is listed, and another of the sites is adjacent to an area of registered common land; however the largest of the sites 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.
- **Scenario 3** – there are limited concerns in respect of the Broke Hill Golf Course new settlement option, assuming steps taken to avoid traffic through or creep/sprawl towards Halstead Conservation Area.
- **Scenario 4** – the equivalent section of the previous report stated that there are two key issues in respect of Pedham Place: “*Firstly, Fort Farningham scheduled monument is onsite (there would presumably be the potential to preserve this...). 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).*” Both of these villages have tight historic cores with a high density of listed buildings including grade 1 listed churches (Halstead is less sensitive).
- **Scenario 5** – there are no concerns regarding in-combination effects from the variable growth locations that are all supported for allocation under this scenario and, as discussed in the previous Interim SA Report, there is no clear case for exporting unmet need from a historic environment perspective.³²

7.8.2. Further considerations regarding the baseline sites/strategy (Scenario 1) include:

³¹ The Consultation Report (2024) states: “*HE welcome the inclusion of policies for the historic environment... 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.*”

³² The Interim SA Report (2023) explained: “*With regards to growth quantum, the previous ISA Report (2022) considered the distribution of historic environment designations across the sub-region, 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 NL 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...*”

- **Sevenoaks** – the previous Interim SA Report (2023) explained: *“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 Knole 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.”* The first of these sites is now no longer supported by the SHELAA / proposed for allocation, the second site is a town centre site that now has the benefits of having been consulted on, in terms of capacity and design considerations, and concerns regarding growth adjacent to the Vestry Estate are of limited significance (discussed in Box 5.3). With regards to new proposed allocations since 2023, none are flagged in Section 5.4 as being subject to particular constraint, but in-combination effects are a consideration, including in terms of traffic.
- **Swanley** – the new proposed higher growth strategy gives rise to a degree of tension with historic environment objectives, albeit overall Swanley has relatively limited constraint. In particular, strategic growth to the northeast would erode the gap to Swanley Village and SWAN12 has a degree of sensitivity.
- **Edenbridge** – whilst there is a need to carefully consider high growth at Edenbridge from a range of perspectives there are limited concerns in historic environment terms. Of the proposed directions for strategic expansion it is land to the west where there is a need to account for encroachment towards listed buildings, including a notable cluster at Skeynes Park. A further consideration is the more modest proposed expansion to the south 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, as this is an expansive low-lying landscape associated with the River Eden, and a footpath does pass through the site. However, there are few listed buildings in the vicinity, and the potential to secure a strong Green Belt boundary might be envisaged that minimises the risk of future development creep/sprawl to the south.
- **Westerham** – low growth is supported in historic environment terms, but there is also a need to consider growth to deliver a transport solution for the issue of A25 traffic through the historic core.
- **New Ash Green** – whilst there is overall limited historic environment constraint, as a largely 20th century settlement, there is a clear concern with strategic expansion to the south, as discussed in Section 5.4. This is a clear case of needing to confirm site specific policy / masterplanning principles.
- **Otford** – is sensitive in historic environment terms, but the proposed allocation is distant from the historic core. Impacts to a historic lane are potentially a consideration (discussed further below).
- **Hartley** – has overall limited constraint, similar to New Ash Green, and the main proposed growth location appears to be unconstrained in historic environment terms.
- **West Kingsdown** – again this is mostly a 20th century settlement, but there is some historic environment sensitivity to the east of the village in proximity to proposed growth locations. The new proposed allocation since 2023 warrants scrutiny given it will take the built form towards the cluster of historic buildings, including a grade 1 listed church, associated with Church Wood (see [historic mapping](#)).
- **Eynsford and Seal** – the proposed low growth strategy is supported.
- **Kemsing** – a high growth strategy is potentially supported as there is limited historic environment constraint, assuming potential to buffer and avoid problematic traffic through the historic core.
- **Pratts Bottom** – is not proposed any allocations despite low historic environment constraint, but it is acknowledged that there is the option of a linked new settlement at Broke Hill Golf Course.

- **South Darent** – this was a significant settlement by the early 20th century (see [historic mapping](#)) with built form extending well beyond the current conservation area, but the proposed approach of expansion south of the railway generates few concerns.
- **Hextable** – again, whilst there is overall limited constraint, including as evidenced by the lack of a conservation area, this is an area that had begun to see development by the early 20th century. Locally listed Swanley Park is a factor that should feed into growth strategy for Swanley / Hextable.
- **Villages & clusters** – as discussed in Section 5.4, the key issue is potentially growth at Chiddingstone Causeway, where there would be a clear risk of impacts to the setting of a grade 2* listed church.

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 are overall limited concerns despite the new proposed higher growth strategy given the sites selected / spatial strategy supported, with a good proportion of growth directed to settlements with limited historic environment sensitivity. However, there will clearly be a need for further work to develop site-specific policy aimed at demonstrating that sites can viably deliver in a timely fashion (i.e. in accordance with the committed trajectory). It is difficult to suggest support for a lower growth strategy, as unmet need might have to be provided for elsewhere in a constrained sub-region and/or there could be issues with delivering the committed housing requirement leading to the presumption in favour of sustainable development. Also, it can be noted here (albeit also applicable under other headings) that a low growth strategy could lead to a challenge with adopting the plan and, in turn, a continuation of the baseline situation whereby growth comes forward under the ‘presumption’.

7.9. Homes

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
5	4	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 such that the presumption in favour of sustainable development applies (albeit homes would then be delivered under the presumption).

7.9.2. Identified supply exceeds Local Housing Need (LHN) under Scenarios 3, 4 and 5, but the ‘**supply buffer**’ is only 3% under Scenario 4. The simple fact that delivering LHN would mean more than quadrupling recent rates of housing delivery suggests the need for a large supply buffer as a contingency for delivery risk.

7.9.3. Also, under Scenario 4 Pedham Place would deliver in the longer term such that there could be a need for a **stepped housing requirement**, i.e. is lower in the early years of the plan period and then higher in later years (with the net effect that LHN is provided for over the plan period) which would amount to delaying providing for housing needs.

- 7.9.4. However, there is also a need to factor in the strong possibility of supply being healthier by the time of plan adoption on account of higher **supply from permissions** given that the District is currently subject to the presumption in favour of sustainable development (see the five year housing land supply statement).
- 7.9.5. There is also a need to scrutinise the **supply mix** in terms of geographical spread and the mix of sites, with a view to meeting a diversity of needs (including settlement specific needs) and ensuring a diverse portfolio of sites that minimises delivery risk (albeit delivery risk can be mitigated by a higher supply buffer). Overall there is tentative support, including noting the iterative approach to identifying supply from urban and PDL sites (which can tend to have high delivery risk) and the new proposed approach of additional support for small and medium sized greenfield sites including at villages (including because this can support a diversity of housebuilders). However, there is a need for further work to confirm the 'supply trajectory' including to confirm that there is not a need for a stepped requirement.
- 7.9.6. As part of this, one consideration might be the timescales for delivering the high growth strategy at **Edenbridge**. Also, under scenarios involving **Pedham Place** there is a need to factor in proximity of proposed baseline growth locations at Swanley and Hextable (also feasibly growth locations in neighbouring local authorities). With regards to **Broke Hill Golf Course**, whilst the main part of the site likely has strong delivery credentials (in terms of timing and risk), the wider site involves three landowners which introduces an element of delivery risk, e.g. given potential need for negotiated land equalisation.
- 7.9.7. On the specific matter of a geographic spread of sites aimed at meeting local arising needs, overall there is considered to be a good distribution of growth, but **Westerham** stands out as a higher order settlement with higher housing prices where there is a proposed low growth strategy due to clear constraints.
- 7.9.8. There are three final considerations:
- **Affordable housing** – 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 (alongside delivering on wider objectives, e.g. relating to infrastructure delivery and built environment decarbonisation) and also ensuring a policy compliant tenure split (to include a good proportion of social rented homes). The proposed strategy is tentatively supported in this regard, although there is a need for ongoing scrutiny of what can realistically be delivered at challenging urban and PDL sites, recognising that there is also a need for them to come forward in a timely manner in line with the committed trajectory.
- The new proposed policy approach is to require 50% affordable housing for the great majority of greenfield allocations, which is an increase on the previous proposal (40%) and reflects the Government's 'golden rules' for sites deemed to be 'grey belt' (NPPF para 155). As such, it seems clear that affordable housing is being prioritised above other policy asks (e.g. net zero development and 20% BNG). Also, at the current time there is an increased emphasis on a tenure split heavily weighted to social housing (which is the tenure that requires the greatest level of subsidy). The current consultation document states:
- “... the required tenure split is 80% social rented housing and 20% shared ownership housing unless otherwise agreed by the Council's Housing Service. Additional social rented homes are required in relation to the Grey Belt uplift.”*
- **Older persons housing** – there is a notable boost to the proposed baseline supply since the previous stage; specifically the cluster of proposed allocations at South Darenth. Also, it is now understood that there is an opportunity to deliver 79 older persons housing units (C2 use class) at Pedham Place under Scenarios 4 and 5 and a new retirement village (150 C2 units) at Broke Hill Golf Course (Scenarios 3 and 5). However, the need/supply balance will require further scrutiny at the next stage.

- **Gypsy and Traveller accommodation needs** – the previous Interim SA Report stated:

“... this may prove to be a key matter for consideration at the next stage of plan-making given that... 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... Every effort must be made to meet needs....”

The identified supply has been boosted only very marginally since 2023 such that, moving forward, this must be a focus of plan-making, because poor accommodation is 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 on average having very poor outcomes across health, education and other indicators. A blog prepared on behalf of the RTPI explains how failing to provide for accommodation needs is all too common including because providing for needs is often deferred by local plans, for example the following are recent case studies:

- Maidstone – the Local Plan was adopted in 2024 with reliance on a follow-on plan to meet a need for 500+ pitches, and that plan has made limited progress.
- Windsor and Maidenhead – the Local Plan was adopted in 2022 on the assumption that a follow-on plan would be adopted, but there has been no progress.³³
- Rugby – the Local Plan was adopted in 2019 with an unmet need to be addressed through a follow-on plan, and now a need for 94 pitches is being dealt with through the emerging new Local Plan.³⁴
- Wiltshire – the Inspector examining the Local Plan recently wrote to the Council explaining: “... we note that the Plan does not specifically address the matter of travellers housing needs as it is otherwise intended to be dealt with under a separate Gypsies and Travellers [plan]... anticipated to be adopted by Quarter 3 of 2025. In light of that situation, we would welcome an update on the current status of the... DPD, together with the Council’s view as to whether there should be provisions in the Plan to ensure certainty of how those needs would otherwise be met in the event that the... [plan] were not to reach adoption.” As of February 2025 there were understood to be some issues, as reported here.

- 7.9.9. In **conclusion**, there is a clear need to rank the scenarios in order of total growth quantum. The higher growth scenario performs well but it is still not possible to predict a ‘significant’ positive effect given the extent of unmet housing need *risk* in the subregion (N.B. there is no clear evidence of unmet housing need that should be provided for in Sevenoaks, but there is a risk nonetheless). Under Scenario 5 the current identified supply is 19% above LHN, and there is the possibility of supply from permissions increasing prior to plan finalisation, but it is still not entirely clear that there would be the potential to set the housing requirement at a level above LHN even under Scenario 5, i.e. because of the likely need for a supply buffer. Also, there is caution at this stage regarding predicting positive effects ahead of further detailed work to consider site-specific viability, delivery risk and supply trajectory. Finally, it is not possible to predict a significant positive effect because of the Gypsy and Traveller pitch provision issue.
- 7.9.10. With regards to Scenario 1, this performs very poorly as it would (likely) generate significant unmet need. 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 would be provided for, such that it might ultimately stay unmet. Unmet housing need is already a concern in the sub-region.

³³ The Inspectors Report stated: “It is unfortunate that the Traveller Local Plan has been delayed, but... good progress has been made... Most recently, an Issues and Options Report... [was] published for consultation.”

³⁴ The Inspectors Report stated: “Whilst the Plan does not provide a supply of deliverable and developable sites to meet the accommodation needs of gypsies and travellers in full, I am satisfied that the combination of the criteria based approach in Policy DS2 and a Gypsy and Traveller Site Allocations DPD will enable the Council to meet [needs].”

7.10. Landscape

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
	4	2	3	5

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.

7.10.2. Taking the scenarios in turn:

- **Scenario 1** – the previous Interim SA Report predicted a ‘moderate or uncertain’ negative effect and concerns are now heightened on account of the new proposed higher growth strategy (discussed below).
- **Scenario 2** – there is now significantly greater concern regarding allocations within the NL relative to 2023. See Section 5.4 for discussion of the specific sites in question.
- **Scenario 3** – a new settlement at Broke Hill Golf Course and the two adjacent SHELAA sites has the potential to be fairly well contained within the landscape assuming that the three SHELAA sites are considered in combination (as opposed to just considering the main SHELAA site that was previously a focus of a dismissed appeal, recognising that there would then be ongoing pressure to expand into the adjacent two SHELAA sites). Green Belt Assessment has identified a concern regarding the sprawl of Orpington and, in turn, Greater London, which is why the sites are not identified as grey belt. However, it is difficult to translate this into a concern from a landscape perspective. Whilst there could feasibly be nearby growth around the edge of Orpington (LB Bromley) this cannot be foreseen.
- **Scenario 4** – the 2023 Interim SA Report tentatively supported Pedham Place from a landscape perspective notwithstanding a location within the NL, stating:

“... the site is located within the [NL] 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... 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)... A larger scheme of this nature would clearly give rise to much more significant concerns from a landscape/[NL] perspective.”

Matters have now moved, as discussed in Section 5, given a new strategic focus on avoiding major growth in the NL and also in light of the evidence provided by the Landscape and Visual Evidence Study (2024) (N.B. referred to above as simply the ‘Landscape Study’ as a shorthand). Specifically, the Study concludes that whilst the potential significance of landscape impacts is ‘high’ there is good potential for mitigation that could reduce impacts to ‘low-medium’.

The Study compares the option of supporting Pedham Place to the option of several NL urban extensions, and concludes:³⁵

³⁵ Also, matters have moved on in that it is no longer correct to say that Pedham Place and the Wasps Stadium complex are being considered as part of a single masterplan, albeit there are clearly important links between the two sites.

“[Pedham Place] would be more able to accommodate development of the type proposed due to its land use, character, context and larger size. This site offers more opportunity for incorporating more extensive mitigation, and there are also more opportunities to provide benefits to landscape and visual amenity, and more potential to provide enhancements that may further the purposes of the [NL], both on and off-site, as well as compensatory mitigation and benefits for local communities.”


- **Scenario 5** – whilst the potential for in-combination effects from the variable sites is limited (west of Sevenoaks is where in-combination effects are most significant) on balance it is appropriate to give weight to the risk of an in-combination effect on the Kent Downs NL under this scenario.

7.10.3. With regards to landscape impacts associated with specific baseline proposed allocations / the baseline proposed growth strategy for individual settlements, matters are discussed in detail in Section 5.4 and are not repeated here for brevity. Perhaps the greatest concern is around numerous proposed allocations that do not benefit from good containment in landscape terms such that there would be a risk of ongoing development creep/sprawl without careful consideration given to securing defensible boundaries, i.e. without careful strategic planning with a long term perspective. One specific site to note is OT2 at Otford (150 homes), which has reasonable containment in Green Belt terms, but landscape sensitivity given the adjacent NL, e.g. views from Telson Lane along which runs the North Downs Way. It is currently unclear what use would need to be made of Telson Lane in order to ensure good access to the site.

7.10.4. In **conclusion**, there are clear landscape concerns under all scenarios given the inherent local sensitivities and the new proposed higher growth strategy. It is appropriate to predict a significant negative effect under Scenarios involving the NL urban extensions but, on balance, only a ‘moderate or uncertain’ negative effect is predicted for Scenario 4 (with considerable uncertainty). It is also important to again note that limited work has so far been undertaken in respect of site specific policy / masterplanning, which is very important from a landscape perspective. Having made these points though, it is also important to say that Scenario 1 would (likely) generate significant unmet need that would then (in theory) have to be provided for elsewhere in a constrained sub-region (also, the plan could struggle to progress to adoption, leading to landscape impacts as sites come forward under the presumption in favour of sustainable development). The previous Interim SA Report (2023) stated:

7.10.5. “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 [NLs].” This conclusion broadly holds true at the current time, in light of the discussion of site and settlement growth options...”*

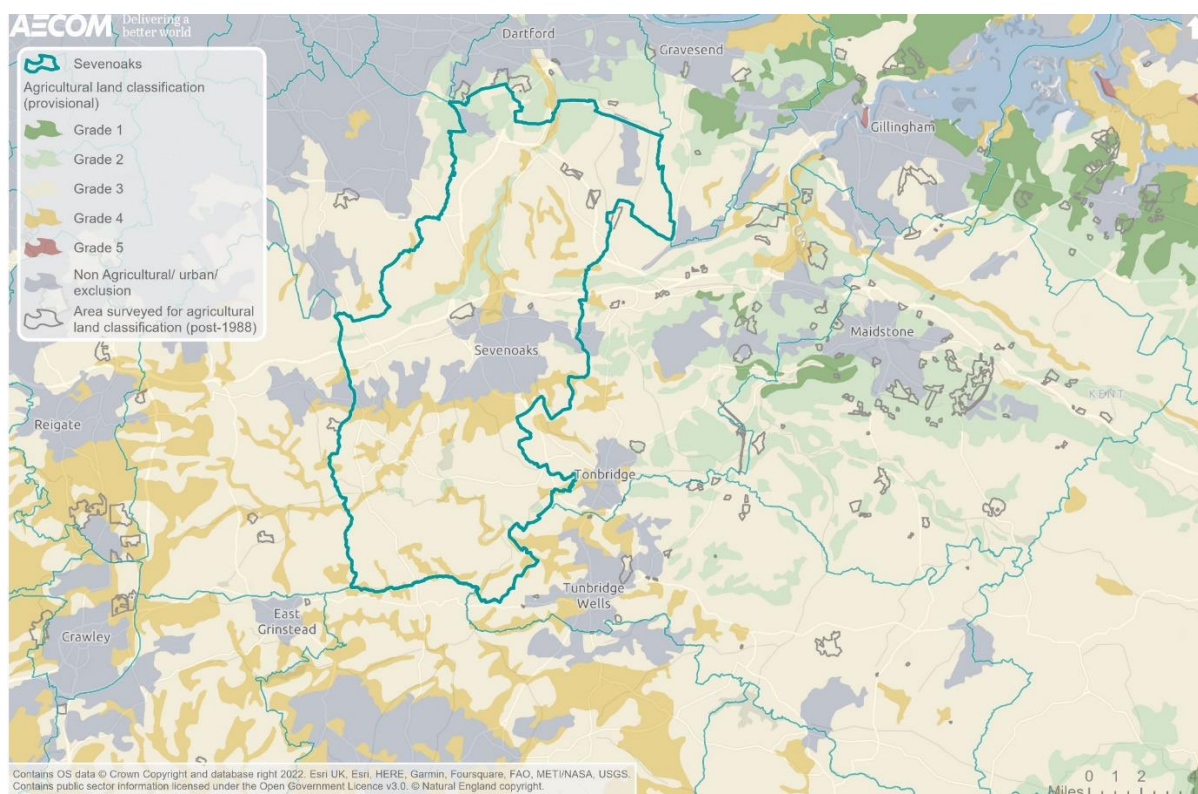
7.11. Land, soils and other resources

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
3	2	2	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 7.3, 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 that is grade 3a and 3b, but this dataset is very patchy and covers only a very small proportion of the District.
- 7.11.3. In this light there is a need to question the new proposed approach of directing higher growth to Swanley and Hextable, and new proposed allocations at Otford and South Darenth are also flagged in Section 5.4 as likely comprising grade 2 quality land according to the national low resolution dataset. Final points to note are then: A) Broke Hill Golf Course is shown as grade 3 quality land by the national dataset and the majority of the site is not in agricultural use (but historically has been orchards); and B) Land west of Otford Road, north of Sevenoaks (1,500 homes) has been surveyed and been found to mostly comprise grade 3b quality land (i.e. not 'best and most versatile').
- 7.11.4. From Figure 7.3 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.
- 7.11.5. 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. One consideration is land west and north of Westerham (Scenarios 2 and 5), where there is a safeguarding area for construction sand and permitted scheme to fill a worked-out quarry with waste from the building industry.
- 7.11.6. In **conclusion**, there is a 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 sub-region. However, there is no clear guidance in respect of judging the significance as part of local plan-making (guidance focuses on planning applications) and this was not a major issue through the consultation in 2023/24.

Figure 7.3: Agricultural land quality across the District and wider subregion



7.12. Transport

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
★ 1	2	★ 1	2	3

- 7.12.1. This is a crucially important issue for plan-making and will need to be a focus of further work ahead of plan finalisation, with a view to demonstrating a vision-led approach. Overall, there are now greater concerns relative to the equivalent appraisal in 2023, including on the basis of a recent Transport Study (2025) which flags some concerns in respect of problematic traffic congestion (an issue in and of itself, but also because of implications for bus services, cycling and generally vision led transport planning).
- 7.12.2. However, on the other hand, generating unmet need is highly problematic in transport terms (as has been discussed) and there is generally support for some of the variable growth locations. In particular, there is a transport case for Broke Hill Golf Course. It is also the case that a high proportion of the new proposed baseline allocations since 2023 are in proximity to a train station or are in the north of the District which generally has good accessibility to higher order settlements. Also, there is understood to be a transport opportunity associated with further strategic growth north of Sevenoaks.
- 7.12.3. A key issue for ongoing consideration is the performance of Pedham Place. The Transport Study flags some concerns, most notably in respect of M25 Junction 3: *“... despite the inclusion of the improvement scheme at M25 Junction 3, issues are still predicted at this junction. Further review of the proposed junction design is therefore required.”* This represents a concern from a delivery perspective, given the cost of junction upgrades, although a solution within the plan period might be assumed. It is noted that M25 Junction 6 capacity was a major issue for the Tandridge Local Plan.
- 7.12.4. Finally, there is a need to highlight the new proposed approach of delivering considerably higher growth to lower tier settlements, which will need to be considered further following the current consultation from a transport, decarbonisation and accessibility perspective. As well as villages, the strategy for New Ash Green requires further consideration from a transport perspective, including alongside the question of a new secondary school at Pedham Place. Amongst other things, there will be a need to consider how this strategy aligns with the vision for bus connectivity. It will be important to work closely with partner organisations including neighbouring local authorities, to consider how growth locations in combination along corridors might deliver benefits.
- 7.12.5. In **conclusion**, the previous conclusions from 2023 still broadly hold true:
- *“Growth quantum - 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.” Having now given consideration to settlement and site-specific growth options there is potentially now a greater degree of concern regarding traffic congestion...”*
 - *“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.”*
- 7.12.6. Overall, the appraisal conclusion now reflects: A) a concern with higher growth including as this would involve Pedham Place; B) a concern with generating unmet housing need; and C) a transport case for supporting Broke Hill Golf Course.

7.13. Water

Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham Pl.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham Place
?	?	?	?	?

The following text is taken from the previous Interim SA Report (2023). Through the consultation in 2023/24 few comments were received on the key matter of wastewater treatment capacity (see the summary of comments received from organisations [here](#)).

- 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.
- 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 upgrades.
- 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 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 locally that are known to be problematic to the extent of constraining growth. It is difficult to draw clear implications for the Local Plan from the South East Water Resource Management Plan ([WRMP](#)).
- 7.13.6. With regards to **DM 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 Milton Keynes Local Plan is notable for requiring 93 litres per person per day for all major developments.
- 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 merits of the growth scenarios would be welcomed.

7.14. Appraisal summary

7.14.1. Table 7.1 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**.²⁴

Table 7.1: The reasonable growth scenarios – summary appraisal findings

	Scenario 1 Baseline sites	Scenario 2 Baseline sites NL sites	Scenario 3 Baseline sites Broke Hill GC	Scenario 4 Baseline sites Pedham PI.	Scenario 5 Baseline sites NL sites Broke Hill GC Pedham PI.
Air quality	2	2	★1	★1	3
Biodiversity	2	3	2	★1	2
Climate change adaptation	=	=	=	=	=
Climate change mitigation	2	2	2	★1	★1
Communities	2	2	2	★1	2
Economy & employment	=	=	=	=	=
Historic environment	2	2	★1	★1	★1
Homes	5	4	3	2	★1
Landscape	★1	4	2	3	5
Land, soils and resources	3	2	2	2	★1
Transport	★1	2	★1	2	3
Water	?	?	?	?	?

7.14.2. The appraisal shows a very mixed picture, although one clear message is that Scenario 2 is not shown to perform well. Scenario 4 is the best performing scenario under the greatest number of sustainability topic headings, and is also predicted the fewest negative effects, but this should not be taken as a clear indication that it is the best performing scenario overall, because the appraisal is not undertaken without any assumptions made regarding the degree of importance (‘weight’) that should be assigned to each of the topics as part of decision-making (rather, it is for the Council to assign weight and reach a decision ‘on balance’). Also, it is important to state that many of the topic specific appraisal conclusions are reached on balance or otherwise with limited certainty including on the basis of evidence base limitations.

- 7.14.3. Focusing on Scenario 1, this is a lower growth scenario whereby the housing requirement would likely need to be set below LHN, hence it is unsurprising that this scenario is judged to perform relatively poorly in socio-economic terms. However, the appraisal also flags some concerns under environmental topic headings given an assumption that unmet housing need would have to be provided for elsewhere within a constrained sub-region (an assumption that may not hold true in practice).
- 7.14.4. Importantly, it can be noted that Scenario 1 is judged to perform relatively well in terms of 'transport' and 'landscape', and it may be the case that the Council (as decision-makers) chooses to assign particular 'weight' to one or both of these topics, when reaching a decision on which of the scenarios best represents sustainable development on balance., when reaching a decision on which of the scenarios best represents sustainable development on balance (and so is 'justified' in NPPF paragraph 36 terms).
- 7.14.5. The following bullet points cover each of the sustainability topics in turn:
- **Air quality** – this is a widespread issue within the District and there is a concern with the new higher growth strategy ahead of further work, but also unmet need is problematic in transport terms.
 - **Biodiversity** – Pedham Place represents a good opportunity to direct growth to a location with limited biodiversity constraint. Unmet need could again be problematic, but a number of baseline proposed allocations are constrained including the proposed new strategic urban extension north of Sevenoaks.
 - **Climate change adaptation** – certain of the new proposed allocations since the previous consultation in 2023 are subject to a degree of flood risk and so it is appropriate to flag an overall risk ahead of consultation with the Environment Agency.
 - **Climate change mitigation** – there is 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 decarbonisation opportunity. There is a need for further work to ensure that decarbonisation opportunities (including built environment) are realised via 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. There is a need for further work to understand community infrastructure issues and opportunities.
 - **Economy and employment** – a notably proactive approach to employment land is proposed. There is some support for certain higher growth scenarios (Pedham Place would deliver some employment land), but on balance the scenarios perform on a par.
 - **Historic environment** – limited concerns were raised through the consultation in 2023/24 but there is a need for further work including on site specific policy / masterplanning. Development briefs have been prepared for some sites but require scrutiny through and subsequent to the current consultation. Again, there is tentative support for a housing requirement set at LHN, rather than a lower growth strategy that risks delaying plan adoption and/or exporting unmet need to a constrained sub-region.
 - **Homes** – there is a clear need to rank the scenarios in order of total growth quantum. There is clear support for Scenario 5 as the housing requirement could comfortably be set at LHN with a healthy 'supply buffer', such that here 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, there is a major challenge around providing for Gypsy and Traveller accommodations needs (strategic sites must be examined for pitch delivery potential).
 - **Landscape** – similar to the discussion above under 'historic environment', there is a need for further work to consider site specific policy / masterplanning including with a view to ensuring comprehensive schemes with strong boundaries that minimise the risk of development creep/sprawl.

- **Land and soils** – there is a need to avoid 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** – the appraisal conclusion now reflects: A) a concern with higher growth; B) a concern with generating unmet housing need; and C) a transport case for supporting Broke Hill Golf Course, which has the benefit of good access to a train station.
 - **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 the option of a new settlement Pedham Place.
- 7.14.6. Consultees are encouraged to comment on the merits of the growth scenarios and also suggest new scenarios for consideration at the next stage. Equally, consultees are welcome to comment on the merits of specific sites and settlement-specific options/scenarios. Suggestions should be informed by the discussion in Section 5, which goes through a process to define the five growth scenarios appraised above. Proactive discussion of growth scenarios now will help the plan to progress.
- 7.14.7. Note that the appraisal above also considers emerging **DM policies**, particularly those with development viability implications including those relating to affordable housing, built environment decarbonisation / net zero development and BNG. The appraisal highlights a number of DM policies that might be given further consideration; however, it is difficult to make specific recommendations, because any recommendation made with a view to improving the performance of the plan under one sustainability topic heading could have knock-on implications for performance under another heading. For example, it would be easy to recommend more stringent requirements in respect of net zero development, but there would be implications for wider objectives with cost implications.
- 7.14.8. It is clear that affordable housing is a particular policy priority and, moving forward, there will be a need for ongoing consideration of how to strike a balance between DM policy objectives in the context of development viability parameters (also, a focus should be on directing growth to locations and sites with strong development viability credentials, as far as possible). It will be important to consider policy requirements in the round where they are associated with a cost for developers, with a view to striking the right balance between policy priorities (e.g. affordable housing versus infrastructure versus wider policy asks) in the context of development viability. It is important to be clear what is being prioritised and what compromises are being made / trade-offs accepted with a view to a 'whole plan' with good viability credentials and, in turn, minimal delivery risk.
- 7.14.9. 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. Key issues include:
- Housing need – this is a key larger-than-local issue given unmet need risks.
 - Transport corridors – this is another key 'larger than local' issue. There is a need to work with neighbours, Kent County Council and other partner organisations to avoid/minimise traffic congestion and support delivery of strategic upgrades.
 - The economy – the north of the District is well-connected to sub-regionally and regionally important economic hubs and corridors, including the Thames Gateway.
 - Growth in the north of the District – 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 – the Kent LNRS provides key evidence to inform strategic planning including strategic green/blue infrastructure investment priorities. Planning for the Kent Downs NL is another consideration, including with Tandridge.
 - 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 serves a very extensive catchment.

Part 3: Next steps

8. Plan finalisation

8.1. Further work

- 8.1.1. Subsequent to the current consultation the Council will undertake further work in respect of spatial strategy / site selection including refining site delivery 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 DM policy, both plan-area wide (noting that the Government has committed to publishing National Development Management Policies) and area / site-specific.
- 8.1.2. Once further work has been completed a new set of reasonable alternative growth scenarios will be developed and subjected to appraisal in order to inform plan finalisation.

8.2. Publication of the Proposed Submission Local Plan

- 8.2.1. 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 formally required SA Report will be published alongside the Proposed Submission Local Plan, essentially providing an appraisal of "the plan and reasonable alternatives".

8.3. Submission, examination and adoption

- 8.3.1. 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.
- 8.3.2. 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).

9. Monitoring

- 9.1.1. 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, at the current time, one point to highlight is the need for good data on infrastructure capacity, including transport infrastructure, schools infrastructure and wastewater treatment infrastructure. This data can be crucially important to local plan-making.

