

# Sevenoaks District Council - Unmet Needs Letters

May 2024

Tel No: 01732 227000  
Ask for: Hannah Gooden  
Email: [Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)  
My Ref:  
Your Ref:  
Date: 8 May 2024  
By Email

Dear Sir/Madam

### **Sevenoaks District Council Local Plan 2040: Duty to Co-operate**

Thank you for your response to our recent Regulation 18 consultation. We acknowledge that you referred to this issue as part of your consultation response, but we would also appreciate a response to this letter.

As you're aware, Sevenoaks District Council is working towards the Pre-Submission stage (Regulation 19) of our new Local Plan. The Plan period will extend to 2040. As with most Local Planning Authorities in the Southeast, one of our biggest challenges is meeting our Local Housing Need (LHN), as set by the Government's standard methodology, against a backdrop of environmental and planning constraints. Sevenoaks District is 93% Green Belt and 60% National Landscape (High Weald and Kent Downs AONBs). There are several other notable constraints in the District such significant heritage assets, ancient woodland and areas that fall within flood zones 2 and 3.

We are writing specifically to your local authority in respect of the matters raised in this letter because our evidence indicates that either our respective Housing Market Areas (HMAs) or our Functional Economic Market Areas (FEMAs) overlap or you are an immediate neighbouring authority.

**We are contacting you regarding your potential to meet any of Sevenoaks' unmet housing need.**

In order to maximise the potential supply of housing, we have undertaken:

Chief Executive: Dr. Pav Ramewal

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Kent TN13 1HG

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- 1- A Settlement Capacity study to maximise potential sites in urban areas  
[file:///wkip-sost-02/personal areas\\$/hgooden/Settlement Capacity Study addendum May 2022.pdf](file:///wkip-sost-02/personal%20areas$/hgooden/Settlement%20Capacity%20Study%20addendum%20May%2022.pdf)
- 2- Two calls for sites – firstly for urban (non GB) sites, and then for Green Belt sites.
- 3- An Initial Regulation 18 consultation (2022/23), focused on purely on optimising sites within urban areas, for example through increased density, mixed-use development, and use of brownfield land.
- 4- A Strategic Housing and Economic Land Availability Assessment (SHELAA) update, to identify a wider range of suitable sites.
- 5- Production of development briefs by our urban design team to ensure site capacities are optimised.
- 6- Development of additional relevant supporting studies, including a Targeted Review of Local Housing Needs and a Stage 2 Green Belt Assessment. All supporting studies are available on our evidence base page:  
[https://www.sevenoaks.gov.uk/info/20069131/plan\\_2040/691/plan\\_2040 %E2%80%93 evidence base documents](https://www.sevenoaks.gov.uk/info/20069131/plan_2040/691/plan_2040_%E2%80%93_evidence_base_documents)

Our estimate at present is that there is sufficient land to build approximately 6,831 new homes in urban (non-Green Belt) areas and through existing consents. This equates to a potential **shortfall in housing supply of approximately 3,729 homes** when viewed against the latest LHN figure of  $704 \times 15 = 10,560$  net new homes currently required over the Plan period.

Our most recent Regulation 18 consultation (2023/24) has considered the potential contribution of Green Belt land to help meet this shortfall, but before we progress with this approach, we want to understand whether any of our neighbouring authorities are able to accommodate some or all of this identified unmet need, in accordance with paragraph 146c of the NPPF.

We appreciate that LPAs are at different plan-making stages and many will be in a similar position in terms of meeting their LHN need figure. However, under the 2011 Localism Act<sup>1</sup> and the provisions of the NPPF<sup>2</sup> I am formally asking whether your authority would be able to meet any of Sevenoaks unmet housing need?

**We would particularly appreciate if you could set out the following:**

1. The stage you are at in the Plan making process and expected timetable to produce a Plan;
2. Whether your authority is in a position to assist; and if so, what action is necessary to secure this provision;
3. If you cannot assist, what environmental and planning constraints will prevent you from doing so and to what extent you are able to meet your own LHN figure.

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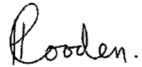
<sup>1</sup> See 33A (“Duty to cooperate in relation to planning of sustainable development”) of the Planning and Compulsory Purchase Act 2004, as inserted by the Localism Act 2011.

<sup>2</sup> In particular, paragraphs 11b, 24 – 27, 35a, 61, 67 and 146c of the NPPF (December 2023).

I look forward to hearing from you on this important issue and would be grateful for a response by **22.05.2024**. Please respond to [hannah.gooden@sevenoaks.gov.uk](mailto:hannah.gooden@sevenoaks.gov.uk) using the subject line "Unmet Housing Need".

If you have any questions, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink that reads "Gooden." with a period at the end.

**Hannah Gooden**

Planning Policy Team Leader

Sevenoaks District Council, Argyle Road, Sevenoaks, Kent, TN13 1HG

01732 227178

[Hannah.gooden@sevenoaks.gov.uk](mailto:hannah.gooden@sevenoaks.gov.uk)

[www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

The person dealing with this matter is Joe Collinson  
Direct Dial 020 3045 5854  
Email Joe.Collinson@bexley.gov.uk  
Date 16 May 2024

## **RE Sevenoaks District Council Local Plan 2040: Duty to Co-operate**

Dear Hannah,

Thank you for your recent letter regarding the potential for the London Borough of Bexley to meet any of Sevenoaks' unmet housing need. This letter responds to the following specific questions set out in your letter which have been answered below:

***“We would particularly appreciate if you could set out the following:***

- 1. The stage you are at in the Plan making process and expected timetable to produce a Plan*
- 2. Whether your authority is in a position to assist; and if so, what action is necessary to secure this provision*
- 3. If you cannot assist, what environmental and planning constraints will prevent you from doing so and to what extent you are able to meet your own LHN figure.”*

### **Local Plan progress**

London Borough of Bexley's development plan consists of the Mayor's London Plan and the Bexley Local Plan. The London Plan was adopted on 2 March 2021, and the Bexley Local Plan was adopted on 26 April 2023. The Local Plan seeks to meet the Mayor's 10-year London Plan housing target of 6,850 new homes. This annual target of 685 units has also been rolled forward across the entire Local Plan period to 2038. The housing target will be met through the development of allocated large sites plus an additional windfall expected from the development of unallocated small sites.

A Statement of Common Ground (SoCG) was jointly prepared and agreed between Sevenoaks and the London Borough of Bexley (LBB) as part of the preparation and examination of LBB's Local Plan. This statement was signed in April 2022 by both parties.

### **London Borough of Bexley's ability to assist with Sevenoaks' unmet housing need**

The London Plan considers all London boroughs to be part of a single housing market area and distributes the identified housing need of London between the boroughs based on their individual opportunities and constraints, and the availability of land. It should be noted that the London Plan was not able to meet all of London's identified development needs given the constraints on land availability in London, and the Mayor has indicated that this will need to be addressed in future iterations of the London Plan where “work will

need to be undertaken to explore the potential options for meeting this need sustainably in London and beyond.”

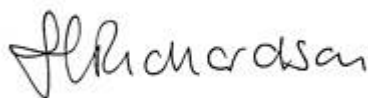
Additionally, the agreed SoCG highlights that LBB and Sevenoaks do not share the same housing market area (being part of the London housing market area and the West Kent housing market area respectively), and that there is limited interaction between the two with regards to housing. This is supported by both LBB’s and Sevenoaks’ Strategic Housing Market Assessments (SHMAs): the demographic data supporting LBB’s SHMA shows that only 1.2% of households that moved to Bexley preceding the 2011 census originated from Sevenoaks, and the average migration inflow from Sevenoaks to Bexley is less than 36 households per year (between 2001-2020).

It must also be recognised that the country is currently experiencing both a cost-of-living crisis and a housing crisis, which are putting acute stress on housing supply and demand in Bexley and across London. This is making it increasingly difficult to meet our own needs, let alone those of our neighbours.

It is acknowledged that Sevenoaks has an identified unmet need for housing which is not possible to meet within its existing settlements, however based on the available evidence and as agreed by both parties in the recent SoCG, the two Local Authorities do not share a housing market area and any unmet need for housing in Sevenoaks would more appropriately be met in the West Kent housing market area. Furthermore, LBB’s housing requirement as set out in the London Plan does not meet local housing need either within Bexley or, when combined with the requirements of other London Boroughs, for the Capital as a whole and the Council is, therefore, not in a position to help meet need from elsewhere.

The Council welcomes all future and ongoing discussions with Sevenoaks District Council under the Duty to Cooperate, as you move through the stages of plan making process.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jane Richardson', written in a cursive style.

**Jane Richardson**

Deputy Director - Housing & Strategic Planning

London Borough of Bexley



Planning Policy and Strategy  
Civic Centre, Stockwell Close, Bromley, BR1 3UH

Email: [ben.johnson@bromley.gov.uk](mailto:ben.johnson@bromley.gov.uk)

Hannah Gooden  
Planning Policy Team Leader  
Sevenoaks District Council  
Argyle Road  
Sevenoaks, TN13 1HG

By email to: [hannah.gooden@sevenoaks.gov.uk](mailto:hannah.gooden@sevenoaks.gov.uk)

21 May 2024

Dear Hannah,

### **Sevenoaks District Council Local Plan 2040: Duty to Co-operate**

Thank you for your letter dated 8 May 2024, regarding the potential for the London Borough of Bromley (LBB) to meet any of Sevenoaks' unmet housing need.

LBB is currently reviewing the Bromley Local Plan. An updated Local Plan timetable is being prepared, but it is envisaged that the review will be taken forward under the new style plan-making system that is due to come into effect later in 2024. Given this, adoption of the new Local Plan is likely to be 2027 at the earliest.

Work is ongoing to establish an up-to-date housing trajectory to address LBBs housing requirement for the new plan period; however, from the work undertaken so far, it is clear that we face significant challenges in addressing this requirement figure, given that Bromley faces many of the same constraints as Sevenoaks. Therefore, **I can confirm that LBB is not in a position to meet any unmet housing need from Sevenoaks.**

It is also important to note that Bromley is part of the London housing market area and is covered by the adopted London Plan<sup>1</sup> prepared by the Mayor of London. The London Plan sets out a London-wide housing need figure; this figure is not disaggregated by borough. The London Plan also sets out a specific housing requirement figure for each borough. As per London Plan policy SD2 (Collaboration in the Wider South East), and given the Mayor's strategic housing supply role, Sevenoaks should engage with the Mayor of London in order to discuss the potential for meeting any unmet need within the Greater London area.

We look forward to engaging with you further in relation to cross-boundary strategic matters in the future, including any Regulation 19 draft Local Plan, and the preparation of a statement of common ground where necessary.

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<sup>1</sup> [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

Yours sincerely,

A handwritten signature in black ink, consisting of the initials 'B.J.' followed by a long, horizontal, slightly wavy line that extends to the right.

Ben Johnson  
Head of Planning Policy and Strategy  
London Borough of Bromley

BY EMAIL ONLY:

FAO: Hannah Gooden, Planning Policy Team Leader

Sevenoaks District Council,  
Council Offices,  
Argyle Road,  
Sevenoaks,  
Kent,  
TN13 1HG

11 June 2024

Dear Hannah,

**RE: Sevenoaks District Council Local Plan 2040: Duty to Co-operate**

Many thanks for your letter of the 8 May 2024, which sets out that Sevenoaks District Council (SDC) is working towards the Pre-Submission stage (Regulation 19) of its new Local Plan. The Plan period will extend to 2040.

Your letter explains the work undertaken to maximise the potential supply of housing in Sevenoaks District, set out at points 1 - 6 of the letter.

SDC estimates that at present there is sufficient land to build approximately 6,831 new homes in urban (non-Green Belt) areas and through existing consents. This equates to a potential shortfall in housing supply of approximately 3,729 homes when viewed against the latest LHN figure of  $704 \times 15 = 10,560$  net new homes currently required over the Plan period.

SDC notes that its most recent Regulation 18 consultation (2023/24) has considered the potential contribution of Green Belt land to help meet this shortfall. However, before progressing with this approach, i.e. Green Belt release, SDC wants to understand whether any of its neighbouring authorities are able to accommodate some or all of this identified unmet need, in accordance with paragraph 146c of the NPPF.

SDC asks neighbouring authorities to set out the following:

- 1. The stage you are at in the Plan making process and expected timetable to produce a Plan;*
- 2. Whether your authority is in a position to assist; and if so, what action is necessary to secure this provision;*
- 3. If you cannot assist, what environmental and planning constraints will prevent you from doing so and to what extent you are able to meet your own LHN figure.*

In reply to each of these, I respond as follows:

## 1) TWBC – Stage of Plan-Making:

Tunbridge Wells submitted its [Submission Local Plan](#) (SLP) for examination in November 2021, and following Examination hearing sessions during March – July 2022, the Inspector wrote to the Council in November 2022 setting out his [“Initial findings”](#) on the SLP.

The principal issues that bear upon the Tunbridge Wells Local Plan’s overall development strategy related to:

- Whether the assessment of sites in the Green Belt had been undertaken on a consistent basis (Inspectors letter paragraphs 1 – 8);
- The need for further consideration to be given to a range of issues in relation to Green Belt release for the proposal for a new settlement at Tudeley Village (SLP allocation STR/SS 3), and to potential alternative ways forward, as posited by the Inspector (Inspectors letter paragraphs 9 – 38);
- The need to give further consideration to an option for strategic growth at Paddock Wood and land in east Capel that does not involve building on land within higher flood zones (Inspectors letter paragraphs 39 – 52).

Following receipt of the Inspector’s Initial Findings Letter, the Council is proposing that the examination of the TWBC Local Plan be progressed with revisions to the Development Strategy in the SLP. The Council has recently consulted on the changes to the development strategy, with all representations received having been submitted to the Inspector. This has included a consultation submission from SDC. Further Stage 3 hearing sessions are scheduled for June and July this year.

In summary, the following changes are proposed:

- Proposed removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan.
- Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2, along with a reduction of employment provision, and reconfigured sport and recreation provision and secondary school education provision.
- At Hawkhurst it is proposed to revise site allocation policy number AL/HA 5: Land to the north of Birchfield Grove, to include housing, and land safeguarded for primary school expansion (in accordance with a planning committee resolution on application reference 22/02664/HYBRID).
- Also, at Hawkhurst, the Council proposes the removal of site allocation policy number AL/HA 8: Limes Grove (March’s Field) from the Local Plan. This site was proposed for employment use in the Submission Local Plan.

As a consequence of the deletion of the strategic Tudeley Garden Village allocation from the SLP, and with reduced growth at Paddock Wood and land at East Capel, Tunbridge Wells is progressing its revised development strategy on the basis of a 10-year housing land supply position. The current 10-year housing land supply position means that Tunbridge Wells is currently unable to meet its own housing needs in full. Tunbridge Wells is proposing an amendment to its development strategy policy (STR 1) to include the requirement for an immediate review of the plan, once adopted. This

will enable the Council to seek ways of providing for its housing growth needs in the period post 2034.

## **2) Whether TWBC can assist with unmet need from Sevenoaks District:**

The reply to Question 1 above explains that the Tunbridge Wells Local Plan, following proposed changes in response to the Inspector's initial findings, no longer meets its housing growth needs in full. TWBC has a 10-year housing land supply over its plan period (to 2028) and is progressing with a commitment to undertake an early review of the Local Plan once adopted.

In this context therefore, Tunbridge Wells Borough Council is unable to assist by accommodating any of SDC's unmet housing need.

Whilst TWBC is sympathetic to SDC's situation, I would like to point out that SDC and TWBC fall within the West Kent Housing Market Area (HMA), having a functional housing market. The Tunbridge Wells Local Plan, including the revised development strategy following the Inspector's initial findings letter, is still reliant upon the release of land from the Green Belt and major development in the High Weald National Landscape. The allocations in the revised development strategy now provide a much smaller buffer of 155 dwellings compared with 1,050 dwellings in the SLP submitted for examination. A buffer has been planned for as it is considered that it is available to provide flexibility in the housing supply, particularly having regard to the high contribution of housing from the strategic site at Paddock Wood and Land at East Capel.

The revised strategy will include the need for an early review of the plan so that the Council can identify future housing sites in accordance with the requirements of the NPPF to meet the longer term need of the borough for later in the plan period (Years 11-15).

## **3: Environmental and Planning Constraints:**

Like Sevenoaks District, Tunbridge Wells Borough is also highly constrained. This is explained in Section 3 of Core Document 3.126 ([Development Strategy Topic Paper](#)) submitted as part of the suite of evidence base documents, supporting our Submission Local Plan. Of particular note is:

- 69% of the Borough is designated High Weald AONB (now High Weald National Landscape);
- 22% of the Borough is Metropolitan Green Belt;
- The borough has a number of, or is close to, areas of ecological importance and there are a number of archaeological and heritage sites within the borough;
- Nearly 7% of the borough is in Flood Zone 3.

As set out in the replies to Questions 1 and 2 above, TWBC is not able to meet its own needs in full and is committing to an early review of its Local Plan once adopted, in order to seek ways of meeting its housing need in the years post adoption.

I trust that these comments are of assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'CHONE', with a long horizontal stroke extending to the right.

**Carlos Hone**  
Head of Planning Services



[www.tmbc.gov.uk](http://www.tmbc.gov.uk)

[www.tmbc.gov.uk](http://www.tmbc.gov.uk)

Hannah Gooden  
Planning Policy Team Leader  
Sevenoaks District Council

**Contact** James Bailey (Head of Planning)  
**Email** [James.Bailey@tmbc.gov.uk](mailto:James.Bailey@tmbc.gov.uk)

By email

Date 22 May 2024

Dear Hannah,

### **Sevenoaks District Council Local Plan 2040 - Duty to Cooperate – Unmet Need**

Thank you for your letter setting out your progress in producing a new Local Plan. As you have highlighted many LPAs are finding it difficult, working with the NPPF 2023, to both meet the requirements for additional housing and at the same time protect nationally designated land, assets, and other matters of acknowledged importance. These are certainly matters of central concern in the emerging Tonbridge and Malling Local Plan.

We are conscious that Sevenoaks District is 93% Green Belt and 60% National Landscape (High Weald and Kent Downs AONBs). Whilst Tonbridge and Malling Borough has approximately 71% Green Belt coverage and 27% National Landscape (High Weald and Kent Downs AONBs), the area of the borough within the West Kent housing market area shared with Sevenoaks is similarly constrained.

Tonbridge and Malling also have a series of other constraints which include flood zones 2 and 3, infrastructure provision including yet to be funded/delivered local and strategic highways schemes, large areas of ancient woodland, sites of importance to nature conservation and biodiversity. In addition, local constraints have been established as matters of acknowledged importance in our on-going evidence gathering and through our earlier Regulation 18 public consultation.

I note that you currently estimate without releasing any Green Belt sites for development over the plan period up to 2040, that SDC has identified a potential shortfall in housing supply of approximately 3,729 homes when considered against the council's latest local housing need figure of 704 dpa, 10,560 net over the plan period. We assume that unless otherwise advised that this unmet need figure will be confirmed when SDC publishes its regulation 19 Local Plan.

Given our similar delivery constraints and challenges, we recognise that exceptional circumstances must be considered and demonstrated if parcels of Green Belt land are to be de-designated for development, and related allocations found sound through the Local Plan process. I am not aware of any precedents where a neighbouring LPA with an identified shortfall of housing or employment land has been regarded at examination, as

having a sufficiently robust case that meets the tests of NPPF para 146 for de-designation of Green Belt in a neighbouring authority. I would however be happy to discuss this further with you.

Given our constraints it is very unlikely that Tonbridge and Malling will be able to accommodate some of Sevenoaks' identified shortfall. TMBC is currently attempting to meet our objectively assessed housing and employment needs. However, as a consequence of new Local Plan evidence, it may become necessary for us to alert and explore with neighbouring authorities any identified shortfalls of our own, in accordance with the duty to cooperate.

We are mindful that our emerging Green Belt evidence has been prepared in alignment with yours, using the same methodology and consultants. Having followed the link provided in your letter SDC's updated Green Belt evidence doesn't yet appear to have been published, and we assume this will accompany your regulation 19 Local Plan.

I am happy to progress this matter having regard to the provisions of NPPF para 146 c), i.e. to further discuss the basis for the request to accommodate some of Sevenoaks' identified need and TMBC's ability to assist, with a view to confirming our positions through a statement of common ground (SoCG). Following your letter this now appears to be necessary, so that we can demonstrate we have met legal compliance in terms of the duty when we reach our respective submission stages. I therefore suggest a meeting be arranged between planning officers in the first instance.

As you are aware we must use best endeavours to fully explore and establish matters in detail in order to report back within our authorities prior to drafting a SoCG, and as per established protocols escalate to prepare for a formal joint Member level meeting to endorse our respective positions.

Currently the TMBC policy team are fully engaged in preparing for a second stage of Regulation 18 consultation as such diary availability is limited. I'm sure however, that we can find a mutually convenient time, hopefully once our next consultation has been made live in July, to hold a structured discussion to confirm our respective positions concerning Sevenoaks' unmet need.

Our current Local Development Scheme is available on our website - <https://www.tmbc.gov.uk/local-plan/local-development-scheme>. It is anticipated that TMBC will submit our Local Plan for Examination within the transition timeframe of 30 June 2025.

Yours sincerely

James Bailey  
Head of Planning

Sent by email

**Planning Services**

**Ask for:** Shazad Ghani

**Telephone:** 01474 337483

**Email:** shazad.ghani@gravesham.gov.uk

**My ref:**

**Your ref:**

**Date:** 22 May 2024

Dear Hannah,

**Sevenoaks District Council Local Plan 2040: Duty to Co-operate  
GBC Officer Response to request regarding meeting some of Sevenoaks District Council –  
unmet housing need.**

Thank you for your letter seeking confirmation as to whether Gravesham (GBC) is able to meet any of Sevenoaks' unmet housing need, pursuant to paragraph 146c of the National Planning Policy Framework (NPPF). In response to your three points, we make the following comments:

**What stage GBC are at in the plan making process and expected timetable to produce a plan.**

GBC is currently preparing a Regulation 19 version of the Local Plan, having undertaken a Regulation 18 Stage 1 consultation in 2018 and a Regulation 18 Stage 2 consultation in 2020. The aim is to submit the Local Plan for examination in advance of the Government's June 2025 deadline. A revised LDS will be published in due course to reflect this timeframe. It is noted that this timetable broadly aligns with that being pursued by Sevenoaks.

**Whether GBC are in a position to assist in meeting any of the potential shortfall of land, and if so, what action is necessary to secure this provision.**

At this stage GBC does not consider that it is able to assist in meeting any of Sevenoaks' unmet housing need, however, we will keep the matter under review and engage with you via the Duty to Cooperate process on this and other matters.

**If GBC cannot assist, what environmental and planning constraints will prevent you from doing so and to what extent are you able to meet your own LHN figure?**

As you are aware from previous correspondence and our Duty to Cooperate meetings, Gravesham is in a similar position in having the challenge of meeting local housing needs (LHN) against a backdrop of environmental and planning constraints.

There are a range of planning and environmental constraints restricting the location of development in the Borough (in line with paragraph 11(b) (i) foot note 7 of the NPPF). For information these are detailed in the Key Constraints background paper, issued at the Regulation 18 Stage 1 consultation. This highlights that 77% of land in Gravesham is designated Green Belt, the eastern half of the Borough, from Shorne southwards, is designated as National Landscape

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(Kent Downs National Landscape) and the northern part of the Borough, along the riverfront is designated a Special Protection Area, Ramsar and SSSI, with much of the area lying within the functional flood plain (Flood zone 2 and 3).

There are also significant heritage assets and areas of ancient woodland and priority habitat within the Borough. Unconstrained areas are therefore limited to the urban area (except the riverfront which is still constrained by flood risk) and rural settlements inset from the Green Belt.

Since the adoption of the Local Plan Core Strategy (2014) a Stage 1 and Stage 2 Green Belt Assessment has been undertaken, and a more focussed Green Belt Assessment is currently underway assessing whether land to the east of Culverstone Green still meets Green Belt purposes. Initial outputs have not identified any areas that do not meet these purposes.

The longstanding strategy for Gravesham has been to optimise the use of previously developed land within the urban areas of Gravesend and Northfleet while protecting the Green Belt and other environmental assets. This approach is embedded in the adopted Local Plan Core Strategy and the emerging Local Plan Review, in line with the NPPF (2023) and Government policy.

The draft evidence informing the work being progressed on the Regulation 19 document, does not identify a surplus of development which can contribute towards meeting unmet needs in neighbouring authorities or elsewhere. This reflects the challenging nature of the borough and complexities of delivering large brownfield sites which form the backbone of supply. Housing completions in Gravesham since the adoption of the Local Plan Core Strategy, have consistently been below the housing needs figure adopted within the Local Plan, unlike neighbouring areas such as Dartford.

As you are aware, Gravesham prepared a Strategic Housing and Economic Needs Assessment (SHENA 2016) which established that Gravesham falls largely within a North Kent housing market area that primarily comprises Dartford, Gravesham and Medway, but is also influenced by the outward migration of households west to east from London along the Thames.

A local Housing Needs Assessment was undertaken in 2021 which confirms that Gravesham is a broadly self-contained housing market area in terms of migration but is part of a wider functionally economic area with Dartford and Medway, which is heavily influenced by London.

The Sevenoaks and Tunbridge Wells Strategic Housing Market Assessment (SHMA, 2015) identified that Sevenoaks falls within a West Kent Housing market area which includes Sevenoaks, Tonbridge and Tunbridge Wells. The January 2022 Local Housing Needs Assessment confirms that Sevenoaks is not a self-contained housing market in terms of migration and is part of a wider functional economic area. It reaffirms that the 2015 SHMA referred to a 'Tunbridge Wells' Travel to Work Area (TTWA) as defined by ONS (August 2015). This includes Sevenoaks District, Tonbridge and Tunbridge Wells; together with Hawkhurst as well as Crowborough and Heathfield in the northern part of Wealden and Rother respectively. Swanley is identified as part of a London TTWA.

The evidence to date confirms that Gravesham and Sevenoaks do not share the same housing market area. This does not mean that there aren't localised housing market connections close to our shared administrative borders, such as at Longfield, Hartley and New Ash Green, however these are not considered to be strategic drivers.

The above provides a summary of where Gravesham is with its emerging Local Plan at the time of writing. We will of course keep you up to date through our regular duty to cooperate meetings as work progresses. As you are aware from our Duty to Cooperate discussions, Gravesham Borough Council has an unmet housing need, which like yourselves cannot be delivered within existing settlements and brownfield sites. As such we would like to maintain our request that both local

planning authorities continue to address unmet need via the Duty to Cooperate process as we progress our respective emerging Local Plans

Please feel free to come back to us if you wish to discuss any points further.

Yours sincerely

*Shazad Ghani*

Shazad Ghani  
Head of Planning Services

Sevenoaks District Council  
Planning Policy  
Argyle Road  
Sevenoaks  
Kent  
TN13 1HG

If calling please ask for Planning Policy  
on 01883722000

E-mail: [LocalPlan@tandridge.gov.uk](mailto:LocalPlan@tandridge.gov.uk)

[Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)

Date: 20 May 2024

Dear Hannah,

**Unmet Housing Need Duty to Cooperate - Tandridge District Council response.**

Thank you for contacting Tandridge District Council as part of your draft local plan process (regulation 18).

Your consultation asks whether Tandridge District Council would be in a position to help Sevenoaks District Council meet some of its unmet housing need. Particularly, we understand that your main three questions are:

1. The stage we are at in the plan-making process and the expected timetable for the production of our Local Plan;
2. Whether we are in a position to assist in either meeting your housing or employment needs, and if possible, to identify how this could be delivered;
3. If we cannot assist, what are the environmental, and planning constraints that will prevent us from meeting this development need, and the extent of the shortfall (Local Housing Needs) in Tandridge District area.

**Plan-making position**

Tandridge District Council submitted 'Our Local Plan 2033' for independent examination in January 2019. The Inspector's Report was published on the 20 February 2024, bringing the examination to a close. The Inspector's final recommendation was that the submitted plan should not be adopted due to soundness issues. At a recent Full Council meeting, the decision to formally withdraw 'Our Local Plan 2033' was made and work will begin on a new Local Plan in Spring 2024.

**Housing Need and Constraints**

Tandridge District Council is not currently in a position where it could help Sevenoaks District Council achieve your housing needs.

**[customerservices@tandridge.gov.uk](mailto:customerservices@tandridge.gov.uk) [www.tandridge.gov.uk](http://www.tandridge.gov.uk)**

Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey RH8 0BT  
Tel: 01883 722000 - Monday-Thursday 8.30-5pm, Friday 8.30-4.30pm - Dx: 39359 OXTED

Tandridge District has major policy constraints, including Green Belt covering 94% of the District, two Areas of Outstanding Natural Beauty (National Landscapes), and extensive areas subject to flooding, as well as significant infrastructure capacity constraints within the District (for example around the M25 J6 and other parts of the strategic road network), all of which can reasonably be expected to significantly reduce the housing requirement.

Such a reduction was accepted at the Examination for 'Our Local Plan 2033'. A final conclusion on Objectively Assessed Need (OAN) was not reached due to cessation of the Examination, however OAN was calculated as ranging between 266 and 470, depending on the choice of annual population projections, substantially less than the estimated Local Housing Need of 639 resulting from the standard method. The Inspector concluded that the housing requirement should be less than OAN, as defined in the 2012 NPPF, due to a number of factors, including the degree of major policy constraints within the district:

*'It is clear to me that there are specific policies of the Framework which indicate that development should be restricted in Tandridge and that in principle, the Plan would be sound in not meeting the OAN in full.'* (Inspectors Report, Annex 1 - ID16, paragraph 44)

Whilst subsequent revisions to the NPPF have introduced the concept of local housing need, the Council nevertheless fully anticipates that the likely future housing requirement will similarly be lower than the local housing need due to the presence of the constraints outlined above.

### Conclusion

We look forward to continuing to work collaboratively with you on planning policy matters.

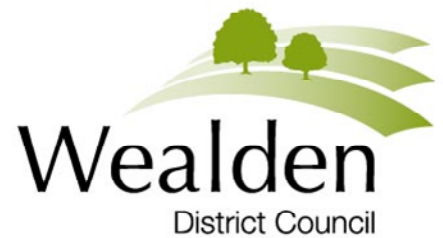
Yours faithfully,

Tandridge Planning Policy

**customerservices@tandridge.gov.uk** **www.tandridge.gov.uk**

Tandridge District Council, Council Offices, 8 Station Road East, Oxted, Surrey RH8 0BT  
Tel: 01883 722000 - Monday-Thursday 8.30-5pm, Friday 8.30-4.30pm - Dx: 39359 OXTED

OUR REF: NW/dp  
**ASK FOR:**  
DATE: 29 May 2024  
YOUR REF:



Hannah Gooden  
Sevenoaks District Council

Head of Planning Policy, Economy &  
Climate Change

By email

Dear Ms Gooden

**Re: Sevenoaks District Council Local Plan 2040: Duty to Cooperate**

Thank you for the letter on 8 May 2024 in relation to a formal request for Wealden District Council (WDC) to accommodate the potential unmet housing needs of Sevenoaks District Council (SDC).

In your letter, SDC has estimated that there is sufficient land to build approximately 6,831 new homes in urban (non-Green Belt) areas and through existing consents. This equates to a potential shortfall in housing supply of approximately 3,729 homes when viewed against the latest Local Housing Needs (LHN) figures of 10,560 (net) new homes over the projected Plan period to 2040.

It is noted in your letter that the most recent Regulation 18 consultation undertaken by SDC that you have considered the potential contribution of Green Belt land to meet this shortfall. However, before you progress this work further, and in line with the provisions of paragraph 146c of the National Planning Policy Framework (NPPF), you wish to understand whether any of your neighbouring authorities are able to accommodate some or all of this identified unmet housing need. The formal request set out in your letter refers to whether WDC would be able to meet any of Sevenoaks unmet housing need. It is noted that you particularly wish for the following to be considered:

1. The stage you are at in the Plan making process and expected timetable to produce a Plan;
2. Whether the authority is in a position to assist; and if so, what action is necessary to secure this provision.
3. If you cannot assist, what environmental and planning constraints will prevent us from doing so and to what extent you are able to meet our own LHN figure.

We endeavoured to provide this information in the paragraphs below, as well as our response to whether we can meet the part, or all of Sevenoaks identified unmet housing need.



## Background

WDC commenced work on a new Local Plan in 2020/21 and has undertaken an eight-week early consultation<sup>1</sup>, named the 'Direction of Travel' consultation, which concluded on 18 January 2021. The Council has since undertaken evidence gathering to support its Local Plan process and has recently updated its Local Development Scheme (LDS)<sup>2</sup> in January 2024. The Council has published and consulted upon the Wealden draft Local Plan (Regulation 18) for eight-weeks between 15 March and 10 May 2024<sup>3</sup>. WDC then expects publication of the Proposed Submission Local Plan Document (Regulation 19) to take place in the Winter/Spring of the 2024/2025, with the Plan itself being submitted to Secretary of State shortly thereafter and by 30 June 2025 at the latest. The expected adoption date of the Local Plan is the Spring/Summer of 2026.

Wealden District is a highly constrained authority with over 53%<sup>4</sup> of the district being located within the High Weald National Landscape, predominantly in the northern part of the district. The district also contains part of the South Downs National Park (SDNP), with over 7% of the district falling within the National Park area. Thus, together, the High Weald National Landscape and the SDNP cover some 60% of the district, in formal recognition of its landscape quality. The local authority area also contains the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), as well as the Pevensey Levels SAC and Ramsar site that are European / internationally designated biodiversity sites. Almost 10% of the district is covered by these sites alongside other Sites of Special Scientific Interest (SSSI)<sup>5</sup>. There are several other notable constraints in the district such as infrastructure provision (particularly major highway improvements), Ancient Woodland and areas that fall within Flood Zones 2 and 3.

In terms of the WDC's own housing needs requirement under the current 'standard method', as described in paragraph 61 of the National Planning Policy Framework (NPPF) (December 2023), this equates to 1,200 dpa. Over the proposed Plan period from 1 October 2023 to 31 March 2040 this equates to an overall need to deliver 19,800 net new homes, excluding any potential unmet housing needs of other neighbouring local authorities.

## Consideration of Unmet Housing Need from the Sevenoaks District Council

### Meeting WDC's Own Housing Needs

As highlighted above, WDC has recently published its Regulation 18 Local Plan for Wealden District on the 15 March 2024, with the consultation closing on Friday 10 May 2024. Through the extensive work we have already undertaken to inform this Regulation 18 Local Plan consultation, we have indicated an overall housing supply figure for the Plan period (1 October 2023 to 31 March 2040) of 15,729 homes. This would achieve an annual target of 953 homes per year.

Therefore, at this stage in the plan-making process, there is a shortfall in housing delivery of 4,071 (net) dwellings, which amounts to a shortfall of 247 dwellings per annum (dpa). This means that the overall housing supply figure for our Regulation 18 consultation is currently a 'capacity' based figure, based on the level of housing that can realistically be delivered within the plan period. The following constraints have impacted upon the potential development capacity of the district:

- Potential highway impacts, particularly around the A22 and A26 corridor, which will likely constrain growth in the south and north of the district respectively, particularly

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<sup>1</sup> [Wealden Local Plan – Direction of Travel Consultation](#)

<sup>2</sup> [Wealden District Council Local Development Scheme \(LDS\), January 2024](#)

<sup>3</sup> [Wealden District Council Draft Local Plan \(Regulation 18\), March 2024](#)

<sup>4</sup> [The High Weald AONB Management Plan 2019-2024](#)

<sup>5</sup> Some of these SSSIs are located within the High Weald National Landscape.

- around Hailsham and Uckfield and the surrounding areas, accounting for cumulative impacts;
- Flood risk, particularly to the southeast of the district and around urban areas that surround Eastbourne;
  - Landscape considerations in relation to the High Weald National Landscape and the setting of the South Downs National Park; and
  - National and international biodiversity designations and habitats across the district.

The above constraints have led to a lack of deliverable sites in sustainable locations within the district to meet our overall housing need. Further details in relation to these constraints is provided within the Interim Infrastructure Delivery Plan (IDP), our Sustainable Transport Evidence Base (STEB), Strategic Flood Risk Assessment (SFRA) and Landscape Assessments that accompany the consultation<sup>6</sup>. Further detailed highways modelling will be undertaken between the Regulation 18 consultation stage and the publication of the Regulation 19 Local Plan to determine whether the potential highway impacts of development in the Local Plan, particularly highway impacts around the A22 and A26, can be mitigated.

Should our overall housing supply position continue to be a 'capacity' based figure as we develop the plan further to the Regulation 19 stage, it will mean that we are unlikely to be able to meet our own housing needs or indeed assist neighbouring local authorities with their 'unmet' housing need. However, WDC will consider this further as we progress the plan to account for any new sites submitted to us through the second formal 'call for sites' process that ran concurrently with the Regulation 18 Local Plan consultation and as we test sites and our growth strategy further with infrastructure providers, including highway modelling. You will also note that we have written to you separately regarding our identified shortfall against our housing need and your ability to meet some of that need.

### Housing Market Area (HMA)

The Wealden Local Housing Needs Assessment (LHNA)<sup>7</sup> was published in August 2021. This latest report concludes with respect to Housing Market Areas (HMAs) that Wealden District is overlapped by several different HMAs, which cross and fall within the district boundary in several locations. The Wealden LHNA confirms that the migration analysis undertaken identified that Wealden has close links to Eastbourne and to a lesser degree with Tunbridge Wells and Lewes. In terms of commuting analysis, this illustrates the main commuting routes for Wealden residents are to Eastbourne, Tunbridge Wells, Lewes and Mid Sussex.

In terms of the LHNA conclusions, the south of the district including, Hailsham and Polegate are considered to fall within an Eastbourne-focused. The northern part of the district including Heathfield and Crowborough are linked to the Sevenoaks and Tunbridge Wells HMA. It should be noted that paragraph 2.87 of that study confirms that for the Sevenoaks, Tunbridge Wells and Tonbridge HMA, that there are close links specifically to Tunbridge Wells, which is confirmed by both the migration and commuting analysis, rather than Tonbridge or Sevenoaks specifically. In terms of mapping of the HMAs that overlap into Wealden District, the Sevenoaks administrative border straddles both the Sevenoaks and Tunbridge Wells HMA at its eastern edge and the Northern West Sussex HMA (primarily associated with Mid Sussex, but also Crawley and Horsham) to the west that incorporates Forest Row.

Sevenoaks District Council published a 'Targeted Review of Local Housing Needs' in January 2022<sup>8</sup> that reviewed the Strategic Housing Market Assessment (SHMA) that was

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<sup>6</sup> Please see our evidence base webpage: <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/wealden-local-plan/local-plan-evidence-bases/>

<sup>7</sup> [Wealden Local Housing Needs Assessment \(LHNA\), August 2021](#)

<sup>8</sup> [Sevenoaks District Council, Targeted Review of Local Housing Needs, January 2022](#)

undertaken in 2015. It at paragraph 2.14 of that document that the 2015 SHMA referred to a 'Tunbridge Wells' Travel to Work Area (TTWA). It goes onto state that this:

*'includes Sevenoaks District, Tonbridge and Tunbridge Wells; together with Hawkhurst as well as Crowborough and Heathfield in the northern part of Wealden and Rother respectively... These conclusions regarding the housing market area remain valid and appropriate'*.

This evidence reiterates that Sevenoaks District, Tonbridge and Tunbridge Wells fall within their own HMA, but that the HMA also overlaps into the northern part of both Wealden and Rother District.

Given the above, the evidence shows that there is some interaction between WDC and SDC in terms of an overlapping HMA (i.e. the Sevenoaks and Tunbridge Wells HMA, although it is noted that the specific linkage with Wealden is with Tunbridge Wells). However, the linkages with Sevenoaks in the case of WDC are not as strong as to the Eastbourne HMA to the south and Tunbridge Wells to the north. In short, if an unmet housing need is anticipated, particularly from EBC or TWBC (who have already written to WDC previously on unmet development needs), these local authorities are likely to be the priority for WDC in terms of meeting unmet housing needs from neighbouring authorities (if we are able to do so) given the stronger connections between WDC and these local authorities.

### Sustainability of New Development

SDC borders the administrative boundary of Wealden District in a rural location to the northwest of Wealden District at Blackham, near to the A264, with the border, and are surrounding it being located wholly within High Weald National Landscape.

Paragraph 74 of the NPPF states that the *'the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)'*. Paragraph 109 of the NPPF also states that *'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'*. It is considered, on sustainability grounds alone, it would be better to address unmet development needs of SDC within and/or adjacent to large regional centres, where jobs, sustainable transport links and retail are largely located. This would be in line with national planning policy on this matter. Substantial development away from these areas, particularly within, or adjacent to the High Weald National Landscape designation, in a rural area, would be considerably less sustainable.

### **Conclusions**

WDC has identified a number of issues above that demonstrates that meeting our own housing requirement, at this stage in the plan-making process, is not possible. However, WDC will consider this further as we progress the Local Plan to the Regulation 19 stage and account for any new sites submitted to us through the second 'call for sites' process that ran concurrently with the Regulation 18 Local Plan consultation and as we test sites and our growth strategy further with infrastructure providers (including detailed transport modelling).

However, turning to your specific request, we are firstly clear that at this stage in the plan-making process, WDC is unable to meet its own local housing needs, with a shortfall of some 4,071 (net) dwellings. WDC is therefore unable to assist in meeting the unmet housing needs of neighbouring authorities at this stage, but this will be kept under review.

Secondly, the evidence from both WDCs LHNA and SDCs SHMA shows that there is some interaction between WDC and SDC in terms of an overlapping HMA (i.e. the Sevenoaks and Tunbridge Wells HMA, although for WDC this meant specifically connections between northern Wealden and Tunbridge Wells), but this is not as strong as the connections between WDC and the Eastbourne focused HMA to the south of the district, or Tunbridge Wells to the north of the district.

Given the above, WDC would not be able to commit at this stage of its plan-making process that it could deliver the suggested amount of unmet housing needs of SDC. However, the Council is developing its evidence base for its new Local Plan and will naturally consider any changes to its evidence base as it progresses through the relevant plan-making stages. We welcome the opportunity to continue having dialogue on these matters as we advance the Local Plan and its supporting evidence base.

I trust that the above comments are helpful and clear at this stage. If you have any further queries, then please do not hesitate to contact us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'NWatters', written over a horizontal line.

Nichola Watters  
Head of Planning Policy, Economy and Climate Change

Sevenoaks District Council - Unmet Needs Letters

November 2025

Tel No: 01732 227000  
Ask for: Hannah Gooden  
Email: [Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)  
My Ref:  
Your Ref:  
Date: 20 November 2025  
By Email

Dear Duty to Co-operate Partner

**Sevenoaks District Council Local Plan: Unmet Need & Duty to Co-operate:  
Formal request to assist with Sevenoaks unmet need**

Thank you for meeting with us recently to discuss the Sevenoaks District Local Plan and our current Regulation 18 consultation, and strategic cross-boundary issues.

We mentioned that we would be writing to you regarding your authority's potential capacity to assist with unmet needs from Sevenoaks and this is that request. This letter follows on from the similar request we sent to you in May 2024. If you are able to respond to this letter by **11 December 2025**, that would be much appreciated. We're happy for your response to be amalgamated with your Regulation 18 response, if that would assist, as our consultation closes on the same date.

Sevenoaks District Council is currently out to Regulation 18 consultation (23 October – 11 December 2025) on our new Local Plan, Regulation 19 publication is scheduled in our LDS to take place in summer 2026, before submission for examination by the end of 2026. As with most Local Planning Authorities in the Southeast, one of our biggest challenges is meeting our Local Housing Need (LHN), as set by the Government's standard methodology, against a backdrop of environmental and planning constraints. Sevenoaks District is currently 93% Green Belt and 60% National Landscape (High Weald and Kent Downs AONBs). There are several other notable constraints in the District such as significant heritage assets, ancient woodland and areas that fall within flood zones 2 and 3.

We are writing specifically to your local authority in respect of the matters raised in this letter because our evidence indicates that either our respective Housing Market

Chief Executive: Dr. Pav Ramewal

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Sevenoaks  
Kent TN13 1HG

t 01732 227000  
e [information@sevenoaks.gov.uk](mailto:information@sevenoaks.gov.uk)  
DX30006 Sevenoaks  
[www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

Areas (HMAs) or our Functional Economic Market Areas (FEMAs) overlap or you are an immediate neighbouring authority.

**We are contacting you regarding your potential to meet any of Sevenoaks' unmet housing need.**

In order to maximise the potential supply of housing, we have undertaken:

- 1- A Settlement Capacity study to maximise potential sites in urban areas
- 2- Three calls for sites – firstly for urban (non GB) sites, and then for Green Belt sites and a targeted call for sites in 2025, focusing on urban, brownfield and potential grey belt land.
- 3- An Initial Regulation 18 consultation (2022/23), focused purely on optimising sites within urban areas, for example through increased density, mixed-use development, and use of brownfield land. A second Regulation 18 (2023/24) which included Green Belt release adjacent to higher tier settlements, and this third, current (2025) Regulation 18 consultation, which targets urban sites, brownfield sites and grey belt sites in sustainable locations.
- 4- An updated Strategic Housing and Economic Land Availability Assessment (SHELAA, 2025) update, to identify a wider range of suitable sites.
- 5- Production of development briefs by our urban design team to ensure site capacities are optimised.
- 6- Development of additional relevant supporting studies, including a Targeted Review of Local Housing Needs and a Green Belt/Grey Belt Assessment. All supporting studies are available on our evidence base page:  
[https://www.sevenoaks.gov.uk/info/20069128/emerging\\_local\\_plan/691/sevenoaks\\_district\\_local\\_plan\\_%E2%80%93\\_evidence\\_base\\_documents](https://www.sevenoaks.gov.uk/info/20069128/emerging_local_plan/691/sevenoaks_district_local_plan_%E2%80%93_evidence_base_documents)

## Housing

The government's latest LHN figure for Sevenoaks is 1,145 dwellings per annum, which over the 15-year plan period amounts to 17,175 net new homes – this represents a 63% uplift from our previous target.

Our current Regulation 18 consultation proposes two options:

- Option 1 – 16,321 units (shortfall of 854 units)
- Option 2 – 18,900 units (buffer of 1,725 or 1.5 years supply)

Option 1, which comprises all the suitable sites from SHELAA, and includes significant Green Belt release, does not meet full need.

Option 2 meets full need, with a modest buffer, and also includes strategic scale sites in the Green Belt and National Landscape.

Our estimate at present is that there is sufficient land to build approximately 2,110 units (allocations) plus 1,311 units (consents) in urban (non-Green Belt) areas and through proposed allocations and existing consents (total 3,421 units). This equates to

a potential shortfall in housing supply of approximately **13,754 homes**, when compared against the 17,175 LHN target.

## **Employment**

In relation to employment land, our evidence base (ENS, 2025) identifies a need for the provision of 40,400 sqm of employment floorspace over the plan period (2027-2042). The Regulation 18 consultation identifies 62,231sqm potential employment floorspace for Option 1 and 49,000sqm additional potential employment floorspace for Option 2. However, almost all of this identified floorspace would be on sites which are currently located in the Green Belt.

## **Gypsy and Traveller Accommodation**

Our Gypsy and Traveller Accommodation Assessment (GTAA, 2025) identifies a need for 192 pitches over the Plan period to 2042. Although many of these pitches are likely to be able to be accommodated within existing sites, all of the existing Gypsy and Traveller sites are located in the Green Belt.

**It is our current understanding that it is unlikely to be the case that adjacent local authorities will be in a position to help meet our unmet needs. Therefore, our current Regulation 18 consultation considers the potential contribution of Green Belt land to help meet this shortfall, but before we progress with this approach, we want to understand whether any of our neighbouring authorities are able to accommodate some or all of this identified unmet need, in accordance with paragraph 147c of the NPPF.**

We appreciate that LPAs are at different plan-making stages and many will be in a similar position in terms of meeting their LHN need figure. However, under the 2011 Localism Act<sup>1</sup> and the provisions of the NPPF<sup>2</sup> I am formally asking whether your authority would be able to meet any of Sevenoaks unmet housing need?

### **We would particularly appreciate if you could set out the following:**

1. The stage you are at in the Plan making process – whether you have recently adopted a plan or your expected timetable to produce a Plan;
2. Whether you are able to meet your own housing and employment needs?
3. Whether your authority is able to assist to meet our unmet housing need and any unmet employment need? If so, please can you provide an indication of the extent to which you are able to do so, if possible.
3. If you cannot assist, what is the justification for your position and what environmental and planning constraints will prevent you from doing so. Please include reference to any key published pieces of evidence used to support your views.

Following receipt and consideration of this information, it is our intention to progress Statements of Common Ground with relevant local authorities to demonstrate our commitment to effective and on-going joint working on the matter of unmet needs.

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<sup>1</sup> See section 33A (“Duty to cooperate in relation to planning of sustainable development”) of the Planning and Compulsory Purchase Act 2004, as inserted by the Localism Act 2011.

<sup>2</sup> In particular, paragraphs 11b, 24 – 27, 36a, 62, 69 and 147c of the NPPF (December 2024).

I look forward to hearing from you on this important issue and would be grateful for a response by **11 November 2025**.

If you have any questions, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink that reads "Gooden." The signature is written in a cursive style.

**Hannah Gooden**

Planning Policy Manager

Sevenoaks District Council, Argyle Road, Sevenoaks, Kent, TN13 1HG

01732 227178

[Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)

[www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

## Hannah Gooden

---

**From:** Loops, Clare <Clare.Loops@bexley.gov.uk>  
**Sent:** 11 December 2025 16:52  
**To:** Hannah Gooden  
**Cc:** Planning Policy; Broughton, Helen; SP&G Team; Salom, Seb  
**Subject:** RE: Duty to Co-operate Session - Sevenoaks District Local Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

CAUTION: This email is from outside Sevenoaks District Council. Only open links or attachments if you trust the sender and content. Forward suspicious emails to itsd@sevenoaks.gov.uk

Dear Hannah,

We have considered your formal request to London Borough of Bexley to assist with unmet need that has been identified in relation to the Sevenoaks District Local Plan.

In response to your specific questions in your request:

**1. The stage you are at in the Plan making process – whether you have recently adopted a plan or your expected timetable to produce a Plan;**

The Bexley Local Plan was adopted in April 2023 and as such is considered to be currently up to date. The timetable for local plan review and production of a new local plan is set out in the [Bexley Local Development Scheme 2025](#)

**2. Whether you are able to meet your own housing and employment needs?**

The Bexley Local Plan sets out policies and sites that demonstrate that the London Plan housing target for Bexley, along with the anticipated growth in employment, can be met. However, from March 2026 the London Plan will no longer be considered up to date as it will be more than five years old, and at this point the Council may need to demonstrate whether its housing requirements can be met when applying the government's standard method of assessing need.

**3. Whether your authority is able to assist to meet our unmet housing need and any unmet employment need? If so, please can you provide an indication of the extent to which you are able to do so, if possible.** Is it unlikely that the Council will be able to assist; at the very least we must wait for a draft London Plan to be published, which currently is timetabled for late May 2026, to understand Bexley's position regarding supply of sites for various uses to contribute to meeting London's growth.

**3. If you cannot assist, what is the justification for your position and what environmental and planning constraints will prevent you from doing so. Please include reference to any key published pieces of evidence used to support your views.**

Sevenoaks District Council and London Borough of Bexley operate in different housing market areas, with the Mayor of London setting housing requirements in the London Plan for London planning authorities. The Mayor has already indicated that it will be a challenge for London to meet its own housing need. The Mayor also sets out other strategic matters in the London Plan such as employment growth in the capital, to which Bexley would contribute. Whilst not a strategic matter, the local matter of providing gypsy and traveller sites has been assessed by the Mayor at a London-wide level, with Bexley providing a local assessment that supported the requirements in the current, adopted Bexley Local Plan.

Further to the above matters, we have a comment to make on proposals in your Regulation 18 Local Plan consultation. This relates to the development sites SWAN11 and SWAN16 that sit at the border with the London Boroughs of Bexley and Bromley in an area of designated Green Belt. The identification of parcels SW02 to SW09 as provisional grey belt is questionable, particularly given their contribution as part of the

wider green belt in this area preventing urban sprawl and the merging of towns. In this context the proposed release of some of these provisional grey belt parcels for development is considered inappropriate.

Kind regards  
Clare

### Clare Loops

Planning Policy Manager  
Strategic Planning Division, London Borough of Bexley  
t: 020 3045 5766 | e: [clare.loops@bexley.gov.uk](mailto:clare.loops@bexley.gov.uk)  
Work pattern - Monday to Friday 09:00 - 17:00  
[View planning policy and guidance for Bexley](#)

---

**From:** Hannah Gooden <[Hannah.Gooden@sevenoaks.gov.uk](mailto:Hannah.Gooden@sevenoaks.gov.uk)>  
**Sent:** 21 November 2025 16:29  
**To:** Loops, Clare <[Clare.Loops@bexley.gov.uk](mailto:Clare.Loops@bexley.gov.uk)>; Broughton, Helen <[Helen.Broughton@bexley.gov.uk](mailto:Helen.Broughton@bexley.gov.uk)>  
**Cc:** Planning Policy <[Planning.Policy@sevenoaks.gov.uk](mailto:Planning.Policy@sevenoaks.gov.uk)>  
**Subject:** Duty to Co-operate Session - Sevenoaks District Local Plan

Dear Clare and Helen

Please find attached a letter, which sets out a formal request to assist with Sevenoaks unmet need, in relation to the Sevenoaks District Local Plan.

We look forward to hearing from you by 11 December  
Best wishes  
Hannah

**Hannah Gooden**  
Planning Policy Manager  
Sevenoaks District Council, Council Offices, Argyle Road, Sevenoaks, Kent, TN13 1HG  
01732 227178  
[Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)  
[www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

*Please note this advice is without prejudice to the decision making processes of the local planning authority and in no way prejudices any future determinations or decisions made by the local planning authority. You are advised to seek your own independent advice on any issues raised in this email.*

---

**From:** Sarah Carter <[sarah.carter@sevenoaks.gov.uk](mailto:sarah.carter@sevenoaks.gov.uk)>  
**Sent:** 28 October 2025 09:41  
**To:** Loops, Clare <[Clare.Loops@bexley.gov.uk](mailto:Clare.Loops@bexley.gov.uk)>  
**Cc:** Broughton, Helen <[Helen.Broughton@bexley.gov.uk](mailto:Helen.Broughton@bexley.gov.uk)>  
**Subject:** Meeting Request - Duty to Co-operate Session - Local Plan

Dear Clare

Thank you for your email.

If, in due course, it is felt that a Duty to Co-operate Session would be of assistance, then please do email me and I will find a suitable date option.

In the meantime, please do let me know if I can be of any further assistance.

Kind regards

*Sarah*

**Sarah Carter**

**PA to Richard Morris - Deputy Chief Executive and Corporate Director - Planning & Regulatory Services**

Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | Kent | TN13 1HG

Tel: 01732 227067

Email: [Sarah.carter@sevenoaks.gov.uk](mailto:Sarah.carter@sevenoaks.gov.uk)

Online: [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

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**From:** Loops, Clare <[Clare.Loops@bexley.gov.uk](mailto:Clare.Loops@bexley.gov.uk)>

**Sent:** 27 October 2025 16:27

**To:** Sarah Carter <[sarah.carter@sevenoaks.gov.uk](mailto:sarah.carter@sevenoaks.gov.uk)>

**Cc:** Broughton, Helen <[Helen.Broughton@bexley.gov.uk](mailto:Helen.Broughton@bexley.gov.uk)>

**Subject:** RE: Meeting Request - Duty to Co-operate Session - Local Plan

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Dear Sarah

Our Cabinet Member is unavailable for the meeting dates. I have briefed him on cross boundary matters following an officer level duty to cooperate session held between Sevenoaks, Bexley and Bromley.

Kind regards

Clare

**Clare Loops**

Planning Policy Manager

Strategic Planning Division, London Borough of Bexley

t: 020 3045 5766 | e: [clare.loops@bexley.gov.uk](mailto:clare.loops@bexley.gov.uk)

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**From:** Sarah Carter <[sarah.carter@sevenoaks.gov.uk](mailto:sarah.carter@sevenoaks.gov.uk)>

**Sent:** 27 October 2025 16:15

**To:** Loops, Clare <[Clare.Loops@bexley.gov.uk](mailto:Clare.Loops@bexley.gov.uk)>; Broughton, Helen <[Helen.Broughton@bexley.gov.uk](mailto:Helen.Broughton@bexley.gov.uk)>

**Subject:** Meeting Request - Duty to Co-operate Session - Local Plan

**Importance:** High

Good afternoon

I am just wondering if you received the email below and if you have been able to liaise with your relevant member/portfolio holder.

My apologies for chasing, but we are keen to confirm a suitable time for this Teams meeting to take place and have the following dates available.

- 10.30am-11am on Wednesday 5 November
- 11.30am-12noon on Monday 10 November
- 12noon-12.30pm on Wednesday 12 November

I look forward to hearing from you soon.

Kind regards

*Sarah*

**Sarah Carter**

**PA to Richard Morris - Deputy Chief Executive and Corporate Director - Planning & Regulatory Services**

Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | Kent | TN13 1HG

Tel: 01732 227067

Email: [Sarah.carter@sevenoaks.gov.uk](mailto:Sarah.carter@sevenoaks.gov.uk)

Online: [www.sevenoaks.gov.uk](http://www.sevenoaks.gov.uk)

---

**From:** Sarah Carter

**Sent:** 20 October 2025 11:35

**To:** [clare.loops@bexley.gov.uk](mailto:clare.loops@bexley.gov.uk); [helen.broughton@bexley.gov.uk](mailto:helen.broughton@bexley.gov.uk)

**Subject:** Meeting Request - Duty to Co-operate Session - Local Plan

**Importance:** High

Good morning

Sevenoaks District Council is launching a Local Plan Regulation 18 consultation which will run 23 October – 11 December 2025.

We are keen to reach out and consult with you at member level at this important stage of our plan-making process.

We would like to arrange a member level Duty to Co-operate session to brief your relevant member/portfolio holder on the plan and to allow them to discuss strategic cross-boundary matters with our portfolio holder, Cllr Nigel Williams. Please can you pass this email onto your portfolio holder/their diary manager to arrange.

Please could you let me know by midday on Friday 24 October if any of the following dates/times are suitable for a virtual meeting:

- Wednesday 5 November (10.30am or 11.30am)
- Monday 10 November (10.30am or 11.30am)

We look forward to hearing from you soon.

Kind regards

*Sarah*

**Sarah Carter**

**PA to Richard Morris - Deputy Chief Executive and Corporate Director - Planning & Regulatory Services**

Sevenoaks District Council | Council Offices | Argyle Road | Sevenoaks | Kent | TN13 1HG

Tel: 01732 227067

Email: [Sarah.carter@sevenoaks.gov.uk](mailto:Sarah.carter@sevenoaks.gov.uk)

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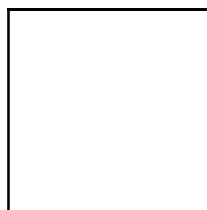
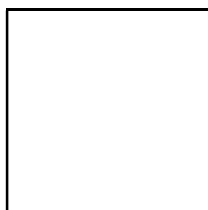
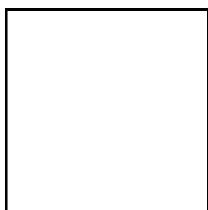
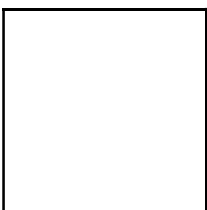
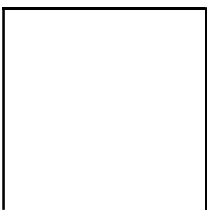
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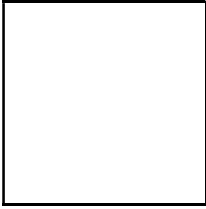
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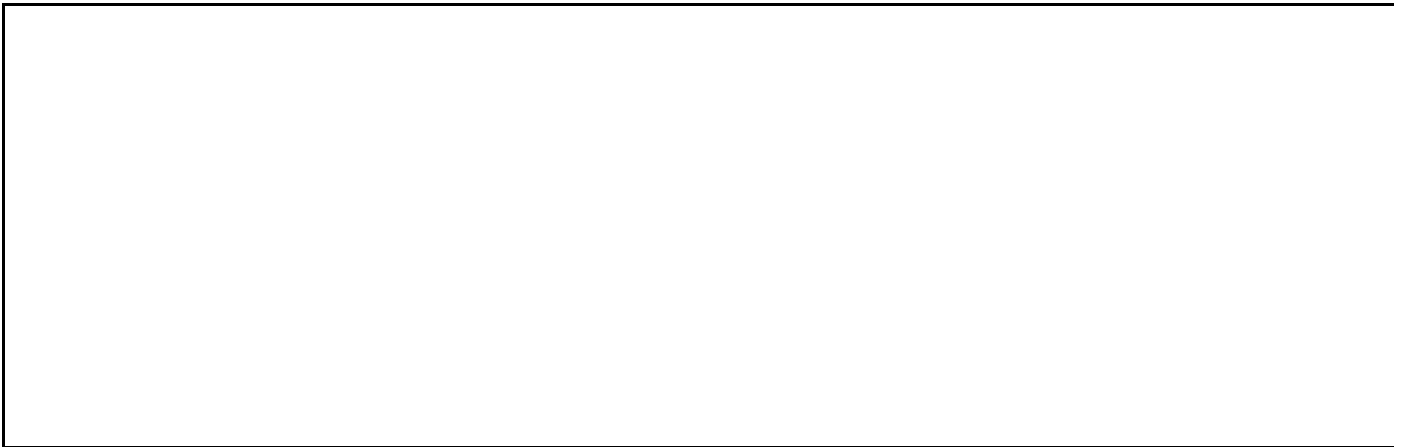
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Strategic Planning Team  
Sevenoaks District Council  
Argyle Road  
Sevenoaks  
TN13 1HG

4<sup>th</sup> December 2025

Dear Hannah,

**Sevenoaks District Council Sevenoaks Local Plan Consultation (Regulation 18, October 2025)**

Thank you for the opportunity to comment on the Sevenoaks Local Plan consultation (2025). We note that this is a consultation (Part 1, November 2022 and Part 2, November 2023) under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.

The consultation is seeking views on updates to policies considering new policy and guidance published by Government, the implications of this for Sevenoaks District Council and how the Council intends to address these changes. Bromley broadly supports the Strategic Issues and Vision and Objectives set out on pages 26 to 31 of the Regulation 18 Local Plan consultation document (October 2025).

Our response also addresses the unmet need and duty to cooperate letter from Sevenoaks dated 20<sup>th</sup> November 2025.

Development Strategy and Housing Supply

The Local Plan Regulation 18 document sets out that there is a need for 17,175 homes over the 15 year period (1,145 homes / annum). As set out on page 15, the first Regulation 18 consultation focussed on housing opportunities within existing settlements and the second Regulation 18 consultation took a more district-wide approach and considered the contribution that Green Belt land could make.

The current consultation document identifies that an additional 6,495 homes are now needed because of the new housing need methodology included in 2024 NPPF guidance. The current consultation document focuses on a broader range of settlements, outside the National Landscape (AONB). Paragraph 1.9 of the document sets out that Green Belt boundaries will only be amended where all other reasonable alternatives have been fully examined, including opportunities in neighbouring authorities.

Bromley is part of the London housing market area and is covered by the adopted London Plan<sup>1</sup> prepared by the Mayor of London. As per London Plan policy SD2 (Collaboration in the Wider South East), and given the Mayor's strategic housing supply role, Sevenoaks should engage with the Mayor of London to discuss the potential for meeting any unmet need within the Greater London area.

Bromley's second Regulation 18 'Direction of Travel' consultation took place between July and September 2025. The London Plan 2021 is currently being reviewed and will provide Bromley with a new housing requirement target which would need to be reflected in the new draft Local Plan. New draft housing targets are unlikely to be known until late 2025 at the earliest. It is anticipated that Bromley will consult on the Regulation 19 draft Local Plan during Q2 of 2026 so the Plan can be submitted for Examination by December 2026.

In response to your letter dated 20<sup>th</sup> November 2025 in relation to neighbouring boroughs Duty to Co-operate and Unmet Need (SDC) Bromley faces many of the same constraints as Sevenoaks and is not in a position to meet any unmet housing or employment need from Sevenoaks. Paragraph 1.15 of the consultation document acknowledges the absence of a commitment from the eight neighbouring authorities who are all varyingly constrained, and therefore the consultation draft considers the potential contribution that Green Belt land in Sevenoaks might make to accommodating new homes in the borough.

The spatial strategy includes two options. Option 1 includes baseline suitable sites and Option 2 includes baseline suitable sites alongside a standalone settlement at Pedham Place (within the National Landscape). It is noted that Option 1 has a shortfall of 854 units and Option 2 exceeds housing need by approximately 1,700 units.

We have no objections to any of the proposed options in principle. Large-scale development close to the Bromley boundary (for example at Swanley and Hextable or a new settlement at Pedham Place) could have knock-on effects for Bromley, for example from increased pressure on strategic and social infrastructure in addition to impacts from areas at high risk of flooding. In this respect it is noted that the scale of development proposed in Swanley has increased significantly (from 755 units to 2360 units) from the previous Regulation 18 consultation and developments are now proposed at Hextable (approximately 1000 units). Whichever option is taken forward, we request that relevant policies and allocations identify and mitigate any potential cross-boundary impacts.

### Gypsy and Traveller provision

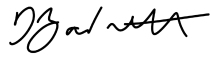
Bromley supports the stated intention in paragraph 2.51 to undertake additional work ahead of the Regulation 19 consultation to identify further sites for allocation to meet gypsy and traveller need within Sevenoaks. The proposed criteria based policy GT2, which would apply to non-allocated sites which may come forward, is supported.

---

<sup>1</sup> [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

We look forward to engaging with you further in relation to cross-boundary strategic matters in the future, including further iterations of the Local Plan policies and allocations, and the preparation of a statement of common ground.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Barnett', written in a cursive style.

Dominique Barnett  
Planning Policy Team Leader  
London Borough of Bromley



BY EMAIL ONLY:

Hannah.gooden@sevenoaks.gov.uk

Hannah Gooden, Planning Policy Manager  
Sevenoaks District Council  
Argyle Road  
Sevenoaks  
Kent  
TN13 1HG

5th December 2025

Dear Hannah,

**Sevenoaks District Council Local Plan: Unmet Need & Duty to Co-operate:  
Formal request to assist with Sevenoaks unmet need**

I refer to your letter dated 20th November 2025, formally asking whether Tunbridge Wells borough is able to accommodate any unmet housing need for Sevenoaks District Council (SDC). It is noted that the unmet need request does not currently relate to employment need, which SDC is proposing to meet through appropriate Green Belt release.

The SDC Regulation 18 Local Plan consultation started on the 23rd October and runs until the 11th December – Tunbridge Wells Borough Council (TWBC) is currently reviewing the consultation documents, with a view to submitting a formal response on or before the December deadline.

It is noted that a big challenge for SDC is meeting its Local Housing Need (LHN) against the backdrop of environmental and planning constraints, which includes the borough being designated 93% Green Belt and 60% National Landscape.

It is noted that SDC and TWBC form part of the same Housing Market Area, and the letter of 20th November sets out what has been done to maximise the supply of housing.

SDC's LHN figure is identified as 1,145 dpa, some 17,175 dwellings over the proposed plan period to 2042.

The Regulation 18 Local Plan being consulted on proposes two options, both of which involve Green Belt release, with Option 2 also including major development in the National Landscape. Option 2 is the only option that would meet the SDC LHN is full, with a buffer of only 1.5 years of supply.

TWBC will comment on these options as part of its response to the Regulation 18 consultation.

The SDC shortfall without Green belt release is identified as approximately 13,754 dwellings. Option 1 (which includes Green Belt release) results in a reduced shortfall of 854 dwellings.

In addition to dwellings, SDCs Gypsy and Traveller Accommodation Assessment (GTAA, 2025) identifies a need for 192 pitches over the Plan period – noting that all existing Gypsy and Traveller sites are located in the Green Belt. In this context, SDC also wishes to understand whether adjacent local authorities are able to accommodate some, or all of this identified unmet need, in accordance with para 147c of the NPPF.

TWBC has considered your request and hopes that this formal response is of assistance.

By way of background, and as discussed at previous DtC meetings, Tunbridge Wells submitted its [Submission Local Plan](#) (SLP) for examination in November 2021, and following Examination hearing sessions during March - July 2022, the Inspector wrote to the Council in November 2022 setting out his ["Initial findings"](#) on the SLP.

The principal issues from the initial findings that bore upon the Tunbridge Wells Local Plan's overall development strategy related to:

- Whether the assessment of sites in the Green Belt had been undertaken on a consistent basis (Inspectors letter paragraphs 1 – 8);
- The need for further consideration to be given to a range of issues in relation to the proposal for a new settlement at Tudeley Village (SLP allocation STR/SS 3), and to alternative ways forward, as posited by the Inspector (Inspectors letter paragraphs 9 – 38);
- The need to give further consideration to an option for strategic growth at Paddock Wood and land in east Capel that does not involve building on land within higher flood zones (Inspectors letter paragraphs 39 – 52).

Following receipt of the Inspector's Initial Findings Letter, the Council proposed that the examination of the TWBC Local Plan be progressed with revisions to the development strategy in the SLP. The Council consulted on those changes, and Stage 3 Hearing Sessions were subsequently held in the summer and autumn of last year.

In summary, the following changes to the TWBC SLP occurred:

- The removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village, a 2,800 home allocation from the Local Plan.
- Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2, along with a reduction of employment provision, and reconfigured sport and recreation provision and secondary school education provision. The reduction in housing numbers is due to updated flood risk modelling, taking account of climate change predictions.
- At Hawkhurst a revised site allocation policy number AL/HA 5: Land to the north of Birchfield Grove, to include housing, and land safeguarded for primary school expansion (at that time, in accordance with a planning committee resolution on application reference 22/02664/HYBRID).

- Also at Hawkhurst, the removal of site allocation policy number AL/HA 8: Limes Grove (March's Field) from the Local Plan. This site was proposed for employment use in the Submission Local Plan.

As a consequence of the deletion of the strategic Tudeley Garden Village allocation from the SLP, and with reduced growth at Paddock Wood and land at East Capel, Tunbridge Wells now has a reduced housing supply of approximately 10 years, rather than the full 15 year housing land supply. With these major changes to the development strategy, TWBC has been unable to meet its own need in full. The housing land supply for the TWBC Local Plan is 678 dwellings per annum. TWBC's housing land supply includes both major development in the High Weald National Landscape and Green Belt release. The Plan meets the borough's employment need in full, largely through one allocation for a prestigious new business park (which has consent and is under construction).

A consequence of the TWBC shortfall is that TWBC is committed to starting work on a Local Plan review within six months of adoption of the current new Local Plan – the examination hearing sessions for that have completed, and earlier this year we consulted on Main Modifications.

On the 14th October 2025 we received the [Inspector's Final Report](#), which in summary concludes that subject to Main Modifications the TWBC Local Plan is 'sound'. The Local Plan is currently working its way through the Committee cycle for adoption. It was taken to the Communities Housing and Environment Cabinet Advisory Board on 11th November (papers for which can be found [here](#)). The Local Plan is being reported to the Council's [Cabinet meeting](#) on the 4th December, finishing with Full Council on the 10th December. The Local Plan review is sought through an amendment to the development strategy policy (STR 1) to include the requirement for the early review of the Plan, once adopted. This will enable the Council to seek ways of providing for its own unmet need.

It is noted that TWBC's new housing need figure is 1,098 dpa – a substantial uplift on the 678 dwellings applied to the new Local Plan.

TWBC acknowledges that Sevenoaks District is a constrained borough, with significant Green Belt and National Landscape coverage in particular, as set out above. This is similar to Tunbridge Wells borough, which is constrained by some 22% Green Belt and around 70% High Weald National Landscape.

In the context of the above, I confirm that TWBC is currently unable to assist SDC with meeting part or all of its unmet housing need – as set out above, TWBC is currently unable to meet its own need in full as part of its Local Plan.

To maximise the supply of housing, TWBC notes that SDC has undertaken:

- 1- A Settlement Capacity study to maximise potential sites in urban areas.
- 2- Three calls for sites – firstly for urban (non-Green Belt) sites, and then for Green Belt sites and a targeted call for sites in 2025, focusing on urban, brownfield and potential grey belt land.
- 3- An Initial Regulation 18 consultation (2022/23), focused purely on optimising sites within urban areas, for example through increased density, mixed-use development, and use of brownfield land. A second Regulation 18 (2023/24) which included Green Belt release adjacent to higher tier settlements, and this

third, current (2025) Regulation 18 consultation, which targets urban sites, brownfield sites and grey belt sites in sustainable locations.

4- An updated Strategic Housing and Economic Land Availability Assessment (SHELAA, 2025) update, to identify a wider range of suitable sites.

5- Production of development briefs by our urban design team to ensure site capacities are optimised.

6- Development of additional relevant supporting studies, including a Targeted Review of Local Housing Needs and a Green Belt/Grey Belt Assessment.

TWBC advocates the following avenues of potential supply (which it is appreciated, SDC may have already fully explored) be thoroughly investigated to establish how these could contribute towards meeting SDCs needs in full. These include:

- In considering the contribution from brownfield land, give consideration of how changes to permitted development rights could contribute towards additional housing supply, potentially through an enhanced windfall allowance in the Plan, and a review of density targets and how they may be increased for previously developed land;
- Clear consideration of the impacts since the COVID 19 pandemic and wider economic restructuring on economic land allocations in the borough, and the changing patterns of the workforce. These could have an impact on employment land requirements, particularly in respect of any existing employment land allocations which may remain unimplemented.

Turning to Gypsy and Traveller pitch provision, TWBC is reliant on a combination of both site allocations and windfall schemes to meet its identified need. Para 6.401 of the [‘Adoption’ version](#) of the Local Plan (which was approved by Cabinet on 4th December) identifies a need of 52 pitches over the Plan period, based on the broader ‘ethnic’ need definition. The TWBC Plan has a permissive policy, Policy H9 Gypsies and Travellers, which applies to both allocated sites and future windfalls. Given that TWBC is reliant on windfall sites coming forward, it is unable to assist SDC with its unmet Gypsy and Traveller pitch unmet need.

Your letter asks that in replying, reference be made to key published pieces of evidence – all supporting documents for the TWBC Local Plan Examination can be found on the [Core Document list](#) which has been kept up to date throughout the examination. Furthermore, the Inspector’s Final Report clearly sets out the key issues examined and the conclusions on these.

I trust that this is of assistance. I’d be happy to discuss any of the above should you wish and look forward to working with you in due course to progress a Statement of Common Ground.

Yours sincerely,



**Ellen Gilbert**  
Planning Policy Manager

## Sevenoaks District Local Plan - Regulation 18 Comments

### 1. In reference to Policy ST1, which is your preferred option?

~~Option 1~~ / Option 2 / ~~None of above~~ (Please delete as appropriate)

Please explain your

Tonbridge and Malling Borough Council (TMBC) strongly supports the aim to meet the identified housing need. However, Policy ST1 as drafted is inconclusive in terms of the Council's commitment to fully meeting identified needs. It states at paragraph 1 that the Plan "aims to ensure that a minimum of 1145 dwellings pa, together with 40,400sqm of employment floorspace is to be developed supported by strategic infrastructure and services". However, Option 1 would accommodate insufficient growth to meet identified housing need. Therefore, Option 1 is not considered to comply with national policy requirements.

TMBC support Option 2 as this does identify sufficient growth to meet need, but only with the inclusion of an additional single large allocation at Pedham Place, which falls wholly within the Kent Downs National Landscape. The inclusion of this allocation would appear contradictory to paragraph 6 of ST1, which states that... "Development within the National Landscape (previously AONB) will be limited to that which can be accommodated whilst still conserving and enhancing its key characteristics, this being mostly small scale, only promoting larger proposals where exceptional circumstances interest are demonstrated."

Given the importance of Pedham Place being delivered during the plan period for 2579 dwellings in order for SDC to meet its identified housing need, we consider that this should be clearly supported within Policy ST1. We acknowledge that SDC conclude at para 1.25 of the Local Plan, that including Pedham Place in the spatial strategy "is the least impactful approach to accommodating development needs in the National Landscape and the most capable of accommodating mitigation and supporting strategic infrastructure". This is supported by the conclusions of the Landscape and Visual Evidence report (November 2024), which tests three spatial options for potential site allocations within the National Landscape:

- Option 1 – baseline sites plus nine smaller sites on the edge of Sevenoaks, Westerham and West Kingsdown, all of which fall in both the green belt and National Landscape;
- Option 2 – baseline sites plus one large stand-alone settlement at Pedham Place near Swanley/Eynsford/Farningham, which also falls in both the green belt and National Landscape; and
- Option 3 – a combined approach of both the above options.

The study concludes that *"Overall, Option 2 (the Pedham Place site) 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 National Landscape, both on and off-site, as well as compensatory mitigation and benefits for local communities".* However, SDC need to confirm with Natural England and the Kent Downs National Landscape Unit through a statement of common ground, that this allocation in the Plan is supported, and that it is compliant with The Levelling-up and Regeneration Act (2023) duty, that requires planning authorities to 'seek to further the purpose of conserving and enhancing the natural beauty of the area'. This is essential to ensure that the site is deliverable in principle. We have been unable to identify where the exceptional circumstances case is set out to justify major development in the National Landscape in the context of paras 189 and 190 of the NPPF amongst the published evidence. Without this, we have concerns about the deliverability of this particular site.

We acknowledge the approach set out in paragraph 2 to maximise the effective use of land, optimise densities, and ensure access to services. However, paragraph 2 appears to limit this approach to development within the boundary of existing settlements only, rather than across the district as a whole. TMBC would support optimising densities and prioritising 'brownfield land' in all sustainable locations. Having reviewed the published Local Plan evidence base we have been unable to identify any work undertaken to specifically consider the optimisation of development densities for the proposed allocations. The published development briefs provide some information, but do not cover all the development allocations in the Local Plan nor Pedham Place.

Paragraph 4 also appears to constrain the location of growth by not including specific reference to Westerham, which the Plan also identifies as a 'town', alongside Edenbridge and Swanley, which have been included in this paragraph. As currently worded, the policy appears to take an inconsistent approach within individual bands of the settlement hierarchy.

Paragraph 5 of policy ST1 supports sustainable patterns of development by amending Green Belt boundaries only in 'exceptional circumstances' where 'grey belt' sites have been identified which have good access to services and facilities, including public transport. The NPPF states at paragraph 148, "*Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations [our emphasis].*" The policy therefore does not fully reflect the steps prescribed here, in omitting reference to the release of other Green Belt locations, if the Council is not able to identify sufficient grey belt sites to meet identified needs. This is pertinent as Pedham Place remains in the Green Belt, so therefore evidence needs to be provided as to why this scale of development could not be accommodated on grey belt land in the district, before considering other such large-scale development in other Green Belt locations. This paragraph should be updated to fully reflect the expectations of the NPPF regarding the release of Green Belt sites.

We have pursued a coordinated approach with SDC in terms of the commissioning of Green Belt evidence, using the same consultants (ARUP) and a broadly aligned methodology, to try and ensure a consistent approach to this cross-boundary issue. As a result of the evidence, TMBC are seeking to fully meet our objectively assessed needs through the allocation of sites in our Regulation 18 Local Plan, which is currently out for public consultation. This includes allocating grey belt land in sustainable locations, as well as small number of other Green Belt locations in the Kent Downs National Landscape to support the growth of these sustainable communities. It is not clear whether SDC have considered a similar approach.

To manage development that may come forward through allocations or speculatively within the Green Belt, TMBC have included specific policies on the Council's approach to this. However, we note that the SDC Regulation 18 Plan does not include specific policies setting out the approach to managing development in the Green Belt. We would suggest that including a policy(ies) on this would be helpful.

As you are aware, TMBC also has significant constraints including 71% Green Belt coverage and 27% National Landscape (High Weald and Kent Downs AONBs) coverage. Furthermore, our borough has other constraints which include flood zones 2 and 3, heritage, highways infrastructure, large areas of ancient woodland, Air Quality Management Areas (AQMAs), internationally, nationally and locally designated nature conservation sites and large areas considered to be the Best and Most Versatile Agricultural Land.

Given these constraints and the work that we have undertaken to date to inform our Regulation 18 Local Plan consultation, we are unable to assist in meeting any of Sevenoaks unmet need as we have communicated previously. We will of course, continue to collaborate with Sevenoaks on strategic matters, as part of the Duty to Cooperate.

## **2. Policy ST2 – submitted under ‘Any further comments’**

**Do you have any comments on or suggested changes to the proposed policy?**

### **Allocations**

This policy currently identifies sites to deliver the level of growth for both spatial strategy options 1 and 2. Option 2 will need to be pursued if the Council is to fully meet its housing need. We note that unimplemented housing and mixed-use site allocations from the ADMP (2015) have been carried forward into this Local Plan and are listed in the policy. We would welcome confirmation that the promoters of these sites have been contacted, that these sites continue to be promoted through the Local Plan process for housing development, and that the Council is confident that these sites all remain suitable, available, and are likely to be delivered during the plan period before 2042.

### **Site capacities**

We note that the site capacities shown in the policy have been provided by site promoters. The Council needs to make the best use of its site allocations; we therefore strongly encourage that site capacity and development density optimisation work is undertaken to check and challenge assumptions that have been provided by site promoters. We note this is to be undertaken through the ongoing preparation of development brief work. This should be pursued urgently as this work is likely to have a material impact upon the ability of the Council to meet its housing need.

### **Traffic**

Tonbridge and Malling Borough Council note that Policy ST2 seeks to allocate land for up to 14,022 dwellings, and that 3123 dwellings are allocated within the Sevenoaks urban area, 2579 are potentially allocated at Pedham Place (option 2), 1189 dwellings are allocated at New Ash Green and that 300 are proposed at West Kingsdown. Taking account of windfalls and sites with consent, this currently increases to a potential delivery total of 4872 for the Sevenoaks urban area, 1261 for New Ash Green and 371 for West Kingsdown, as illustrated at figure 1.5 in the Local Plan document. Cumulatively this growth is likely to have implications for traffic growth on roads that cross the borough boundary, in particular the A20 and A25.

Our Regulation 18 Local Plan allocates developments in the north of the borough, including 3000 dwellings north of Borough Green, 2000 of which are identified for delivery during our plan period before 2042. This site will be subject of further detailed testing as we progress towards Regulation 19. Further testing of cumulative impacts will also be required as we progress towards Regulation 19.

It is possible that there will be a higher level of containment for traffic demand arising from developments proposed within the Sevenoaks urban area. However, local authority partners need to understand clearly the potential cumulative impacts of growth proposed in adjoining boroughs upon the A20 London Road, A25 Sevenoaks Road, and the A227 Gravesend Road.

We note in the published Sevenoaks Local Plan tests report that scenario 2 would result in additional traffic surrounding Pedham Place, including an increase of more than 100 vehicles predicted along the A20 Main Road with resulting increase in journey times. We note that local junction modelling of impacts has yet to be undertaken.

The A227/A20/Bull Lane junction north of Borough Green is identified in our local junction modelling report as requiring mitigation during our plan period. It is important to fully understand the combined future traffic demand upon local roads and junctions, as the delivery of highway infrastructure relating to Borough Green Gardens (3000 dwellings, 2000 during the plan period) will be critical to the delivery of this site.

We therefore look forward to working closely with SDC in confirming sites to be included in our Regulation 19 Local Plans and their phasing, in progressing further transport modelling work. This will ensure that combined traffic demand and impacts arising from neighbouring authority Local Plans and committed developments is well understood, and where necessary appropriate mitigation can be identified.

### **3. Policy H7**

**Do you have any comments on or suggested changes to the proposed policy?**

We support a policy that seeks to optimise densities and to make the best possible use of land brought forward for development, and that ensures that appropriate densities are achieved without detrimental impact on local character or amenity. The criteria included appear to be appropriate and exclude public open space, we assume where this is proposed on-site. However, it is not clear what the evidence is to support the densities set out within part 2 of this policy.

### **4. Policy GT1- submitted under 'Any further comments'**

**Do you have any comments on or suggested changes to the proposed policy?**

We are pleased that the Council has published a recent Gypsy and Traveller Accommodation Assessment. This identifies a need for 192 pitches over the plan period of which 115 pitches are needed within the first 5 years of the plan period.

The Council should be aiming to meet the identified pitch need in full; this is not explicitly expressed in the policy or supporting text. Paragraph 2.49 states that there is a residual need of between 41 and 52 pitches, however Policy GT1 only allocates 23 new pitches. At paragraph 2.53 it is stated that "Not all Gypsy and traveller pitches will be delivered through Local Plan site allocations". The Council need to set out the supply position clearly, as currently the identified need is not being met. Further work will be required to demonstrate that the need can be met for Regulation 19. We suggest that the Council works closely with their consultant to undertake detailed site assessments of existing temporary and permanent Gypsy and Traveller sites, as well as sites promoted through the Local Plan process for this use, to fully understand their potential.

### **5. Policy EMP2 – submitted under EMP1**

**Do you have any comments on or suggested changes to the proposed policy?**

The Council's economy evidence identifies an office (E(g)i need of 25,800sqm requiring 2.6ha of land and an industrial need (B2/B8) of 14,600sqm requiring 3.7ha of land. We support the intention to meet these identified needs as explained in policy EMP1, however the supply position outlined in policy EMP2 is not yet clear. We assume because further work is required to identify suitable

floorspace capacities and uses on some of the employment site allocations. This will need to be fully clarified in the Regulation 19 Local Plan.

Based upon the information presented for the employment site allocations included in the policy, the Council appears to be far exceeding its identified industrial need, however the proportion of B2/B8 floorspace on sites which also include ancillary class E is unclear. Specific class E floorspace is identified at sites SEV26 land at Bartram Farm and PED1 Land at Pedham Place, totalling 26,000sqm. Pedham Place is therefore essential in meeting office demand which we assume would be delivered later in the plan period due to the scale of this allocation.

Clarification should be provided regarding the floorspace and intended use class(s) for all employment allocations in this policy, in the Regulation 19 Local Plan.

## **6. Policy TLC1**

**Do you have any comments on or suggested changes to the proposed policy?**

We support this policy, which seeks to support defined town and local centres to ensure they remain at the heart of local communities, as key locations for retail, leisure, employment and a wide range of other services and facilities. We agree that new development for main town centre uses should be located within defined town centre boundaries, and that the loss of main town centres uses within the primary shopping areas should be resisted.

We note that the Council's Economic Needs Study suggests that the majority of new office floorspace will act as a replacement of that lost to residential conversions and recommends that this should be delivered in town centres, with a preference for Sevenoaks, Swanley and Edenbridge (Local Plan paragraph 3.5). Unless the Council anticipates significant office floorspace windfalls, this is unlikely to be achieved given location of specifically allocated class E floorspace in policy EMP2.

## **7. Policy NE1**

**Do you have any comments on or suggested changes to the proposed policy?**

TMBC are concerned that the potential allocation of Pedham Place is not in conformity with paragraph 2 of Policy NE1, as this would be major development but there does not appear to be any detailed information on how such a development would be in the public interest within the Plan. We consider that if the Council wish to pursue this site, then a case for Exceptional Circumstances is required. As such the wording of this policy should be revised or extended to make this clear, and to avoid potential policy conflict within the Plan.

## 8. Policy T1

### **Do you have any comments on or suggested changes to the proposed policy?**

We support this policy and recognise that there is no single solution that will meet identified transport challenges. An integrated approach is therefore required that seeks to address identified junction and link hot spots, as well as improving mode choice through improved walking, cycling and public transport infrastructure. We welcome the recognition in this policy at paragraph 3 to work with neighbouring authorities to address improvements that are identified to support cross boundary trips.

## 9. Policy IN1

### **Do you have any comments on or suggested changes to the proposed policy?**

We support this policy which requires that *“all new development must be served and supported by appropriate on-and off-site infrastructure and services as identified in the Infrastructure Delivery Plan (IDP) or as indicated by infrastructure providers”* (paragraph 1).

We are however concerned regarding the significant lack of detail in the published IDP October 2025 Statement. This does not currently make clear the full extent of infrastructure required across the borough to support identified site allocations and other developments that may be delivered during the plan period. It is imperative that SDC has a clear understanding of all infrastructure required, as any failure to deliver required infrastructure, services and other facilities could lead to demand where there is a lack of adequate services or facilities, to spill over the borough boundary placing pressure upon neighbouring areas.

TMBC has published an Interim Infrastructure Delivery Plan and accompanying delivery schedules, the content of which will continue to evolve alongside our Local Plan as requirements are identified and details are confirmed. An updated version will be published at Regulation 19 stage. We are willing to work with SDC to support the delivery of any cross-boundary requirements that may be identified, through ongoing partnership working in accordance with the Duty to Cooperate.

Please ask for: Mark Aplin  
E-mail: mark.aplin@dartford.gov.uk  
Date: 11 December 2025

Dear Hannah,

**RE: Sevenoaks District Local Plan 2027-2042 - 3<sup>rd</sup> Regulation 18 consultation**

Thank you for consulting further Dartford Borough Council (DBC). Below we provide comments on the Sevenoaks plan consultation document and your request regarding potentially unmet development needs.

1. Background

1.1 The current consultation is the third iteration of the Regulation 18 stage of the Sevenoaks Local Plan. DBC welcomes the progression of Plans in the area that meet development needs in a sustainable way.

1.2 The programme for plan production (LDS) has also been revised in line with Government deadlines to produce a new plan under the current system/legislation. Submission of the Plan is required before 31 December 2026 for examination during 2027. This will follow a final Regulation 19 consultation in Summer 2026. For next summer and the Sevenoaks Regulation 19 final draft plan, representations will only be made after consideration of DBC's Cabinet.

1.3. The first Sevenoaks Regulation 18 consultation focused on opportunities in existing settlements and the second Regulation 18 considered the potential contribution of Green Belt land adjacent to higher-tier settlements. DBC has responded to previous consultations and engaged in duty to cooperate activities with Sevenoaks. Given the incremental development of the Sevenoaks plan, and as it still has not reached the pivotal publication (Regulation 19) stage, a number of concerns raised by DBC still stand (but are not reiterated in full in this response).

1.4 In December 2024 the Government reviewed housing targets for Local Planning Authorities across the country. This change resulted in a 'local housing need' target of 17,175 set for Sevenoaks (1,145 homes per year). Prior to this change, the housing target was 10,680 homes (712 homes a year), resulting in a 63% increase on previous target.

1.5 This third Regulation 18 consultation focuses on a broader range of settlements in Sevenoaks outside the National Landscape (formerly known as Areas of Natural Beauty) and considers potential sites after a review of land against revised national policy (e.g. 'grey belt land' in the Green Belt). This version of the Local Plan and proposed sites has been prepared with the aim to deliver the required 17,175 new homes over 15 years.

## 2. Proposed approaches to housing growth

2.1 The current version of the Sevenoaks Local Plan consultation proposes two options:

- Option 1 is earmarked to deliver 16,321 new homes and includes a baseline of suitable sites (a shortfall of 854 dwellings).
- Option 2 estimates the delivery of 18,900 new homes and includes baseline suitable sites and Pedham Place, a stand-alone strategic site in the north of the district, located within the National Landscape and near the M25/M20 interchange at Swanley (a surplus of 1,725 dwellings).

2.2 DBC notes growth proposed at three locations included in both options that are on or close to the district boundary, being: Hextable, South Darenth and Hartley.

2.3 Hextable - 1006 new homes, including:

- 178 homes on one PDL (previously developed land/brownfield) site
- 767 homes across nine greenfield sites
- Windfall sites (sites not specifically identified in the Local Plan)

2.4 South Darenth - 370 new homes, including:

- 40 homes across two partial PDL sites
- 289 homes across six greenfield sites
- Windfall sites
- Plus up to 5,000sqm of commercial floorspace

2.5 Hartley - 351 new homes, including:

- 40 homes on one brownfield site
- 31 homes on one PDL site
- 49 homes across two partial PDL sites
- 114 homes on one greenfield site
- Windfall sites
- Plus 1,880sqm of commercial floorspace

## 3. Development Strategy

3.1 The development strategy for Sevenoaks District is to meet development needs in sustainable locations. What this means in practice has been emerging at each consultation stage. This third Regulation 18 consultation focuses on a broad range of settlements and land in the Green Belt that may qualify under the new national 'grey' belt definition: an attempt to meet needs and identify new housing sites in relatively sustainable locations. Green Belt boundaries, including 'grey' belt land, will only be amended where all other reasonable alternatives have been fully examined, including opportunities in neighbouring authorities.

3.2 The settlement hierarchy has been updated to identify additional settlements that can accommodate future growth. This broader range of settlements are as follows:

- Principal Town - Sevenoaks Urban Area
- Towns - Swanley, Edenbridge, Westerham
- Primary Service Settlements - Hartley, Otford, New Ash Green
- Secondary Service Settlements - West Kingsdown, Eynsford, Seal, Kemsing, South Darenth, Pratts Bottom, Hextable
- Train stations (outside National Landscape) - Knockholt, Leigh, Penshurst (Chiddingstone Causeway)

3.3 This updated settlement strategy has newly identified South Darenth and Hextable as secondary service settlements, in close or very close proximity to Dartford Borough. The Plan identifies a density of 30-60 dwellings per hectare (dph) in and around villages and rural locations, which Dartford considers may be greater than existing typical densities at these locations. However, it is recognised that dph measurements paint only part of the density and design picture; and that overall development at lesser density would require more land to meet housing needs.

3.4 DBC continues to have a number of concerns about development intensification and new sites in small and/or rural settlements, namely around ensuring sufficient employment, infrastructure and community services to support new residents, and a general lack of available brownfield land. Proposing a further series of relatively small developments at various locations around villages is highly unlikely to either: make any contribution to infrastructure provision through new on-site facilities; or be a distribution of development that supports the uptake of public transport.

3.5 Some secondary schools in Dartford serve many pupils living in parts of the Sevenoaks District. These Dartford schools (e.g. Wilmington Grammar Boys, Wilmington Grammar Girls, Longfield Academy and Wilmington Academy) are increasingly constrained sites and, being in the Green Belt, are restricted in terms of expansions. Additional development proposed in and around the northern part of the District will exacerbate this pressure. We are concerned that similar pressure will be put on health facilities in Dartford Borough, exacerbating an acute situation were, despite major population growth occurring as planned in Dartford, there has been an almost complete lack of investment in new primary care in particular.

3.6 Further to this, the two train stations closest to South Darenth and Hartley (Farningham Road Station and Longfield Station) are located in Dartford Borough, and it is expected that new residents will be travelling to these stations. The Dartford Plan does not propose development by these locations which is contrary to the clear spatial strategy, achieving sustainable development, brownfield land use, and given local impacts (e.g. limited alternatives to accessing stations other than by car). Additional transport and active travel proposals in the Sevenoaks Local Plan would be welcome to demonstrate how traffic will be managed effectively and active travel promoted, as well as information on how these stations will be able to meet increased demand.

#### 4. Pedham Place strategic site (Option 2)

4.1 The consultation document also includes a second option that includes all of the above in addition to one additional large site. Option 2 of the Sevenoaks Local Plan consultation proposes the development of Pedham Place, a 140-hectare stand-alone strategic site located

within the National Landscape. It is proposed that 2,500 new homes will be supported by new facilities and services.

4.2 We have previously raised concerns about the lack of clarity and detail available for Pedham Place, which has been acknowledged by Sevenoaks. DBC understands the challenges and constraints faced by the District in meeting ambitious future housing targets and identifying suitable sites for development, but, given the lack of additional information, we still consider there will be issues of insufficient on-site infrastructure to function as a self-contained settlement, and that alternative infrastructure mitigation (in both council areas) will not be secured.

4.3 Without significant infrastructure within the site or in the right location in the vicinity, residents are likely to travel to Dartford for their essential needs given the location of Pedham Place, which is close to, but physically separated by, the M25 and A20/M20 (M25 Junction 3) intersection from Swanley. In addition to this barrier to accessing the nearest settlement, it only caters for more basic needs and does not provide for higher order facilities that are not within the development and may be regularly required. The most direct access to key urban services will often be via the A225 in Dartford Borough; for example, there is no train or Fastrack links between the area and Dartford Town Centre. This could have significant knock-on impacts on the local highway network and put increased pressure on infrastructure, services and facilities in Dartford. If the proposal materialises, a substantial package of transport, active travel and other new infrastructure will be required to be agreed in advance.

4.4 Similarly, Sevenoaks should plan positively to contribute towards both meeting sub-regional and national economic and community needs, and ensuring Pedham Place makes substantial provision for jobs, reducing the necessity for all its residents to commute to work elsewhere.

4.5 DBC would expect to see significant progress in these respects prior to the preparation of final draft Sevenoaks Plan for publication. We look forward to involvement and engagement in this and understanding how adverse consequences in Dartford would be mitigated as Sevenoaks works to tackle the negative impacts of the proposal.

4.6 DBC notes that the consultation effectively shows that including Pedham Place makes the difference in terms of not having unmet need in Sevenoaks. The consultation proposals indicates that under Option 2 (including Pedham Place), the government's housing target would be met, thereby enabling Sevenoaks to successfully meet their own housing needs.

## 5. Metropolitan Green Belt

5.1 Both Sevenoaks and DBC feature significant parts of the metropolitan Green Belt in the south-east encircling Greater London. DBC commented earlier this year on the Green Belt methodology Sevenoaks put forward to address national policy and to consider the potential for identifying 'grey belt' land. Several issues were raised by DBC.

5.2 DBC has not had confirmation that these have been fully addressed, however has now identified a worrying feature of the finalised evidence. In the Green Belt Assessment for Sevenoaks District evidence for this consultation, prepared in October 2025, several parcels of Green Belt land at Hextable have been included that cross the boundary between Sevenoaks and Dartford. These sites have been identified as grey belt.

5.3 Sevenoaks Council have informally acknowledged this and confirmed the boundary will be amended in line with district boundaries at the Regulation 19 consultation stage. However, we are concerned about the implications of a published formal study that purports to specify the status of land within Dartford Borough. We request this be addressed as a matter of urgency; the document should be rapidly withdrawn or replaced with a version that does not cover land in Dartford Borough.

## 6. Formal request to assist with Sevenoaks unmet need

6.1 Further to the above comments on the Regulation 18 consultation, we would also like to respond to your letter dated 20 November 2025 regarding Dartford's capacity to assist with unmet need in Sevenoaks. The letter follows on from a similar request in May 2024, and in response DBC raised a number of queries.

6.2 Before responding directly to the latest request from Sevenoaks, DBC must highlight that if Sevenoaks were to proceed with consultation Option 2, there would not be unmet housing need for discussion. More generally however, we recognise the challenges of meeting ambitious Local Housing Need levels set by the Government's standard method, particularly considering the environmental and planning constraints in Kent and Sevenoaks District. We also acknowledge the extensive work that Sevenoaks Council has undertaken in on housing land in the District.

6.3 In response to your four specific questions, we set out the following responses.

**SDC1. The stage you [DBC] are at in the Plan making process – whether you have recently adopted a plan or your expected timetable to produce a Plan.**

6.4 The Dartford Plan to 2037 was adopted in April 2024. There is no requirement for an early review.

6.5 Our recently prepared LDS (recommended for approval in December 2025) has identified work on a new Local Plan to start at the end of 2026 under the proposed new national system (and once legislation has been completed). Progression of a new local plan will likely be disrupted by local government reorganisation.

**SDC2. Whether you [DBC] are able to meet your own housing and employment needs?**

6.6 Dartford Borough Council's adopted Local Plan does not have an identified shortfall and includes policy and land for housing and employment to meet long term needs as set out in national policy. However, the Dartford Plan housing trajectory projected aggregate supply would slip below aggregate need (a housing requirement of 790 PA on average) in the final year of the plan period (2037).

**SDC3. Whether your authority [DBC] is able to assist to meet our unmet housing need and any unmet employment need? If so, please can you provide an indication of the extent to which you are able to do so, if possible.**

6.7 DBC has a demonstrable track record of successful duty to cooperate engagement, as accepted by the Dartford Plan Inspector. DBC is very open to further collaborative work with

Sevenoaks, and to engage and communicate fully to assist Sevenoaks achieve a sound Local Plan.

6.8 DBC notes that at this stage, with the Sevenoaks Plan still evolving and not yet at the final draft publication phase, there is a lack of confirmed housing supply data. If Sevenoaks decides as a result of the current consultation to move forward with Option 1 and exclude Pedham Place, thereby opting to promote a final published plan with a housing shortfall, DBC would remain available to discuss further issues of unmet housing need.

6.9 There remains time in the process for ongoing dialogue and confirmation of data. At present however, the Council would like to advise that it currently appears there are practical and plan-specific circumstances that may hinder DBC's ability to commit to assist in this way.

6.10 DBC has experienced, and fully understands, the complexity and uncertainties of applying the duty to cooperate, and the scale of the challenge to get a legally compliant plan in place. DBC has always advocated for a practical and positive approach to engagement, and in discussing Duty to Cooperate matters. In this respect, the DBC would like to highlight the significant relevant real-world issues that Dartford, Kent and the South East also faces; excessive housing pressure, and risks to precious green and natural spaces.

6.11 There is extensive flood risk in Dartford Town Centre, and there was an increase in the amount of protected land in the Borough, when 260 hectares of land at Swanscombe Peninsula was identified as SSSI (including a growth location in the predecessor local plan Core Strategy was unexpectedly designated). Elsewhere, the majority of the Borough (circa 54%) remains within the metropolitan Green Belt, despite the release of land for Gypsy and Traveller allocations in 2024 for the Dartford Plan.

6.12 DBC clearly and robustly maximised urban capacity in the Dartford Plan, agreed by the Inspector. There is no residual unconstrained land available, with factors such as contaminated sites being significant. DBC clearly demonstrated this in the statement 2 for the MIQs at stage 1 (legal compliance) Local Plan examination hearings, including through an illustrative mapping exercise (statement available on request).

6.13 DBC notes that in some respects Sevenoaks is less constrained than Dartford, with much greater viability meaning scope for land value capture and infrastructure investment and affordable housing provision. DBC has been the second-fastest growing area of the country in the last census and accordingly has a clear infrastructure deficit impacting on the well-being Dartford neighbourhoods. It could be contended that if the low rates of development in Sevenoaks have resulted in fewer urban social issues there may be greater scope for urban intensification and utilisation of infrastructure.

6.14 Environmental, economic and infrastructure planning constraints are significant. DBC is unable not currently able to confirm the extent to which it could assist. One issue is the reality of overall housing delivery rates in recent years in Dartford means that enough new homes are completed such that an amount would be available to be redistributed elsewhere. In terms of housing delivery since the start of the plan period, completions have not met the cumulative requirement in the Dartford Plan. Consistent with this, for the last two years Housing Delivery Test results have been less than 95% of housing need (85% and 90%). Housing Action Plans have therefore been produced that outline how we will address the causes of under-delivery and identify actions to increase the delivery in the coming years. These are predicated on our

current Local Plan and sufficient land flexibility built-in (which nevertheless must operate within national housing market conditions).

6.15 Dartford is also facing similar pressures to Sevenoaks, and the South East more broadly, in meeting housing needs, and housing delivery rates have not been steady. Housing completions have been influenced by national and international economic matters including Brexit and Covid-19, which then impacted on rising costs of construction materials, labour shortages, and inflation, constricting the large housebuilders holding development land in Dartford and delivery by others.

6.16 The impact of practical issues of this kind have been mentioned in previous discussions, in the context of something that could be explored by and with Sevenoaks District to provide insight and greater clarity on duty to cooperate requirements and best practice. There remains uncertainty as review and dialogue on this issue has been not been sufficient to establish a relevant position. This adds to the 'real world' constraints of financial viability, infrastructure, and available land without permission and other factors identified by DBC.

6.17 Significantly, it appears to DBC that Sevenoaks are capable of meeting their own needs (consultation Option 2) which under national policy and the considerations outlined above, renders it unnecessary under current circumstances for commitments to be made when no unmet need may exist.

**SDC4. If you [DBC] cannot assist, what is the justification for your position and what environmental and planning constraints will prevent you from doing so. Please include reference to any key published pieces of evidence used to support your views.**

6.18 Please see paragraphs above, and DBC's response to the last request from Sevenoaks. As we detailed last time, questions remain; and we highlighted that the Dartford Plan is clear that Dartford's planned housing requirement does not lead to a set allocation of housing being reapportioned to any one specific local authority. The Dartford Plan's approach sets out a range of implications which could include for 'needs in the wider area' (paragraph 2.61). This is in the context of overall excess demand pressures in the area as a whole; it would not necessarily be directed in part or whole to Sevenoaks.

6.19 Therefore it is considered very relevant that the functional cross-boundary linkages between the two districts is not as strong as our east-west linkages. This is evidenced and reflected in the signed statement of comment ground (SOCG) between the two parties. Sevenoaks have presented a statistic more recently that may indicate a functional connection may have become less weak, however the councils have not had a chance to discuss this. It remains DBC's understanding that the overall position in the extant of SOCG is appropriate, objectively clear and well-evidenced. It is not believed that the long-standing radial movement through North Kent of people moving out of London eastwards to Dartford and more coastal Kent authorities, and pattern of mass commuting in the other direction back to London, has been overtaken by flows over the Dartford-Sevenoaks boundary. DBC believes strategic decisions under the duty to cooperate may only be effective when they relate to what happens on the ground, and the reality of housing and other functional movements.

6.20 Further detailed information on Dartford's environmental and planning constraints (including infrastructure and viability), such as the SHLAA and SFRA, can be found on our website: [The Dartford Plan – Evidence and Weblinks – Dartford Borough Council](#).

6.21 As set out above, DBC must consider other neighbouring authorities in strategic development. At the time of writing, Gravesham have not yet published their Local Plan (Regulation 19) but it is expected to be released within the next month. At this stage in a Local Plan, duty to cooperate considerations should be close to being completed and the plan itself finalised. This will require full review and consideration by DBC.

6.22 DBC is uncertain if Gravesham have identified a development option where that meets their own need. However, Gravesham have recently made clear they consider their past request to DBC to assist in meeting their needs as still outstanding. Thus, DBC may need to consider not only if it can assist with meeting their needs in practice, but if so, other factors including whose needs should be prioritised to be compliant with legislation and guidance.

6.23 Functional and practical reasons will be further reinforced with upcoming Local Government Reorganisation proposals. Whilst DBC will commence work towards a new local plan, any local plan to be adopted for Dartford in future is likely to be produced by a new authority covering a wider area (and eventually in the context of a spatial development strategy). DBC notes that none of the current reorganisation options pairs Sevenoaks and Dartford, reflecting functional geography.

## 7. Summary on Cooperation

7.1 From the Sevenoaks consultation it is uncertain if assistance from any authority is necessary, given the potential Pedham Place has as an option in meeting housing needs in full; if it is made genuinely sustainable and impacts on all locations properly mitigated (particularly through significant new public transport, active travel, and highway upgrades).

7.2 If that option is set aside, Dartford Council would highlight:

- a) there is no certainty at present that DBC would be in a position to assist with unmet need in practice; and
- b) if this were possible, it does not appear that DBC could currently commit to assisting Sevenoaks given the necessity for further discussion and review of evidence and finalised proposals (including in the context of the expected requirement to decide upon unmet needs arising elsewhere).

7.3 The strong and productive working relationship between Dartford and Sevenoaks is valued, and we wish to reiterate that we look forward to discussing the Sevenoaks Local Plan with you further. Please do not hesitate to contact me with any queries arising on our response.

Yours sincerely,



Mark Aplin MRTPI BA(Hons) MA MSc  
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Our ref: Sevenoaks Local Plan

11 December 2025

Dear Ms Gooden,

**SEVENOAKS DISTRICT COUNCIL LOCAL PLAN: UNMET NEED & DUTY TO COOPERATE AND REGULATION 18 CONSULTATION**

Thank you for your letter dated 20 November 2025 containing Sevenoaks District Council (SDC)'s formal request to Tandridge District Council (TDC) to assist with your area's unmet needs. This letter provides TDC's formal responses to both that request and your Local Plan Regulation 18 consultation.

**Duty to cooperate request to assist with SDC's unmet Needs**

Upon review of your evidence, we agree that it demonstrates that SDC will not be able to meet its Local Housing Need (LHN) in your urban areas alone, which results in a shortfall of 13,754 homes. It is also agreed that SDC will be unlikely to meet its employment needs and Gypsy and Traveller Accommodation in the urban areas and will need to consider whether exceptional circumstances exist to release suitable Green Belt sites through the Local Plan.

While understanding the challenges SDC faces in meeting these needs within your area, at this stage TDC is unable to assist in meeting any of your unmet needs within our boundary. Indeed, on the information currently available, it is unlikely that TDC will be able to meet its own housing needs, let alone assist its neighbours.

The primary reason for this is that TDC is one of the most constrained areas in the country with 94% Green Belt coverage (the highest in the country), large areas covered by two National Landscape designations (Surrey Hills and the High Weald, the former of which is the subject of a proposed extension of around 30%), significant areas at high risk of flooding and major road infrastructure deficits. This makes delivery of any development of scale a significant challenge to bring forward.

In addition, there are several infrastructure deficits, which were most recently identified in TDC's withdrawn Local Plan process. This showed that there are significant safety and capacity issues with access to Junction 6 of the M25 as well as the need for major junction interventions for the M23, both of which are significant constraints to growth in Tandridge district. These issues remain unresolved with no indication that the government will invest in the solutions required to address this in the next round of funding or beyond. In addition to the issues with the strategic road network, TDC is made up of several small settlements all of which have significant localised social infrastructure deficits that raises considerable uncertainty over the sustainability of the area to accommodate significant levels of growth.

It was these significant land use, policy, environmental and infrastructure constraints that led the previous Local Plan inspector to acknowledge in his final report that TDC is an area so affected by constraints that it would be unlikely to meet its full housing needs. This context was most recently also acknowledged by the inspector to the Mid Sussex Local Plan.

These difficulties are compounded by the fact that, because of the December 2024 changes to the standard method, TDC will now have to plan for its own very significant uplift in housing in its new Local Plan. The LHN for TDC as calculated by the latest standard method is 827 homes a year. To put our challenge into context, the mostly recently adopted housing requirement for TDC is 125 homes per year set out in the Tandridge Core Strategy 2008.

TDC recognises that, as a matter of principle, the December 2024 changes to the NPPF (and in particular, the introduction of the concept of “grey belt”) may result in additional sites becoming available. In that regard, work is underway to establish what land is suitable and available to come forward within TDC’s new Local Plan to meet our own needs. This includes similar work that you have undertaken including a Settlement Hierarchy, Housing and Economic Land Availability Assessment, Housing and Economic Needs Assessment, Infrastructure Delivery Plan and Green Belt Assessment being prepared. These studies are due to conclude during 2026 at which point TDC will have greater certainty as to what land can reasonably be made available to contribute towards meeting our own needs in our Local Plan. Until that work is complete, TDC is unable to say for certain what the outcome will be. However, given the extensive constraints documented earlier in this letter, the early indications are that TDC will still not be able to meet its own needs in full and will need itself to consider cross-boundary working with partners to present a long term strategic approach to this issue.

It is in this context that TDC is unable to assist SDC in meeting its unmet needs at the present time. TDC will provide a further update on this once the aforementioned studies have been concluded.

## **SDC Local Plan Regulation 18 Consultation**

Having reviewed SDC’s Regulation 18 consultation document and supporting evidence, TDC recognises and commends the efforts your council is taking to try and meet its needs through the Local Plan process. Our overall view is that the work you have undertaken is in the main thorough in terms of the breadth of evidence prepared and related site searches. While we have some queries over aspects of your methodologies and conclusions, as explained in this letter, TDC supports SDC’s overall approach of trying to meet as much of your needs as possible within your boundary.

TDC does not wish to comment on every aspect of the Regulation 18 consultation document in detail but instead raise several key points for SDC’s consideration going forward.

### **1) Strategic Issues, Vision and Objectives**

TDC agrees with and supports SDC’s identification of the key strategic issues the plan will need to address and the related vision and objectives. Some suggested changes to further strengthen them are as follows:

- General – there is no reference to the importance of protecting the role and function of the Green Belt, which remains a key national objective to which the government affords great weight. Given that 93% of Sevenoaks is currently within the Green Belt, this warrants inclusion of a reference in the overarching vision for the area as it is an integral part of SDC’s character and sense of place.
- V4 OB10 – Add reference to also working with partners such as adjoining local authorities to mitigate the impact of planned growth through co-ordinating the delivery of necessary infrastructure.
- V7 OB19 – this should be strengthened with explicit reference to protecting the status and integrity of National Landscapes as being a key objective for the plan. Without it, this

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objective appears vague and raises questions over the long term protection the plan will seek to have for National Landscapes.

## 2) Development Strategy

TDC supports the identification of Sevenoaks, Swanley and Edenbridge as the principal towns where most of the new development should be focused. This provides the best opportunity to deliver sustainable development on previously developed land within settlement boundaries, which must be SDC's priority and the focus for its development strategy.

TDC also supports the intention to focus major growth outside of the National Landscape given the statutory duties to conserve and enhance the natural beauty of these areas. TDC does, however, have concerns over SDC's approach to Green Belt and related identification of grey belt land as well as the potential for a major new settlement in the National Landscape at Pedham Place. These are explained as follows:

### SDC Green Belt Assessment

As we have previously identified to SDC, there is a difference in our respective Council's Green Belt Assessment methodologies in terms of the definition of the 'large built-up area' for the purposes of our Green Belt reviews. We note that SDC has taken the approach of classifying only Greater London, Dartford urban area and Gravesend and Northfleet urban areas as large-built up area to assess the performance of Green Belt against purpose (a) as defined by Paragraph 143 of the NPPF. As explained in your Green Belt Assessment of 10 October 2025, this is based on recent work undertaken by the ONS, in which only built up areas with a population in excess of 75,000 residents are classified as "large".

TDC would advise caution before seeking to correlate the ONS classification to the application of Green Belt policy. There is no reference or support in the NPPF or PPG for the use of the ONS position to define what should be a large built up area for Green Belt purposes. Instead, TDC notes that the NPPF is clear in Paragraph 142 of the NPPF that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Settlements such as Sevenoaks, Swanley and Edenbridge are clearly urban in character within their developed limits and as such TDC questions whether it is appropriate for SDC to be actively encouraging the urban sprawl of these areas, contrary to NPPF Paragraph 142, by using a narrowly defined, untested and arguably unrelated ONS definition of what a large built-up area is. In TDC's view, the approach taken by SDC has had the unintended impact of identifying more extensive areas of grey belt than would be the case if the requirements of Paragraph 142 of the NPPF were applied as the guiding principle for protecting Green Belt in an area.

These concerns are particularly important because SDC's current approach represents a significant departure from its previous and long-established practice, which took a more localised approach to the identification of "large built-up areas", and included urban areas such as Sevenoaks, which has a population of around 30,000. Critically, that previous approach has been shared by most of SDC's neighbours and is (as far as we are aware) broadly consistent with that taken by most authorities in the South-East.

Without wishing to get into a debate as to whether the meaning of "large built-up areas" is a matter of law or a matter of judgment for individual authorities, it is obviously problematic if neighbouring authorities take a fundamentally different approach to this issue. That is particularly the case where the consequence of SDC's approach is that SDC is making judgments about the status of settlements which are outside its own area, which are not agreed by the local planning authorities for those areas. This applies both in the context of SDC's conclusion that Dartford, Gravesend and Northfleet are large built-up areas, and in the context of its apparent conclusion that other large towns (such as Oxted, Tonbridge and Tunbridge Wells) are not.

In this regard, TDC stresses that (subject to the site-specific comments below) it accepts that it is a primarily matter for SDC to decide for itself to what extent it wishes to release sites from the Green Belt in order to meet its own housing needs. TDC's concern is merely that, in reaching that decision, SDC and its neighbours should take a consistent approach to the interpretation and application of the NPPF. If, contrary to this, SDC considers that the definition of "large built up areas" is a matter for local interpretation, we trust that you would equally accept that TDC's interpretation and methodology (which is likely to differ from yours) is a matter for us.

### Development in National Landscapes

TDC welcomes the general support for protecting the natural beauty of National Landscapes in the Regulation 18 consultation. Our main concern, however, is that this general support could be undermined by the potential allocation of the major new settlement at Pedham Place on land that is both within the National Landscape and the Green Belt.

TDC understands that the inclusion of this site would give SDC an opportunity to meet its needs in full and acknowledges that much of the site is subject to urbanising features by being mostly laid as a golf course that might affect its relative contribution to the overall integrity of the National Landscape. It is noted, however, that much of the evidence for the development of the site appears to come from the site promoter as opposed to SDC.

TDC therefore encourages SDC to ensure its evidence base is sufficiently objective and robust on the assessment of benefits versus harms for Pedham Place in order to determine whether it would reasonably comply with the NPPF requirements for the consideration of development in the National Landscape and Green Belt. Without being satisfied of the case for developing Pedham Place, TDC is not in a position to provide support for its possible allocation in the SDC Local Plan and would urge SDC to simply uphold the NPPF requirement to place great weight on preserving the natural beauty of National Landscapes, which must include all component parts.

### Development Strategy – The Options

Given our position regarding Pedham Place, TDC does not support Option 2. TDC considers at this stage that there are no exceptional circumstances that would justify SDC releasing any land in the National Landscape for development.

Therefore, of the two options TDC would provisionally support Option 1 on the basis that this would have the greatest impact of protecting the National Landscape as well as bringing forward land to make a significant contribution to meeting SDC's needs within its own boundaries. TDC's support for Option 1 is, however, tempered by our concerns over the approach taken by SDC to define its large built up area for its Green Belt assessment. SDC is urged to re-examine this and then re-evaluate what the impact of pursuing Option 1 in full as currently proposed would have on the integrity, role and function of Green Belt in SDC.

### **3) Planned Growth at Edenbridge**

In addition to our concerns regarding the approach taken to its Green Belt Assessment, TDC would request that further information is provided to TDC over the scale of growth at Edenbridge and how any cross-boundary impacts on infrastructure demands are to be managed.

Given that Edenbridge is less than seven miles from Oxted (15-minute drive) there are existing transport and education links that need to be addressed before SDC commits to promoting the delivery of an additional 2,801 homes. School provision is a particular concern with many residents of Edenbridge attending schools in Tandridge District (such as Oxted Secondary School and Dormansland Primary School). While TDC recognises that the intention is for additional infrastructure to be delivered within SDC's boundaries alongside planned growth, the evidence presented in the Regulation 18 does not yet provide TDC with sufficient guarantees that there would be no impact on our services and infrastructure. TDC advises that SDC discuss these

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matters directly with Surrey County Council and us at the earliest opportunity before any further growth at Edenbridge is agreed to be taken forward to Regulation 19 stage.

#### **4) Comments on draft policies**

Other than those areas of concern raised in this letter, TDC has no objections to the content of the draft policies included in the Regulation 18 consultation. They are well drafted and cover the main aspects for the full range of policies required for a Local Plan.

#### **Conclusion**

I trust you find TDC's response helpful as you progress to the next stage of Local Plan preparation. Overall, TDC while having concerns on some specific aspects as is documented, provisionally supports Option 1. This is predicated on SDC being able to justify its approach to Green Belt release as being applicable specifically to SDC as opposed to setting any form of precedent that would apply to other areas. Should you wish to meet to discuss any of these points in further detail I would be very happy to do so at your convenience.

Yours sincerely

*N Perrins*

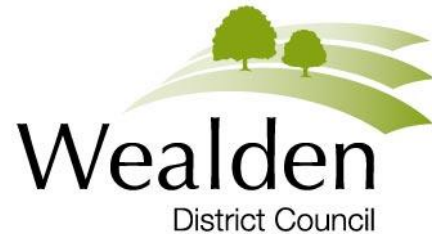
Nicholas Perrins  
Planning Policy Manager  
Tandridge District Council

OUR REF: CS/SLP/Dec25

**ASK FOR:**

DATE: 3 December 2025

YOUR REF:



Planning Policy Team  
Sevenoaks District Council

Head of Planning Policy, Economy &  
Climate Change

By email  
([planning.policy@sevenoaks.gov.uk](mailto:planning.policy@sevenoaks.gov.uk))

Dear Sir/Madam,

### **Response to the Sevenoaks District Plan - Regulation 18 Consultation (December 2025)**

Thank you for the opportunity to formally comment on the emerging Sevenoaks District Local Plan (Regulation 18). We have maintained close engagement and cooperation with Sevenoaks District Council (SDC) through ongoing and effective duty to cooperate meetings throughout the production of our respective Local Plans. Wealden District Council (WDC) supports continual engagement with SDC that would help both Councils to explore opportunities for future joint working, to gather useful information and evidence, and to develop policies in support of our respective Local Plans. We have responded to specific consultation questions of relevance to WDC below within this letter.

WDC note that the proposed plan period is from 2027-2042 to allow for a 15-year plan from adoption. This relies on the Plan advancing to the Regulation 19 stage and being submitted to the Planning Inspectorate before the end of 2026 and being examined and adopted in 2027. The proposed Local Plan seeks to identify a maximum supply of 18,900 (net) dwellings against a housing requirement under the 'standard method' of 17,175 (net) dwellings and deliver 40,400 sq. m. of employment land, which is expected to meet local employment need. Existing retail floorspace is to be retained, and 23 gypsy and traveller pitches are identified against a target of 192 pitches over the plan period. WDC supports the identification of further development sites (considered to meet overall need) since the previous Regulation 18 consultation in November 2023 and the significant advancement of the Local Plan over this time. This is recognised as a significant challenge based on the environmental constraints and designations within Sevenoaks District and the extent of Green Belt (93%), of which you have sought to identify parts which can be considered as Grey Belt land.

#### **Policy ST1 – A Balanced Strategy for Growth**

With regards to the proposed development strategy, WDC supports spatial option 2, which seeks to maximise housing land supply within Sevenoaks District. Whilst this spatial option relies on the delivery of a standalone settlement (Pedham Place) in the north of the district for 2,579 (net) dwellings, it is considered

necessary, in our view to meet overall housing need and on balance would assist in accommodating mitigation and strategic infrastructure.

With regards to Grey Belt development, WDC recognise that the 'settlement hierarchy' approach focuses growth in locations that are sustainable and provides the quantum of development needed. A proportionate and sequential approach is proposed for locations within the National Landscape – initially considering urban and brownfield sites, but not greenfield sites, having liaised with both the High Weald and Kent Downs National Landscape Unit teams. Although the premise of this sequential approach is supported, it is considered that if SDC is unable to meet its full housing needs (or the 'unmet' housing needs of neighbouring local authorities) that every effort should be made to consider sites within the National Landscape that are greenfield sites, if they do comply with the National Planning Policy Framework (NPPF) (December 2024) under paragraphs 189 and 190.

WDC consider that it would also be beneficial for any Grey Belt land that is proposed to be developed to be clearly identified and mapped within the Local Plan (and not just the Green Belt Assessment), to satisfy the requirements of the NPPF.

### **Policy ST2 – Housing and Mixed-Use Site Allocations**

WDC recognise that many of the strategic sites (where detailed site development briefs and visions have been prepared) are located to the north of Sevenoaks District and some way from WDCs administrative boundary. In addition, several other larger site allocations have been listed in draft Policy ST2 (Housing and Mixed-Use Site Allocations). There is a total housing land supply in the south of Sevenoaks District of 2,801 (net) dwellings in Edenbridge and 370 homes in Chiddingstone Causeway. However, it is considered that there are limited cross-boundary infrastructure issues between SDC and WDC given the rural nature of the administrative boundary between the two local planning authorities.

### **Policy GT1 – Provision for the Gypsy and Traveller Community**

SDC identifies the need for Gypsy and Traveller provision equates to 192 pitches over the Plan period. However, only 23 additional pitches for Gypsies and Travellers have been identified to meet this specific accommodation need, which falls far short of the residual need to accommodate pitches. It has been suggested that additional work will be undertaken ahead of the Regulation 19 consultation to identify further sites for allocation to meet this need. WDC supports this and welcomes the additional work to reduce the gap, but would ask to clarify where any unmet need is being met by other planning authority areas in Kent. This is a pertinent issue as Gypsy and Traveller need has been identified as a strategic matter of importance and cooperation within the existing Statement of Common Ground (April 2019) between SDC and WDC and is highlighted as a strategic issue in the NPPF (paragraph 20) and the Planning Policy for Traveller Sites (PPTS).

### **Policy H2 – Provision of Affordable Housing**

WDC supports the sliding scale approach to the affordable housing policy and identified thresholds, with percentage contributions increasing from 0-50% as the site size and number of homes delivered increase. There appears to be anomaly for the contribution of 0% for 6–9-unit development sites (less than 0.5ha) not within the designated area. This anomaly should be explained if this is correct as all other contributions are the same for the type/size of site in or outside the rural area. In addition, the asterisks within the table that relate only to points 6 and 7 within the wider policy is not sufficiently clear for the reader.

### **Policy DE6 – Design Codes**

WDC supports the policy DE6 on design codes and notes the support within national policy to deliver a policy of this type. However, there is question as to why this policy does not apply to

major commercial development in the same way that it will require new development of more than 100 dwellings to produce a Design Code. There is slight ambiguity with the policy overall as the supporting text before it at paragraph 5.18 states that design codes will be required for all allocated sites where a design code is specified in the development brief or windfall sites of a size appropriate for a Design Code as advised by the Council.

### **Policy AF1 – Ashdown Forest**

WDC supports policy AF1 on the Ashdown Forest in line with the joint work that has been undertaken by all relevant local planning authorities within the key area of influence of the Ashdown Forest Special Protection Area (SPA). However, for consistency with the proposed draft policy NE5 (Ashdown Forest SPA) of the Regulation 18 Wealden Local Plan (March 2024)<sup>1</sup>, and to bolster the policy in relation to air quality impacts, we recommend that under a heading of 'air quality' additional text could be added as follows:

*'new development that is likely to result in increased traffic will need to be assessed through a site specific HRA at the application stage to consider any air quality impacts to present adverse effects on the integrity of the Ashdown Forest SAC'.*


WDC are committed to work together with all relevant authorities on planning matters in relation to the Ashdown Forest and we welcome SDCs support and commitment to this through the recent signing and completion of the Statement of Common Ground (SoCG) on the Ashdown Forest SAC (November 2025).

### **Policy IN1 – Infrastructure Delivery**

WDC support the draft policy and note the reference in the last paragraph under section 4, in terms of working with neighbouring authorities to ensure the necessary physical, social and environmental infrastructure is provided to support development. WDC support ongoing conversations with SDC on any cross-boundary infrastructure impacts as the Local Plan progresses, so that these can be addressed in our respective Infrastructure Delivery Plans (IDPs). At this stage, it is identified that there are no significant cross-boundary infrastructure impacts or issues between WDC and SDC as they are not required to support the proposed development strategy, but we will keep this conversation open as both emerging Local Plans are developed.

Thank you for consulting with WDC on the Regulation 18 version of the Sevenoaks District Local Plan. Please do not hesitate to contact us if you wish to discuss this response further. We look forward to working together with you, continuing our Duty to Cooperate meetings and updating our joint SoCG as our respective Local Plans progress.

Yours faithfully,



Nichola Watters  
Head of Planning Policy, Economy and Climate Change

---

<sup>1</sup> [Draft Wealden Local Plan \(Regulation 18\), March 2024](#)

Hannah Gooden  
Planning Policy Manager  
Sevenoaks District Council

By Email to: [Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)

Date: 2 December 2025

Dear Hannah,

**RE: Sevenoaks District Council Local Plan: Duty to Co-operate. Unmet need letter.**

Thank you for your letter dated 20 November 2025, in which you formally ask whether Maidstone Borough Council (MBC) can meet any of Sevenoaks District Council's unmet housing need.

The Duty to Co-operate, as set out in Section 110 of the Localism Act 2011, requires local planning authorities to co-operate in relation to strategic cross-boundary issues. Unfortunately, published evidence around travel to work areas, housing market areas and functional economic market areas does not indicate any form of meaningful overlap with Sevenoaks District. Nor does the boundary of Maidstone Borough adjoin the boundary of Sevenoaks District.

Following receipt of the Planning Inspector's final report on 8<sup>th</sup> March 2024, Maidstone Borough Council adopted its Local Plan Review (LPR) at a meeting of the Full Council on 20<sup>th</sup> March 2024. Full details can be viewed here: <https://localplan.maidstone.gov.uk/home>. Given the recent adoption of the LPR and the growth requirements contained within it, MBC is not in a position to change the LPR.

MBC would therefore encourage Sevenoaks District Council to further engage with their neighbouring authorities in seeking to meet any unmet needs.

I trust this response clearly sets out the position of MBC and suitably explains the reasons as to why the authority is not in a position to meet any unmet housing needs of Sevenoaks District at this time.

Your sincerely,




Karen Britton  
Head of Planning and Economic Development  
Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent ME15 6JQ  
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**Maidstone Borough Council**

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Sevenoaks District Council - Unmet Needs Letters

May 2026

Tel No: 01732 227000  
Ask for: Hannah Gooden  
Email: [Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)  
My Ref:  
Your Ref:  
Date: 27 May 2026  
By Email

## Sevenoaks District Council Local Plan: Unmet Need & Duty to Co-operate

Thank you for your response to our November 2025 letter regarding the above. We have reviewed all the responses from our neighbouring authorities, together with the responses to our recent Regulation 18 consultation.

This letter now provides an update on our housing supply position as we move forward to Regulation 19 publication the summer. The proposed publication dates (subject to member approval) are 23 July – 17 September 2026.

**We are still proposing to fully meet our housing and other development needs. However, this will include Green Belt release and therefore we are contacting you again regarding your authority's potential capacity to assist with unmet needs from Sevenoaks, in accordance with paragraph 147c of the NPPF, and this is that request.**

If your position is unchanged from your response to our November 2026, please could you respond to that effect, by **17 June**. If your position on any of the questions below has changed, please could you provide an update, by **17 June**.

We would particularly appreciate if you could set out the following:

1. The stage you are at in the Plan making process – whether you have recently adopted a plan or your expected timetable to produce a Plan;
2. Whether you are able to meet your own housing and employment needs?
3. Whether your authority is able to assist to meet our unmet housing need and any unmet employment need?
4. If you cannot assist, what is the justification for your position and what environmental and planning constraints will prevent you from doing so. Please include reference to any key published pieces of evidence used to support your views

Chief Executive: Dr. Pav Ramewal

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We are writing specifically to your local authority in respect of the matters raised in this letter because our evidence indicates that either our respective Housing Market Areas (HMAs) or our Functional Economic Market Areas (FEMAs) overlap or you are an immediate neighbouring authority.

We are aware that the Duty to Co-operate (DtC) ceased to be a legal test for Local Plans from 25 March 2026, but will still be considered through the assessment of soundness during the Local Plan examination process. Inspectors will still expect to see evidence of LPAs maintaining effective co-operation in line with national policy requirements. Therefore, and as discussed at our recent officer DTC meeting, Statements of Common Ground (SoCG) are in preparation to set out co-operation and positions on strategic cross boundary matters, as required by the NPPF.

## **Housing**

The government's latest LHN figure for Sevenoaks is 1,164 dwellings per annum, which over the 15-year plan period amounts to 17,460 net new homes.

Our draft Regulation 19 Plan outlines sufficient land to build 1,494 units (allocations) in urban (non-Green Belt) areas and 4,943 units through existing consents and windfalls. This equates to a shortfall in housing supply of approximately **11,023 homes**, when compared against the 17,460 LHN target.

## **Employment**

In relation to employment land, our evidence base (ENS, 2025) identifies a need for the provision of 40,400 sqm of employment floorspace over the plan period (2027-2042). The draft Regulation 19 Plan identifies approximately 100,000 sqm employment floorspace. However, almost all of this identified floorspace will be on sites which are currently located in the Green Belt.

## **Gypsy and Traveller Accommodation**

Our Gypsy and Traveller Accommodation Assessment (GTAA, 2025) identifies a need for 192 pitches over the Plan period to 2042. We have included site allocations in the Regulation 19 Plan and some pitches are able to be accommodated within existing sites, but all of the existing Gypsy and Traveller sites are located in the Green Belt.

We appreciate that LPAs are at different plan-making stages and many will be in a similar position in terms of meeting their LHN need figure. However, under the provisions of the NPPF<sup>1</sup> we are formally asking whether your authority would be able to meet any of Sevenoaks unmet need?

I look forward to hearing from you on this important issue and would be grateful for a response by **17 June 2026**.

If you have any questions, please do not hesitate to contact me.

---

<sup>1</sup> In particular, paragraphs 11b, 24 – 28, 36a, 61, 67 and 147c of the NPPF (December 2024).

Yours faithfully

*Gooden.*

**Hannah Gooden**

Planning Policy Manager

Sevenoaks District Council, Argyle Road, Sevenoaks, Kent, TN13 1HG

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## Hannah Gooden

---

**From:** Barnett, Dominique <Dominique.Barnett@bromley.gov.uk>  
**Sent:** 10 June 2026 13:14  
**To:** Hannah Gooden; Planning Policy  
**Cc:** Glavin, Claire  
**Subject:** RE: Sevenoaks Local Plan - request to assist with Sevenoaks unmet need

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Dear Hannah,

I can confirm that there has been no change to our position set out in our letter dated 4<sup>th</sup> December 2025. We will continue to engage with you as you progress to Regulation 19 and during the preparation of a Statement of Common Ground.

Kind regards,

Dominique

### **Dominique Barnett | Planning Policy Team Leader**

London Borough of Bromley  
Bromley Civic Centre, Churchill Court, 2 Westmoreland Road, Bromley, BR1 1AS  
[dominique.barnett@bromley.gov.uk](mailto:dominique.barnett@bromley.gov.uk)

---

**From:** Hannah Gooden <Hannah.Gooden@sevenoaks.gov.uk>  
**Sent:** 27 May 2026 10:52  
**To:** Planning Policy <Planning.Policy@sevenoaks.gov.uk>  
**Subject:** Sevenoaks Local Plan - request to assist with Sevenoaks unmet need

Dear neighbouring authority

Further to our DTC letter November 2025, please find attached an update letter, which sets out a formal request to assist with Sevenoaks unmet need, in relation to the Sevenoaks District Local Plan, in advance of Reg.19 publication this summer.

Please do let me know if you have any queries and we look forward to hearing from you by 17 June.

Kind regards  
Hannah

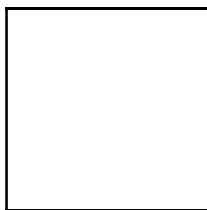
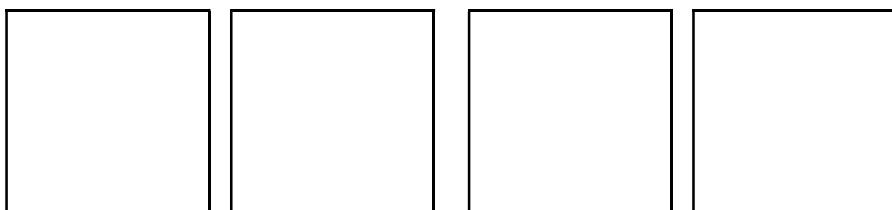
**Hannah Gooden**  
Planning Policy Manager  
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[Hannah.gooden@sevenoaks.gov.uk](mailto:Hannah.gooden@sevenoaks.gov.uk)  
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*Please note this advice is without prejudice to the decision making processes of the local planning authority and in no way prejudices any future determinations or decisions made by the local planning authority. You are advised to seek your own independent advice on any issues raised in this email.*

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### Planning Services

Please ask for: Mark Aplin  
E-mail: mark.aplin@dartford.gov.uk  
Date: 9 June 2026

Dear Ms. Gooden,

#### **RE: Sevenoaks District Council Local Plan: Unmet Need & Duty to Co-operate**

Thank you for your letter dated 27 May 2026 providing an update on the housing supply position of Sevenoaks.

We understand that Sevenoak's Draft Regulation 19 Plan is able to accommodate 6,437 dwelling, resulting in a housing supply shortfall of approximately 11,023, and approximately 100,000 sqm employment floorspace, mostly located within the Green Belt.

We also understand that Sevenoaks are still proposing to fully meet development need, which will include the release of Green Belt land. In accordance with paragraph 147c of the NPPF this requires contacting neighbouring authorities on their capacity to assist in meeting Sevenoak's unmet needs.

Our position remains unchanged from our letter sent November 2025, but we have provide an update to Question (1) below.

#### **(1) The stage DBC are at in the Plan making process – whether you have recently adopted a plan or your expected timetable to produce a Plan.**

1.5 In accordance with the new national planning system, local authorities with an up-to-date local plan are required to reach Gateway 1 for a new Local Plan by 30 April 2027 or by the time their plan is 5 years old, whichever is the latest. This gives DBC a Gateway 1 target date of April 2029. There is no requirement for an earlier review. Our recently prepared LDS (approved by Cabinet in December 2025) has identified work on a new Local Plan to start at the end of 2026 under the new national system. Progression of a new Local Plan will likely be disrupted by local government reorganisation.

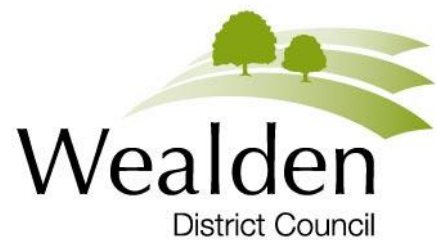
Please do not hesitate to contact me with any queries arising from our response.

Yours sincerely,



Mark Aplin MRTPI BA(Hons) MA MSc  
Strategic Planning & Infrastructure Manager,  
Planning Services,  
Dartford Borough Council

OUR REF: NW/dp  
**ASK FOR:**  
DATE: 16 June 2026  
YOUR REF:



Planning Policy Team  
Sevenoaks District Council

Head of Planning Policy, Economy &  
Climate Change

By email

Dear Ms Gooden

**Re: Sevenoaks District Council Local Plan: Unmet Need & Duty to Co-operate**

Thank you for your letter on 27 May 2026 in relation to a formal request for Wealden District Council (WDC) to accommodate the potential unmet development needs of Sevenoaks District Council (SDC). Thank you also for arranging a meeting with us on the 11 June 2026 to discuss the Sevenoaks District Regulation 19 Local Plan, and the strategic cross-boundary issues.

In your letter, you have provided an update to your housing land supply position as you move forward to the Regulation 19 publication this summer (scheduled for 23 July to 17 September 2026). The letter notes that you are still proposing to fully meet your housing and other development needs, but that this will include substantive Green Belt release. The letter states under the 'standard method' calculation for housing need (paragraph 62 of the National Planning Policy Framework (NPPF)), that for the 15-year plan period between 2027 and 2042, there is a need for 17,460 (net) new homes (or 1,164 dwellings per annum (dpa)) in Sevenoaks District. It notes that the current draft Regulation 19 Local Plan outlines that there is sufficient land to build 1,494 units (allocations) in urban (non-Green Belt) areas and 4,943 units through existing consents and windfalls. This equates to a shortfall in housing supply of approximately 11,023 homes, when compared against the Local Plan target (noting that Green Belt release will deliver the remainder).

Your preferred spatial strategy for housing will require the significant release of Green Belt land and in line with the provisions of paragraph 147c of the NPPF (December 2024), you wish to understand whether any of your neighbouring authorities are able to accommodate some, or all of this identified unmet housing need, before formally considering Green Belt release, so that all other reasonable options for meeting development needs are fully examined.

With respect to employment provision, your evidence base identifies a need for 40,400 sqm of employment floorspace over the plan period. The draft Regulation 19 Local Plan proposes approximately 100,000 sqm of employment floorspace, although almost all of this will require the significant release of Green Belt land. It is also noted that all existing Gypsy and Traveller pitches are located within the Green Belt, and new provision will require the release of Green Belt land. The formal request set out in your



letter refers to whether WDC would be able to meet any of Sevenoaks unmet development needs. It is noted that you particularly wish for the following to be considered:

1. The stage we are at in the Plan making process – whether we have recently adopted a plan or the expected timetable to produce a Plan;
2. Whether we are able to meet our own housing and employment needs?
3. Whether our authority is able to assist to meet your unmet housing need and any unmet employment need?
4. If we cannot assist, what is the justification for our position and what environmental and planning constraints will prevent us from doing so. Please include reference to any key published pieces of evidence used to support our views.

We have endeavoured to provide this information in the paragraphs below, as well as our response to your overarching request.

## **Background**

In terms of our Local Plan timetable, WDC commenced work on a new Local Plan in in 2020/21 and has previously undertaken an eight-week early consultation<sup>1</sup>, named the ‘Direction of Travel’ consultation, which concluded on 18 January 2021. The Council then published and consulted upon the Wealden draft Local Plan (Regulation 18) for eight-weeks between 15 March and 10 May 2024<sup>2</sup>. Following revisions to the NPPF (December 2024), WDC chose to publish a ‘Focused’ Draft Wealden Local Plan (Regulation 18) to reconsult on its revised spatial strategy and this closed on 30 March 2026. Alongside this, WDC also published its latest Local Development Scheme (LDS) in January 2026<sup>3</sup>. WDC is aiming for the publication of the Proposed Submission Local Plan document (Regulation 19) to take place in Quarter 2 of 2026/2027 and its submission of the Local Plan in Quarter 3 of 2026/2027 and at least by end of 2026.

Wealden District is a highly constrained authority with over 53%<sup>4</sup> of the district being located within the High Weald National Landscape, predominantly in the northern and eastern parts of the district. The district also contains part of the South Downs National Park (SDNP), with over 7% of the district falling within the National Park area. Thus, together, the High Weald National Landscape and the SDNP cover some 60% of the district, in formal recognition of its landscape quality. The local authority area also contains the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), as well as the Pevensy Levels SAC and Ramsar site that are European/internationally designated biodiversity sites. Almost 10% of the district is covered by these sites alongside other Sites of Special Scientific Interest (SSSI)<sup>5</sup>. There are several other notable constraints in the district such as infrastructure capacity, Ancient Woodland and areas that fall within Flood Zones 2 and 3.

In terms of the WDCs own housing needs requirement under the current ‘standard method’, as described in paragraph 62 of the NPPF (December 2024), this equates to 1,465 dpa. Over the proposed Plan period for the Regulation 19 Local Plan (1 April 2026 to 31 March 2042) this equates to an overall housing need of 23,440 net new homes, excluding any potential unmet housing needs of other neighbouring local authorities. Our latest employment evidence base<sup>6</sup> that was commissioned jointly with Eastbourne Borough Council (EBC) demonstrated that for the period between 2025-2042, there was recommended need for 194,400 sqm of employment floorspace, primarily in industrial and warehouse uses (use classes B2 and B8) at 178,300 sqm (with the remaining need for offices).

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<sup>1</sup> [Wealden Local Plan – Direction of Travel Consultation, November 2020](#)

<sup>2</sup> [Wealden District Council Draft Local Plan \(Regulation 18\), March 2024](#)

<sup>3</sup> [Wealden District Council Local Development Scheme \(LDS\), January 2026](#)

<sup>4</sup> [High Weald Area of Outstanding Natural Beauty \(AONB\) Management Plan 2024-2029](#)

<sup>5</sup> Some of these SSSIs are also located within the High Weald National Landscape.

<sup>6</sup> [Employment and Economic Study – Eastbourne and Wealden, January 2026](#)

## Consideration of Unmet Development Needs from Sevenoaks District Council (SDC)

### Meeting WDCs Own Housing and Employment Needs

As highlighted above, WDC published its draft 'Focused' Wealden Local Plan (Regulation 18) for Wealden District on the 6 February 2026, with the consultation closing on 30 March 2026. Through the work we have already undertaken to inform this draft 'Focused' Wealden Local Plan (Regulation 18) consultation, we have indicated an overall housing supply figure for the prospective Plan period (at that stage, the 1 April 2025 to 31 March 2042) of 16,609 homes. This would achieve an annual housing delivery target of 977 dpa. For employment floorspace, the draft 'Focused' Wealden Local Plan (Regulation 18) confirmed that it could support the provision of at least 159,530 sqm of employment floorspace, which is a 34,870 sqm shortfall on need.

As part of the draft 'Focused' Wealden Local Plan, we have also identified several additional option sites in the review and, which once further assessment work has been undertaken, they may represent additional opportunities for housing and employment growth. This additional work includes further detailed assessment, submission of additional information, and/or technical matters being overcome. If taken altogether, these 'potential' sites may deliver an additional 4,854 (net) dwellings over the Plan period, albeit that the sites may not be suitable for allocation or development at any stage, pending further site investigation, updated evidence, and information sought.

WDC has undertaken significant work to identify land with potential for future development and to maximise the number of homes and employment floorspace that the district is able to provide. This included the re-evaluation of assumptions made for sites since the draft Wealden Local Plan (March 2024) was published and an assessment of further sites that were submitted to us during the 'Call for Sites' process that was ongoing to the end of April 2026. A Strategic Housing and Economic Land Availability Assessment (SHELAA)<sup>7</sup> has been undertaken to assess the capacity of the district and the extent to which local housing and employment needs can be met. The draft Local Plan (including site allocations) has also been through the Sustainability Appraisal (SA)<sup>8</sup> process.

However, at that stage in the plan-making process, there was a shortfall in both employment floorspace (as highlighted above) and housing delivery of 8,160 (net) dwellings, which amounted to a shortfall of 480 dpa. This is greater than the 4,071 shortfall previously identified in March 2024. This means that the overall housing supply figure for our draft 'Focused' Wealden Local Plan (Regulation 18) published in February 2026 was a 'capacity' based figure, based on the level of housing that can be delivered within the plan period, having regard to the identified constraints below:

- Landscape considerations in relation to the High Weald National Landscape and the setting of the South Downs National Park;
- National and international biodiversity designations and habitats across the district; and
- Flood risk, particularly to the southeast of the district and around urban areas that surround Eastbourne.

The Council previously suggested that potential highways impacts, particularly around the A22 and A26 corridor, would potentially constrain growth in the south and north of the district, particularly around Hailsham and Uckfield and the surrounding areas, accounting for cumulative impacts. The Council in view of changes to the NPPF around vision-led transport, is undertaking a County-Wide Transport Model to consider housing and employment growth options considered in this draft Local Plan and the spatial strategies in the accompanying SA to confirm whether this stance remains. This transport evidence will be published at the Regulation 19 stage.

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<sup>7</sup> [Strategic Housing and Economic Land Availability Assessment \(SHELAA\), January 2026](#)

<sup>8</sup> [Draft 'Focused' Wealden Local Plan Sustainability Appraisal \(SA\), January 2026](#)

Nonetheless, the above constraints have led to a lack of deliverable sites in sustainable locations within the district to meet our overall housing and employment need. Further details in relation to these constraints is provided within our evidence base webpages<sup>9</sup>. Should our overall housing supply and employment position continue to be a 'capacity' based figure as we develop the plan further to the Regulation 19 stage, it will mean that we are unlikely to be able to meet our own housing/employment needs or indeed assist neighbouring local authorities with their 'unmet' housing/employment need. However, WDC will consider this further as we progress the plan to account for any new sites submitted to us through the formal 'call for sites' process that remains open and as we test sites and our growth strategy further with infrastructure providers, including highway modelling.

### Housing Market Area (HMA) and Functional Economic Market Area (FEMA)

The Wealden Local Housing Needs Assessment (LHNA) was published in January 2026<sup>10</sup>. This latest report concludes with respect to Housing Market Areas (HMAs) that Wealden is overlapped by several different HMAs, which cross and fall within the district boundary in several locations. The Wealden LHNA confirms that the migration analysis undertaken identifies that Wealden has close links to Eastbourne and to a lesser degree with Tunbridge Wells and Lewes. In terms of commuting analysis, this illustrates the main commuting routes for Wealden residents are to Eastbourne, Tunbridge Wells, Lewes and Mid Sussex. In terms of the LHNA conclusions in 2021, it suggested that approximately 41% of Wealden District's population is overlapped with Eastbourne Focused HMA including those towns and villages that surround Eastbourne, as well as Hailsham. The remainder of the district is related to other HMAs, most notably the Tunbridge Wells, Sevenoaks and Tonbridge HMA to the north of the district that incorporates 34% of Wealden's population including Crowborough and Heathfield.

It should be noted that paragraph 2.87 of the LHNA undertaken in 2021 confirms that for the Sevenoaks, Tunbridge Wells and Tonbridge HMA, that there are close links specifically to Tunbridge Wells, which is confirmed by both the migration and commuting analysis, rather than Tonbridge or Sevenoaks specifically. In terms of mapping of the HMAs that overlap into Wealden District, the Sevenoaks administrative border straddles both the Sevenoaks, Tunbridge Wells and Tonbridge HMA at its eastern edge and the Northern West Sussex HMA (primarily associated with Mid Sussex, but also Crawley and Horsham) to the west that incorporates Forest Row.

The FEMA for WDC is identified in Council's employment evidence base and concludes that the FEMA should mirror the HMA for Wealden and so the same issues apply for employment uses (i.e. Wealden is linked predominantly with Tunbridge Wells to the north and Eastbourne to the south).

Sevenoaks District Council published a 'Targeted Review of Local Housing Needs' in October 2025<sup>11</sup> that relooked at its HMA analysis. In terms of migration, paragraph 2.29 of the report confirms that:

*'key flows across all age groups are from Greater London with the overall strongest inflows in the 30 to 64 age group. Most notable outflows are to Tonbridge and Malling, Tunbridge Wells, and elsewhere in Kent, particularly the 30 to 64 age group.'*

In terms of commuting flows, it is also clear that Wealden District is not a destination for workers who live in Sevenoaks District (at only 0.2%) or equally a destination for Wealden residents who choose to work in Sevenoaks District (at 0.7%).

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<sup>9</sup> [Wealden District Council Planning Policy Evidence Base](#)

<sup>10</sup> [Wealden District Council Local Housing Needs Assessment \(LHNA\), January 2026](#)

<sup>11</sup> [Targeted Review of Local Housing Needs, Sevenoaks District Council, October 2025](#)

Given the above, the evidence shows that although there is some interaction between WDC and SDC in terms of an overlapping HMA and FEMA (i.e. the Sevenoaks, Tunbridge Wells and Tonbridge HMA/FEMA) it is noted that the specific linkage for Wealden is with Tunbridge Wells. The linkages with Sevenoaks in the case of WDC are not as strong as to the Eastbourne-focused HMA to the south and specifically Tunbridge Wells to the north. In short, if an unmet housing or employment need is anticipated, particularly from EBC or Tunbridge Wells Borough Council (TWBC) who have already written to WDC previously on unmet development needs, these local authorities are likely to be the priority for WDC in terms of meeting unmet development needs from neighbouring authorities (if we are able to do so) given the stronger connections between WDC and these local authorities.

### Meeting WDCs own Gypsy, Traveller and Travelling Showpeople Accommodation Needs

The current Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) was published in May 2022<sup>12</sup> for all local planning authorities in East Sussex. This highlighted the accommodation needs of Wealden (excluding the SDNP) and confirmed that this was for 51 pitches for Gypsies and Travellers and 3 plots for Travelling Showpeople to 2040 that aligned with the 'ethnic' definition rather the Planning Policy for Traveller Sites (PPTS) definition at that time. This assessment is currently being updated by all LPAs in East Sussex. In between the publication of the previous draft Wealden Local Plan (Regulation 18) (March 2024) and the time of writing, several national planning policy changes have taken place alongside collaborative working with neighbouring local planning authorities in East Sussex. This included:

- The updated Planning Policy for Travellers Sites (PPTS) document (December 2024), which made significant changes to the definition of Gypsies, Travellers and Travelling Showpeople in Annex 1 of the PPTS, following domestic and European Court judgements;
- Since the consultation on the draft Regulation 18 Local Plan in March 2024, we have undertaken a targeted 'Call for Sites', alongside other East Sussex LPAs, seeking specific Gypsy and Traveller site submissions through targeted engagement with the local Gypsy, Traveller and Travelling Showpeople communities as well as other organisations (including public sector landowners), which was widely publicised;
- A review was undertaken of all sites submitted through the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) process, to identify any sites submitted for any or all purposes. The Council also considered whether existing Gypsy and Traveller sites could be extended.

As a result of this work, potential sites for Gypsy and Traveller development were identified (27 pitches). These were assessed against site assessment criteria formulated and agreed by the East Sussex Gypsy and Traveller Duty to Cooperate group, creating a consistent methodology and assessment criteria for all Gypsy and Traveller sites submitted across East Sussex. Those sites determined to pass most of the site assessment criteria were then assessed as part of the Council's SA process. These were all presented as 'Options' in the latest draft 'Focused' Wealden Local Plan (February 2026).

WDC will continue to work on these sites and will continue to consider other options to meet its Gypsy, Traveller and Travelling Showpeople Accommodation Needs, but at this stage in the plan-making process it will mean that we are unlikely to be able to meet our own Gypsy, Traveller and Travelling Showpeople Accommodation needs or indeed assist neighbouring local authorities with their 'unmet' Gypsy, Traveller and Traveling Showpeople Accommodation Needs. However, WDC will consider this further as we progress the plan to account for any new sites submitted to us through the formal 'call for sites' process that remained open until the April 2026 and as we test sites and our growth strategy further.

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<sup>12</sup> [East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment \(May 2022\)](#)

## Sustainability of New Development

SDC borders the administrative boundary of Wealden District in a rural location to the northwest of Wealden District at Blackham, near to the A264, with the border, and the area surrounding it being located wholly within High Weald National Landscape.

Paragraph 77 of the NPPF states that the '*the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*'. Paragraph 110 of the NPPF also states that '*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*'. Therefore, it is considered, on sustainability grounds alone, that it would be better to address unmet development needs of SDC within and/or adjacent to large regional centres, where jobs, sustainable transport links and retail are largely located. This would be in line with national planning policy on this matter. Substantial development away from these areas, in a rural location, would be considerably less sustainable.

### **Conclusions**

WDC has identified a number of issues above that demonstrates that meeting our own development requirements, at this stage in the plan-making process will be difficult. However, WDC will consider this further as we progress the Local Plan to the Regulation 19 stage and account for any new sites submitted to us through the recently closed 'call for sites' process and as we test sites and our growth strategy further with infrastructure providers (including detailed transport modelling).


However, turning to your specific request, we are firstly clear that, at this stage in the plan-making process, WDC is unable to meet its own local housing needs with a shortfall of some 8,160 (net) dwellings, or its employment needs. WDC is therefore unable to assist in meeting the unmet housing and employment needs of neighbouring authorities at this stage, but this will be kept under review as we progress our Local Plan to the Regulation 19 stage.

Secondly, the evidence base for both WDC and SDC shows that although there is some interaction between WDC and SDC in terms of an overlapping HMA and FEMA (i.e. the Sevenoaks, Tunbridge Wells and Tonbridge HMA/FEMA), this linkage is not as strong as the connections between WDC and the Eastbourne focused HMA/FEMA to the south of the Wealden District, or Tunbridge Wells to the north of Wealden District.

Given the above, WDC would not be able to commit at this stage of its plan-making process that it could deliver the suggested amount of unmet development needs of SDC. However, the Council is developing its evidence base for its new Local Plan and will naturally consider any changes to its evidence base as it progresses through the relevant plan-making stages. We welcome the opportunity to continue having dialogue on these matters as we advance the Local Plan and its supporting evidence base.

I trust that the above comments are helpful and clear at this stage. If you have any further queries, then please do not hesitate to contact us.

Yours sincerely



Nichola Watters  
Head of Planning Policy, Economy and Climate Change



BY EMAIL ONLY:

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Hannah Gooden, Planning Policy Manager  
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Sevenoaks  
Kent  
TN13 1HG

19 June 2026

Dear Hannah,

**Sevenoaks District Council Local Plan: Unmet Need & Duty to Co-operate:  
Formal request to assist with Sevenoaks unmet need**

Many thanks for your letter of the 27 May 2026, providing an update on the Sevenoaks District Council's (SDC) housing supply position as it moves towards publication of its Regulation 19 Local Plan this summer. The proposed publication dates (subject to member approval) are noted.

Tunbridge Wells Borough Council (TWBC) is supportive of the fact that SDC proposes to meet its full housing and other development needs, which is reliant upon Green Belt release. The latest LHN figure and housing land supply, as well as Gypsy and Traveller Accommodation needs and supply in the emerging Regulation 19 Local Plan, and employment growth need figures, set out in your letter are acknowledged.

Given the need for Green Belt release, SDC is asking TWBC to consider whether it has capacity to assist with unmet needs from Sevenoaks, as required by the NPPF. Any assistance that could be given would potentially reduce the extent of Green Belt release in Sevenoaks district.

SDC wrote to TWBC on the 20 November 2025 with an unmet need request (excluding employment unmet need at that time), and TWBC replied on the 5 December 2025. I confirm that the response set out in our letter of 5 December 2025 remains fully valid, in so far as it relates to TWBC's capacity to assist with meeting unmet need from Sevenoaks, and there has been no change in circumstances that would alter the response given at that time.

I would like to add/update SDC on the following points, reflecting Questions 1-4 in the 27 May 2026 letter:

**Question 1:**

On December 10, 2025, TWBC adopted its Local Plan. As outlined in TWBC's letter of 5 December 2025, it is committed to starting an early Local Plan Review within 6 months of adoption (this is set out in Strategic Policy STR 1 The Development Strategy, in the adopted Local Plan). TWBC officers are presenting a report to TWBC's Cabinet meeting on the 25 June 2026, which seeks approval of a Local Plan Review

Timetable and the Notice of Intention to Commence plan-preparation. Providing these are approved for publication, they will be published on the Council's website no later than 30 June 2026. The report has been published and is available here (see item 11) <https://democracy.tunbridgewells.gov.uk/ieListDocuments.aspx?CId=118&MId=6066&Ver=4>

The timetable sets out dates for the key stages in the preparation of the new Local Plan, which will be prepared following the new regulations/process which took effect in March this year. Of particular note, is that TWBC intends to pass through the Gateway 1 Self-Assessment (readiness checker) by the end of October 2026. The 30 Month plan-making and adoption process would then begin from November, with month 30 (adoption) being April 2029.

It is noted that TWBC has recently commenced a first Call for Sites (CfS), which opened on the 11 May and closes on the 3 August 2026 initially – it is highly likely that the CfS will need to be extended to help ensure as many sites as possible are submitted for assessment.

**Question 2:**

As set out above, TWBC's position is unchanged since its response letter of 5 December 2025. In summary, TWBC has not been able to meet its own housing need in full, but the adopted Local Plan has met employment need in full.

**Question 3:**

As set out above and explained in more detail in our letter of 5 December 2025, TWBC is unable to assist in meeting unmet housing need from Sevenoaks.

In terms of capacity to assist with meeting unmet employment need from Sevenoaks, whilst TWBC has been able to meet its employment need in full, it does not have additional capacity to assist Sevenoaks with its employment need.

**Question 4:**

The justification and evidence for this response from TWBC has been set out fully in our response letter of 5 December 2025. There has been no change to this.

I trust that this is of assistance. I'd be happy to discuss any of the above and look forward to working with you to progress a Statement of Common Ground. We will also continue to engage with SDC through Duty to Cooperate (DtC) meetings.

Yours sincerely,



**Ellen Gilbert**  
Planning Policy Manager