

Local Plan - Regulation 19 Publication

Questions and Answers

July 2026

What has the Council agreed so far?

The Council has agreed (at a Cabinet meeting on 7 July 2026) to publish the final draft version of the Plan. This is known as the Regulation 19 Local Plan, and the publication period will run until 17 September. The Plan and all the Regulation 19 responses will then be considered by Full Council in December 2026, to agree the submission for examination by Government.

How can I comment on the Regulation 19 Plan?

We are publishing the final draft of the Local Plan (known as the Regulation 19 Local Plan) for eight weeks from 23 July until 17 September 2026.

You can take part:

- Online at www.sevenoaks.gov.uk/emerginglocalplan
- By completing a paper survey available from local libraries, town or parish council offices and the Sevenoaks District Council offices
- By emailing us at planning.policy@sevenoaks.gov.uk

If you are interested in taking part and would like to be updated on Local Plan news, sign up to our [mailing list](#).

I've already commented on the Local Plan at the last consultation, why should I comment again?

Any comments submitted at Regulation 19 are sent straight to the Planning Inspector, so this is your chance to have direct involvement in the examination. If you want to request to participate in the examination hearings, you need to respond at this stage.

What can I comment on at this Regulation 19 stage?

The Regulation 19 survey asks a series of set questions about whether the plan is 'sound' and legally compliant and what modifications are required.

The tests of soundness, against which the Inspector will examine the plan, are:

- a) Positively prepared – e.g. does the Plan provide a strategy which meets the District's need?
- b) Justified – e.g. is it an appropriate, evidence-based strategy?
- c) Effective – e.g. are the sites and policies deliverable?
- d) Consistent with national policy – e.g. is it consistent with the NPPF?

You can also comment on sites, policies and supporting evidence.

What type of comments could influence the Planning Inspector to omit/reduce a site?

All comments received at Regulation 19 stage will be sent directly to the Inspector for them to consider. They will be considering whether a site is 'sound' as set out above. A key question is whether sites are deliverable and are there any impediments to them coming forward. Any additional information, for example regarding site constraints, heritage, landscape and ecology, access and transport capacity, viability and legal issues will all be considered by the Inspector.

What is the Local Plan and why do we need it?

The Government requires councils to produce a Local Plan to meet mandatory Government housing targets, and guide what can be built and where over a 15-year period. The Government set Sevenoaks District a housing target of 17,460 new homes in the District up to 2042, which the Council must meet. This includes policies to secure thousands of affordable homes, for example new social housing and part-buy part-rent homes, to support future generations within our District.

It also includes proposals to support the economy and provide new infrastructure while protecting the natural environment, historic character and the majority of the Green Belt.

Crucially, it gives the Council strong grounds to resist inappropriate development, including speculative planning applications, which can be submitted at any time.

What if we don't have a Local Plan?

Not having a Local Plan doesn't stop or delay any development. New developments would still happen, but in an unplanned way and with far less control over planning conditions that could mitigate the impact of development on neighbours and the wider communities.

There would also be an increased risk of unauthorised encampments, speculative housing development and planning by appeal, leaving the Government's Planning Inspectorate, to determine applications and their conditions.

The Council would also be less able to require developers to fund infrastructure to support the new housing, such as schools, transport upgrades and health facilities. By having a Local Plan, infrastructure providers can better predict the demand for their services at a local level over the long term, and target investment accordingly.

Finally, not having an up-to-date Local Plan could lead to direct Government intervention with planning decisions taken out of the Council's hands entirely, resulting in a loss of local control over what development happens and where.

We are working to submit the Local Plan before the end of December 2026. If we delay doing so, the Government has created a new framework for producing Local Plans, which would require us to completely redo many of the key documents to date. This could cost the Council over £1 million and would further leave our District open to inappropriate and unauthorised development for several years, with potentially many sites already within the current plan coming forward as planning applications –

but without controls or proactive guidance direction to protect residents. The Government has confirmed Local Plans submitted before the end of December will be accepted, and the document will not become 'out of date' once the new framework comes in. It is therefore critical to ensure it is submitted before December 2026.

Why can't existing built-up areas accommodate the new housing?

The Government has set us a target of 17,460 new homes over 15 years.

We know from our studies there is not enough land within our built-up areas or on brownfield land to meet this new housing target. As a result, we must look at land in the Green Belt to help deliver the Government's housing target.

What are Grey Belt sites?

The Grey Belt is a new concept introduced by the Government in December 2024, through the National Planning Policy Framework. This document defines what Grey Belt is and sets out the approach that we are required to follow. This has been used in drawing up our Grey Belt evidence.

Grey Belt is Green Belt land that was previously developed, or land that does not strongly support some of the key purposes of the Green Belt. This means much of the District's former Green Belt land could now be considered Grey Belt, and vulnerable to development.

Whilst we strongly appreciate the frustration around this redesignation of the Green Belt, we cannot contradict the Government's national planning laws on this redesignation. Sites which are considered Grey Belt must be in sustainable locations if they are to be included in the Local Plan. Work on the Grey Belt is available as part of our evidence base. The Local Plan will seek to protect the remaining grey and Green Belt land from development and having a Local Plan in place should help us resist speculative development on the remaining 98% of Green Belt within our District.

What is the housing target?

Our Local Plan looks to address the Government's new housing target of 17,460 new homes (or 1,164 homes per annum over 15 years).

Are we required to meet the Government's housing target?

We have little choice but to meet the Government's revised target of 17,460 new homes in the new Local Plan. The Government changed the housing target from 'advisory' to 'mandatory' and explicitly states the release of Grey and Green Belt land must be used to meet the housing target in full.

Failing to meet that target could result in the Local Plan being refused by the Government's Planning Inspectorate, and the Inspector can also re-add sites anywhere in the District, or amend existing housing numbers on proposed sites, to meet the target. Their decision would be final.

Who would build the new homes?

Most new homes would be built by developers, this can be small scale developers building single dwellings, through to the developers of larger sites. A small number will be built as self-build or custom-build housing.

How many of the new homes would be affordable?

Affordable housing refers to housing for sale or rent for those who cannot afford to buy housing on the open market. The Local Plan sets out the proportion of development sites expected to contribute towards affordable housing, together with the type and quantity of affordable homes to be delivered. The policy proposes affordable housing contributions of 30% on brownfield sites and 40% on greenfield sites, with the aim of securing a mix of affordable homes that meets identified local needs.

How many new socially rented homes (sometimes called council housing) are being proposed?

We will seek to secure socially rented homes as part of the affordable housing requirements. Given the need for affordable homes, and to maximise social rented accommodation, where a site is required to provide affordable homes, we will be seeking 80% of them to be social rented. This provides the most affordable option and is the tenure which meets the housing needs of those households on our Housing Register. For the remaining 20%, we will be seeking affordable home ownership, with a focus on shared ownership.

Can I apply for any of the new affordable homes?

For all types of affordable homes, there will be some eligibility criteria, and in some instances, this will include having a local connection. Social housing will be available through the [Housing Register](#).

Other forms of affordable housing may be provided by housing associations. They may offer shared ownership properties for sale. You will need to apply to them directly. First Homes or Discount Market Housing are usually sold by house builders or resold by the homeowner.

Can I look at the supporting or background documents?

As part of the Local Plan, we have been developing an [evidence base](#). The evidence base has been updated to ensure we have the latest and most robust evidence to support the Plan.

What has happened so far?

We have run three previous Regulation 18 consultations in 2023, 2024 and 2025

During this time, there have been changes at a national level, including a new approach to calculating our housing target figure and several revisions to the National Planning Policy Framework, including the introduction of Grey Belt. This has necessitated a review of our development strategy in the Local Plan.

What is the timeframe for producing the new Local Plan?

After the publication period closes (on 17 September 2026), we intend to submit the Local Plan for examination by the Planning Inspectorate, subject to Full Council approval on 1 December 2026. This submission will include all the comments submitted as part of the Regulation 19 publication.

The timetable for the examination, which will include public hearings, will be set by the Planning Inspectorate but the examination is expected to take place in 2027. Find out more about [Local Plan examinations](#).

If the Planning Inspector concludes the Local Plan is sound, we will adopt it and it will be used to help determine planning applications, likely from 2028 onwards.

Why, when so many people objected to the proposals in the Regulation 18, have so few sites been removed/reduced in size

A large number of sites were removed from the Plan between Regulation 18 and 19 for various reasons including land availability and constraints such as flooding and access.

The overriding priority of the Local Plan is to ensure it meets mandatory Government housing Targets. Without doing this, the Local Plan is likely to fail to be approved by the Government Planning Inspector. We understand that new development is not always welcomed, but the rate of change of housing growth is primarily caused by the significant 63% increase of the housing target of 17,400 new homes over 15 years. We have previously tried to push back on these targets, but the Government is adamant that they will not be reconsidered, and may intervene to add sites if we try to progress a Plan with a shortfall.

Why can't you just not proceed with a Local Plan?

The Government may intervene and centrally impose sites and policies in the Local Plan if we do not proceed. This could also include allocating additional sites, not included in the Local Plan currently, in order to not just meet, but exceed the housing targets. There is also a risk that the Government will directly take over planning applications within the District, as it has done in other areas. This severely impacts the ability to mitigate or condition local planning applications in line with residents, councilors and stakeholders' local priorities.

Why not disregard the target and put forward a much lower figure?

The Government may intervene and allocate additional sites, including those which have previously been omitted from the Plan. This could include new sites, even in the National Landscapes. For example, the Secretary of State ordered Three Rivers District Council (Hertfordshire) to allocate an additional 4,200 homes (on Green Belt land) in their emerging Local Plan, which only sought to meet 6,200 of its 12,480 housing need. This included one within the Chilterns National Landscape (for 678 units). The Secretary of State said that the draft plan 'fails to propose allocating all appropriate housing sites available', meaning the plan was 'highly likely to be found unsound at examination'. This is of interest since it is an indication that Government is willing to consider major development in the National Landscape to meet housing need, which has parallels to the consideration of Pedham Place near Swanley.

The issue of fully meeting need and inclusion of sites within the National Landscape was recently discussed with the Planning Advisory Service (PAS), who are providing plan-making support of behalf of the Government. They referred to the Three Rivers intervention letter as an indication of the emphasis being placed on meeting need.

It was also noted that if full need is not met, then it is likely that many of the omission sites will want to participate in the examination, to set out the merits of their sites, whereas if a plan is promoted which meets full need, then only these sites will be the focus on the examination. Over 550 sites were submitted into the call for sites and the Reg.18 Plan included just over 100 of these sites.

Where else has Government intervened in Plan-making recently?

- Buckinghamshire in February 2026 – Secretary of state directed them to undertake Regulation 19 consultation in July 2026 and submission in December 2026
- South Tyneside – intervention in March 2025, directing them to submit their Regulation 19 Plan for examination
- Castle Point Borough Council (Essex) – the Secretary of State intervened in 2022 after repeated failure to progress a Local Plan. Commissioners were appointed and the Council lost control of plan making. This is the clearest modern example of full intervention.
- Stockport Council – in September 2025 the Planning Minister imposed strict timescales for the Council to bring forward a Local Plan, addressing a history of slow plan-making.

Can you wait until Government changes or after Local Government Reorganisation in 2028?

Not having a plan in place would leave the District vulnerable to many years of speculative, uncoordinated development proposals, particularly for housing and Gypsy/Traveller pitches, with developers able to exploit policy gaps. Without an up-to-date Local Plan and local policies to defend decisions at appeal, the Council would lose its ability to shape the future development of the District, significantly weakening its position in planning appeals and examinations. The Plan gives the Council strong

grounds to resist inappropriate development, including speculative or omission-site proposals, by demonstrating that housing and infrastructure needs are being met in a planned, coordinated and evidence-based way. A substantial amount of time and resources have gone into the preparation of the Plan and the supporting evidence base, and it would be a waste of money not to progress. And not having an up-to-date Local Plan creates a high likelihood of direct Government intervention as outlined above.

The Government is currently carrying out 'Local Government Reorganisation', which means merging many of the existing councils, such as Sevenoaks District Council and Kent County Council, into larger councils called Unitary Authorities. These will assume all the roles, responsibilities and services of both those councils, and bring them under one roof. Under the new Unitary Authority, until such time as a new Local Plan for the whole West Kent Council area comes forward, any approved Local Plans, will be used to determine planning applications within the 'former' Sevenoaks District Council area. If we get an adopted Local Plan, it will bring all the benefits and protection from unauthorised development and encampments for many years.

We've had so many problems with water supply in the District, and our neighbouring local authorities have suffered badly, the cumulative effect of so much extra housing makes us worry that the water supply won't cope – why can't you exclude housing in the Plan now on this basis?

We completely understand why residents feel anxious about water supply. Given the significance and complexity of recent water infrastructure issues in the region, it is essential that we have confidence that planned growth can be reasonably accommodated without negative impacts on existing communities. Engagement with the water companies has been ongoing throughout the preparation of the Local Plan (2021 to present) to understand what upgrade works may be required to support planned growth across the District. This work has helped identify both future infrastructure needs and existing pinch points or capacity constraints, which have been recorded in the Infrastructure Delivery Plan.

To ensure upgrades are delivered before and alongside development (rather than after), we have developed a robust policy (Policy UD1) which requires developers, at planning application stage, to demonstrate that sufficient utilities capacity exists to meet the needs of their development. Applicants must engage with utilities providers and provide evidence of capacity to the Council's satisfaction. This approach is consistent with national Planning Practice Guidance, which expects detailed modelling at application stage.

The policy also recognises that larger developments may need to be phased to ensure upgrades can be delivered at the right time. Any necessary water or wastewater upgrades will be secured via planning condition, requiring delivery prior to occupation to avoid adverse impacts such as sewer flooding, pollution or low/no water pressure. Once the Local Plan is adopted, Policy UD1 will carry full weight in decision making.

The Council cannot exclude sites from the Local Plan because of uncertainties around water supply. National policy requires us to plan for our assessed housing need, and water companies have a statutory duty to ensure adequate water and wastewater

provision for new development. What the Council can do (and has done) is require detailed evidence of local constraints and ensure that any necessary upgrades are identified, funded and delivered before homes are occupied.

And what about other infrastructure?

We recognise that residents are concerned not just about water supply, but about the wider impacts of development on schools, health facilities, transport, utilities and other essential infrastructure. These concerns are entirely understandable, and preparing a Local Plan gives us the ability to plan for these cumulative impacts in a coordinated and evidence-based way.

By looking at development pressures across a whole settlement or cluster of sites, we can identify the infrastructure projects needed to support growth. Assessing impacts cumulatively allows us to secure strategic infrastructure such as schools, improved public transport, health facilities and utilities upgrades. This ensures development is not considered in isolation, but as part of a wider, planned network of infrastructure needs.

Engagement with all infrastructure providers has been ongoing throughout the preparation of the Local Plan (2021 to present). This work identifies what new or improved infrastructure is required to support planned growth across the District, and the resulting projects are included in the Infrastructure Delivery Plan (IDP). The IDP is then used as a live delivery tool, tied directly to planning permissions, ensuring that infrastructure is planned and delivered alongside development, rather than following behind it.

If this Plan is approved, will all these developments go ahead?

All the site allocations in the Local Plan will still need to obtain planning permission before they can be built out. For the larger sites, this is likely to take many years. And the plan covers a 15-year period and many of the sites are phased to come forward in the latter part of the Plan period, so these new developments will not all come forwards at once.

Once a planning application is submitted for a site, there will be another round of public consultation on the specifics of the scheme, including detailed designs for full planning applications. Clearly, if there are issues with any proposals at this stage (for example in relation to securing suitable access, infrastructure or design) then planning permission would be refused.

Does being in the Regulation 19 publication, mean you've made it easier to be built upon?

The emerging Local Plan begins to carry weight from the point it is published for Regulation 19 consultation (23 July 2026), because that is the stage at which the Council confirms its intended submission version of the Plan. From that moment, decision makers can give the Plan material weight, which then increases as the Plan progresses through examination. However, at this early stage, the Reg.19 Plan has

limited weight. Through the examination and hearing (2027) weight increases as the Inspector considers evidence and proposed modifications. Post examination, the Plan carries significant weight, as the Inspector's findings will have resolved most outstanding issues and by the time the Plan is adopted, it carries full weight, becoming the primary basis for decision making.

This staged increase in weight helps the Council resist inappropriate development and provides growing certainty for applicants, communities and Members as the Plan moves towards adoption. Some site promoters may choose to twin-track their submissions, promoting a site allocation in the Local Plan whilst also preparing a planning application. Once we are further along in the examination process, there is greater certainty for all involved.

When Pedham Place is largely in National Landscape – why is it included in the Local Plan?

In relation to the proposed growth options, the Regulation 19 Publication Local Plan will take forward Option 2 (baseline sites plus Pedham). This is because this is the only option which fully meets need, which was highlighted as an overriding priority in both the Planning Inspectorate and Planning Advisory Service (PAS) advisory visits. It is considered that the impact on the National Landscape can be appropriately mitigated, and that this option would be in the public interest by providing much-needed housing and essential strategic infrastructure, which would not otherwise be delivered. The scheme includes the provision of education and community facilities, a local centre, employment, open space and housing. It would also provide improvements to M25 J3 and public transport connections. The proposed housing supply includes urban sites (at optimized density), PDL/brownfield sites, Grey Belt sites, together with extants (sites which already have planning permission) and a windfall allowance. However, without the inclusion of Pedham Place, we are not able to meet the District's Housing need.

Why have you now included Broke Hill when it had been excluded from the Local Plan due to being high performing Green Belt?

Broke Hill is in a new 'pending/provisional' category for the inclusion in the Local Plan. At this time, Broke Hill currently has a live planning application for a significant number of homes, which will be referred to the Council's Development Management Committee in due course (likely later this summer). The Council has not yet formed a view on the suitability of the planning application.

In order not to prejudice or pre-determine the outcome of that planning application, the site is included in the Regulation 19 Plan, but its inclusion or non-inclusion in the submitted Plan will depend on the outcome of the planning application in due course.