

Sevenoaks Local Plan Regulation 18 Consultation – Questions and Answers

Sevenoaks Pop-up Session – Wednesday 29 October 2025

Development Strategy

Question	Answer
Should we consider new towns rather than expanding existing settlements?	This has been considered and the option 2 proposal (Pedham Place) is a standalone settlement (albeit near Swanley). You can comment on the development strategy as part of this consultation
Have you considered challenging the central government housing targets given it's a significant (+30%) increase and the high level of green belt?	Yes, Our Leader wrote to central government to object to the new standardised method for calculating housing need and the resultant 63% increase in the housing target for 63%. Although a response was received, the NPPF has been published and the upshot is that we need to plan to meet this full need (1,145 homes per year over the 15 year plan period, so 17,175 in total). The Leader is intending to write to Government again, following Ministerial changes, seeking a meeting to discuss the implications of National Planning Policy changes on our District.
What would the government have to put forward for SDC to actually stand their ground and say NO?	
What plans are there for compulsory purchase?	At this stage there are no plans to use CPO powers, but central government is considering different methods to speed up delivery and recently consulted on potential mechanisms
Would there be any compulsory purchase for the private land around Dunton Green station to improve accessibility for the new development?	

If insufficient numbers of housing units achieved by time local plan submitted, what happens then?	We want to do everything possible to try and submit a plan which meets full need. If this is not possible, members will need to decide if they want to submit a plan with a shortfall, given that the previous plan, which did not meet full need, was not successful at examination. If neither option are successful, due to the timeframes of Local Government Reorganisation, it is likely that a plan would be prepared for a wider geography.
If the planning inspector throws out option2 and option1 for not reaching the quote, what will you do for the next plan with an increased quota with the 2027 LHR?	
If there is a big vote against Pedham Palace, are you finding another site to compensate?	There are a number of 'omission' sites which have been submitted through the call for sites, but are not included in the Plan at this stage. It is likely that these sites will continue to be promoted (by landowners/developers) as we move forwards to examination. If Pedham Place is not taken forwards for some reason, we may need to re-consider some of these sites
How would the new plan affect the tilted balance?	Given the Council's current housing position, the tilted balance of paragraph 11(d) of the NPPF applies, that there is a presumption that the Council should grant planning permission unless the proposal would lead to adverse impacts that would significantly and demonstrably outweigh the benefits, when assessed against the NPPF policies as whole. Once a new Local Plan is in place and the Council's housing supply position improves, the tilted balance will no longer be engaged, and the Council will therefore be able to have greater influence over development in the District.

Green Belt and grey belt

Question	Answer
Why have you treated large built up areas as just Greater London and not Sevenoaks, Swanley and Edenbridge?	The Office for National Statistics (ONS) defines Large Built-up Areas as settlements with a minimum population of 75,000 residents. There are no settlements within the District which reach this threshold and therefore none of the District's settlements qualify as a Large Built-up Area. Greater London qualifies as it has over 75,000 residents.
Evidence document showing 2017 Arup Green Belt assessment, which is wrong	We are aware that one of the links in the online survey led to an old evidence base webpage and this has now been corrected.
I was shocked when I read that the majority of Green Belt in the area is classified as grey belt. Please explain this conclusion for the Green Belt purposes.	Please see the published Green Belt Assessments and the new definition of 'grey belt'. Because this definition is quite broad (i.e. it is land which is previously developed or doesn't perform strongly against three specific purposes), then much of the Green Belt will fall within this definition. However, just because land is grey belt, it doesn't automatically mean it should be taken forward for development - it would need to meet a number of other criteria, including being situated in a sustainable location. See NPPF for further details
Can it be explained in detail why every site in Kemsing has been assessed as grey belt. It doesn't make sense and all the explanations are contradictory.	
Are they grey belt and National Landscapes designations mutually exclusive?	No. National Landscape (NL) (which is a designation which falls within NPPF footnote 7) is excluded from the definition of grey belt, where the application of the policies relating to the NL would provide a strong reason for refusing or restricting development.

Will land not removed from Green Belt as Grey Belt remain in the Green Belt?	Yes, land which is identified as potential grey belt, but not proposed for allocation through the Local Plan, will remain as green belt
Why the difference in treatment between Green Belt between Sevenoaks and Seal and between Sevenoaks and Otford?	There is a very small strategic gap between Sevenoaks and Seal and if this small parcel of land was developed, the two settlements would merge. The gap between Sevenoaks and Otford, albeit small, is much larger and there is also the M26 motorway in between. Therefore, limited growth in this location would not lead to the physical merging of these two settlements.
What is the process to change a "proposed grey belt area" back to Green Belt, what evidence, and what are time scales/limits to submit objections?	SEV20 - Land north of Barnett Field, Blackhall Lane, Sevenoaks (10 units) There is an opportunity to comment on the Green Belt evidence base document (and specific parcels of land) as part of this consultation. The consultation runs until 11 December and there will be a further opportunity to comment next year at Reg.19 publication stage and again at the Local Plan examination. Please see the published Green Belt Assessments and the new definition of 'grey belt'. Because this definition is quite broad (i.e. it is land which is previously developed or doesn't perform strongly against three specific purposes), then much of the Green Belt will fall within this definition. However, just because land is grey belt, it doesn't automatically mean it should be taken forward for development - it would need to meet a number of other criteria, including being situated in a sustainable location. See NPPF for further details
How do we challenge the change from green belt to grey belt on a specific piece of land?	
Can these green/grey belt assessments be challenged?	
What evidence does the public needs to show to say that the current evidence-based documents are incorrect?	

The plan is merging Dunton Green and Otford? Who makes that decision, and why can motorways be Green Belt boundaries?	Dunton Green is part of the Sevenoaks Urban Area. Otford is a separate service settlement to the north of Sevenoaks. There is a relatively small gap between the two settlements, but the M26 is located in this area. Development is proposed in the area between Dunton Green and the Otford Road, but this would not lead to the coalescence of these two settlements, due to the motorway providing a hard barrier to further development. Barriers, such as roads, rivers, railway lines, are defined in the Green Belt Assessment. Ultimately, it is elected councillors who decide which sites are taken forward in the Local Plan.
Footnote 7 test. At what point do you make considerations?	This is in relation to grey belt. Where there is a designation which falls within NPPF footnote 7 (such as National Landscape), these areas are excluded from the definition of grey belt, where the application of the policies relating to the NL would provide a strong reason for refusing or restricting development. We intend to undertake these assessments between Reg.18 and Reg.19 (next summer) to understand if the provisional grey belt sites are likely to be grey belt. Planning guidance states that it may only be possible to provisionally identify land as grey belt in advance of more detailed specific proposals.
What are the reasonings for the grey belt assessments?	Please see the Green Belt/grey belt assessment, which has been prepared in accordance with national policy and the new definition of 'grey belt'. There is an opportunity to comment on the Green Belt evidence base document (and specific parcels of land) as part of this consultation.

Housing

Question	Answer
Considered kit houses? Save time, reduce need of scarce skills. High performance, reduced energy. Passives standards.	The draft policies do not currently make reference to kit houses, however this is something that we could consider for the next iteration of the Plan. We would encourage you to submit this formally as part of your response to the Chapter 2 - Housing Choice for All policies.
How have the government housing targets been calculated for the Sevenoaks area?	The housing need of 1,175 dwellings per annum was calculated using the Governments Standard Methodology for calculating housing need. A full explanation of this methodology can be found in Planning Practice Guidance online here: https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments
How can we ensure that we achieve 60% affordable housing?	Emerging Policy H2, Provision of Affordable Housing, sets the highest affordable housing requirement at 50% (on grey belt sites). This reflects the % cap of 50% set by the National Planning Policy Framework. This figure is based on evidence surrounding what developers can realistically deliver whilst still making sites viable. We will apply this 50% target to all major grey belt sites and work with developers and housing providers to maximise affordable homes. In addition, we have published an addendum to the Affordable Housing SPD (2011), reflecting the 50% requirement on grey belt sites, and specifying that viability assessments will not be accepted on grey belt sites, in line with national policy. Policy H2 also sets a number of additional requirements for affordable housing provision, with the aim that on site provision of affordable homes will be achieved wherever possible. We will be preparing a new
How can we be sure that affordable housing will be built given that developers nearly always renegotiate on affordable housing commitment?	
As soon as any single reduction of the target of 50% is made (via the mechanisms of S106, a CIL payment, a developer proving that 50% is unachievable, in cases such as point 7 in the question below, etc.) in lieu of a development meeting its 50% affordable housing target, the overall target set to SDC by Central Government becomes achievable, unless affordable housing targets of >50% are set on subsequent developers. How does your plan show that this inevitable shortfall can be recovered?	

	Affordable Housing SPD ahead of the Regulation 19 publication in Summer 2026 and this will be available for public consultation.
Is there a key workers housing policy in the draft Local Plan?	There is no policy per se. Local Essential Workers are defined in the Sevenoaks District Intermediate Housing Protocol and have limited priority for intermediate housing.
Developments in progress like Broke Hill. If they get planning permission, are the numbers added to the target?	Any permissions granted for residential development, prior to the adoption of the Local Plan, will be included in the 'Extants' category of the housing supply and this equates to 3,978 units.. We also calculate a 'windfall' allowance, based on the 9-year average of small sites (1-4 units) which have gained planning permission, and this is a separate category in the housing supply, which can be found at table 1.2 of the consultation document. The current windfall allowance equates to 900 units over the plan period.
Approving new sites gives landowners windfall gains, particularly on previous greenbelt sites. What happens to those gains?	
Are planning permissions which are already granted but not yet built taken into account?	
What is the definition of a dwelling? (how many people/ what size?)	A dwelling can differ by size, tenure and number of bedrooms. Chapter 2 - Housing Choice for All includes a range of policies on house size, type and tenure. The Targeted Review of Local Housing Need (TRLHN) provides evidence of the current stock and need across the District for each type of dwelling.
Given that housebuilders aren't developing their current sites how can we expect them to develop these newly offered sites?	We appreciate and share in the frustration of this issue. As a planning department, we unfortunately have very limited mechanisms to encourage or incentivise development to be progressed once planning permission has been granted. However, we are aware that the government is currently exploring options for how to ensure that build outs are achieved on sites with planning permission.

Where are affordable homes / communities for elderly people some of whom will be disabled. Also majority are alone.	Of the overall housing need of 17,175 homes up to 2042, 961 of these should be for older persons. Policy H3 - Housing for Older People sets our expectations in relation to the delivery of housing for older persons. We also have the Targeted Review of Local Housing Need (TRLHN) and Older Persons Housing Needs Study, available on our evidence base webpage, which will inform where housing for older persons will be provided across the District.
How many homes will be built for renting from Housing Association? Really built for social renting.	New affordable homes build on S106 sites will be delivered by Registered Providers (housing associations). Emerging policy H2 requires 80% new affordable housing to be delivered as Social Rented housing unless otherwise agreed by the Housing Service.
What proportion of the Option 1 and Option 2 housing proposals are a) Social Rented b) Affordable rented c) Intermediate housing (between social and market rents, i.e. >80% of market rent, but <100% of market rent). In the document set, a= 80%, b= 20%. Why is there no mention of c? Are any category c housing counted in the plan's affordable housing target?	Emerging policy H2 requires 80% new affordable housing to be delivered as Social Rented housing and 20% as Shared Ownership housing, unless otherwise agreed by the Housing Service. Shared Ownership is a form of Intermediate Housing. Intermediate Rented housing is defined in the Council's template S106 legal agreement with rents set at a maximum of 80% of open market rent inclusive of any service charge
No mention of intermediate housing option in 2.12? Why?	
Page 80 - Are any of the identified "affordable homes" intermediate housing? (£1 under market rent would classify these homes as "affordable housing" under the category of intermediate rents).	

Re Policy H2 table - What is the definition of "Major"? What about Grey Belt sites not defined as "Major"?	Major' sites are those of 10 units or more. Grey belt sites of 9 units or less would be considered 'minor' and are exempt to the golden rules for grey belt sites due to their size.
Policy H2 - What happens to the financial contribution paid in lieu of affordable housing when it can be demonstrated by the developer that affordable housing is unviable on the site, and how does the financial contribution assist those seeking affordable housing? What links the two?	Financial contributions paid in lieu of affordable housing may only be used for the purposes set out in the Affordable Housing Supplementary Planning Document.
Page 84 - We see examples of planning conditions attached to rural housing provision (for example, for agricultural workers only) being challenged and overturned, and, where owners evidence that there are no occupiers or purchasers for such properties, the restriction is lifted. How is "in perpetuity" in this context, protected?	"In perpetuity" means that the restriction is intended to last forever, but in practice planning conditions can be reviewed if circumstances change. The Local Plan and national policy allow for this as conditions must remain reasonable and relevant. So whilst the policy aim is long-term protection, there is a legal process for lifting restrictions, if there is evidence, to the satisfaction of the Council, that they no longer serve their purpose.
How many permissions already been granted have not been built? How many 'empty' homes are in Sevenoaks District?	As at 31 March 2025, there are 3,978 dwellings permissioned and not yet started or currently under construction. There are currently 506 properties which have been unoccupied and unfurnished for 6 months or more.

Transport and Infrastructure

Question	Answer
Why are you not increasing the parking in Sevenoaks to accommodate commuters who will drive to Sevenoaks to catch trains to London?	We have worked closely with infrastructure providers, including Network Rail and KCC Highways, to understand what's needed to support the growth proposed in the emerging Local Plan. This has helped us identify emerging infrastructure requirements and also any existing pinch-points and capacity constraints that need to be addressed. As the emerging Local Plan progresses, we will continue discussions with infrastructure providers to ensure an appropriate level of station parking is planned for.
You mentioned supporting infrastructure - schools, shops, doctors, transport etc. what is planned and will it really be of adequate scope?	We have worked closely with all infrastructure providers that serve Sevenoaks District to understand what's needed to support the growth proposed in the emerging Local Plan. This has helped us identify infrastructure requirements and also any existing pinch-points and capacity constraints that need to be addressed. The emerging projects that have been identified are set out in the Infrastructure Delivery Plan Statement October 2025 and is available to view and comment on as part of the public consultation. We will continue to engage with infrastructure providers to develop the Infrastructure Delivery Plan further as the Local Plan progresses, with projects being refined and more detail added on phasing, costs and delivery mechanisms. This iterative approach ensures that infrastructure provision remains responsive, deliverable, and aligned with our strategic objectives.
What is the scale of new infrastructure as a result of these new developments? - 1) new reservoir, 2) sewage, 3) GP and schools, 4) free flow of traffic	
How are additional infrastructure requirements for a development assessed and how are constraints which restrict development assessed and applied?	
Infrastructure (schools and hospitals) are already in short supply in the district. Will enough additional be provided?	
The vision for the main DG site suggests a bus extension, school etc. How would existing houses be impacted? The plan looks to disregard existing homes.	

Who determines if you need a GP surgery for a development?	
DG is already stretched (schools, GP, roads). The village won't cope. What commitment given to infrastructure (that never happened when rye wood was built)?	
The land East of Childsbridge Lane Kemsing and south of West End. Surely the hopelessly inadequate roads through Seal and via Pilgrims Way make this non viable?	We are working closely with KCC Highways to model and measure the expected impact that the growth proposed in the emerging Local Plan will have on the transport network across the District. A second stage Transport Assessment has been undertaken to determine the transport implications of the proposed site allocations, and this is available to view and comment on as part of the public consultation. As the Local Plan progresses, further transport modelling work will be undertaken to better understand the traffic flow, capacity issues and mitigation required to accommodate the proposed growth. All transport improvement projects identified will be set out in the Infrastructure Delivery Plan by Regulation 19.
Given the current traffic problems in and around Sevenoaks's especially at rush hour how are you going to change the roads to handle the extra traffic? e.g. Brittain's Lane	
What about Rye lane! How is traffic going to be managed on Sev 24? Otford traffic is already horrendous	
Has any modelling been done on the A25 with Borough Green garden city, Kemsing, Quarry Site, Otford and Dunton Green? did the simulation come to a standstill?!	
How could the infrastructure in Kemsing possibly cope, the roads can not be improved!	
What steps are taken to ensure that developers actually deliver the mandatory requirements and infrastructure associated with building on grey belt land?	The delivery of infrastructure, including that constructed on-site or financial contributions made towards delivery off-site, are secured through a legal agreement (Section 106) between the infrastructure provider and the developer, and are enforced. These legal agreements set out the infrastructure to be provided as part of a

	development and when (e.g. roads, schools, GP surgeries, community facilities or utilities).
Are the infrastructure impact assessments and requirements published with the planning application?	Infrastructure projects identified in the Infrastructure Delivery Plan form part of the Local Plan (once adopted) and are then material considerations in the determination of planning applications. This means that if there is a piece of infrastructure that is deemed necessary on a particular site, it will be secured through a legal agreement (Section 106) at planning application stage. The timing of infrastructure delivery will be secured through the Section 106 agreement, which will specify, based on the urgency of the project, the stage of development at which the infrastructure must be provided.
Infrastructure. Before or after construction?	
With the infrastructure 1st policy, when can we expect the infrastructure be put in to get the infrastructure in place for the existing population?	
Where are we getting teachers and other professionals for the new infrastructures?	Ensuring adequate staffing levels for new infrastructure lies outside the scope of land use planning. However, in the case of education and health provision for example, the Council works closely with Kent County Council Education and the NHS to ensure that the timely delivery of infrastructure is aligned with the recruitment of professionals required to operate it effectively. We recognise that attracting and retaining skilled staff can be challenging - particularly in light of affordability pressures within the Sevenoaks District. To help address this, the emerging Local Plan includes policies that support employment growth alongside the delivery of new homes, prioritising affordable homes for those with a local connection to the area, including key workers. This integrated approach aims to provide future residents with greater choice in both housing and employment, helping to

	create the conditions necessary for sustainable service delivery.
Why are there no input from the bus authority and bus providers? Focus seemed to be entirely on rail no buses.	We contacted all infrastructure providers that serve Sevenoaks District, including bus operators, as set out in the Infrastructure Delivery Plan Statement October 2025 (Appendix A). Disappointingly we didn't receive any input from the bus operators but this is something that we will pick up again and address with them following the close of the public consultation.
Sewerage infrastructure - Will a new treatment works be needed in or near Sevenoaks, & how will this impact on River Darent?	We are aware that Thames Water has recently consulted on its draft Drainage and Wastewater Management Plan. The Long Reach Catchment Plan proposes a new sewerage treatment works (STW) site in Sevenoaks District to help manage future pressures on the existing STW. This needs further investigation and we will engage with Thames Water and KCC as the plans develop.
Is there any way to restrict access to Otford station so that Kemsing residents don't have to go to Sevenoaks to get the train to London?	The proposed growth set out in the Local Plan may have an impact on train capacities and frequency of services. Any improvements/changes suggested by Network Rail to accommodate additional passengers will be identified in the Infrastructure Delivery Plan.
And also charge extra for Otford residents to travel from Otford station. And while we are at it, rename Otford station 'Kemsing East'?	
Why have the assessments e.g. for traffic and infrastructure been done at a level that includes all of the proposed sites?	Sevenoaks District Council leads on engagement with infrastructure providers to gain an understanding of what new or improved infrastructure is needed to support the proposed Local Plan growth. The sites are considered by infrastructure providers individually and cumulatively,
Is the IDP done in a site to site basis? who conducts it?	

	although it is more often the cumulative impact of development that results in the need for infrastructure projects.
Is disruption/environmental damage/ construction traffic congestion etc. during construction taking into account when assessing a site?	Yes, the construction phase is considered as part of a planning application. Planning permissions often include conditions that control when / where / how construction traffic is managed to limit disruption to existing residents and the environment.
Improved connectivity from New Ash Green to Kemsing what is this i.e. bus route, a new road etc. (will buses be wheelchair accessible)?	We recognise that connectivity between New Ash Green and Kemsing is currently limited, and we are committed to improving sustainable transport options. We'll continue to work with KCC and local transport providers to explore opportunities for better links including potential improvements to bus services.

Climate Change and Flood Risk

Question	Answer
Page 165 - Policy CC4 Given the densities of housing you require, is it not inevitable that the tree planting ratio stated above will be unachievable on each site? What measures have you set to ensure that alternative tree planting in other locations, but within the locality boundary, will be completed, and where are the planned locations?	It is accepted that not every site will be able to achieve this, and there is a clause in the policy acknowledging this. We do expect the majority of larger sites to be able to do so. At present, we have not proposed a mechanism to secure off-site planting in circumstances where this is not the case. Please be sure to include this in your comments to the formal consultation for this to be considered.
Flood Risk Para 4.31 Why, in the paragraph above, is there no mention of the rare chalk stream, known locally as Guzzlebrook, one of only 200 chalk streams in the world, which runs through part of Kemsing? Surely this is worth mentioning and celebrating? It has been brought to your planning department's attention multiple times in the public comments relating to SE/25/00697/FUL – The Laurels, Greenlands Road, Kemsing	This policy is primarily about identifying potential flood risks rather than celebrating the various water environments within the District. Nonetheless, we will be happy to consider adding a line on the chalk stream into the supporting text to add to the context. Please be sure to include this in your comments to the formal consultation for this to be considered.
Page 173 Policy W2 - Is this SDC policy as yet? We have seen planning applications for developments where, in the absence of other methods of dealing with surface water run-off, the developer identifies discharge into the foul sewer as the only possible option. If this is policy, why is the application not rejected at an early stage? For example, see SE/25/00697/FUL – The Laurels, Greenlands Road, Kemsing	This is not yet policy and cannot be applied to applications currently. It will become policy once the Local Plan has been adopted.

Design

Question	Answer
The Local Plan talks about how development must have the highest quality design - how will this be addressed?	Chapter 5 of the Local Plan explains the Council's strategies for achieving high quality design in new development across the District. Please let us know what else you think would support our objective.
How do we select the community review panel?	The pre-ample to the Community Review Panel policy DE1 explains this process in more detail. We will be sharing and promoting this opportunity when it is launched in 2026.
Please explain fig 5.1 Design Advisory Panel should normally be at Development Brief stage, not at end of process.	The Development Briefs are very much the start not the end of the process. The development briefs are high level visions for sites that outline the opportunities and ambitions for the area. Development Briefs for some of the larger sites have had specialist masterplanning, highways and transport/active travel input via a workshop. As fig 5.1 demonstrates the Design Advisory Panel input is part of the pre-application process, which is at the beginning of the process and there is no limit to the amount of involvement from the Design Advisory Panel.
Community Review Panel - Will this be a different group of people for each application? Or a formal group who will comment on all applications within the SDC area? Given that many Parish Councils have councillor vacancies and find it hard to find committed volunteers, where do you think the (presumably voluntary) CRP post holders will come from? Will they be expected to meet with stakeholder groups, for example local residents opposed to a development, environmentalists, etc.? Lastly, is this	The Community Review Panel will not replace the public's right to comment on applications. The guidance on the Community Review Panel has not yet been published but the preamble to the policy (DE1) in the Local Plan explains in more detail. At this stage we are hopefully that our communities will engage with the Community Review Panel process and other local authorities run them with success. The primary role of a Panelist is to comment rather than disseminate information.

envisaged to replace public objections in the planning process, to try to overcome “nimby” objections?	
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Natural Environment

Question	Answer
Why does the proposal for housing north of The Wildlife Reserve not recognise that this is a nationally important nature resource?	The Sevenoaks Wildlife Reserve is a SSSI (Site Special Scientific Interest) and this is recognised. Any future development of land to the north of the SSSI will need to respond to this constraint and ensure a positive relationship between the two sites - as explained in the session, a landscape-led response has led the development brief for the site
Does the wildlife reserve have the same weighting as the National Landscape?	The Wildlife Reserve is a SSSI (Site of Special Scientific Interest) and is outside the National Landscape (previously AONB). They are different national designations since one relates to ecology and biodiversity, whereas the other is related to landscape.

Development Briefs

Question	Answer
Is there a Development Brief for each of the larger development sites in Otford & Kemsing?	Not for this stage of consultation. So far development briefs have been prepared for sites which were published within the previous Local Plan consultation, with the exception of SEV24 and SWAN15. Further development briefs for suitable sites which have been promoted most recently will be prepared for the next Regulation 19 consultation.
Does the development brief for land north of Sevenoaks refer to motorway access when it mentions improving east to west or is that only active travel?	The development brief does not suggest motorway access will be provided from the site.
The brief says density in the site north of Sevenoaks should be lower by the Wildlife Reserve, and higher near stations. That's contradictory - which wins?	The density range across the development parcels is indicated on page 20 of the SEV24 development brief, within the Placemaking and Built Form Plan. The development areas (yellow to orange shaded areas) closest to the Wildlife Reserve are proposed at the lowest density of 30-40dph. The highest density range of 50-60 dph is proposed within the development area closest to Dunton Green Station and within the development area fronting Otford Road.
Where will the vehicle access be for SEV24?	Currently vehicle access for SEV24 is proposed at two locations along Otford Road - one just north of the Lidl car park and another towards the roundabout/McDonalds. Vehicle access to the eastern portion of the site is proposed from the southern end of Rye Lane. Page 14 of the SEV24 development brief provides a Movement Plan which indicates these access points.

Have you calculated the density without taking into account of the flood plains in SEV24?	Yes - the proposed total number of 1500 dwellings has been calculated from the developable areas only (those shaded in yellow within the Vision diagram on page 12 of the SEV24 Development Brief) therefore excluding the flood zone. The density across these parcels vary from 30-60 dph.
How is DG station assessed as a sustainable way to support the plan? Single track rd., inadequate parking, no pavement on Rye Lane, 1 car access under rail bridge	We recognise that Dunton Green train station requires improvements, in terms of accessibility and parking, to ensure it can efficiently serve new and existing residents and encourage sustainable transport modes. This is noted within the development briefs for SEV24 and SEV19 which both contain reference to the need for improvements to Dunton Green train station within the Wider Settlement Infrastructure Requirements. More information surrounding what and how these improvements can be delivered with the new developments will be drawn out through the emerging Infrastructure Delivery Plan and ongoing development brief work.

Site Specific Queries

Question	Answer
Why is sev17 included in the plan if it was rejected by the inspector in 2022 and the reasons for rejection still apply?	Since the Planning Inspector's decision on this site, the new National Planning Policy Framework (NPPF) 2024 was published, alongside a new standard methodology for calculating housing need. This has seen the introduction of grey belt and an increase of 63% in annual housing need across the District. This means that the weighting in a planning decision now cannot be assumed to be the same as it was when the Planning Inspectorate published the decision. Accordingly, the site is considered suitable for development at this stage of the Local Plan process.
I know that your planning team was adamant on 29 July that SEV17 was not grey belt. What changed between then and 17 September?	
SEV17. To what extent did you take into account the inspectors finding during public inquiry in dismissing Croudace appeal when determining this land as grey belt?	
Why is Sev17 included when it was rejected by the Planning Inspector?	
The site in northern Sev includes the site of former municipal tip. Will this be cleaned up and developed?	This is considered through the Strategic Housing and Economic Land Availability Assessment (SHELAA). Where a site is former landfill, it is identified as requiring a contaminated land assessment to understand whether the site is suitable for development. The site assessments highlight where this is the case for each site and we would expect further information to be submitted by site promoters where this is identified.
Housing in Otford looks as if it will take up the car park - is this correct?	None of the potential sites in Otford including building over a car park.
Is there a developer promoting the dev in northern Sevenoaks and who are they?	Yes, Land North of Sevenoaks is being promoted by Fairfax Developments.

How do we get into the details for sites in Dunton Green?	Details for sites in Dunton Green can be looked at on our Interactive Map which can be found on the SDC website. The interactive map allows you to select a specific site and see the overview details and will also link to the SHELAA and also corresponding Development Brief if applicable to the specific site. The Interactive Map can be found at www.sevenoaks.gov.uk/emerginglocalplan
If Sevenoaks station car parks are developed, where are commuters going to park? Hopefully not side streets north of station, Bessels Green, Dunton Green etc.	The redevelopment will be required to reprovide the extent of existing car parking for commuters on site through a Multi Storey Car Park.
Why has the area of ancient woodland in the Sev Northern area been reduced on the map?	The area of Ancient Woodland within SEV24 is not proposed to be reduced. Development will be restricted within a 15m buffer of the Ancient woodland edge. If this appear reduced on the map, this is an error.

Site Selection Process

Question	Answer
Can sites be included without landowners' consent?	No, landowners must be supportive of the land being promoted to demonstrate that the site is 'available' and therefore allocated in the Local Plan. At Regulation 18 stage, this is assumed due to site submissions being required to confirm that landowners are supportive. However, we often find that sites will become unavailable through the consultation process, where responses are submitted by landowners who are not supportive. In addition, the Council will undertake detailed availability work, including land registry services and mailouts, to gather evidence of landowner support and availability.
Is there scope for some sites to be deemed unsuitable and removed? What criteria would eliminate one? I.e. only material planning, or public opposition?	Yes. We often see additional evidence submitted which would change the suitability outcome of a site. This could be any planning consideration assessed through the SHELAA process, for example highways access or capacity, flooding or environmental constraints. These considerations must be supported by evidence to form a justifiable basis to list a site as unsuitable.
Are you only considering sites proposed by landowners or are you pursuing underused or hoarded brownfield sites?	We have considered 521 sites through the Local Plan process. This includes two Call for Sites exercises (in 2021 and 2025), where site promoters put land forward to us. A small number of sites are existing adopted allocations, in our Allocations and Development Management Plan (ADMP) (2015) which have not yet been built out and have therefore been bought forward into this iteration of the Plan. In addition, a Settlement Capacity Study has also been undertaken and is available to view on our Evidence Base
Development around the station What about the derelict parcel of land in front of the Premier Inn (old Farmers pub). Has that been considered for inclusion?	

	webpage. This study looks at potential sites within our urban areas that may be suitable for development, and for those considered suitable we have undertaken further work with landowners regarding availability. A number of these sites have been confirmed as available and are included in the list of proposed allocations. In addition, sites which have planning permission at 31 March 2025, and have not yet started or been completed, are included in the housing supply total - this represents approximately 4,000 units.
Why have air quality assessments not been included?	The requirement for Air Quality Assessments is considered through the Strategic Housing and Economic Land Availability Assessment (SHELAA). This is following advice from our Environmental Health team. Site specific SHELAA assessments highlight where a site will require an air quality assessment to be prepared. At Regulation 18 stage, this is not considered to be a barrier to suitable development, as we do not yet have the findings from these assessments.
How many sites did you have vs the sites that are appropriate for development?	We considered 521 sites through the Strategic Housing and Economic Land Availability Assessment (SHELAA) process. These sites were identified through two Call for Sites exercises (2021 and 2025), by carrying forwards adopted allocations from the Allocations and Development Management Plan (ADMP) (2015) which have not yet been built out, and through the Settlement Capacity Study. Of the 521 sites which were assessed through the SHELAA, 132 are considered Suitable at this Regulation 18 consultation stage, and are identified in Policies ST2, GT1, EMP2 and COM2 of the consultation document.

What has happened to the sites which were included in the 2040 plan but are not in the new plan?	They may have fallen out of the process for a number of reasons. For example, they may not comply with our revised strategy, they may have been withdrawn by the original site promotor or we may have become aware of an issue on the site which makes it no longer suitable.
What does mixed use encompass?	Mixed use means that a site has more than 1 planning use proposed on it. This could mean the site is for housing, but also for employment or community uses such as education and leisure. Details on each mixed use site can be found in the site assessments on our website.
What is meant by land is “promoted”?	When referring to promoted land, we are talking about land that has been submitted to us for consideration for development. We have carried out a number of 'call for sites' over the last few years which resulted in a number of submissions made by land owners, or agents acting on behalf of land owners. These are promoted sites.

Consultation

Question	Answer
When objecting to a specific site can each person state their objection and another 100 use the same identical objection? This then counts as 101 objections.	Yes - each comment is counted regardless of whether it is identical to another comment.
What's the point of objecting, if you've considered policy. Why would the number of objections matter?	It is not so much the number of objections that matter, but the information within them. If we are alerted to information that we might not have already been aware of, this could impact the outcome for the site moving forwards to the next stage of the process.
There are many older people in DG. Particularly bordering the main DG site. As proposing 1500 units Pls can you arrange a pop up session in DG?	In areas where settlements are in close proximity, for example Otford and Kemsing, Otford and Dunton Green, Swanley and Hextable, Eynsford and Farningham and Hartley and New Ash Green, we have booked a session in one location with the expectation that it will serve multiple communities. As I'm sure you can appreciate these sessions are hugely resource intensive and we have planned as many as we can facilitate. As such, we will not be scheduling any more beyond those already planned, but of course appreciate that may displease some people.
Does your online consultation also restrict the number of characters when submitting a response?	No, there is not a character limit on the online survey when submitting responses.
Our local library does not have hard copies of the document – Kemsing?	A pack of hard copy documents was delivered to Kemsing Library. We will get in touch with them to investigate.
What weight are you giving to public opinions and comments?	We are welcoming all public opinions and comments through the Regulation 18 Consultation process, these will

	all be carefully considered after the consultation has ended and will inform how we move forward as we work our way to Regulation 19 in the Summer of next year. For example, they may alert us to information about a site that we were not aware of and this may impact how or if the site moves forward.
Can we see which landowners have submitted these proposals?	We are unable to provide private landowner information due to data protection.
Why are there none of these sessions in Kemsing when we are facing a 25% population increase?	In areas where settlements are in close proximity, for example Otford and Kemsing, Otford and Dunton Green, Swanley and Hextable, Eynsford and Farningham and Hartley and New Ash Green, we have booked a session in one location with the expectation that it will serve multiple communities. As I'm sure you can appreciate these sessions are hugely resource intensive and we have arranged as many as we can facilitate.
The online form is very difficult to follow + each site (6 in Kemsing) need to be done separately - why?	People may wish to submit specific or different information for each site and therefore it was essential to have a dedicated space for all of them. We appreciate that it may take some time for people who wish to comment on multiple sites but it is important that we are able to split these out on a site by site basis as we move through the process.
Why had the portal been made so un user friendly... it's very hard to navigate and asks leading questions?	We recognise that due to the large number of policies and sites that we are required to consult on, and the requirements of a Local Plan consultation, the online survey may not be the preferred way to respond. Therefore, we are

	also accepting responses by email (to planning.policy@sevenoaks.gov.uk) and by post.
Are you only considering comments that are within the grounds of the NPPF?	All comments will need to be based on material planning considerations and yes, these will need to align with the NPPF.
What is the process for flagging errors found in the evidence-based documentation?	Please submit comments through the consultation portal - evidence base section

Other queries

Question	Answer
Page 87 - This is disingenuous. The Government have increased the age at which pensions are available, ramping up to 67 by 2042, and it is planned to rise to 68 after 2044. This means that your now-arbitrary statement using "residents aged 65 and over" should be adjusted taking into account those aged 66 and 67 over the lifespan of this plan. You are applying out-of-date criteria to support your statistics relating to housing requirements for "older people", which is intended, surely, to be separate from the category of "working-age people". The "housing required" numbers are therefore artificially inflated by misrepresentation. In addition, people are living longer but also maintaining active lifestyles into older age when compared to current demographics.	No comment – please resubmit this as a response to the consultation.
Otford has better transport links (train and road) so they went there	No comment – please resubmit this as a response to the consultation.
How many homes are there currently in Otford? How many in development plan for Pedham place? For scale to be able to compare	According to the Census 2021 data, there are 1,401 households in Otford Parish. The Pedham Place proposal is for 2,579 homes.
How many TPOs are there in place already in DG?	There are several TPOs across the Parish which can be viewed on our interactive planning map here: https://www.sevenoaks.gov.uk/info/20008/planning. Please open, scroll to 'frequently used constraints' and select 'Tree Preservation Order'

Why is DG part of the principle Sevenoaks site? Its a tiny village. Is it simply convenience that there is land? How are you considering existing residents?	Dunton Green is included within Sevenoaks Urban Area (SUA) which is defined as the Principal Town in the Settlement Hierarchy (SH). This means identified land and sites within SUA are of the most sustainable as per the SH Methodology. Consideration is made to existing residents through extensive analysis and assessment of the sites in relation to the existing state of the settlements to ensure development can be brought forward without major harm to those living there.
Where can I find out the sites that already gained planning permissions?	As at 31 March 2025, there are 3,978 dwellings permissioned and not yet started or currently under construction. We do not have a readily available map of these as they are constantly changing, but there is some more information on this on pages 50 and 51 of the draft plan document.
Do you have capacity for work experience students; or are you full?	To enquire about work experience opportunities, please contact us on 01732 227000 or information@sevenoaks.gov.uk
Are there any plans to build a second McDonald's in Otford, to support the proposed increased population of the village and existing main road network. Thanks.	There are no currently known plans for an additional McDonalds in Otford.
Will SDC look to put in true legal constraints on developers and take legal action where these are not fulfilled?	Particular elements of schemes (such as the provision of schools, community infrastructure, public realm improvements etc.) can be secured by conditions and S106 planning obligations, to ensure these are delivered on site and in a timely manner. We have undertaken whole-plan viability assessment to ensure that these scheme elements

	can be delivered on site, without compromising the viability of the scheme.
What happens to speculative planning applications i.e. Croudace during the time it takes to put the local plan together?	Some site promoters chose to 'twin-track' their proposals i.e. to promote them for a site allocation as well as submitting a planning application. However, the inclusion of a site in a Reg.18 consultation only has very limited weight at this stage. As the Plan progresses, through Reg.19 publication and examination, the inclusion of a site in a submitted draft plan would be a material consideration in the assessment of the planning application, though of limited weight. But this is only if a site is not very controversial, since it has not yet been tested at examination. The Green Belt/grey belt evidence has now been published and is available to use in decision-making as well as for the Local Plan process
What would be the response to a private developer putting in a planning application for grey belt site and bypassing this whole process?	
Does the new plan have any effect on planning applications that are put forward now?	
How do we get anyone to engage when our Kemsing councillors can't reply or speak to us?	If you have specific further queries, you are welcome to contact the planning policy team on planning.policy@sevenoaks.gov.uk or speak to your local ward councillor