

Sevenoaks Town Council's response to the District Council's Regulation 19 consultation on its Local Plan - As amended and approved by the Sevenoaks Town Council Planning & Environment Committee on 7th September 2026

Question 1: Please clearly state below which Policies, Sites or Evidence Base documents your comments relate to. Please utilise the Policy and Site references included in the drop down links above.

Policies commented on:

Policy CC2, Policy DE1, Policy DE2, Policy DE3, Policy DE4, Policy HW1, Policy IN1, Policy OS1, Policy COM1, Policy T2 and Policy T3.

Allocation sites commented on:

Pinetops, 5 Crownfields (ST2-5), Land at Cramptons Road (ST2-6), Sevenoaks Station (ST2-8), Station Car Park (ST2-9), Land East of High Street (ST2-10), 160 London Road (ST2-11), Delivery & Post Office / BT Exchange, South Park (ST2-12), Land north of Barnett Field (ST4-1), Land west of Brittain's Lane (ST4-4), Brittain's Lane, Kippington (ST4-5), Land north of Sevenoaks, west of Otford Road (ST4-7).

Please provide your comments here.

Sevenoaks Town Council considered the policies within the Regulation 19 draft Local Plan to be too high-level and insubstantial to deliver any substantive change, as well as lacking a tangible framework to secure their delivery. It would have expected far more detail and direction within a local planning document, setting out how the objectives will be delivered and delivering measurable progress. While the housing policies (ST2-ST5) propose measurable projects which will achieve the aim of delivering the required housing numbers and in the format of housing and mixed-use allocations, the remainder of the policies are lacking in a strategy which will hold the Plan accountable for delivering the objectives that it envisions.

The Transport section was considered to be of particular intangibility in practice, in that it discusses the provision of facilities but does not address the need to influence behaviours and how to change these, nor does it consider how the overall transport infrastructure for Sevenoaks Town would function with 4,500 additional houses within three miles.

The Infrastructure Delivery Plan identifies three major junctions along the A25 and either within or close to the Sevenoaks Town boundary that are already subject to significant capacity and congestion pressures. These are the Riverhead roundabouts, the Bat & Ball junction, and the Seal Road / Seal Hollow Road traffic lights.

Evidence from a former consultant to Kent County Council shows that the planned roundabout at Bat & Ball is unlikely to be able to support the growing traffic flow along the A25 and from the 950 new dwellings anticipated at Sevenoaks Quarry. The Town Council expressed particular concern that the narrow approaches from the east and north of the anticipated Bat & Ball junction roundabout will not only continue to cause significant congestion, but that this impact will be further exacerbated by the proposed 1,500 homes at allocation site ST4-7. It advised that pressure to the highway network will also be intensified as capacity at the nearby schools are increased.

Sevenoaks Town Council emphasised the importance of an "infrastructure first" approach in housing delivery, and raised its concern that the District will not be able to support 17,460

new homes over the next 15 years without securing both new and improved infrastructure provision for existing and future residents.

It noted that a separate consultation is currently being undertaken by the District Council on a revised Community Infrastructure Levy (CIL) Charging Schedule, which proposes to replace the need for developers of 10 or more units to pay a contribution towards indetermined infrastructure improvements via CIL with a more focused Section 106 agreement approach instead. While the intention of ensuring that infrastructure improvements are targeted at the specific locations receiving the increased housing numbers is supported, Sevenoaks Town Council emphasised that local input as to what improvements are needed is vital to ensuring that the best value is achieved for both existing and future residents. Town and Parish Councils must be consulted, both on the contents of the Infrastructure Delivery Plan and its corresponding Project Schedule, as well as future Section 106 negotiations. It considered Town and Parish Councils to be the best placed for identifying the most pressing needs and values of local people, as well as to aid in the delivery and maintenance of future community assets.

The Town Council further recommended that the value of Town and Parish Councils in providing local representation must be consistently recognised and applied throughout the Local Plan and its Policies, particularly in the preparation and consultation process of Design Codes, Design Review Panels, Section 106 negotiations, and Infrastructure Delivery Plan consultations.

Character area and identity remains one of the highest of the Town Council's priorities, and it welcomed the recognition afforded to this within the Local Plan's policies. Concern was raised however, with the omission of any mention within the draft Plan as to the existing Residential Character Area Assessments, of which there is one for both Sevenoaks Town and Edenbridge.

Housing and mixed-use allocations:

Sevenoaks Town Council advised that recognition as to how the significant housing proposed within Sevenoaks Town could impact the dynamic and identity of the Town must be considered. The three developments proposed at and around the Sevenoaks Station area (ST2-8, ST2-9 and ST2-11) propose 720 new housing units between them, which could have a significant impact as to the perceived central point of Sevenoaks Town – particularly when taken in conjunction with the 1,500 units proposed at land north of Sevenoaks, west of Otford Road (ST4-7). Due to steep topography, the Town Centre is neither easily nor conveniently accessible from these sites by foot, which could further risk disconnect between the Town Centre and these large development sites. In the absence of a regular, 14 hour 7 day a week bus service, these sites will not be able to contribute to the economy of Sevenoaks, with future residents more likely to travel to nearby amenities via train.

Furthermore, the Town Council considered that the additional housing proposed for Sevenoaks Town, not least from the three sites proposed around Sevenoaks Station (being ST2-8, ST2-9 and ST2-11), will contribute a significant rise in demand for commuter infrastructure to and from London. The Town Council noted that the IDP does not propose any provision for this increased demand to the rail network, which the Sevenoaks Rail Travellers Association has predicted will be in the range of 2,400 additional daily commuter journeys into London by 2040. Similarly, the Development Briefs for proposed allocations ST2-8, ST2-9

and ST2-11 also omit any plans for addressing the significant increase in access and pressure to the railway network.

On current patterns, between 30% and 50% of the aforementioned 2,400 additional daily commuter journeys into London will likely be via the faster services via Sevenoaks Station, and Sevenoaks Town Council therefore advised that infrastructure and service improvements will be essential to ensuring that the network has the capacity to support these journeys.

Please see comments made directly under the allocations for ST2-8, ST2-9 and ST2-11, as well as under Question 5, Proposed Modification 15, which the Town Council hopes will address its concerns.

Policy H1 (Housing Mix):

Sevenoaks Town Council raised concern as to the lack of detail provided within Policy H1 as to the “variety of house sizes and types” which should be delivered across the District as part of this Policy. It considered that specification or a framework as to what and how this variety of housing should be determined should be embedded within the Policy in order to reduce ambiguity and ensure that its purpose is actually achieved. Modern ways of providing elderly housing, such as increasing the density of elderly and special care units on the most sustainable and accessible of sites in order to facilitate creation of communities and reduced reliance on outside care was considered to be a particularly effective method. Please see Question 5, Proposed Modification 1 which the Town Council considers will address its concern with this lack of detail.

Policy SEV1 (Sevenoaks Town Centre):

Sevenoaks Town Council welcomed the recognition of the envisioned Cultural Quarter, which is a key aspiration of its Neighbourhood Development Plan, as well as of its Town Centre and St John’s Hill Area Masterplans. It noted that the latter documents are no longer drafts, but have since been finalised and adopted.

The Town Council also noted that, while the Development Briefs for the proposed allocations cite Policy SEV1 as a Policy Priority, mention is not made within those for the Town, St Johns and Northern allocations. This was considered to be both an inconsistency and missed opportunity to secure consistency and successful application of Policy SEV1, particularly as the Town and St Johns Masterplans both include design guidance and infrastructure recommendations for some of the sites proposed for allocation within the Regulation 19 Local Plan. The Town Council raised particular attention to the traffic movement options for the Town Centre triangle, explored within the Sevenoaks Town Masterplan. A range of options, including for a one-way traffic system and improvements to the pedestrian environment were explored, with a recommendation that any future changes be modelled and introduced on a trial basis. Delivery of much needed improvements – both to the pedestrian and motorist environment and particularly on the exceedingly narrow London Road – would be an ideal provision for securing under Section 106 negotiations, particularly as the existing network is insufficient to support the current population numbers.

Please see Question 5, Proposed Modification 2 which the Town Council considers will address its concern.

Policy CC2 (Sustainable Design and Construction):

Sevenoaks Town Council welcomed the inclusion of sections 8a and 8b within Policy CC2 and on “Sustainable Construction,” including its provisions addressing polluted water run-off, dust, noise and vibration. It expressed its disappointment however, that supporting paragraph 4.16, which provides further context to this provision, does not appear to consider the impacts associated with construction vehicles; referring only to construction machinery.

The Town Council considered that its previously submitted request for the policy to recognise and require mitigation of the air-quality and noise impacts associated with heavy goods vehicles (HGVs) remain relevant to making the Plan sound and consistent. Please see Question 5, Proposed Modification 3 which the Town Council considers will address this concern.

Policy DE1 (Community Engagement):

Sevenoaks Town Council deeply regretted the loss of the proposed new Community Review Panel that had been proposed in the previous Regulation 18 iteration of this Local Plan. It acknowledged however that this Policy may have been challenging to enforce, citing its own observation that Aim C6 of the Sevenoaks Town Neighbourhood Plan (which requires major and/or sensitive applications to be submitted to Design Review Panel) has not been successfully enforced since the Plan's adoption in May 2023. The Town Council emphasised the importance of positive and active community engagement however, and considered this to remain essential to ensuring the successful delivery and integration of the Local Plan's proposed housing allocations into the wider community. Policy DE1 does not currently provide any detail as to how this will be achieved, nor a framework or standards expected via consultation methods. Please see Question 5, Proposed Modification 4 which the Town Council considers will address this concern.

Policy DE2 (Design Review):

Sevenoaks Town Council expressed its keen support for the reduction of the threshold previously proposed via the Regulation 18 draft of the Local Plan, for a development scheme to be required to undertake a Design Review Panel. It reiterated the importance however, in ensuring that local views and priorities are represented during this process, in order to ensure the successful delivery and integration of the Local Plan's proposed housing allocations into the wider community. Please see Question 5, Proposed Modification 5 which the Town Council considers will address this concern.

Policy DE3 (Ensuring Design Quality):

Sevenoaks Town Council questioned the omission of any mention within the Local Plan of either the Sevenoaks or Edenbridge Residential Character Area Assessments. These are highly detailed and locally valued design guidance documents, the former of which is further supported within the Sevenoaks Town Neighbourhood Plan ("made" at Referendum in May 2023) via Policy C4 which explicitly names this Supplementary Planning Document and requires applicants to comply with its design standards.

The Town Council noted that a brief mention to these Residential Character Area Assessments is made in the introductory pages of the Development Briefs, but only appears in the resulting design guidance of four of these Briefs (being ST2-3, ST2-5, ST2-6 and ST4-4). It is omitted within the identify and design guidance notes of any of the remaining Development Briefs and is not recognised within the Local Plan, which risks its consistency both in compliance by developers and application by Planning Officers.

Please see Question 5, Proposed Modification 6 which the Town Council considers will address this concern.

Policy DE4 (Design Guidance and Codes):

The Town Council expressed its support for the reduced threshold from 100+ units to 10+ units for a development to require a Design Code, however noted that this requirement neither clarifies which bodies should be consulted on the emerging Design Code past "in partnership with SDC and the local community," nor the method for how this consultation

should take place. Please see Question 5, Proposed Modification 7 which the Town Council considers will address this concern.

Policy HW1 (Health and Wellbeing):

Policy HW1, paragraph 15a states that “new development should be located within safe, well-lit, and accessible walking distance to services and facilities.” Sevenoaks Town Council raised its concern that this Policy does not provide a contingency requiring a development proposed in an area that does not have these facilities already, to provide them as part of the scheme. Please see Question 5, Proposed Modification 8 which the Town Council considers will address this concern.

Policy IN1 (Infrastructure Delivery):

Sevenoaks Town Council expressed support for supporting paragraph 9.10, which recognises Town and Parish Councils as important partners in identifying appropriate and necessary infrastructure improvement needs, however raised its concern that this has not fed into Policy IN1, outside of the previous Regulation 18 consultation. The Town Council noted with its support that the District Council has since sent an email dated 26th August 2026, seeking Town & Parish Council input in its IDP, and emphasised that this opening of dialogue must be maintained throughout the lifetime of the Local Plan, as well as their input sought during Section 106 negotiations. Please see Question 5, Proposed Modification 9 which the Town Council considers will address this concern.

Policy OS1 (Open Space and Recreation):

Sevenoaks Town Council noted that Neighbourhood Development Plans are indicated as an anticipated method for identifying and designating “Local Green Spaces”, including “all other open spaces of value to the local community”. It considered this description to be lacking detail and therefore consistency in how it will be applied, and also advised that the designation of such spaces solely via Neighbourhood Development Plans – which take a significant amount of time and funding to produce – as a functionally inadequate means of doing this. Local open spaces are a valuable asset to local communities and should be granted protection for the important function that they have in furthering residents’ social and recreational interests as well as mental and physical wellbeing. The Town Council suggested that allowing open spaces of local value to be identified and allocated via the Asset of Community Value (Community Right to Bid / Buy) process would be an appropriate additional measure for identifying such spaces and make this policy more deliverable. Please see Question 5, Proposed Modification 10 which the Town Council considers will address this concern.

Policy COM1 (Provision and Retention of Community Uses):

Sevenoaks Town Council expressed its keen support for paragraph 58 on page 292, which states that “ACV status is therefore a relevant consideration when assessing proposals affecting valued community facilities.” It considered the term “relevant” to be insufficient due to the standard terminology in assessing planning applications being “material” and advised that in its current format, this description may not be robust enough to give it much weight in practice. Please see Question 5, Proposed Modification 11 which the Town Council considers will address this concern.

Comments on proposed housing allocation sites:

Pinetops, 5 Crownfields (ST2-5):

Sevenoaks Town Council questioned the lack of consideration within the SHELAA report produced for this site, as to impact and mitigation measures which will be required to protect

the portion of this site which is covered by a blanket Tree Protection Order. It noted that a portion of the allocation for Bakers Yard (EMP2-1) had been removed since the Regulation 18 consultation, on the grounds of its Tree Protection Order, however the report for ST2-5 has not recognised this as a site constraint.

The Town Council expressed its concern that the proposed housing numbers and density appeared to have been calculated without first taking into consideration and excluding the portion of the site covered by the blanket TPO. It considered this to be an essential step, particularly as this would cause the proposed housing density to increase to a significant and unacceptable volume contrary to the Local Plan's recommendations.

Furthermore, Sevenoaks Town Council raised concern as to the deliverability timeline predicted within the report, on the grounds of having received report that the land is subject to a restrictive covenant which prohibits its development. While the Town Council acknowledged that restrictive covenants are separate from the planning system and therefore that they would not prevent an emerging scheme from obtaining planning permission, it questioned whether the deliverability of this site as a housing allocation would still hold.

Please see Question 5, Proposed Modification 13 which the Town Council considers will address these concerns.

Land at Cramptons Road (ST2-6):

Sevenoaks Town Council raised its concern with the significant increase in proposed density from the previous Regulation 18 consultation. This is particularly on the Town Council's understanding that such a large development would require piling works, which were considered too high of a risk next to one of the Town's main sources of drinking water. The Town Council stipulated that there must be no possible risk to the integrity of the Town's water supply caused by piling works. It recommended that spatial allocation should instead be prioritised to create an outdoor play space and common area, in order to address the significant undersupply of such amenities in this local area. Please see Question 5, Proposed Modification 14 which the Town Council considers will address this concern.

Sevenoaks Station (ST2-8), Station Car Park (ST2-9), and 160 London Road (ST2-11):

Sevenoaks Town Council expressed concern that the Development Brief for the two Station sites, as well as 160 London Road, have neither been considered in conjunction with each other, nor in relation to how they will be incorporated into the identity of the Town. The topography of Sevenoaks Town, whereby the Town Centre is an arduous uphill walk from the train Station and is not supported either by convenient and safe active travel routes or a reliable and frequent bus service, poses a significant risk that any resulting housing development in the Sevenoaks Station area could be to the detriment of the thriving Town Centre and its envisioned Cultural Quarter. While the three sites pose an opportunity to develop highly sustainable locations, this must be supported by travel infrastructure which would secure the vitality, health and economy of the Town Centre. As currently proposed, and without robust links to the Town Centre, these development sites are unlikely to contribute to the economy of Sevenoaks Town, with their future residents much more likely to travel further afield via train for their services and nighttime economy. The Town Council noted that the Infrastructure Delivery Plan does not address the emerging need for enhanced train and bus services which will be a direct consequence of over 700 new homes being delivered at this location alone.

Sevenoaks Town Council further raised its concern that the Development Brief for Sevenoaks Station proposes the multi-storey car park to be delivered at the furthest possible location

from the Station. This poses the significant risk that commuters will bypass this, in favour of using valuable residential parking space, which is proposed to be delivered much closer to the Station itself. In practice, this will not deliver a cohesive and productive development which balances the need for commuter and residential infrastructure and is not considered an effective use of land, nor mix of use.

The Town Council also questioned whether the Local Plan's evidence base satisfactorily supports the housing mix proposed for this site, which envisions the site to primarily house future commuters who have no need for a car. The building heights, which go up to 12 storeys, were considered to be inappropriate and not cohesive with the identity of Sevenoaks Town as a market town of a primarily domestic-scale, with houses typically reaching 2.5 storeys.

Furthermore, Sevenoaks Town Council emphasised that the Development Briefs for the Sevenoaks Station and surrounding sites must provide a clear vision for the key role of these sites. If they are intended as a gateway to the Town, then adequate infrastructure must be delivered to ensure that people arriving via train are able to easily access the Town Centre. If their key functions are proposed to be housing, then it must be delivered in a way which secures positive integration with the rest of the Town, including coherent and well-designed living spaces. To deliver housing for commuters who are not encouraged to and supported in accessing the rest of Sevenoaks Town was considered by the Town Council to be a significant missed opportunity.

Finally, Sevenoaks Town Council reiterated its earlier comments under Policy Housing and mixed-use allocations, that the additional housing proposed for Sevenoaks Town, not least from the three sites proposed around Sevenoaks Station (being ST2-8, ST2-9 and ST2-11), will contribute a significant rise in demand for commuter infrastructure to and from London. The Town Council noted that the IDP does not propose any provision for this increased demand to the rail network, which the Sevenoaks Rail Travellers Association has predicted will be in the range of 2,400 additional daily commuter journeys into London by 2040. Similarly, the Development Briefs for proposed allocations ST2-8, ST2-9 and ST2-11 also omit any plans for addressing the significant increase in access and pressure to the railway network.

On current patterns, between 30% and 50% of the aforementioned 2,400 additional daily commuter journeys into London will likely be via the faster services via Sevenoaks Station, and Sevenoaks Town Council therefore advised that infrastructure and service improvements will be essential to ensuring that the network has the capacity to support these journeys.

Please see Question 5, Proposed Modification 15 which the Town Council hopes will address its concerns.

Land East of High Street, Sevenoaks (ST2-10):

Sevenoaks Town Council raised concern that the loss of 300 parking spaces within the Town Centre in favour of housing provision within proposed allocation site ST2-10 would have a significant impact on the wider highway network as well as the economic viability and attractiveness of Sevenoaks as a commercial centre.

The July 2025 Transport Report produced for Land East of High Street demonstrates that existing parking provision within the Town Centre is already subject to significant pressure; particularly Buckhurst Lane (104% occupancy at its peak) and Leisure Centre B (109% occupancy at its peak). At the Saturday peak, eight of the ten surveyed car parks were operating at or above 90% capacity. The Town Council considered that the proposed loss of existing parking provision, combined with the introduction of over 4,500 new homes within

the catchment area of Sevenoaks Town Centre, would further reduce the resilience of the Town Centre's parking network, as well as risk exacerbate existing parking and highway pressures.

Delivery & Post Office / BT Exchange, South Park (ST2-12) and Policy ST2:

Sevenoaks Town Council noted with confusion that the proposed allocation site ST2-12, which had previously been proposed in the Regulation 18 consultation for 75-100 dwellings, has been reduced to 0 dwellings.

The Town Council considered this to be a particularly sustainable and ideal location for a mixed development of housing and commercial uses, and therefore sought clarification as to why its proposed housing numbers and associated Development Brief – consulted on at Regulation 18 stage – have been removed from both the Local Plan and its Evidence Base list.

Please see Question 5, Proposed Modification 16 which the Town Council hopes will address its concerns.

Land north of Barnett Field (ST4-1), Land west of Brittain's Lane (ST4-4), and Brittain's Lane, Kippington (ST4-5):

Sevenoaks Town Council raised its concern that the three proposed housing allocations (referenced ST4-1, ST4-4 and ST4-5) are not based on a convincing argument for their allocation as grey belt. Please see the Town Council's response to Question 2 where this query is raised to the Independent Examiner.

The Town Council considered that these sites, the first of which abuts a Site of Special Scientific Interest and view to the National Landscape and the rest which also interact with National Landscape, do not meet the criteria for grey belt designation, and requested the Independent Examiner's close consideration of this.

Brittain's Lane is also considerably narrow and lacking pavement on either side, which would need significant infrastructure improvements including road widening and both pavement and active travel route provision, in order to support the proposed new housing sites.

Please see Question 5, Proposed Modification 17 which requests that, should these allocation be retained, appropriate road and pavement improvements are secured.

Land north of Sevenoaks, west of Otford Road (ST4-7):

Notwithstanding the Town Council's concern raised under ST4-1, ST4-4 and ST4-5 that it is not convinced with the methodology used to designate grey belt sites within the proposed Local Plan, Sevenoaks Town Council also raised significant concern with the proposed housing allocation for ST4-7. This is on the grounds that it considered the proposed housing to risk unacceptable damage to the adjacent wildlife reserve and its inhabitants, as well as the rare chalk stream which travels through the site and over which a road and housing sites are proposed.

The proposed road was of a particular concern, due to there being no consideration as to impact on the floodplain and wildlife, as well as any unintended consequences whereby traffic will start to migrate via this route in favour of the motorway.

The Town Council also drew to attention that the Development Brief has not considered the site constraint for the area to the east, which is located on a former landfill and which would therefore pose significant issues at the delivery stage for any emerging development.

At a minimum, the Town Council considered that the smaller, southern hamlet proposed at the northern boundary to the nature reserve should be removed, on the grounds of potential risk and damage to the wildlife reserve. This could be achieved by increasing the housing

density to the western hamlet, which is sustainably located in the near vicinity of Dunton Green train station and would make an ideal location for smaller, denser units which would support the Town's aging population and allow the creation of small, supportive communities.

Please see Question 5, Proposed Modification 18 which the Town Council hopes will address its concerns.

Question 2: Do you consider the Local Plan to be legally compliant?

- Yes
- No
- **Unsure X**

Please provide your comments here

Sevenoaks Town Council raised its concern as to whether the framework and evidence base on which the identification and allocation of proposed grey belt sites have been based are legally compliant and arising from a locally applicable definition of what a "large settlement" is.

The Town Council advised of a legal opinion which had been secured by the Sevenoaks Society, which provides an appraisal of Sevenoaks District Council's approach – outsourced to Arup – of defining a "large built-up area" as 75,000 people. It raised concern that this definition could risk weakening the protection of the District's entire Green Belt, and expressed its support of the legal opinion. The Town Council considered this to have provided clear grounds for challenging the Local Plan's proposed designation of grey belt sites, not only based on the Marlow case – whereby the Minister's definition of Marlow as a "large built up area" prohibited the reclassification of Green Belt at its border – but also based on more local evidence of the Brittain's Lane Inspector's decision which reached the same conclusion. Given the fact that Sevenoaks' built-up area is significantly larger than Marlow's, and its similar planning constraints of being adjacent to National Landscape, important nature conservation assets and floodplains, Sevenoaks Town Council considered the two aforementioned arguments relevant to the Local Plan and particularly to proposed allocation sites ST4-1 and ST4-7.

Sevenoaks Town Council wished to draw the Independent Examiner's attention, both to the Sevenoaks Society's legal opinion, which it understood to have been submitted as part of the Society's own response to the Regulation 19 consultation, as well as to its implication that the Local Plan's designation of "grey belt" sites may not be consistent with Ministerial and Planning Inspector case decisions.

The Town Council requested that the Independent Examiner carefully consider and confirm their satisfaction that:

- The external ARUP reports which have informed the proposed allocation of grey belt designation are based on an accurate definition and informed criteria for identifying grey belt. This is in relation particularly to the proposed allocations sites referenced ST4-1 (Land north of Barnett Field), ST4-4 (Land west of Brittain's Lane), ST4-5 (Brittain's Lane, Kippington) and ST4-7 (Land north of Sevenoaks).

- The biodiversity and viability of both the Sevenoaks Wildlife Reserve, located at the southern border of proposed allocation ST4-7, as well as the rare Darent River chalk stream which travels through the proposed allocation, will not be compromised or adversely impacted by its proposed development.

The Town Council requested that, should the Inspector concur with the Sevenoaks Society's legal opinion or find fault with either of the above, that the Local Plan be amended to require any forthcoming development of these Green Belt sites at the edge of Sevenoaks Town, to be released only under exceptional circumstances and with significant benefits delivered as part of their proposals. Without this treatment, the Town Council did not consider the Plan to be either "sound" or "legally compliant."

Its concerns notwithstanding however, Sevenoaks Town Council would defer to the expertise of the Independent Examiner.

Question 3: Do you consider the Local Plan to be sound?

- Yes
- No
- **Unsure X**

If you do not consider the Local Plan sound, or you are unsure, please specify on what grounds.

- Positively Prepared
- Justified
- **Effective X**
- **Consistent with National Policy X**
- I consider the Plan sound
- Unsure how to answer

Please provide your comments here

Effective:

Sevenoaks Town Council reiterated its concern (as per Question 1) that the policies within the Regulation 19 draft Local Plan to be too high-level and insubstantial to deliver any substantive change and lacking a tangible framework to secure their delivery. It would have expected far more detail and direction within a local planning document, setting out how the objectives will be delivered and delivering measurable progress. While the housing policies (ST2-ST5) propose measurable projects which will achieve the aim of delivering the required housing numbers and in the format of housing and mixed-use allocations, the remainder of the policies are lacking in a strategy which will hold the Plan accountable for delivering the objectives that it envisions.

The Transport section was considered to be of particular intangibility in practice, in that it discusses the provision of facilities but does not address the need to influence behaviours and how to change these, nor does it consider how the overall transport infrastructure for Sevenoaks Town would function with 4,500 additional houses within three miles. The Town Council reiterated its earlier observation under Question 1, that neither the IDP nor the

Development Briefs for the three significant development sites proposed around Sevenoaks Station (being ST2-8, ST2-9 and ST2-11) had taken into consideration the pressure that these developments could have on the nearby rail network.

Consistent with National Policy:

Sevenoaks Town Council reiterated its response to Question 2, as follows:

Sevenoaks Town Council raised its concern as to whether the framework and evidence base on which the identification and allocation of proposed grey belt sites have been based are legally compliant and arising from a locally applicable definition of what a "large settlement" is.

The Town Council advised of a legal opinion which had been secured by the Sevenoaks Society, which provides an appraisal of Sevenoaks District Council's approach – outsourced to Arup – of defining a "large built-up area" as 75,000 people. It raised concern that this definition could risk weakening the protection of the District's entire Green Belt, and expressed its support of the legal opinion. The Town Council considered this to have provided clear grounds for challenging the Local Plan's proposed designation of grey belt sites, not only based on the Marlow case – whereby the Minister's definition of Marlow as a "large built up area" prohibited the reclassification of Green Belt at its border – but also based on more local evidence of the Brittain's Lane Inspector's decision which reached the same conclusion. Given the fact that Sevenoaks' built-up area is significantly larger than Marlow's, and its similar planning constraints of being adjacent to National Landscape, important nature conservation assets and floodplains, Sevenoaks Town Council considered the two aforementioned arguments relevant to the Local Plan and particularly to proposed allocation sites ST4-1 and ST4-7.

Sevenoaks Town Council wished to draw the Independent Examiner's attention, both to the Sevenoaks Society's legal opinion, which it understood to have been submitted as part of the Society's own response to the Regulation 19 consultation, as well as to its implication that the Local Plan's designation of "grey belt" sites may not be consistent with Ministerial and Planning Inspector case decisions.

The Town Council requested that the Independent Examiner carefully consider and confirm their satisfaction that:

- The external ARUP reports which have informed the proposed allocation of grey belt designation are based on an accurate definition and informed criteria for identifying grey belt. This is in relation particularly to the proposed allocations sites referenced ST4-1 (Land north of Barnett Field), ST4-4 (Land west of Brittain's Lane), ST4-5 (Brittain's Lane, Kippington) and ST4-7 (Land north of Sevenoaks).
- The biodiversity and viability of both the Sevenoaks Wildlife Reserve, located at the southern border of proposed allocation ST4-7, as well as the rare Darent River chalk stream which travels through the proposed allocation, will not be compromised or adversely impacted by its proposed development.

The Town Council requested that, should the Inspector concur with the Sevenoaks Society's legal opinion or find fault with either of the above, that the Local Plan be amended to require any forthcoming development of these Green Belt sites at the edge of Sevenoaks Town, to be released only under exceptional circumstances and with significant benefits delivered as part of their proposals. Without this treatment, the Town Council did not consider the Plan to be either "sound" or "legally compliant."

Its concerns notwithstanding however, Sevenoaks Town Council would defer to the expertise of the Independent Examiner.

Question 4: Has the Council maintained effective cooperation with their neighbouring Local Authorities and relevant statutory bodies?

- Yes
- No
- **Unsure X**

Please provide your comments here

Question 5: Please set out any modification(s) you consider necessary to make the Local Plan legally compliant or sound in respect to any legal compliance or soundness matters identified?

Please provide your comments here

Proposed Modification 1, Policy H1 (Housing Mix):

Sevenoaks Town Council requested that Policy H1 be amended to provide a clearer specification or framework as to what and how the required “variety” of house sizes and types will be determined. It considered this to be required in order to reduce ambiguity of the Policy and to ensure that it is applied consistently and its purpose successfully delivered.

Proposed Modification 2, Policy SEV1 (Sevenoaks Town Centre):

Sevenoaks Town Council requested that the citation of its Town Centre and St John’s Hill Area Masterplans within this Policy be updated to reflect that these documents have since been completed and adopted by the Town Council – and are therefore no longer “draft” Masterplans. This suggestion is made on the grounds that the Local Plan should reflect the most up to date information and evidence base.

It also requested that the Development Briefs for all sites located within Northern, St Johns, and Town Ward be updated to include reference to Sevenoaks Town Council’s three Masterplans – both within the list of documents recommended for consultation during a scheme’s design process, as well as within the design requirements section. This is on the grounds that the Northern Masterplan makes up part of the adopted evidence base of the Sevenoaks Town Neighbourhood Plan, and both of the more recent St Johns and Town Masterplans will make up part of its 5 year review evidence base. Including these important documents, which have also considered weaknesses and improvement opportunities for existing infrastructure, will also ensure compliance and consistency of Policy SEV1, which is a listed policy priority within the Development Briefs and cites the Masterplans as guiding documents for future developments and improvements.

Particular consideration should be given within the Development Briefs for developments of 10 or more housing units as to traffic and pedestrian movement options, as well as new public open spaces. The Town Centre and St Johns Masterplans include a review of the existing environment and have identified opportunities and options for improving the

pedestrian and motorist network, as well as specific locations for potential new public open spaces. These should be incorporated into the Development Briefs.

Proposed Modification 3, Policy CC2 (Sustainable Design and Construction):

The Town Council considered that its previously submitted request for the policy to recognise and require mitigation of the air-quality and noise impacts associated with heavy goods vehicles (HGVs) remain relevant to making the Plan sound and consistent.

This is on the grounds that a significant proportion of the housing proposed through the Local Plan is located on large allocation sites, the construction of which is likely to generate substantial movements of HGVs transporting materials, equipment and waste. These movements have the potential to contribute to noise, exhaust emissions and other air-quality impacts affecting nearby communities.

Importantly, the Town Council identified no other policy within the Plan which addresses the environmental and amenity impacts arising specifically from construction vehicle movements. Their omission from this policy therefore creates a policy gap in relation to a foreseeable and significant impact associated with the delivery of the Plan's housing allocations. This was considered to be particularly concerning, given that the Plan seeks to reduce the District's 444.7 kilotonnes of CO₂ emissions while facilitating substantial development.

The Town Council therefore considered that the policy and its supporting paragraph (4.16 on page 160) should expressly recognise construction vehicle movements and require proportionate measures to minimise their environmental and amenity impacts. Without such provision, the Plan does not provide an effective policy framework for addressing this foreseeable impact of development and is consequently not fully effective or internally consistent. The requested amendment is therefore necessary to ensure that the Plan is sound and consistent.

Proposed Modification 4, Policy DE1 (Community Engagement):

Sevenoaks Town Council requested that clear expectations and standards as to the method, degree and evidence that will be required to support the community engagement statements required under Policy DE1. The Policy in its current format does not provide any detail or framework as to how applicants are expected to engage with the local community, and until the detailed guidance envisioned within supporting paragraph 5.9 is delivered, this Policy will not achieve any degree of consistency in how it is adhered to by applicants, nor applied to and measured against their emerging statements by the relevant LPA Officer.

Proposed Modification 5, DE2 (Design Review):

Sevenoaks Town Council requested that this Policy or its supporting paragraphs be amended to specify that local views must be represented during the Design Review Panel process for significant development proposals. It recommended that Town & Parish Councils be engaged at a minimum during this process, in order to ensure that local knowledge and integration with the surrounding settlement and community can be secured at the earliest stage of design. This change is considered to be relevant in order to make Policy DE2 more effective and successful in its intention to deliver high quality housing which integrates with the surrounding area.

Proposed Modification 6, Policy DE3 (Ensuring Design Quality):

Sevenoaks Town Council requested that Policy DE3, Objective OB6 and the design guidance of any relevant Development Briefs be updated to recognise the Sevenoaks and Edenbridge

Residential Character Area Assessments. Applicants should be directed consistently to the same design guidance, where it applies.

Sevenoaks Town Council considered this request to be necessary not only to ensure soundness and consistency in the design guidance promoted within the Local Plan and its supporting evidence base, but also to have increased in importance since the previous Regulation 18 consultation. This is on the basis that Policy DE4 previously envisioned the production of a “Design in Sevenoaks” document which would provide valuable design standards from public realm, accessibility, private amenity space and more. Its provisions do not appear to have been displaced to an alternative policy, and the Town Council expressed concern that this could cause significant loss in local character and distinctiveness and make the objective of respecting Sevenoaks District’s character less tangibly deliverable.

Proposed Modification 7, Policy DE4 (Design Guidance and Codes):

Sevenoaks Town Council noted that Policy DE4 requires the production of Design Codes for developments of over 10 units “in partnership with SDC and the local community,” but neither clarifies which bodies should be consulted in this process, nor the method for how this consultation should take place. It requested that this be amended to clarify what organisations or bodies would be appropriate to include in this “local community” partnership and recommended that this should include Town & Parish Councils as well as any relevant Residents Associations in order to make this policy clearer and more deliverable. It also recommended the method of partnership – for instance local community consultation, Community Review Panels, or roundtable discussions with key stakeholders (including Town & Parish Councils and Residents Associations) be clarified. This is on the basis that the Policy in its current format will not secure consistent and fair application in practice.

The Town Council also requested that the scope and output of Design Codes and their Guidance should be explicitly required within Policy DE4 to consider and respect existing key local characteristics, in order to deliver the Local Plan’s Objective (OB6) of respecting local character.

Proposed Modification 8, Policy HW1 (Health and Wellbeing):

Sevenoaks Town Council requested that paragraph 15a within Policy HW1 be amended to provide a contingency for instances where new development cannot be delivered in existing “well-lit, and accessible” locations, with a requirement for safe, well-lit and accessible walking routes to therefore be required as part of the development. This on the basis that the current wording will often not be deliverable, so including the contingency would make the Policy more sound.

Sevenoaks Town Council also requested that this policy clarify that such amenities as active travel routes and new facilities should be required for delivery at the earliest stage of a scheme’s delivery. It considered that this would greatly improve the effectiveness both of this policy as well as complement the volume of housing and new residents promoted within policies ST2-ST5.

Proposed Modification 9, Policy IN1 (Infrastructure Delivery):

Sevenoaks Town Council requested that Paragraph 6 of Policy IN1 be amended to explicitly include Town and Parish Councils within the list of key stakeholders that the District Council pledges to work proactively with, in identifying infrastructure needs associated with emerging developments. This is on the grounds that it will support successful identification and meeting of local needs, as well as upholding the statement within paragraph 9.10 which

claims the knowledge of Towns and Parish Councils to have informed the preparation of the Infrastructure Delivery Plan. Town and Parish Councils, which have been identified as key delivery partners of a number of projects identified within the latest publication of the IDP, have not until very recently (26th August 2026) been consulted on its contents, nor during Section 106 negotiations where their input would be particularly valuable as potential delivery or maintenance partners for new community assets. Securing their status amongst the infrastructure providers included in such discussions would facilitate a consistent approach to recognising that “local councils play an important role in identifying local infrastructure needs” (Paragraph 9.10, page 275).

Proposed Modification 10, Policy OS1 (Open Space and Recreation):

Sevenoaks Town Council requested that paragraph 2 of Policy OS1 be amended to provide a clearer criteria or definition of what would be considered an “open space of value to the local community” and recommended that registered Assets of Community Value be included within this list in the first instance. This is on the grounds that allowing community groups and Town & Parish Councils to nominate open spaces of value would be a much more productive and simple method of identifying such spaces, without the need to undertake the rigorous, time-consuming and expensive process of producing or updating a Neighbourhood Development Plan. It would significantly improve the functionality of this Policy and the deliverability of communities being able to identify open spaces that they consider to be locally important.

Proposed Modification 11, Policy COM1 (Provision and Retention of Community Uses):

Sevenoaks Town Council requested that supporting paragraph 58 on page 292, which states that registered Assets of Community Value (ACV) will be considered “relevant” considerations when assessing planning applications, be amended with clear planning terminology (being “material.” This is on the basis that “material” is the correct planning term and will help planning officers and applicants accurately and consistently apply this consideration.

It further requested that the consideration of ACVs as a material planning consideration be explicitly added to the associated Policy COM1, as this is what will be applied in practice against planning applications. The following further wording was proposed for paragraph 5 of Policy COM1:

“5. Proposals for the change of use or development of community facilities – particularly but not exclusive to those covered by an ACV listing – for non-community uses will only be supported...”. This on the grounds that it clarifies the position stated within the supporting text, that ACV status is a material planning consideration. This will facilitate fair, accurate, and consistent application of this as a material consideration by planning officers across the District.

Proposed Modification 12, Policy T2 (Sustainable Movement) and Policy T3 (Vehicle Parking):

Sevenoaks Town Council requested that Policies T2 and T3 be amended to recognise the need for new developments to include, at a minimum, safe stopping spaces for deliveries as well as disabled and visitor carer parking spaces – regardless of the transport hierarchy proposed within Policy T2. This was considered necessary in order to facilitate delivery of Policy H4, which covers specialist and supported housing needs but which does not address the parking needs that arise from specialist and supported care needs, as well as Policy H1 which acknowledges both the need for a range of housing types as well as recognising the need to accommodate the needs of the District’s aging population.

Including the need for delivery parking provision will aid in the success of Policies ST2, ST3, ST4 and ST5, which envision a significant volume of new housing throughout the District, in tandem with Policy T2 which places spatial provision for private vehicle parking at the lowest end of the movement hierarchy. This is on the grounds that, without the right supporting infrastructure in place to support car-free homes, behaviours cannot change.

Proposed Modification 13, Pinetops, 5 Crownfields (ST2-5):

Sevenoaks Town Council requested that consideration be given as to the deliverability of proposed allocation (ST2-5), given potential covenants restricting its development. Should the Planning Inspector consider the proposed allocation to be acceptable, the Town Council requested that the Development Brief be updated to recognise this potential restriction, as well as to take into consideration the TPO's on the site.

The Town Council advised that the latter must also include a recalibration of the site's proposed housing numbers, taking into account the significant reduction in developable land once the portion covered by a blanked TPO has been removed. In its current form, this allocation's proposed housing density would increase significantly and to an unacceptable volume, once land within the TPO is discounted.

Proposed Modification 14, Land at Cramptons Road (ST2-6):

Sevenoaks Town Council requested that the Planning Inspector take into account the potential risk to the Town's water supply from piling works, when considering the proposed density in allocation ST2-6. It further recommended that the Development Brief be updated to allow spatial allocation for an outdoor play and common area, in order to address the significant undersupply of such amenities in this local area.

Proposed Modification 15, Sevenoaks Station (ST2-8), Station Car Park (ST2-9) and 160 London Road (ST2-11):

Sevenoaks Town Council requested that the Development Briefs for ST2-8, ST2-9 and ST2-11 be updated to require cohesive design and consideration between the three proposed allocation sites, in order to ensure that they are complementary to each other as well as clear as to the intended role of these sites – i.e. as a gateway to visitors or as housing for commuters.

The Town Council further requested that the Development Briefs explicitly recognise the need to integrate these developments with the wider Town and particularly the Town Centre, which is located uphill and without any reliable bus service or safe active travel infrastructure. Convenient, frequent and reliable bus services must be secured as part of any future development of these sites, in order to ensure that they can contribute to the economy and vitality of the Town Centre.

Sevenoaks Town Council also requested that the spatial plan proposed within the Development Brief be amended to ensure that commuter parking is located as close as possible to the Station, and residential parking furthest away from this and closer to the housing. This is on the grounds that, in practice, the residential parking which is currently proposed close to the Station and at odds with the commuter parking which is located at the furthest possible point from the Station, will cause significant issues and a disconnect between the two proposed uses of this allocation.

Finally, Sevenoaks Town Council requested that both the IDP as well as the Development Briefs for proposed allocation sites ST2-8, ST2-9 and ST2-11 be updated to recognise and

address the significant rise in demand for commuter infrastructure to and from London, directly arising from these developments. This must include an increase in services to and from London, which the Sevenoaks Rail Travellers Association has predicted will be in the range of 2,400 additional daily commuter journeys into London by 2040. Sevenoaks Town Council considered this to be essential to ensuring that the existing network will have the capacity to support these additional journeys.

Proposed Modification 16, Delivery & Post Office / BT Exchange, South Park (ST2-12):

Sevenoaks Town Council noted with confusion that the proposed allocation site ST2-12, which had previously been proposed in the Regulation 18 consultation for 75-100 dwellings, has been reduced to 0 dwellings within Policy ST2.

The Town Council asked that the Inspector seek clarity as to the loss of housing numbers for this allocation site, and requested that consideration be given to reinstating these – particularly if this could reduce the burden of development in the green belt.

The Town Council advised that this is a particularly sustainable and ideal location for a mixed development of housing and commercial uses, as well as for a higher density of housing to be provided.

Proposed Modification 17, Land north of Barnett Field (ST4-1), Land west of Brittain's Lane (ST4-4), and Brittain's Lane, Kippington (ST4-5):

Notwithstanding the Town Council's concern raised under Questions 1, 2 and 3 that it is not convinced with the methodology used to designate grey belt sites within the proposed Local Plan, Sevenoaks Town Council requested that – should the Examiner be minded to approve their retention in the emerging Local Plan – significant improvements to road and pavement infrastructure be added as an essential requirement within their Development Briefs. This is on the grounds that, Brittain's Lane in particular is extremely narrow and lacking any pavement or allocated pedestrian space. Given its proximity to a school and lack of alternative access routes, Sevenoaks Town Council deemed the widening of Brittain's Lane as well as provision of pavements on either side to be essential to securing safe access, as well as ensuring that the transport network has the capacity to support the increase in residents.

Proposed Modification 18, Land north of Sevenoaks, west of Otford Road (ST4-7):

Notwithstanding the Town Council's concerns raised under Questions 1, 2 and 3, Sevenoaks Town Council requested that – should the Examiner be minded to approve the retention of proposed allocation ST4-7 in the emerging Local Plan – the following changes be made to its Development Brief:

- Removal of the proposed road, on the grounds of impact on the floodplain and wildlife reserve – which is not recognised within the Development Brief – as well as the significant risk that traffic will begin to divert via this route, in favour of the motorway.
- Recognition within the site constraints section, that the proposed housing hamlet to the east of the site is located on a former landfill. This is on the grounds that this could pose significant issues in deliverability. Ideally, this proposed housing allocation would be removed, in favour of retaining the green space for community access.
- Removal of the smaller, southern hamlet proposed at the northern boundary to the wildlife reserve at the very minimum. This is on the grounds of potential risk and damage to the reserve. The Town Council considered that this could be achieved without forfeiting housing numbers, by increasing the proposed housing density in the western hamlet. This hamlet is sustainably located in the near vicinity of Dunton Green train station and would make an ideal location for smaller, denser units which would support the Town's aging population and allow

the creation of small, supportive communities. The Town Council would ideally wish for the eastern hamlet to be removed as well, and suggested that it be replaced with a further green open space.

- Requirement for mitigation measures to be secured at Section 106 negotiation stage, towards monitoring of the proposed new entrance to nature reserve. Cyclists and electric scooter users, as well as dog walkers are prohibited from entering the reserve on safety and wildlife protection grounds. Introducing a new entrance without ensuring that the wildlife reserve's staff would have the capacity, staff, funding and means to monitor the new entrance would pose an unacceptable risk to their protection measures. This could be in the form of funding towards staff, to be secured in perpetuity, or upgraded monitoring systems which would secure this without the need for staff to attend on-site.

Question 6: If your representation is seeking modification to the Local Plan, do you consider it necessary to request participation in the examination hearing session(s)?

- **Yes X**
- No
- Not Applicable

Please provide any additional comments here: