Sevenoaks Local Plan 2042 – Regulation 19 Local Plan response

Land at Swan Lane, Edenbridge
Prepared on behalf of Barratt David Wilson (BDW) Kent

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1 EXECUTIVE SUMMARY

1.1 OVERVIEW

1.1.1 This representation is prepared by DHA Planning on behalf of Barratt David Wilson (BDW) Kent. in response to Sevenoaks District Council's (SDC) Local Plan Regulation 19 (Reg. 19) consultation.

1.1.2 BDW controls "Land at Swan Lane, Edenbridge". This Site formed a proposed allocation within the SDC Regulation 18 Local Plan "Land at Swan Lane, Edenbridge" for a housing-led, mixed-use scheme, including 600 new homes (Site Allocation EDEN16, part of Policy ST2). DHA Planning submitted representations on behalf of BDW to support the delivery and suitability of this allocation, setting out that EDEN16 could deliver up to 700 new homes with other employment uses. The Reg. 18 Plan identified the Site as Grey Belt.

1.1.3 The Reg. 19 Local Plan has removed a number of Sites from Edenbridge, including Site EDEN16 (Swan Lane). It is our view that this approach is not reasonable given the role of Edenbridge in the settlement hierarchy and the fragility of the housing supply position set out within the Plan. Additional housing sites are required to help ensure an effective and sound Plan.

1.1.4 These representations set out our view that the Local Plan seems too focussed on delivering the most amount of housing across the lowest quantum of sites rather than seeking to deliver the right homes at the highest standard in the most sustainable locations. It is considered that allocating the site for development would assist because, as the Sustainability Appraisal sets out, Local Housing Need has more than quadrupled compared with recent rates of housing delivery.

1.1.5 For this plan to meet the legal and soundness requirements additional housing needs to be allocated in the Plan. As acknowledged by the Council, this will require additional Green Belt release to reflect the Local Housing Need in the area. Sites in Edenbridge remain the logical option given it is a higher category settlement outside the National Landscape.

1.1.6 It is considered that Land at Swan Lane, Edenbridge should be allocated in the Submission Local Plan. The site was previously allocated in the Regulation 18 Local Plan and was positively assessed in the 2025 Strategic Housing and Economic Land Availability Assessment. The site is also considered to be Grey Belt.

1.1.7 The sites which continue to be allocated in Edenbridge are not more sustainable than Swan Lane when applying the government's Connectivity Tool for sustainability and the distances to services. It is set out with accompanying technical evidence that the Site is sustainably located and would not represent an unnatural extension to Edenbridge. Further, the sites which remain allocated in Edenbridge do not deliver the local services, community or infrastructure benefits which a site allocation of this size could deliver.

1.1.8 Instead, the Site would deliver the following benefits:

- Up to 650 new homes, including affordable housing (in line with the Golden Rules) and the provision of older persons accommodation. This will facilitate the creation of an expanded community to contribute to the enhanced vitality and viability of Edenbridge town centre, ensuring rail services, facilities and services continue to operate successfully.

- The Site is well located close to existing services and facilities and would represent a sustainable urban extension, which would contribute to the upgrading of existing facilities to meet its residents' needs, alongside the creation of a Local Centre to further enhance the sustainability of this part of Edenbridge.

- Expeditious and reliable delivery of housing. The Site is under control by Barratt Redrow who has the financial capacity and resource to deliver multi-tenure models and multiple house types. The Site could potentially utilise all three brands By utilising these three brands our client can deliver at speed, which would help to deliver houses early on during the plan period.

- Provision of financial contributions towards the infrastructure required within Edenbridge. This too would provide additional headroom for funding were the infrastructure costs to increase beyond current IDP predictions or if another allocation in the district were not to come forward.

- The Site is not of a size that it would significantly contribute towards highway constraints. Rather the Site would contribute towards alleviating highway issues with a link road along Swan Lane to facilitate alternative modes of transport that assist in managing traffic capacity in the town. This could come forward in the immediate term. The Site is well related to existing pedestrian and cycle transport links and is therefore accessible by a range of modes of transport.

- The Site is pastoral and is of low ecological value. The development is not constrained by ecology, and it is expected that 10% BNG can be easily achieved on the Site.

- The Site can provide a Country Park which can meet the needs of existing and future residents particularly where the Local Plan Evidence Base points to an under provision of open space in northern Edenbridge. This will provide access to the countryside for all. Public Rights of Way around the Site would likely be improved to provide all-weather access.

- The Site can deliver enhancements to the active travel links with a bus route on Swan Lane and a bridleway bisecting the Site.

- Additionally, as part of the Edenbridge Local Cycling and Walking Infrastructure Plan three route intervention plans have been prepared on behalf of the Council to improve footways and cycling infrastructure in Edenbridge including along Station Road which would be the primary access road from the site to shops and services.

1.1.9 Overall, the Site is located in a highly sustainable and accessible location. The Site is relatively unconstrained, with no constraints identified that would prevent it coming forward for housing-led development. The development of the Site for

housing would provide the opportunity to support the acute Local Housing Need of the Sevenoaks District, by delivering growth and contributing to the viability of Edenbridge. Furthermore, it would provide an important contribution towards the supply of housing and diversification of sites in line with the NPPF.

2 INTRODUCTION

2.1 PURPOSE OF THIS REPRESENTATION

2.1.1 This representation is prepared by DHA Planning on behalf of Barratt David Wilson (BDW) in response to Sevenoaks District Council's (SDC) Local Plan Regulation 19 (Reg. 19) consultation.

2.1.2 SDC is currently consulting on its 'Submission Draft' of the Plan prior to submission for Independent Examination.

2.1.3 We understand that the adoption of the new Local Plan is targeted for 2027 and is intended to replace the current development plan documents for the period up to 2042.

2.1.4 In respect of the process to date, a consultation on the Regulation 18 (Part 1) Plan closed on 11 January 2023 and consisted of a settlement first (non-Green Belt) focus.

2.1.5 A second Regulation 18 (Part 2) consultation then ran between November 2023 and January 2024 and adopted a more district-wide approach whereby the Council stated it will continue to focus on optimising development opportunities in existing settlements but also consider the potential contribution of Green Belt land in exceptional circumstances.

2.1.6 A third Regulation 18 consultation focuses on the opportunities for new homes, employment spaces and infrastructure provision within and around existing settlements but having regard to the potential of 'Grey Belt' land, particularly as a consequence of increased housing need.

2.1.7 In this respect, In the run-up to the 2024 General Election, 'kickstarting economic growth' was a central plank of Labour's manifesto. Fundamental to this is the delivery of 1.5 million new homes over the next parliament. To achieve this, mandatory housing targets have been restored and a strategic approach taken to Green Belt release.

2.1.8 This increased emphasis on housing delivery (market and affordable) has seen the annual housing requirement for SDC increase with the publication of the latest 'Standard Method'. As it currently stands SDC is seeking an annual housing target of 1,164 dwellings per annum.

2.1.9 This final 'pre-submission' plan seeks principally to distribute growth to the highest tiers of the settlement hierarchy, with new development making use of previously developed or brownfield land where possible, with the principal need being met through Green Belt release.

2.2 SCOPE OF THIS RESPONSE

2.2.1 The Local Plan is expected to be submitted in December 2026, under the 'legacy' plan-making system and represents the final opportunity to comment on matters of soundness and legal compliance.

2.2.2 In this regard, this representation has been prepared in accordance with the December 2024 iteration of the National Planning Policy Framework (NPPF) and any subsequent references to the NPPF should be taken as relating to this version of the framework.

2.2.3 Whilst for decision making this has been superseded by a new NPPF dated 17 August 2026, transitional arrangements at Annex A confirm that for the purpose of plan-making, only Plans being prepared under Part 2 of the Planning and Compulsory Purchase Act 2004 (as amended by the Levelling up and Regeneration Act 2023) and the Town and Country Planning (Local Planning) (England) Regulations 2026 should be produced in accordance with the August 2026 NPPF.

2.2.4 Any other plans should be produced in accordance with the version of this Framework published in December 2024, unless any of the transitional arrangements in Annex 1 to that Framework apply (in which case those transitional arrangements continue to apply). It is understood that the Sevenoaks Local Plan 2042 will be examined against the December 2024 NPPF.

2.2.5 Where references are made to the direction of travel of the new NPPF (August 2026) these are specifically references as 'NPPF 2026'

2.3 TESTS OF SOUNDNESS AND LEGAL COMPLIANCE

2.3.1 For the purpose of these representations, paragraph 36 of the NPPF dictates that Local Plans are 'sound' if they are:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.3.2 In terms of legal compliance, the main requirements for the pre-examination stages of the Local Plan are in relation to:

(a) planning for community engagement;

(b) the sustainability appraisal (including consultation with the statutory environment consultation bodies);

(c) identifying significant cross boundary and inter-authority issues; and

(d) ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

2.3.3 It is also noteworthy that the new Town and Country Planning (Local Planning) (England) Regulations 2026 came into effect on 25 March 2026, replacing the 2012 Regulations and introducing a new framework for plan-making. As part of the new regulations, the statutory Duty to Cooperate no longer applies to Plans being prepared under the new system and has also been revoked for Plans being prepared under the legacy system. However, in its place, the NPPF still requires local authorities to maintain effective cooperation throughout the plan-making process.

2.3.4 This document provides our client's views on legal compliance and the 'tests of soundness'.

2.4 OUR CLIENT'S INTEREST

2.4.1 BDW controls "Land at Swan Lane, Edenbridge" (hereafter referred to as "the Site"). BDW has the financial capacity and resource to deliver multi-tenure models and multiple house types to ensure an expeditious delivery of housing during the early stages of the Plan period.

2.4.2 This Site formed a proposed allocation within the SDC Regulation 18 Local Plan "Land at Swan Lane, Edenbridge" for a housing-led, mixed-use scheme, including 600 new homes (Site Allocation EDEN16, part of Policy ST2). DHA Planning submitted representations on behalf of BDW to support the delivery and suitability of this allocation, setting out that EDEN16 could deliver 700 new homes with other employment uses. The Reg. 18 Plan identified the Site as Grey Belt.

2.5 SUPPORTING DOCUMENTS

2.5.1 These representations are accompanied by the following documents:

(1) Vision Document, prepared by GDM (see **Appendix 1**);

(2) Initial Transport Access Assessment, Transport Delivery Note and Sustainability Review prepared by i-Transport (see **Appendix 2**); and

(3) Landscape and Visual Appraisal & Green and Grey Belt Appraisal prepared by Iceni Projects (see **Appendix 3**).

3 EVIDENCE BASE DOCUMENTS

3.1 SUBMISSION DOCUMENTS

3.1.1 As set out under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is required to make available "proposed submission documents" for consultation.

3.1.2 Regulation 17 of the Act defines what "proposed submission documents" means. This includes amongst other items "such supporting documents as in the opinion of the Local Planning Authority are relevant to the preparation of the Local Plan" (Regulation 17 e).

3.1.3 At the time of publication of the Reg. 19 Plan, the following evidence documents, which are fundamental to the preparation of the Plan (and cannot be considered as anything other than "proposed submission documents") are missing:

(1) An up-to-date Air Quality Assessment. An older iteration underpins the Habitats Regulation Assessment (HRA)

(2) Development Briefs are not provided for all proposed site allocations.

3.1.4 The Council acknowledges that it is continuing to work on the Development Briefs for the Green Belt sites and taking into account the consultation responses on these sites to inform the design guidance. It is considered that there is a lack of evidence for why these sites have been allocated at their proposed capacities or the deliverability of the sites. Development Briefs have slowly become available for the Sites during the course of the Regulation 19 Consultation, however, we question whether these have been developed through engagement with statutory consultees and infrastructure providers. These briefs also set out that the site-specific deliverable area will be established as part of the development management process. This is too late in the process, and we consider it is reasonable to raise doubt over the deliverability of the homes allocated within the Plan.

3.1.5 For example, Land north of Sevenoaks, west of Otford Road is proposed for 1,500 new homes. There are significant environmental constraints, including swathes of the Site being located in Flood Zones 2 and 3. It is not clear whether the Development Brief has been informed through discussions with the Environment Agency or KCC, the LLFA. It is clear that further scrutiny is needed and there are significant concerns that the housing allocated for these Sites can be achieved. Given the limited evidence available to assess the sites, it is unclear how the options have been adequately assessed.

3.1.6 As set out in Section 6.2 of this Representation, as a first priority, the housing delivery policies and associated development briefs need to be clear as to overall site areas, the area of land that has been set aside for landscaping, BNG and infrastructure delivery on each site and the net density used to determine each site's capacity. This will ensure the allocations are effective and the housing anticipated to be delivered can come forward over the Plan period.

3.2 CONCLUSION

3.2.1 In not making these documents available with the Reg. 19 Consultation Local Plan for review and comment, the Council has failed in its statutory duty in this regard. In particular the absence of an up-to-date Air Quality Assessment is fundamental to the HRA and determining whether the spatial strategy put forward in the Local Plan is likely to have a significant effect on European designated sites. A set of development briefs should accompany all of the Regulation 19 Local Plan allocations which have been informed through engagement with relevant stakeholders. Without these documents, there is limited evidence available to demonstrate that the sites have been adequately assessed and that the amount of housing allocated to the sites is achievable or deliverable.

3.2.2 The missing documentation should be made available and re-consulted upon prior to the Plan proceeding to Examination.

4 ASSESSMENT OF 'SOUNDNESS'

4.1 VISION AND OBJECTIVES

4.1.1 The proposed vision is consistent with the most recent Regulation 18 consultation and continues to state that the plan will be underpinned by seven objectives:

(1) Promoting healthy communities;

(2) Tackling the challenge of climate change;

(3) Delivering design excellence;

(4) Supporting the delivery of strategic infrastructure;

(5) Homes to meet local needs;

(6) Agile and competitive economy and resilient town centres; and

(7) Protecting the natural and historic environment.

4.1.2 Our client supports the objectives, all of which accord with principles set out in the NPPF and general good planning, but ultimately the development strategy itself is contradictory and is not effective in achieving those objectives. This is essential to ensure the Plan is effective and can be delivered.

4.1.3 For example, the objective to meet local housing need is undermined by the proposed distribution of development. We consider that the Regulation 19 Plan fails to maximise opportunities to expand growth around sustainable top tier settlements, such as Edenbridge. This is pertinent given that the majority of development being proposed is within the 35% of the district that is outside of the National Landscapes.

4.1.4 Similarly, density assumptions are such that they are unlikely to deliver design excellence nor support healthy communities. Where sites have been identified, the Council has at times applied excessively high-density assumptions that are out of character with the surroundings and make limited provision for either BNG or infrastructure. Indeed, despite many parties stressing concern at Regulation 18 stage the Council has further increased the expected yields. These density ambitions also conflict with housing need evidence, with developments needing to deliver apartments, rather than much needed family housing, to meet the Council's aspirations. Therefore, the Local Plan seems more focussed on delivering the most amount of housing across the lowest quantum of sites rather than seeking to deliver the right homes at the highest standard in sustainable locations on the edge of top tier settlements.

4.1.5 It is noted that the Plan does not include detailed Site Allocation Development Management Policies. This will raise doubts over whether the Sites can deliver the quantum of housing allocated, in a way that successfully addresses technical and environmental considerations. We do not consider the Plan will be effective on this basis.

4.1.6 We expand on all the above points in further detail as part of these representations, but in summary we support the proposed objectives but the development strategy as drafted is not capable of delivering them.

4.2 THE DEVELOPMENT STRATEGY

4.2.1 The development strategy seeks to deliver homes sufficient to meet the district housing requirement as set out by the Standard Method (1,164 dpa) for a 15-year Local Plan period (2027-2042). This equates to a minimum of 17,460 homes and associated wider needs.

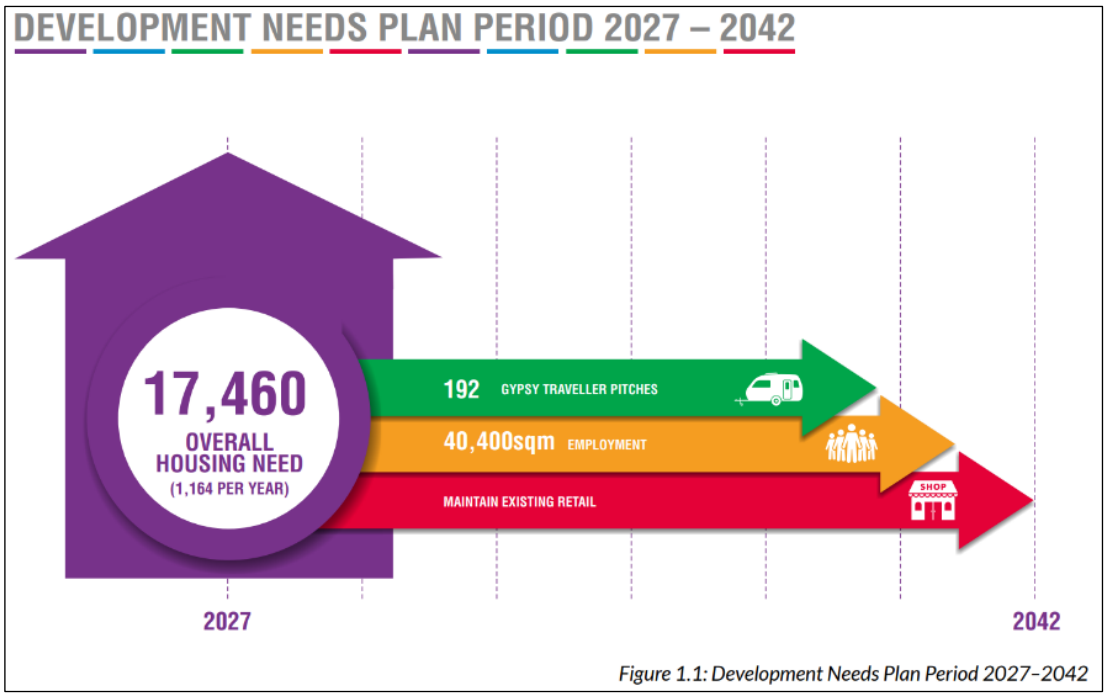


FIGURE 4.1, SUMMARY OF TABLE 1.1 SHOWING DEVELOPMENT NEEDS

4.2.2 The Council has explored opportunities for other authorities to assist with its needs but ultimately concludes that the plan should meet the needs in full within its own boundaries. We support this conclusion.

4.2.3 The Council's strategy is therefore to meet its own development needs in the most sustainable locations. In this respect, the first Regulation 18 consultation focused on opportunities in existing settlements, the second Regulation 18 considered the potential contribution of Green Belt land adjacent to higher-tier settlements and the third Regulation 18 consultation focused on a broader range of settlements outside the National Landscape.

4.2.4 The strategy manifests itself in policy ST1 A Balanced Strategy for Growth.

4.3 POLICY ST1: A BALANCED STRATEGY FOR GROWTH

4.3.1 Policy ST1 states:

'This Plan sets out a balanced approach to delivering "good growth" over the 15 year period to 2042, as illustrated on the Key Diagram. It provides for a minimum of 1,164 homes per year and 40,400 sqm of employment floorspace, supported by the necessary strategic infrastructure and services.

Development is directed primarily within existing settlement boundaries, making efficient use of land through optimised densities and the prioritisation of previously developed (brownfield) sites. Particular emphasis is placed on locations that are well served by facilities and have strong connections to public transport, walking, and cycling networks. Major development proposals must demonstrate best and most efficient use of land, deliver strategic infrastructure, and respond positively to all relevant evidence base documents.

All proposals are expected to align with the place-making principles set out in the Local Plan, development briefs and with relevant Neighbourhood Plans.

Growth within the District will be directed sequentially towards the main towns: Sevenoaks, Swanley, Edenbridge and Westerham, reflecting their established roles and functions. Service Settlements will accommodate moderate levels of development, while villages and hamlets will see only small-scale, limited, or infill development to support rural communities and the wider rural economy.

Sustainable development patterns are reinforced by amending Green Belt boundaries only in exceptional circumstances. Green Belt amendments are focused on identified "Grey Belt" sites which have good access to services and public transport and whose release would have a limited impact on Green Belt purposes. These sites are predominantly located on the edges of higher-tier settlements or close to train stations.

The development strategy seeks to focus major growth outside of the Kent Downs and High Weald National Landscape (AONB) and seeks to further the purpose of conserving and enhancing the natural beauty of National Landscapes. Larger proposals within these designated landscapes, such as at Pedham Place, are only considered where exceptional circumstances and demonstrable public interest are shown.

4.3.2 We consider policy ST1 to be ineffective, unjustified and inconsistent with national policy. As a wider consequence it is not positively prepared.

4.3.3 We provided a detailed explanation on a topic-by-topic basis below.

Sevenoaks District Settlement Hierarchy

4.3.4 The Sevenoaks District Settlement Hierarchy report (September 2025 and amended 2026) sets out the settlement tiers and settlement sustainability scores for the emerging Local Plan.

4.3.5 The Settlement Hierarchy further reaffirms that an illogical approach has been followed to site allocations. Indeed, our client has concern about the distribution

of development and the extent to which major towns and villages within the settlement hierarchy have not been afforded reasonable growth.

4.3.6 The Sevenoaks District has a total of 97 settlements categorised by the Settlement Hierarchy report into settlement types, set out in a hierarchical order of most to least sustainable, including Principal Towns, Towns, Primary Service Settlements, Secondary Service Settlements Villages, Hamlets, and Clusters.

4.3.7 To assess the sustainability and position of a settlement the following criteria are used to assess the position and grouping of the settlements:

(a) The population of a settlement
(b) Facilities and services to meet the daily needs of residents
(c) Access to education
(d) Access to health services
(e) Connectivity and access to public transport
(f) Defined urban confines boundary (the reverse of the Green Belt boundary).

4.3.8 These criteria are broken down into a further 48 categories with points awarded to each category. For example, 1 point is awarded for every 1,000 residents and 1 point is awarded per secondary school.

4.3.9 The scoring system favours railway stations as a key indicator of sustainability**.** Settlements can receive a theoretical maximum of 10 points for rail services, whilst bus routes only receive 1 point per route. A summary table is below.

Settlement name	Settlement type	Overall settlement score	Train station	Kent Downs National Landscape	High Weald National Landscape
Sevenoaks Urban Area	Principal Town	784	Yes	No	No
Swanley	Town	182	Yes	No	No
Edenbridge		176	Yes	No	No
Westerham		126	No	Yes	No
Hartley	Primary Service Settlement	148	No	No	No
Otford		98	Yes	Yes	No
New Ash Green		90	No	No	No
West Kingsdown	Secondary Service Settlements	55	No	No	No
Eynsford		53	Yes	Yes	No
Seal		50	No	Yes	No
Kemsing		47	Yes	Yes	No
South Darenth		45	No	No	No
Pratts Bottom		39	No	No	No
Hextable		38	No	No	No
Crockenhill	Villages	35	No	No	No
Leigh		33	Yes	No	Yes
Farningham		33	No	Yes	No
Brasted		31	No	Yes	No
Knockholt		30	Yes	Yes	No
Shoreham		29	Yes	Yes	No
Four Elms		28	No	No	No
Sundridge		27	No	Yes	No

Halstead		25	No	No	No
Sevenoaks Weald		21	No	Yes	No

TABLE 4.1, COMPARISON OF SETTLEMENTS IN THE SUSTAINABILITY APPRAISAL (NL SETTLEMENTS HIGHLIGHTED)

4.3.10 BDW supports the identification of Edenbridge as a Town within the settlement hierarchy.

4.3.11 Supporting paragraph 4.28 sets out that "*Sevenoaks town, as the District's principal town, will be expected to accommodate the greatest level of growth, followed sequentially by the District's other three towns (Swanley, Edenbridge and Westerham). The next tier down (service settlements) will be the focus for more modest growth, together with areas, outside the National Landscape, where there is good public transport accessibility.*".

4.3.12 This text acknowledges that as a tier 2 settlement Edenbridge should accommodate the greatest levels of growth, after Sevenoaks. This is along with Swanley and Westerham, albeit it is noted Westerham is more constrained as it is washed over by the National Landscape. Edenbridge falls outside the National Landscape.

4.3.13 The town is well positioned to support the Council's spatial strategy owing to a lack of environmental constraints and other planning designations compared to other Towns with a secondary focus for growth. The town also uniquely benefits from two railway stations.

4.3.14 The SA sets out in paragraph 5.2.28 that

> *The settlement hierarchy, as understood from a recent study (2025), provides a starting point for distributing growth, recognising: locally arising housing needs; the importance of supporting accessibility (to services, facilities etc); and transport objectives around minimising the need to travel and modal shift.*

4.3.15 The SA adds in paragraph 5.2.29 that:

> *There is the potential to distribute growth in a way that represents a departure from the settlement hierarchy (e.g. low growth directed to a town that is more typical of the level of growth directed to villages, or high growth directed to a village that is more typical of the level of growth directed to towns, potentially with a view to the village becoming a town). However, any such decisions must be carefully justified.*

4.3.16 The SA in Paragraph 5.2.30 states that:

> *There is a clear argument for ensuring a strong focus on strategic sites, i.e. sites delivering at least several hundred homes that are suited to comprehensive masterplanning and tend to support a mix of uses onsite and delivery of new / upgraded infrastructure alongside new housing. NPPF paragraph 77 supports strategic sites.*

4.3.17 The SA clearly suggests it is rational as a starting point to direct growth to the higher order settlements and notes the important role strategic sites play in

delivering essential infrastructure alongside housing growth. The Plan contains few strategic sites capable of delivering several hundred homes; only eight are proposed to deliver more than 300 units.

4.3.18 It is therefore considered to be unjustified that a strategic site (600-700 at Swan Lane) on the edge of a Tier 2 Settlement which was considered a suitable site at Reg. 18 stage has been removed from the Plan. The majority of facilities are located in and around Edenbridge Town Centre to the south. This would be an accessible walking and cycling distance or could be accessed using the existing bus services from Swan Lane to reach the town centre including the 231 and 233 services (a 9–11-minute journey time), providing a combined hourly service. The Site is one of the most sustainably located sites in Edenbridge according to the Department for Transport's Connectivity Tool.

4.3.19 Overall, for Edenbridge, numbers allocated in the Local Plan have dropped by 653 units from 2,131 homes in the Reg. 18 Plan to 1,478 in the Reg. 19 Plan (44 in Edenbridge Town under Policy ST2 and 1,434 in Green Belt / Grey Belt release via Policy ST4). No new sites have been included for Edenbridge in the Reg. 19 Plan. We do not consider this to be justified nor based on proportionate evidence.

4.3.20 Particularly where the 2026 Sustainability Report quoting the Interim Sustainability Report states that:

> *"With regards to higher growth, this is ruled out on balance but warrants ongoing consideration.* ***Edenbridge is a unique context in a number of respects, including around good rail connectivity (but relatively poor road connectivity) and limited 'headline' constraints to growth*** *(but a concern regarding sprawl across an expansive vale landscape)."*

4.3.21 Also, the Interim SA Report in 2023 stated: "*... it is important to generally recall key aspects of the strategic context, namely: the stretching nature of district-wide housing need; the position of Edenbridge in the settlement hierarchy; good train connectivity and a near-committed new secondary school; constraints to growth at Sevenoaks (discussed above) and Westerham (discussed below), including AONB-related; and uncertainty regarding the potential for high growth at Swanley.*"

4.3.22 The 2025 ISA Report highlighted a need to consider higher growth at Edenbridge aimed at maximising benefits and planning gain. It concluded in paragraph 5.4.28 that: *"a reasonable low growth scenario involves allocation of the SHELAA supported sites. It is evident that a high growth strategy is now proposed and there are some concerns around ensuring comprehensive growth; however, the strategic context is such that it is difficult to envisage lower growth. With regards to higher growth, this is ruled out on balance but warrants ongoing consideration. Edenbridge is a unique context in a number of respects, including around good rail connectivity (but relatively poor road connectivity) and limited 'headline' constraints to growth (but a concern regarding sprawl across an expansive vale landscape).".*

4.3.23 Overall, we conclude that it is reasonable for Edenbridge to have more growth, and it is not justified or a reasonable option to remove sustainable, suitable sites from the Plan. The characteristics that lend Edenbridge to accommodate more growth are:

(1) Two railway stations (one of which is very close to the Site, connecting Edenbridge to two of the four rail lines that run through the District;

(2) Bus connections to villages, Sevenoaks and to Tunbridge Wells;

(3) South of the M25 (Junction 6);

(4) Large employment hub in the District;

(5) Outside the National Landscapes;

(6) Key services and facilities needed to make the settlement suitable including a primary school, doctors, a dentist, post office, convenience stores, library, community hall, recreation grounds and bus service access.

(7) Existing shops, services and leisure facilities which would benefit from more custom; and

(8) Third largest settlement in the District.

4.3.24 We note the Council has raised some concern over the scale of growth around Edenbridge which was originally proposed at Regulation 18 stage, and perhaps in light of the quantum of objections against growth in this area, has led to the removal of sites such as Swan Lane.

4.3.25 However, we maintain that given the role of Edenbridge the growth planned at Regulation 18 Stage was entirely commensurate. Edenbridge has a population of c. 10,000 in 2024, and as noted above, is a very sustainable settlement outside of the National Landscape. Otford, on the other hand, has a population of c. 7,000 (2024) and sits below Edenbridge in the settlement hierarchy. Notwithstanding this, it benefits from a large-scale strategic allocation of 1,500 homes. This rationale is therefore not reasonable.

Key Diagram

4.3.26 As required by the NPPF (para 23) broad locations for development should be indicated on a key diagram.

4.3.27 The Key Diagram at Figure 0.5 fails to fulfil this requirement in only identifying the location of some permitted sites, strategic sites and emerging development sites. This amounts to just ten sites. The Key Diagram must therefore be amended accordingly to make it consistent with the requirements of National Planning Policy and more clearly illustrate how development is apportioned among the settlements.

Permanence of Green Belt Boundaries

4.3.28 Given the characteristics and challenges associated with plan making in SDC, being 93% Green Belt, we consider the planning strategy should look to overdeliver to make adequate provision for longer term Green Belt boundary protection.

4.3.29 As the Council sets out in supporting paragraph 4.21:

> *All other reasonable options have been explored, including focusing on brownfield land, optimising density on urban sites and discussing with neighbouring authorities about whether they could accommodate our unmet need. Despite these efforts, the Plan sets out that there is sufficient land to build approximately 1,500 units in urban (non-Green Belt) areas. After taking into account extant permissions and windfalls (approximately 5000 units), this equates to a potential shortfall in housing supply of approximately 11,000 homes, when compared against the 17,460 LHN target.*

4.3.30 Paragraph 145 of the NPPF is also clear that once established, Green Belt boundaries should only be altered where Exceptional Circumstances are fully evidenced and justified through the preparation or updating of Local Plans.

4.3.31 SDC has established through the various consultations that insufficient land exists within settlement confines capable of meeting the housing need in full. It is not disputed that Green Belt release is needed, and it is acknowledged that Exceptional Circumstances exist to alter Green Belt boundaries. This being the case, the Framework states that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

4.3.32 We have concerns that the current Reg. 19 Local Plan does not allocate adequate deliverable land to deliver the current 15-year housing requirement and that additional sites are needed. Even if this conclusion is not supported, it is apparent that Green Belt boundaries will have to be reviewed again as part of the next Local Plan Review. Our client considers that for soundness purposes and having regard to the extent of Green Belt land expected to be released and the intended permanence in the long term of Green Belt boundaries, the Council should be proactively looking to include a substantial additional buffer.

4.3.33 The NPPF states that *"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations" (paragraph 148).*

4.3.34 The Council acknowledges that much of the district is Grey Belt (Stage 2 Green Belt Assessment (Main Report October 2025) and Stage 2 Green Belt Assessment (Annex Report October 2025). There remains an opportunity therefore to remove Grey Belt land around key settlements, where they are in a sustainable location. Land at Swan Lane was identified as Grey Belt in this review.

4.3.35 We would draw the Council's attention to the Guildford Local Plan adopted in 2019. Within this a comprehensive review of the Green Belt (which covers 89% of the borough) was undertaken and the Local Plan strategy prepared with a time horizon of 20 years from 2015 to 2034. The Inspector's report following the examination of the Local Plan noted at paragraph 62 that:

> *"Exceptional circumstances therefore exist to move the Green Belt boundary to facilitate the development of this site over the plan period, and the approach taken would ensure the establishment of good long-term boundaries to the Green Belt."*

4.3.36 Not only does SDC's Plan identify a shortfall of 222 homes, but there is also no contingency in place if the sites that are included do not deliver as envisaged. This

is too great a risk, particularly when the Local Plan is reliant on more than 2,500 homes being planned and delivered prior to 2042 from a singular new settlement (see below).

4.3.37 Any delay in Pedham Place's delivery, or other large-scale sites, will result in a substantial shortfall in delivery for which the Local Plan contains no wider remedy.

4.3.38 The Framework is clear that Local Plans must be justified and effective. This means that there must be an appropriate strategy and deliverable over the plan period. Without an adequate buffer of additional sites, the Local Plan will fail these requirements. Accordingly, it is prudent to amend Green Belt boundaries to ensure these retain their permanence beyond the Plan period. Land at Swan Lane would form part of an appropriate buffer of additional sites to ensure that there is an appropriate strategy which is deliverable over the Plan period.

Affordable Housing Need

4.3.39 Affordability in the District remains a fundamental issue given the high house prices relative to incomes. As of 2024, the median house price in the District was £475,000, the highest in Kent, and house prices were 13.2 times annual earnings compared with 9.6 in Kent and 7.7 times across England (Targeted Review of Local Housing Needs, 2025).

4.3.40 In terms of past delivery, net affordable housing completions between 2012 and 2024 as published within the annual Authority Monitoring Reports are as follows:

MONITORING YEAR	NET NUMBER OF NEW BUILD AFFORDABLE HOUSING UNITS COMPLETED
2012/13	-15
2013/14	51
2014/15	15
2015/16	87
2016/17	26
2017/18	47
2018/19	18
2019/20	184
2020/21	17
2021/22	17
2022/23	21
2023/24	0
Total 2012 to 2024	**468**
Twelve Year Annual Average	**39 pa**

TABLE 4.2, AFFORDABLE HOUSING COMPLETIONS 2012-2024 (ASMR DATA 2012-23)

4.3.41 In the context of rising unaffordability within the district at house price to income ratios significantly in excess of regional and national averages, the further decline in recent affordable housing delivery is of critical concern and must be an urgent development priority for the Local Plan. As such, ensuring that the Local Plan addresses the shortfall is of paramount importance. This reinforces that the 17,460 homes set out in the standard method should very much be a minimum and delivery policies need to be amended to ensure components of the housing supply will meet and deliver homes as a minimum. This is particularly because the Council is required to apply a mandatory 20% buffer to its housing land supply requirement because the Council has persistently underdelivered on its housing targets.

4.3.42 This is not currently the case resulting in an ineffective plan that is not positively prepared for the extreme scale of the unmet affordable need.

4.3.43 The above matters in mind, we consider the plan requires a longer-term outlook to address the key development constraints.

4.4 HOUSING DELIVERY (EFFECTIVENESS OF POLICY ST1)

4.4.1 The Council identifies that the housing need will be met as follows (summary of Table 1.2):

SOURCE	UNITS
Urban Non-Green Belt Sites (Policy ST2)	1,459
PDL Green Belt Sites (Policy ST3)	452
Greenfield Sites in the Green Belt (Policy ST4)	7,236
Major Green Belt (Non-Grey Belt) (Policy ST5)	3,341
Total Allocations	**12,488**
Extant and Windfall Sites	4,750
Total Supply	**17,238**
Deficit	**-222**

TABLE 4.3, HOUSING COMPONENTS AS SET OUT IN TABLE 1.2 OF THE PLAN

4.4.2 By way of response, we comment as follows.

Shortfall

4.4.3 Notwithstanding concerns about the deliverability of the development strategy as outlined below, there is an identified shortfall of 222 homes, which means that development needs are not being met.

4.4.4 To be positively prepared the Council must provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. As such, additional site allocations totalling more than **222 homes** are needed for Soundness purposes even with the submission plan as drafted.

4.4.5 This matter in isolation could be remedied with additional allocations such as Land at Swan Lane, Edenbridge.

Commitments and Windfalls

4.4.6 The existing planning commitments are relied upon for a core element of the overall housing provision and, along with windfall developments, account for 4,750 homes.

4.4.7 Of this total, existing permissions that are not yet started or under construction account for 3,602 homes, with a further 199 homes from sites granted planning permission (or subject to a resolution to grant) post 1 April 2026.

4.4.8 A windfall allowance of 949 homes is currently included within the Council's housing components based on past trends. This assumes 73 homes per year from years 3 to 15 (13 years).

4.4.9 By way of response, we consider that the Council has adopted an excessively optimistic approach to these 'existing' components.

4.4.10 A large portion of the permitted sites are brownfield developments that are stalled owing to viability constraints given ongoing inflation of build costs. DHA Planning has secured many of the corresponding permissions and we have had very little engagement with the Council on which sites remain deliverable. Further evidence of delivery and continued viability is therefore needed to ensure that all the relied upon sites remain deliverable.

4.4.11 By way of an example, DHA acts for the owners of proposed allocation ST2-31 (The Forge, Ash) and have been exploring detailed proposals. However, following extensive testing both the proposed allocation, and a lesser quantum of development (without affordable housing), residential redevelopment would not achieve the existing use value and is not viable. As a consequence, the owners have not participated in the more recent Regulation 18 consultations and not given any assurances that the site remains deliverable.

4.4.12 To reinforce this point, the owners have formally requested that the site be withdrawn from consideration. **12 units should therefore be removed** from the housing components.

4.4.13 Whilst this is a relatively small quantum, it reinforces concerns about viability and the credibility of the availability of wider PDL land.

4.4.14 By way of a second example, the Council's Development Management Team has adopted a distinct new policy position on the re-use of existing buildings in the Green Belt, which has further diminished the type of delivery that underpins past windfall trends.

4.4.15 The Council previously relied upon the NPPF provision which allows for the re-use of buildings, providing the building is of permanent and substantial construction. Policy GB7 of the adopted development plan required the submission of a detailed structural survey to demonstrate that buildings were structurally capable of conversion without major or complete re-construction.

4.4.16 Given the predominantly rural nature of the majority of the District and the plentiful supply of underutilised working rural buildings, policy GB7 of the adopted Local Plan provided a steady supply of conversion schemes involving single and, occasionally, multiple dwellings. Until the Council changed its position, these schemes made a valuable contribution.

4.4.17 The Council now contends that in determining whether a proposal would represent a conversion, the case of Hibbitt and Another v Secretary of State for Communities and Local Government [2016] EWHC 2853 is relevant. The Hibbitt case established that a proposal would not constitute a conversion where the useable/retained parts of the building would be less than modest or skeletal.

4.4.18 The Hibbitt case related to a Class Q prior approval decision, where the scope for external works is inherently more restricted before requiring planning permission, however its application to planning permissions has resulted in the refused consent of numerous structurally sound buildings for residential use, rendering the policy provision and its associated source of supply effectively obsolete.

4.4.19 Similarly, the introduction of permissions post the base date of 1 April 2026 results in a degree of double counting. Indeed, if such commitments are to be included, one must also factor in those consents that have expired and fallen out of the supply consultation in the corresponding timeframe. **To avoid such risk, the 199 homes identified post 1 April 2026 should be deleted.**

4.4.20 The Council's 2026 Housing Trajectory sets out that an average of 73 units per annum have been delivered in the District. This is based on sites of 1-4 units in the past nine years from March 2017 to March 2026. Our client generally agrees that some windfall sites may continue during the plan period. However, we do not believe that historic trends can be relied upon. Indeed, regard should also be had to delivery rates on brownfield sites in the Green Belt, that have historically contributed to delivery in Sevenoaks District. Based on recent Government guidance and the removal of an ability to consider viability when dealing with 'major' development in the Green Belt, it is highly likely that previously deliverable sites will be restricted.

4.4.21 Given the age of the current development plan, any historic delivery of windfall sites cannot be a robust basis to calculate a new allowance, and so windfalls should be approached with significant caution.

4.4.22 To de-risk the over-reliance on windfall sites, we consider the allowance should be relied upon only for the final 10 years of the plan. This still allows for a generous 730 home component. The further **219 homes** should be removed from the supply.

Policy ST2: Urban Site Allocations

4.4.23 There are several legacy Local Plan allocations that have not come forward to date that are included within the scope of this policy. Indeed, sites carried forward from the Allocations and Development Management Plan 2015 (ADMP) are as follows:

- ST2-12 Delivery & Post Office / BT Exchange, South Park, Sevenoaks;
- ST2-20 Bus Garage, Kingdom Hall, Swanley
- ST2-21 Bevan Place, Swanley

- ST2-22 Swanley Centre
- ST2-32 New Ash Green Village Centre

4.4.24 Whilst we are pleased to see that these sites are not relied upon for the purpose of housing delivery, we do question the validity or need to include such uncertain policies in the plan given that they are not contributing to the housing target, are urban and there would be no in principle objection to their delivery if the sites were to become available. We provide further context below.

ST2-12 Delivery & Post Office- BT Exchange, South Park, Sevenoaks

4.4.25 This site is allocated for redevelopment for 42 homes in the ADMP. However, at the time of writing both the Post Office and BT Exchange remain fully operational with no known announcements having been made about their future.

4.4.26 BT has previously provided a clear statement that the site is fully operational until 2030 at the earliest. Furthermore, even if the site were to close in 2030, there is no guarantee that the site would be disposed of, planned, determined and delivered within the plan period.

4.4.27 Evidence suggests there would be significant viability challenges for a constrained brownfield site of this nature.

ST2-20 Bus Garage/Kingdom Hall

4.4.28 This site is allocated for redevelopment for 30 homes within the Council's Allocations and Development Management Plan 2015. However, the site is an operational bus garage and place of worship with no evidence that such uses will cease in the plan period. Furthermore, no evidence is presented as to how the loss of employment and community facilities have been considered and addressed.

ST2-21 Bevan Place, Swanley

4.4.29 This site is Council owned and allocated in the ADMP for 46 units. It has been promoted for a long period of time and progressed to a formal application that was rejected by the Council. Since the refusal no obvious progress has been made on an alternative scheme. Viability also remains a concern.

ST2-22 Swanley Centre

4.4.30 This site is proposed to be allocated for 450 homes as part of a mixed use development.

4.4.31 An application for the redevelopment of Swanley Centre was submitted and refused by the Council under planning application SE/17/02279/FUL but allowed at appeal. This scheme included a proposed 210 homes at a range of 3 to 11 storeys.

4.4.32 Since permission was granted, various planning applications have progressed that suggest redevelopment proposals are unlikely to be forthcoming. This includes applications to establish residential uses under the various provisions of the Town

and Country Planning (General Permitted Development) (England) Order 2015 that would suggest comprehensive redevelopment proposals may not come forward.

4.4.33 In addition to the already dense scheme of up to 11 storeys, achieving an additional 240 units is unlikely to be something compatible with the prevailing character of the area. Furthermore, going above five stories significantly increases build costs, while market values do not necessarily rise in proportion.

4.4.34 Given the uncertainty surrounding these sites, their inclusion should be reviewed as they remain undeliverable and do not meet the threshold for allocation.

ST2-29 Current Hill Allotments

4.4.35 This site is allocated for redevelopment for 20 homes in the ADMP within the Council's Allocations and Development Management Plan 2015, but no progress has been made to date.

4.4.36 There has been no obvious willingness of the owner to relocate allotments and release the land for development. Given the above context, we would expect the Council to demonstrate far greater evidence that this site will be delivered, given it has not been advanced in a period of buoyancy.

4.4.37 **The proposed 23 units should be deleted**.

Policies ST3 & ST4 Previously Developed and Grey Belt Sites

Policy ST4-34 Richardsons Farm, West Kingsdown

4.4.38 DHA acts for the owners of the above site and have been instructed to formally withdraw the site from inclusion in the plan as it is no longer deliverable. **20 units should therefore be deleted** from the supply component and we question the extent that deliverability has been properly checked prior to publication of the pre-submission plan.

Density Aspirations

4.4.39 Policy H7 seeks to achieve densities of between 30-60 dwellings per hectare (dph) in rural areas and in excess of 150 dph in town centres, which is also believed to be the basis for the proposed allocation capacities.

4.4.40 Our client considers delivery of such densities will be challenging in a semi-rural Green Belt authority, largely constrained by two National Landscape designations and their setting.

4.4.41 Land use change statistics in England were last updated in 2023 for the period 2021-22 (MHCLG). The publication identifies:

> *(1) The average density of residential addresses surrounding a newly created residential address was 31 addresses per hectare, a decrease of 11 compared to 2020-21.*

(2) The average density surrounding new residential addresses created on previously non-developed land was 24 addresses per hectare, an increase of 1 compared to 2020-21.

(3) The average density surrounding new residential addresses created within land designated as Green Belt was 15 addresses per hectare, a decrease of 2 compared to 2020-21.

(4) It should also be noted that these statistics pre-date the introduction of Biodiversity Net Gain (BNG) and updated drainage principles, both of which require additional land for landscaping and mitigation.

4.4.42 The densities proposed for site allocations are therefore at odds with 'normal' residential densities at a national level and, even if workable, would deliver poor place making and developments that are incongruous with their edge of settlement locations. Without attention, the legacy of the plan will be the delivery of poor quality housing.

4.4.43 Furthermore, whilst it is agreed that maximising the efficient use of sites released from the Green Belt is both of significant strategic importance and consistent with the objectives of the Framework (paragraph 129), policy H1 has regard to housing mix and states that proposals should be informed by the dwelling mix profiles set out in the latest housing needs evidence (Targeted Review of Local Housing Needs 2025). This evidence subsequently points towards the need for family sized 3 to 4 bedroom housing i.e. lower density development yet this is not reflected in the allocation projections.

Table ES1 Overall dwelling type/size mix recommendations by tenure

Dwelling type/size	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1/2-bedroom house	10-15%	20-25%	25-30%	10-15%
3-bedroom house	30-35%	15-20%	45-55%	30-35%
4 or more-bedroom house	30-35%	5-10%	0%	25-30%
1-bedroom flat	0-2%	10-15%	2-5%	2-5%
2 or more -bedroom flat	5-10%	5-10%	5-10%	5-10%
1/2- bedroom bungalow/level-access	5-10%	25-30%	5-10%	10-15%
3 or more-bedroom bungalow/level-access	5-10%	2-5%	2-5%	5-10%
Dwelling type	**Market**	**Social/ Affordable Rented**	**Affordable home ownership**	**Overall range**
House	70-75%	50-55%	70-75%	70-75%
Flat	2-5%	10-15%	2-5%	5-10%
Bungalow/level-access	20-25%	30-35%	20-25%	15-20%
Number of bedrooms	**Market**	**Social/ Affordable Rented**	**Affordable home ownership**	**Overall range**
1	2-5%	20-25%	5-10%	5-10%
2	20-25%	30-35%	35-40%	25-30%
3	45-50%	30-35%	55-65%	35-40%
4	20-25%	10-15%	0%	25-30%

TABLE 4.4, EXTRACT OF TARGETED REVIEW OF HOUSING NEED 2025

4.4.44 In simple terms, there is unresolved tension between making efficient use of land and delivering the types of homes that the development industry is willing to build and that households need. Indeed, it can be seen from the commentary of site promoters, it is clear that even those with proposed allocations are concerned about the deliverability of the site for the quantum identified.

4.4.45 As a first priority, the housing delivery policies and associated development briefs need to be more transparent about the overall site areas, the area of land that has been set aside for landscaping, BNG and infrastructure delivery on each site and the net density that has been applied to identify a capacity.

4.4.46 As a consequence of the over ambitious requests, the density of the proposed allocations contained within policies ST2 to ST4 are unrealistic and need to be revisited. This is evident by the high number of promoters that benefit from proposed allocations but are still expressing concern about the quantum proposed.

4.4.47 For example, Land north of Sevenoaks is allocated for 1,500 homes, however, delivery of these unit numbers is questionable given the substantial site constraints summarised below:

(1) This Site is adjacent to the Sevenoaks Gravel Pit Site of Special Scientific Interest and presently is open countryside connecting the SSSI to the wider landscape; and

(2) A quarter of the proposed allocation is within Flood Zone 3a (high risk of flooding) and within Flood Zone 3b (a functional flood plain).

(3) Part of the Site is Ancient Woodland and so a 15m statutory buffer around this woodland is required.

4.4.48 Even at the most optimistic level, the site capacities should be reduced by 10%.

4.4.49 The following deductions should therefore be made:

- 143 units removed for sites covered under policy ST2[1]
- 45 units removed for sites covered under policy ST3; and
- 721 units removed for sites covered under policy ST4

4.4.50 Overall, this reduces the developable sites by **909 homes**.

Policy ST5: Deliverability of Pedham Place

4.4.51 The allocation of Pedham Place is supported as it is recognised that it plays a critical role in meeting the district's housing requirement. Without the site, there would be a substantial deficit in housing delivery against assessed need. However, we have significant concerns regarding the commencement of delivery from Pedham Place so early in the housing trajectory, and the reliance of the strategic

[1] Note the figure has been discounted to avoid the earlier removal of Current Hill Allotments to avoid double counting.

allocation to deliver its total development capacity (inclusive of infrastructure requirements) in full within just one Plan period.

4.4.52 As the Inspector will be aware, Pedham Place is a complex, mixed-use allocation of a scale far eclipsing any previous development in the district. For context, the Council's current largest application at Sevenoaks Quarry (22/00512/OUT) totalled 800 homes, 150 C2 units and associated infrastructure. Outline permission was granted in October 2024, 30 months after submission in February 2022 and a reserved matters application has not yet been submitted.

4.4.53 A strategic development of the scale of Pedham Place is unprecedented for the District. The allocation comprises 2,600 homes, employment, education, leisure and major highways infrastructure works, primarily the M25 Junction 3 improvement scheme which will be required immediately due to pre-development over capacity constraints and improvements to the A20 and local road network.

4.4.54 From experience, such strategic scale developments are typically delivered across multiple Plan periods and would not be expected to deliver until the latter stages of the Plan period at the earliest, particularly where major infrastructure is required. We refer the Council to Maidstone Borough Council and the failure of its Garden Communities and Strategic Development sites as allocated in the 2024 Local Plan to deliver as anticipated. Two years post-adoption of Maidstone Borough Council's Local Plan Review, the Council cannot demonstrate a five year housing land supply Therefore, it is critical a range of deliverable sites are included alongside the strategic scale.

4.4.55 Where new settlements are included, these should be robustly supported by clear evidence of deliverability within the timescales envisaged and an increased supply of other deliverable sites to ensure a steady trajectory of housing delivery across the entirety of the Plan period.

Timing of Delivery

4.4.56 Nevertheless, if the site were to proceed one must consider how deliverable the entirety of the 2,600 units is over the Local Plan period and the timing of earliest delivery.

4.4.57 The following table compares the Council's envisaged housing delivery trajectory for Pedham Place with our own revised timetable using evidence-led build out rates. The Plan relies upon the first delivery of 120 homes within year 5 of the Plan period (2031/32). However, this will be predicated on the delivery of highway infrastructure identified within the Infrastructure Project Schedule 'IPS' (2026) comprising the M25 Junction 3 improvement scheme' and 'Junction improvement to A20' and local roads.

PLAN YEAR	SDC PEDHAM PLACE DELIVERY FIGURE	DHA REVISED FIGURE
2027/28 – Year 1	-	-
2028/29 – Year 2	-	-
2029/30 – Year 3	-	-
2030/31 – Year 4	-	-
2031/32 – Year 5	120	-

2032/33 – Year 6	180	-
2033/34 – Year 7	180	60
2034/35 – Year 8	260	149
2035/36 – Year 9	260	149
2036/37 – Year 10	260	149
2037/38 – Year 11	260	149
2038/39 – Year 12	260	149
2039/40 – Year 13	260	149
2040/41 – Year 14	260	149
2041/42 – Year 15	300	149
Total	**2,600**	**1,252**
Deduction	**-**	**-1,348**

TABLE 4.5, SUMMARY OF THE PHASING OF PEDHAM PLACE

4.4.58 The IPS states that both schemes will be co-ordinated with appropriate phasing of development sites and will be developer funded. However, Junction 3 of the M25 is confirmed to already be operating over capacity and will be expected to require immediate upgrades.

4.4.59 Both schemes are consequently defined as 'critical' priority level within the IPS. However, there is no clarity when either scheme is envisaged to come forward or certainty as to how the schemes will be viably funded given neither scheme has been costed.

4.4.60 Our client is therefore concerned as to the degree of certainty that can be afforded to the delivery of homes as early as the first five years of the Plan period, given that critical strategic highway mitigation will be necessary prior to the completion of the first dwellings and at this stage, has neither been designed nor costed and may not have been agreed with National Highways.

Realistic Timetable

4.4.61 Given the absence of any strategic sites in Sevenoaks district for comparison, one could have regard to the delivery periods and build out rates set out in the Lichfield 'Start to Finish report Third Edition (dated September 2024) first published in March 2024. For strategic scale development in excess of 2,000 homes, the median time period between validation of the first application to completion of the first dwelling was 6.3 years, whilst mean build out rates have fallen from 161dpa in the second edition (2020) to 149dpa for this scale of development. Using these figures, even on the unrealistic assumption that a planning application was submitted on adoption of the Local Plan in 2028, delivery would not occur on-site until 2034, and on this most optimistic assumption just 1,280 units or half of the identified capacity would be delivered within the Plan Period.

4.4.62 In justifying the Council's approach, the Council's Housing Trajectory document also refers to the Lichfield Start to Finish report third edition, albeit incorrectly references a March 2025 publication date.

4.4.63 In relation to sites over 2,000 dwellings, the Housing Trajectory incorrectly relies upon the outdated 2020 build out rates of 161 dwellings per annum, which have since fallen in the latest September 2024 report to 149 dwellings per annum.

4.4.64 The housing trajectory documents suggest that the Lichfield research figure has been used to inform SDC's approach, however this clearly is not the case, given the Pedham Place is relied upon to deliver an average of 236 dwellings per annum, peaking at 300 dwellings in the final year of the Plan period.

4.4.65 We therefore re-calculate the housing trajectory for Pedham Place against the latest 149 dwellings per annum build out rate, commencing after 6.6 years and on this basis, suggest a minimum of **1,348 homes must be removed** from the planning supply component for the Plan period.

Delivery of other strategic sites

4.4.66 The Housing Trajectory for Land north of Sevenoaks, west of Otford Road sets out a delivery rate of 150 units per year from year 6 to year 15.

4.4.67 However, the Lichfields 2024 report sets out that the median time period between validation of the first application to completion of the first dwelling was for 1,500 – 1,999 dwellings is 5.3 years with a mean build out rate 110 dwellings per annum. There is no justification provided by SDC for a more ambitious trajectory.

4.4.68 We therefore recalculate the housing trajectory for Land north of Sevenoaks, west of Otford Road against the latest 110 dwellings per annum build out rate, commencing after 5.3 years. On this basis, we suggest that a minimum of **323** homes must be removed from the supply component of the Plan period. Notwithstanding this, there may be an additional lag in delivery rates at this strategic site due to the site being owned by multiple landowners.

4.4.69 Notwithstanding this, Broke Hill Golf Course, Sevenoaks Road, Halstead suggests delivery from Year 2 of the plan. The Site is allocated for 741 units and is yet to have an Outline Planning Permission approved and will then require multiple Reserved Matters consents. It is unlikely that sub parcels for a scheme of this size would be granted and build out commencing by 2027 / 2028. Lichfield's' Start to Finish report set out that the average time from validation of an outline application to delivery of the first dwelling for a large site of 500 dwellings or more ranges from 4.9 to 6.6 years. We consider Site ST5-1 would more likely deliver in years 6 – 10, leading to an immediate shortfall in housing delivery.

4.4.70 The Reg. 19 Housing Trajectory states that Land north of Maidstone Road, Swanley for 277 dwellings (ref. ST4-12) is developable at years 6 – 10. This is also the case for the 280 dwellings at Land west of Ash Green Reg. 19 ref. ST4-25. Despite this, both of these sites have been phased to deliver from years 2 to 6. Land at Maidstone Road has outline planning permission and Land west of New Ash Green does not. This discrepancy needs to be resolved.

We consider that the delivery of the 280 New Ash Green units needs to be rectified for a more realistic timeframe (years 6 to 10) for the delivery of sites of this scale. Absence of Sound Buffer

4.4.71 The Regulation 19 Local Plan identifies a shortfall of 222 homes against the standard method target. Based on the Council's supply table presented, the Plan is not capable of meeting its need in full, even before a sufficient buffer is added to account for non-delivery.

4.4.72 The importance of a robust buffer is significant given the historic records of housing undersupply (3.59 years, July 2026) and exceptionally poor housing delivery (25% HDT, August 2026) over a sustained period of time, placing Sevenoaks as the joint seventh worst performing of the 273 local planning authorities for housing delivery.

4.4.73 The latest Housing Delivery Test score of 25% equates to an average annualised delivery over the three years 2022/23 – 2024/25 of less than 175 dwellings. For context, the Council's April 2023 Housing Land Supply Statement covering the same period identified a total supply for the five years of 3,331 homes. Assuming average delivery rates were to continue, just 875 homes will be delivered in the five years the Housing Land Supply Statement covered.

4.4.74 In other words, 2,456 homes were not delivered as envisaged, equating to a non-implementation rate of 74%.

4.4.75 This under delivery has, in part, resulted in the rising unaffordability in the district which remains a fundamental issue given the high house prices relative to incomes. As of 2024, the median house price in the district was £475,000, the highest in Kent, and house prices were 13.2 times annual earnings compared with 9.6 in Kent and 7.7 times across England (Targeted Review of Local Housing Needs, 2025).

4.4.76 At the time of writing, the affordable housing need has reached 353 homes per year, against a 12-year average delivery backdrop of just 39 per year since 2012 (11%) (AMR, 2012-2024). The LHNA (August 2025) records that in the latest recorded monitoring year 2023/24, there were 973 households on Housing Register and MHCLG figures for April 2026 show that in March 2026, there were 102 households in temporary accommodation.

4.4.77 In light of our identified concerns above and given the severity of the housing need and the records of under delivery, there is insufficient contingency in place if the sites that are included do not deliver the number of units as envisaged.

4.4.78 This is too great a risk, particularly when the Local Plan is reliant on around 2,600 homes being delivered from an unprecedented strategic site in the district, of which first delivery is relied upon in the first five years of the Plan. Any delay in its delivery will result in an immediate and substantial shortfall in delivery for which the Local Plan contains limited wider remedy.

4.4.79 The Framework is clear that Local Plans must be justified and effective. This means that there must be an appropriate strategy and deliverable over the plan period. Without an adequate buffer of additional sites, the Local Plan will fail these requirements.

4.4.80 As such, the importance of addressing a Local Plan that addresses the shortfall is of paramount importance. This reinforces that the 17,460 homes set out in the standard method should very much be a minimum and policy ST1 needs to be amended to ensure components of the housing supply will meet and deliver at least 17,460 homes. This is not currently the case.

4.4.81 Referring to our revised calculation of supply, which would result in a shortfall of 2,934 homes, the addition of a minimum 10% buffer for soundness, would result in a total identified shortfall of 4,680 dwellings.

4.4.82 However, in light of the scale of historic under-delivery, the Council will be required to demonstrate a 20% buffer to the identified supply of specific deliverable sites by virtue of the HDT policy consequence where delivery is less than 85%. As set out in detail within subsequent sections below, the housing trajectory will not remedy the Council's present five-year housing land supply shortfall, and on this basis, is unlikely to significantly improve housing delivery until at least the latter stages of the Plan period.

4.4.83 It is therefore entirely plausible that a 20% buffer on account of under delivery will persist at least until supply exceeds the housing requirement. Based on the Council's published housing trajectory, this would be until year nine of the Plan period in 2035/36.

4.4.84 Given the expected long-term requirement to demonstrate a 20% buffer due to under delivery, and the addition of an unprecedented strategic site, we suggest that a more appropriate minimum buffer of 20% is necessary to ensure the deliverability of the housing target.

4.4.85 This would bring our total identified shortfall to **6,426 homes.**

Revised Housing Projection

4.4.86 Based on the above commentary, we consider a more accurate projection of delivery for the Plan period as a whole should be as follows.

SOURCE	PLAN PROPOSAL	DHA DEDUCTION	REVISED DELIVERY
Urban Non-Green Belt Sites (Policy ST2)	1,459	-23 (Currant Hill) -12 (The Forge) -143 Over Estimated Densities	1,281
PDL Green Belt Sites (Policy ST3)	452	-45 Over Estimated Densities	407
Greenfield Sites in the Green Belt (Policy ST4)	7,236	-20 (ST4-34 Richardsons Farm) -721 Over Estimated Densities	6,513
Major Green Belt (Non Grey Belt) (Policy ST5)	3,341	-1,348 for delivery	1,993
Total Allocations	**12,488**		**10,194**

Extant and Windfall Sites	4,750	-199 (double counting) -219 (windfalls)	4,332
Total Supply	**17,238**		**14,526**
Deficit	-222		-2,934

TABLE 4.6, DHA REVISED HOUSING SUPPLY

4.4.87 Based on the above conclusions, the plan deficit is substantial and requires addressing in order to be found sound.

Housing Trajectory

4.4.88 The objectives of National Planning Policy are clear in their expectation that strategic policies will maintain a supply of housing consistent with the annual need. Paragraph 79 of the NPPF (2024) applies policy consequences where delivery falls below 95% and applies a 20% supply buffer when delivery falls below 75%.

4.4.89 In this context, we are concerned that despite the historic unmet need in the district, the published housing trajectory proposes to continue to undersupply housing in Sevenoaks for a further eight years post adoption, before increasing annual delivery to more than twice the annual requirement in 2035/36, before tailing off again to under deliver in the final four years.

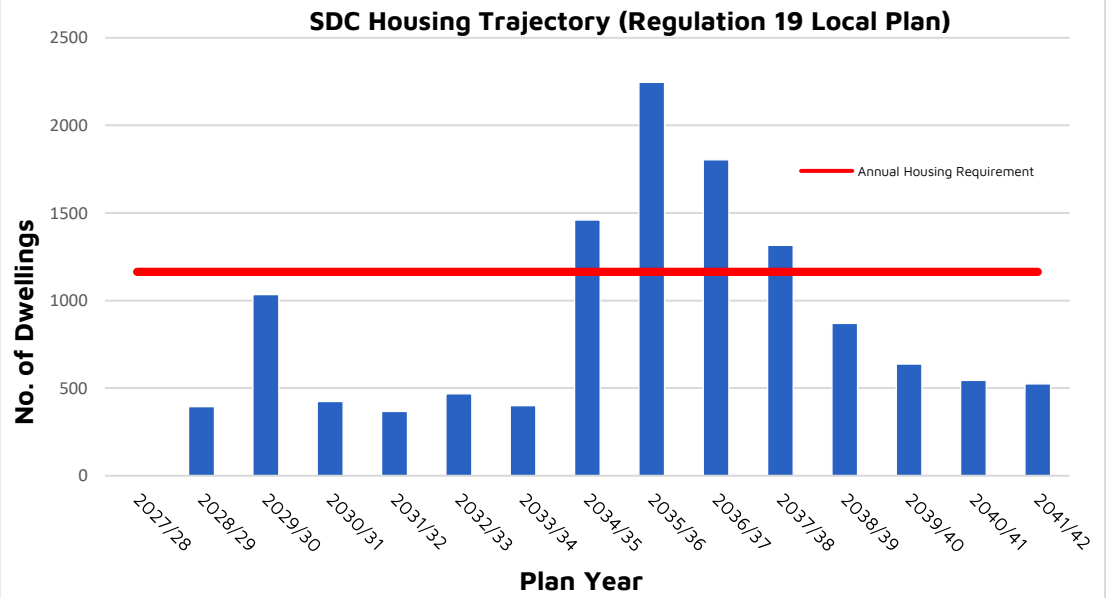


FIGURE 4.2, EXTRACT OF SDC HOUSING TRAJECTORY

4.4.90 It is our client's position that the housing requirement is best delivered through a steady and sustained supply of housing throughout the Plan period and as a minimum, would secure a robust supply of housing within the initial stages of the Plan period.

4.4.91 However, as drafted, even using the Council's published figures, the Local Plan would not be capable of demonstrating a five-year housing land supply on adoption. The first three years would be almost entirely reliant upon extant permissions, which is of significant concern in itself given the current rates of non-implementation evidenced by the Council's housing delivery test score compared to its comparable housing land supply. The fourth and fifth years would then fall short by almost a full year (941 dwellings), equating to a supply total of 4.52 years, reducing further to 3.76 years once a 20% buffer is applied as required by the Housing Delivery Test score.

4.4.92 Using our own revised supply figures set out in the preceding section of this representation, it is demonstrated that the realistic housing land supply is likely to be worse still on adoption of the Plan, around **3.22 years**.

Position using SDC Published Figures	**Years 1-5**	**Years 6-10**	**Years 11+**
SDC Rolling Target (1,164 x 5 *5% buffer)	6,111	6,111	6,111
(1,164 x 5 *20% buffer)	6,984	6,984	6,984
SDC Total	5,260	7,435	4,543
Surplus / Shortfall 5% buffer	-851	1,324	-1,568
HLS (5% buffer)	4.30 years	6.08 years	3.72 years
Surplus / Shortfall 20% buffer	-1,724	451	-2,441
HLS (20% buffer)	3.77 years	5.32 years	3.25 years

TABLE 4.7, DHA HOUSING SURPLUS/SHORTFALL AND HLS UTILISING SDC PUBLISHED FIGURES

DHA Revised Sources of Supply Figures	Years 1-5	Years 6-10	Years 11+
Revised Windfall	-219	N/A	N/A
Minus Double Counting	-199		
Minus DHA Omissions	-43		-12
Minus Density Reductions	-181	-489	-240
Minus Pedham Place	-120	-633	-595
DHA Revised Totals	4,498	6,313	3,696
Surplus / Shortfall 5% buffer	-1,613	202	-2,415
HLS (5% buffer)	3.68 years	5.17 years	3.02 years
Surplus / Shortfall 20% buffer	-2,486	671	-3,288
HLS (20% buffer)	3.22 years	4.52 years	2.65 years

TABLE 4.8, DHA REVISED HOUSING SURPLUS/SHORTFALL AND HLS

4.4.93 Given the current Housing Land Supply position of 3.59 years, the adoption of a new Local Plan represents only a minor improvement over the present situation at a 5% buffer, however given a 20% buffer will still be required at the point of adoption on account of the latest HDT result, the supply position would actually worsen to 3.22 years and assuming housing delivery does not improve, the Plan would not demonstrate a sufficient supply of housing at any point in the Plan period.

4.4.94 Our client's position is consequently that the Plan will not achieve the government's explicit requirement to significantly boost the supply of housing.

4.4.95 The Plan would then continue to undersupply against the housing need until 2035/36, eight years post-adoption, at which point the trajectory relies heavily upon inflated housing delivery in the middling years. The practicality of such an approach is strongly questioned; indeed, evidence has not been provided to suggest that such a high delivery peak could be accommodated within the construction industry or absorbed by the market.

4.4.96 It is also noted that during this period of high delivery, windfall approvals and build outs, typically emerging during periods of lower delivery from allocations, would also be relied upon to be steady, despite a near doubling of housing from allocated sites.

4.4.97 Most pressingly, even leaving aside our wider concerns, we would strongly object in principle to the planned failure to meet the acute unmet housing need until eight years post-adoption, which flies in the face of government objectives to significantly boost the supply of housing effective immediately.

Reduced Plan Period

4.4.98 It is our client's position that the emerging Local Plan should set out a clear and robust strategy for meeting the housing need in full (with an appropriate buffer) for at least the next 15 years to 2042.

4.4.99 It is at this point noted that the Council's published supply figures rely on extant permissions from 21 March 2026 (i.e. one year prior to the start of the Plan period). If the Council is to rely upon supply derived within the year 2026/27, it follows that an additional year of need must also be added to the supply, effectively requiring a 16-year Plan period running from 2026/27 to 2041/42. This would increase the total housing requirement by 1,164 homes to a total of 18,624 homes.

4.4.100 In light of the severity of the housing need, driven in part by the constrained nature of the 93% of the district designated Metropolitan Green Belt and which tightly bounds the existing settlement areas, it should also be considered whether a longer Plan period would be appropriate.

4.4.101 Paragraph 145 of the NPPF is clear that once established, Green Belt boundaries should only be altered where Exceptional Circumstances are fully evidenced and justified through the preparation or updating of Local Plans.

4.4.102 The Framework goes on to state that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the Plan period.

4.4.103 The Council has established that urban and brownfield opportunities have been all but depleted. It is not disputed therefore that Green Belt release is unavoidable, and it is acknowledged that Exceptional Circumstances exist to alter Green Belt boundaries. We therefore suggest that the Inspector should consider whether the Local Plan should look to cover a longer period than 15 years and to make provision for longer term Green Belt boundary reviews.

4.4.104 We have concerns as to deficiencies in the housing supply within the current 15-year Plan period. However, even if this conclusion is not supported, it is inevitable that Green Belt boundaries will have to be reviewed again as part of the next Local Plan review and will not, therefore, persist beyond the Plan period.

4.4.105 It is acknowledged at this juncture that the August 2026 NPPF now requires a reduced minimum Plan period of 10 years (Policy PM2 1(b). However, the policy confirms that Local plans can cover a longer time period where this would, for example, help support the delivery of longer-term infrastructure or strategic development.

4.4.106 In this instance, given the recognised housing delivery constraints and the introduction of the proposed strategic development at Pedham Place, we would strongly object to the appropriateness of a reduced 10-year Plan period and its consistency with national policy.

4.4.107 Even under the 2024 Framework, the Tunbridge Wells Local Plan 2038 was adopted in December 2025 with a reduced Plan period, albeit this was on soundness grounds, due to deficiencies in the sources of supply from the latter stages of the Plan period.

4.4.108 We consider a similar approach in Sevenoaks to be shortsighted and ineffective in achieving both the government and the Council's own objectives to remedy the severe housing and affordability crisis in the district and inconsistent with the Council's long term growth strategy for the strategic development of Pedham Place.

4.4.109 As detailed above, the Plan as drafted will not be capable of demonstrating a five-year housing land supply on adoption and based on our calculations, will not likely do so until 2035/36, eight years post-adoption.

4.4.110 A revised 10-year Plan period would consequently only serve to ensure that the housing crisis in the district persists for a further eight years than necessary and we would strongly object to any discussions at examination proposing any other than a minimum 15-year Plan period.

4.5 CONCLUSION

4.5.1 The Plan as currently drafted fails to satisfy its legal duties as set out under Section 19 of the Planning & Compulsory Purchase Act 2004.

4.5.1 There are significant concerns regarding the deliverability of several of the sites in the Council's proposed housing allocations, especially within the short term. Additional sites therefore need to be identified to ensure the Council meets its housing requirement over the Plan such as "Land north of Swan Lane, Edenbridge".

4.5.2 With reference to the proposed site allocations, SDC does not identify a deliverable supply of sites sufficient to meet Local Plan requirement either over a 15 year or 16 year period. It further demonstrates that the Council does not have a 5 year supply as required by the NPPF (para 78). The Council therefore simply cannot demonstrate that the Plan is "Positively Prepared", "Effective" or "Consistent with National Planning Policy". The Plan must identify more sites, such as "Land north of Swan Lane, Edenbridge" to ensure the planned housing requirement is met over the short and medium term.

4.5.3 Additional sites must be identified to satisfy this requirement. Further sites must also be identified to demonstrate a 5 year supply of deliverable sites.

5 LAND AT SWAN LANE, EDENBRIDGE

5.1 THE SITE

5.1.1 The Site lies outside, but immediately adjacent to, the defined urban area confines of Edenbridge within the Metropolitan Green Belt. It is irregular in shape and comprises circa 41.84 hectares (ha) of land which are a series of fields in pastoral use. Access to the land is established through agricultural accesses off Swan Lane and Fairmead Road. Most of the field parcels are delineated by vegetation including hedgerows, tree belts, or scattered trees. The north-eastern boundary is defined by a stream that flows broadly south-easterly, feeding the River Eden. The Site is gently undulating and slopes towards the northern and eastern boundaries where the site drains.

5.1.2 A bridleway (SR393A) bisects the Site centrally and follows the access track up to the existing properties cut out of the red line boundary (Swan Lane Farmhouse, The Barn, The Oast, The Granary and High Winds). This joins up with a network of Public Right of Ways (PRoWs) to the north of the Site (SR488, SR393 and SR595).

5.1.3 Land to the north and east of the Site land is in agricultural use. To the south and west of the Site are the existing 2 storey dwellings associated with the existing town of Edenbridge. Swan Lane allotments are to the north of Swan Lane and to the rear of properties at Highfields Road. Built form in the immediate context of the Site is typically two-storeys in height and semi-detached in nature, with larger detached properties fronting on to Swan Lane.



FIGURE 5.1, SITE LOCATION PLAN

5.2 REGULATION 18 LOCAL PLAN

Site Allocation EDEN16

5.2.1 The Reg. 18 Local Plan proposed to allocate "Land at Swan Lane, Edenbridge" for a housing-led, mixed-use scheme, including 600 new homes (Site Allocation EDEN16, part of Policy ST2). DHA Planning submitted representations on behalf of BDW to support the delivery and suitability of this allocation, setting out that EDEN16 could deliver 700 new homes with other employment uses.

5.2.2 The Reg. 18 Plan identified the Site as Grey Belt.

5.2.1 The 2025 SHELAA identified Land at Swan Lane, Edenbridge (Site ref: MX/24/00002) as a suitable, sustainable, and deliverable site for development. This informed the proposed allocation within the Reg. 18 Local Plan- Site EDEN16.

5.2.2 At SHELAA Stage 1 it was assessed that the Site meets the proposed Development Strategy adjacent to the urban confines of Edenbridge.

5.2.3 The detailed SHELAA assessment identified the main constraints as the Site's greenfield status, medium-high landscape sensitivity, Green Belt location, limited flood risk, nearby heritage assets, transport/access requirements, and other technical matters including agricultural land, contamination, ecology, and archaeology.

5.2.4 It also recorded several positives: the Site is Grey Belt, close to Edenbridge and its railway stations, outside key environmental designations, and not subject to identified air quality, noise or existing allocation constraints.

5.2.5 The Reg.18 representations submitted on behalf of BDW confirmed the Site was suitable and deliverable for development. It was accompanied by transport evidence to provide comfort in terms transport impacts as well as an opportunities and constraints plan and a masterplan.

Edenbridge Allocations

5.2.6 Alongside EDEN16, a number of other sites were identified for housing and mixed-use allocation within Edenbridge, delivering in the region of 2,131 homes. These allocations are shown overleaf.

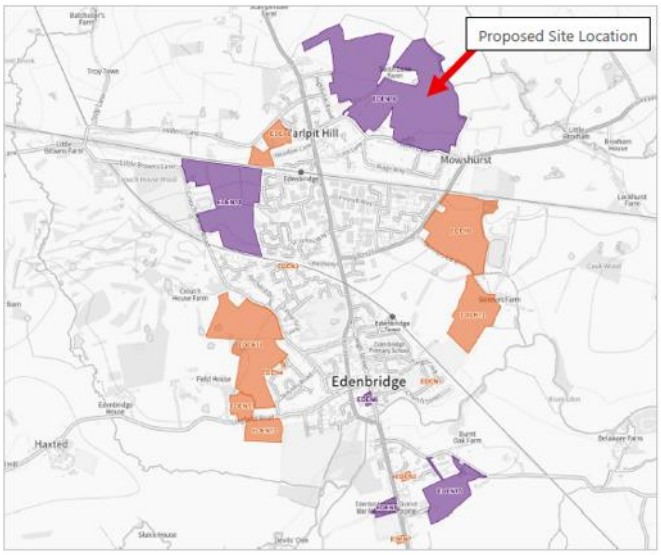


FIGURE 5.2, LOCAL PROPOSED ALLOCATIONS REGULATION 18 (PURPLE - MIXED USE; ORANGE - HOUSING)

5.2.7 As noted in this section, the growth focused around Edenbridge demonstrates the sustainability of this location and the role of the settlement in the hierarchy. It is a relatively unconstrained settlement, compared to Sevenoaks and Westerham, and it is logical for growth to be directed to this location. This represented a reasonable option for growth.

5.3 REGULATION 19 PLAN

5.3.1 The Site is not included as an allocation in the Reg. 19 Local Plan. The updated SHELAA (2026) advises that the Site (ref. MX/24/00002) is unsuitable for development. The grounds provided simply state: "*The site is located adjacent to Edenbridge and constitutes provisional grey belt land. However, due to the distance from services and facilities in Edenbridge, this site is* ***considered relatively less sustainable than other sites promoted adjacent to Edenbridge****. It would also promote an* ***unnatural extension to the settlement****. Due to the cumulative level of growth proposed for Edenbridge, and the constraints of this site, it is not considered suitable for inclusion in the Local Plan*."

5.3.2 The accompanying Sustainability Appraisal (SA) confirms this reduction in growth to Edenbridge is 'justified' as follows:

> *Edenbridge is our third largest settlement (behind Sevenoaks Urban Area and Swanley). A significant number of sites were promoted in this area and have been included for allocation in and adjacent to Edenbridge. However, to achieve sustainable and proportionate development and extension of this settlement,* ***we have chosen to review growth at Edenbridge****. This is due to infrastructure capacity, for example in relation to the road network (which is constrained by multiple signal-controlled single-lane railway bridges). In particular, previous allocation EDEN16, a site to the north-east of Edenbridge, is now not being allocated due to the cumulative impact, the unnatural extension to Edenbridge that would arise and because it is*

considered to result in an unsustainable extension due to the distance from the local centre and its facilities.

5.3.3 The change in direction by the Council is not considered reasonable, not least given the function of Edenbridge within the settlement hierarchy and the fragile housing land supply position within the Regulation 19 Plan.

5.3.4 The rationale for removing the Site is concern over 1) the cumulative scale of growth around Edenbridge meaning some sites should be removed, and 2) the view that Land at Swan Lane is less sustainable than other proposed allocations. **We consider both conclusions are not justified and is therefore unsound.** We deal with each below.

Growth at Edenbridge - Spatial Strategy

5.3.1 At the heart of the NPPF is the presumption in favour of sustainable development, and in terms of Plan Making, policies should promote a sustainable pattern of development that seeks to, inter alia, meet the development needs of their area (paragraph 11). Part 9 of the NPPF expands on this further, noting that significant development should be focused in locations which are, or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes.

5.3.2 As noted above, the District has one principal town (Sevenoaks Urban Area) and three towns which sit below: Swanley, Edenbridge and Westerham.

5.3.3 We would therefore expect that these towns would be the starting point for the consideration of SDC's spatial strategy for growth, with some limitations for Westerham given it is washed over by the National Landscape. The Sevenoaks District Settlement Hierarchy 2025 and its Addendum 2026 sets out that Westerham has been historically categorised as a Town as it has a Town Council. It sets out that due to this, Westerham will remain in the Town category as an exception despite its scoring within the Primary Service Settlement boundaries.

5.3.4 It is extremely sensible to seek to focus growth at the largest settlements in line with paragraph 11a) of the NPPF which seeks to ensure sustainable patterns of development to meet development needs.

5.3.5 Moreover, the Sustainability Appraisal which accompanies this Evidence Base confirms that Edenbridge and the Site itself is an acceptable and logical location for growth as assessed in Option 6 of the Sustainability Appraisal (existing growth option plus 600 new homes at Swan Lane). Therefore, the principle of focusing growth around Edenbridge is accepted.

5.3.6 SDC has a significant housing need and is required to find sustainable sites to meet this need. Edenbridge benefits from two railway stations and an established town centre with a good range of facilities and services. The Council's view that there is too much growth being focused on Edenbridge does not appear to be justified by the evidence base. Planning for growth enables associated infrastructure to be identified and funded by the development to facilitate the growth. It is entirely appropriate to focus growth in this location so the development can benefit from

the existing sustainability of the town. Further, additional growth will continue to ensure the town can maintain its role within the settlement hierarchy and enhance the vitality and viability of the town centre to maintain the town's facilities and services.

5.3.7 The Site at Swan Lane is located in a sustainable location to the north of Edenbridge. It is not located within the National Landscape and is Grey Belt. We consider the site remains a further sensible extension to Edenbridge and will provide a suitable opportunity for SDC to meet its housing needs. Its removal between the Reg. 18 to Reg. 19 Local Plan has not been fully justified.

Sustainability of the Site

5.3.8 As set out within the accompanying Transport Delivery Note, the Site is located in a sustainable location.

5.3.9 The Site forms a logical extension to Edenbridge, a Tier 2 settlement, with a good range of services and facilities. It benefits from two railway stations (Edenbridge Railway Station just 600 m walk along public footpaths and Edenbridge Town just 1.7 km), connecting Edenbridge to two of the four rail lines that run through the District, meaning that uniquely, Edenbridge has direct rail access both into London and also in an east/ west direction providing services to Redhill and Tonbridge, with onward connections to Gatwick Airport and Ashford.

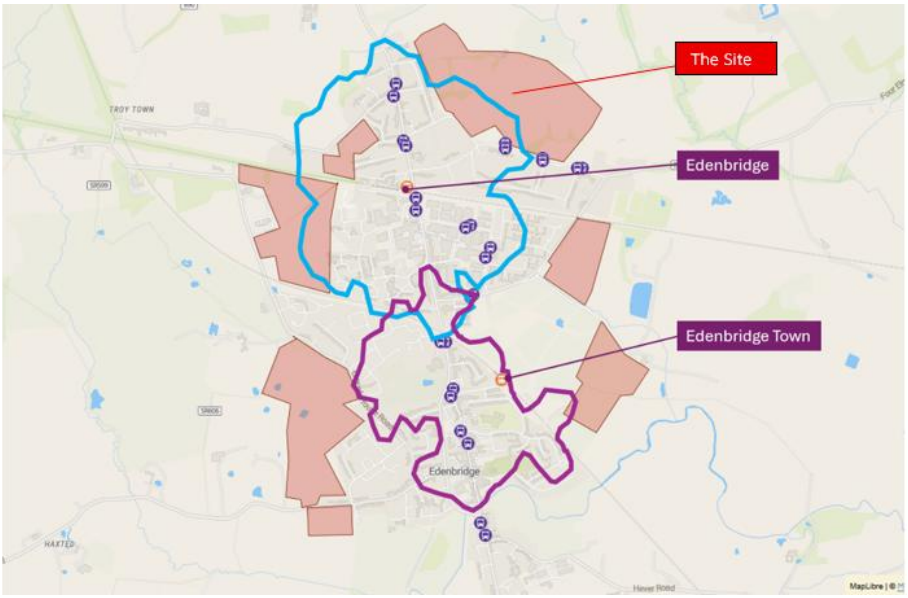


FIGURE 5.3, 800M CATCHMENT FROM RAILWAY STATION TO EMERGING ALLOCATIONS (COURTESY OF I-TRANSPORT SUSTAINABILITY REVIEW)

5.3.10 The Town has the key services and facilities needed to make the settlement suitable including a primary school, doctors, a dentist, post office, convenience stores, supermarkets library, community hall, recreation and sports grounds and bus service access. The site sits close to major employment at the industrial estates in the north of Edenbridge, as well as convenience retail at Lidl and Home Bargains, a short walking distance away.

5.3.11 Alongside, the Proposed Development will provide a range of commercial and community facilities to serve the new neighbourhood, including a local convenience store and community facility. This will further enhance the sustainability credentials of the Site.

5.3.12 Further facilities are located in and around Edenbridge Town Centre to the south. This would be an accessible walking and cycling distance or could be accessed using the existing bus services from Swan Lane to reach the town centre including the 231 and 233 services (a 9–11-minute journey time), providing a combined hourly service. Bus services are also available to larger towns such as Royal Tunbridge Wells and Oxted. The Site itself is the only site that lies directly adjacent to a viable and existing bus route. This further highlights the sustainability credentials of the Site.

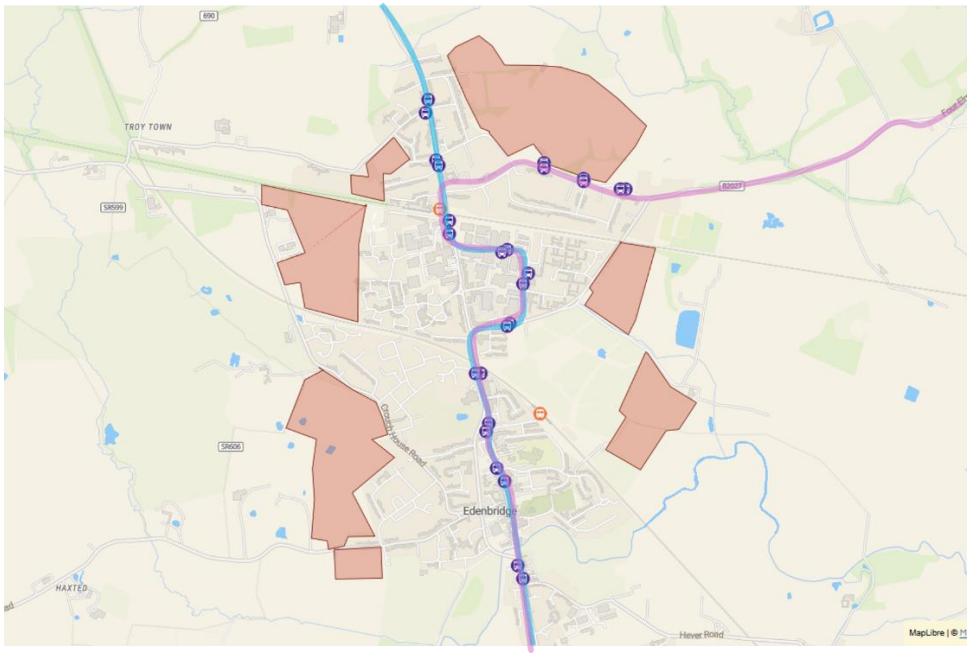


FIGURE 5.4, EXISTING BUS ROUTES IN EDENBRIDGE (COURTESY OF I-TRANSPORT SUSTAINABILITY REVIEW)

5.3.13 The majority of facilities are located in and around Edenbridge Town Centre to the south. This would be an accessible walking and cycling distance or could be accessed using the existing bus services from Swan Lane to reach the town centre including the 231 and 233 services (a 9–11-minute journey time), providing a combined hourly service. The Site is one of the most sustainably located sites in Edenbridge according to the Department for Transport's Connectivity Tool. The Swan Lane draft allocation also achieves the highest level of connectivity in the Transport Delivery Note when considered against the other proposed allocations in Edenbridge. A development of this scale (greater than the other proposed allocations) would also enable greater transport infrastructure improvements.

5.3.14 Additionally, active travel improvements are proposed in the context of the recently published (May 2026) Edenbridge Local Cycling and Walking Infrastructure Plan (LCWIP). Swan Lane connects to the Station Road corridor which is identified as the priority route in the LCWIP walking and cycling strategy for improvements. This further elevates the sustainability of the Site.

Sustainability of Site Compared to other Allocations in Edenbridge

5.3.15 A Transport Delivery Note and Access Assessment accompany this Representation in **Appendix 2**. This has assessed the connectivity of the Site compared to other allocations around Edenbridge. This applies the DfT connectivity tool to compare the locations, and it notes that Land at Swan Lane performs better than some allocations and no worse than others.

5.3.16 However, this is only one part of the sustainability case and as set out in the note, there are significant opportunities to connect the site through active travel measures.

5.3.17 Jacobs have produced a Local Plan Test Report as part of the Evidence base. This identifies four junctions in Edenbridge with potential hot spots for potential capacity constraints. However, subject to mitigation measures, set out in the junction assessment presentation as part of the Jacobs Evidence Base, these are not insurmountable.

5.3.18 It is therefore not justified for SDC to remove EDEN16 as an allocation within the Reg. 19 Plan on the basis of it being less sustainable than other sites and the approach is unsound.

Sustainability Appraisal

5.3.19 The Council provided six reasonable 'growth scenarios' as alternative approaches to allocating sites to provide development needs:

(1) Scenario 1 – the proposed submission approach

(2) Scenario 2 – Scenario 1 **minus** Pedham Place **plus** higher growth to the east of Swanley (Reg. 18 approach at ST4-10) and at Edenbridge (Reg. 18 Swan Lane omission site)

(3) Scenario 3 = Scenario 2 **plus** higher growth at Kemsing and Hextable (as per Reg. 18)

(4) Scenario 4 = Scenario 3 **plus** higher growth at Broke Hill (as tested at Reg. 18)

(5) Scenario 5 = Scenario 4 **plus** higher growth at Westerham (four NL sites)

(6) Scenario 6 = Scenario 1 **plus** additional growth at Edenbridge (Reg. 18 Swan Lane site)

5.3.20 Two of these scenarios include additional growth at Edenbridge (Regulation 18 omission site EDEN16).

5.3.21 The SA sets out that "*Scenario 1 (the proposed submission approach) is ranked first under the greatest number of sustainability topic headings; and B) Scenario 6 (which sees additional growth at Edenbridge, as per the approach at Reg 18) performs best in terms of the number of predicted positive effects.*".

5.3.22 Six sites at Edenbridge have been judged to be unsuitable because they would represent "*an unnatural extension to the settlement*". The SA refers specifically to Edenbridge in Chapter 5.

5.3.23 Paragraph 5.4.41 of the SA sets out that:

> *In **conclusion**, whilst there is no reasonable lower growth scenario, given the strategic context, it is reasonable to consider a higher growth scenario involving an additional ~600 homes from the site previously proposed for*

allocation in 2025, namely Land at Swan Lane. As such, there are two reasonable growth scenarios:

- *Scenario 1 – 12 allocations = 1,439 homes*
- *Scenario 2 – Scenario 1 plus one additional allocation = 2,039 homes*

	Scenario 1	**Scenario 2** - Pedham Pl. + Edenbridge + Swanley	**Scenario 3** - Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable	**Scenario 4** - Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill	**Scenario 5** - Pedham Pl. + Edenbridge + Swanley + Kemsing + Hextable + Broke Hill + Wester'm	**Scenario 6** + Edenbridge
Air quality	=	=	=	=	=	=
Biodiversity	1	2	2	2	2	1
Climate change adaptation	=	=	=	=	=	=
Climate change mitigation	1	2	2	2	1	1
Communities and health	1	2	2	2	2	2
Economy & employment	1	3	3	3	2	1
Historic environment	1	2	2	2	2	1
Homes	3	6	5	4	2	1
Landscape	2	1	1	1	2	2
Land, soils and resources	1	2	2	2	2	1
Transport	2	1	1	1	1	2
Water	?	?	?	?	?	?

TABLE 5.1, THE REASONABLE GROWTH SCENARIOS – SUMMARY APPRAISAL FINDINGS. EXTRACTED FROM THE COUNCIL'S SUSTAINABILITY APPRAISAL

5.3.24 The SA adds that:

> *"Edenbridge – is broadly sensitive in flood risk terms, but the assumed strategic urban extension to the north under Scenarios 2 to 6 generates limited concerns. The site could be bounded to the north by a stream (although streams do not always represent strong boundaries) and whilst there is a centrally located surface water flood risk channel this could likely be integrated as part of a green/blue infrastructure strategy.".*

5.3.25 The SA in para 6.9.1 sets out that:

> *For Scenario 6 (additional units with Swan Lane) there is a case for higher growth in terms of avoiding unmet need (in the context of a constrained sub-region) and ensuring that the plan progresses to adoption and which ensures a healthy headroom.*

5.3.26 Allocating the Site would assist because, as the SA explains, Local Housing Need has more than quadrupled compared with recent rates of housing delivery.

5.3.27 Para 6.10.7 of the SA sets out that

> *"Overall there is a clear 'housing' case for maximising plan period supply, plus there is a clear case for maximising supply from smaller sites that can deliver earlier in the plan period, and which will tend to be associated with relatively limited delivery risk. These are the key factors that lead to an overall preference for Scenarios 5 and 6.".*

5.3.28 It is also prudent to note that in the Regulation 19 SA, the Appraisers, Aecom, *tentatively support* (our emphasis) growth scenario 1. It is clear Aecom does not wholly agree with this approach and there are gaps in supply. The SA suggests reallocation of the site would provide the most predicted positive effects.

5.3.29 Aecom finds that there is a case made for additional allocations. These reasons are summarised as follows:

(a) Could be a need for a stepped requirement;

(b) Additional supply could allow for a healthy supply headroom;

(c) There is a case to be made for a longer plan period; and

(d) Unmet need is an issue in the sub-region.

5.3.1 It is therefore considered that the Council has not appropriately considered this Site in the context of the Evidence Base and its approach is not reasonable or justified.

5.4 DEVELOPMENT POTENTIAL FOR SWAN LANE

5.4.1 BDW has been progressing technical work for the Site to develop an emerging concept plan. It considers the Site could deliver the following:

(1) Up to 650 Class C3 dwellings including provision for housing for the elderly, a proportion of bungalows, self & custom build plots;

(2) A local centre which could allow for retail, community and commercial floorspace;

(3) A new link road through the Site incorporating bus, cycle and pedestrian routes;

(4) Retention of existing trees and hedgerows where possible;

(5) Policy compliant levels of public open space including the provision of a new Country Park;

(6) A landscape-led approach to the layout and form of development to seamlessly connect into the existing settlement edge and to provide a suitable transition to the countryside;

(7) Incorporation of principles of sustainable design; and

(8) A comprehensive phasing plan including the phasing of infrastructure coming forwards with the Proposed Development.

5.4.2 A Vision Document accompanies this Regulation 19 Representation (see **Appendix 1**).

5.5 DELIVERABILITY

5.5.1 The Site is controlled by a national housebuilder Barratt Redrow Kent with a strong track record of delivery in Kent.

5.5.2 The Site has no planning history of relevance or a history of unimplemented permissions that would alter the conclusions that it is a suitable site. There are not considered to be any impediments to the site being phased for potential development commencing within the 0–5-year period.

5.5.3 There are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination that cannot be mitigated through the redevelopment of the scheme.

5.5.4 On behalf of the landowner, we can confirm that there are no unexpected financial restrictions that would impact upon the viability of an employment scheme or that would prohibit development coming through within the early stages of the plan period. To the contrary, we consider there to be opportunity to deliver a high-quality development.

5.5.5 There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

5.5.6 The Site is not constrained and is of a size that can be delivered in a timely manner.

5.5.7 Barratt Redrow has three brands: Barratt, Redrow and David Wilson. This enables multiple outlets to operate across the Site simultaneously**.** Accordingly, the

delivery trajectory for this Site will be expedient and facilitate the delivery of houses across the first part of the Plan period.

5.6 OTHER SUITABILITY CONSIDERATIONS

Contributing towards a Range of Allocations

5.6.1 The Site would provide a larger scale, but not strategicically sized, housing allocation to provide a more secure, robust and deliverable housing land supply, in light of the Council's lack of housing land supply and significant shortfall in delivery of housing. It will help contribute to the Council's housing supply in a very sustainable location.

Landscape and Visual Impact

5.6.2 As set out within our Regulation 18-part 3 Local Plan Representation, whilst the Site was judged as lying completely within an area of medium to high landscape sensitivity, on a more specific basis, the sensitivity of the site is likely to be less when accounting for proximity to the existing development edge of Edenbridge. The Site does not contain small woodlands or ancient woodlands defined as valued landscapes. The Landscape Visual Evidence assesses a much larger site and confirms that there are few absolute constraints to develop the area, that it is a low-lying landscape and not particularly prominent and that the areas closer to the edge of Edenbridge have more human influence and are less sensitive.

5.6.3 The Site can be comprehensively master planned to ensure the impact of the landscape is mitigated and the development integrated successfully into the environment.

Grey Belt

5.6.4 The site lies within the Metropolitan Green Belt, which directly borders the urban confines of Edenbridge on its north-eastern side.

5.6.5 It has previously been accepted by SDC that the Site forms Grey Belt land.

5.6.6 Iceni Projects has prepared a Green /Grey Belt and Landscape Visual Assessment (**Appendix 3**) which assesses the Site against the key purposes of the Green Belt and agrees with the conclusions of the SDC Stage 2 Green Belt Assessment that the Site does not contribute to purposes (a), (b) or (d).

5.6.7 Given the scale of housing need SDC needs to plan for, and its acknowledgment that insufficient sites are available within the urban area to meet this need, preference should be afforded to sustainable grey belt sites such as this.

Flood Risk

5.6.8 Whilst not specifically referred to in the 2026 SHELAA, the Strategic Flood Risk Assessment, Level 1 has been updated which defines the Site as "high risk" (red) in SFRA Level 1 given parts of the Site are located within Flood zones 2 and 3. This

is not unusual for a Site of this scale, and it is pertinent to note that other sites with Flood Zones 2/3 are allocated for housing.

5.6.9 As the Sustainability Appraisal sets out, six sites allocated for development in the Emerging Plan require Exception Tests because they significantly intersect with fluvial or surface water flood zones. These are listed as follows:

(1) Land north of Sevenoaks, west of Otford Road (1,500 homes; 106.5 ha) – a strategic urban extension to Sevenoaks, where past SA work has flagged flood risk constraint.

(2) Land at Breezehurst Farm, Crouch House Road (450 homes; 17.9 ha) – a strategic urban extension to Edenbridge, where past SA work has flagged flood risk constraint.

(3) Land south west of Skinners Farm, Edenbridge (155 homes; 8.3 ha) – a strategic urban extension to Edenbridge, where past SA work has flagged flood risk constraint.

(4) Land west of Brittains Lane, Sevenoaks (56 homes; 5.3 ha) – an urban extension to Sevenoaks previously proposed for 65 homes.

(5) Abacus Furniture, Farm Road Garages, Sevenoaks (11 homes; 0.2 ha) – an urban site in Sevenoaks previously proposed for 10 homes.

(6) 78-80 and 82-84 High Street, Leathermarket, Edenbridge – a small urban site previously proposed to deliver 14 homes but now allocated for 0 due to outstanding flooding evidence and availability concerns, although it remains a key regeneration opportunity, to include homes if possible.

5.6.10 It is considered that a Sequential Test and Exception Test report could equally be passed for Land at Swan Lane. Given the scale of development, there is potential to avoid flood risk via site layout design and incorporate the necessary mitigation measures.

5.7 SITE OPPORTUNITIES

5.7.1 The Site can deliver a number of benefits to Edenbridge, including:

- Additional housing and the creation of an expanded community to contribute to the enhanced vitality and viability of Edenbridge town centre, ensuring rail services, facilities and services continue to operate successfully.

- Provision of financial contributions towards the infrastructure required within Edenbridge. This too would provide headroom / a buffer for funding were the infrastructure costs to increase beyond current IDP predictions or if another allocation in the district were not to come forward.

- The Site is well located close to existing services and facilities and would represent a sustainable urban extension, which would contribute to the upgrading of existing facilities to meet its resident's needs.

- The Site is not of a size that it would significantly contribute towards highway constraints and could come forward in the immediate term.

- The Site is however well related to existing pedestrian and cycle transport links and is therefore accessible by a range of modes of transport. The site is located adjacent to established and viable transport corridors, including a regular and valuable bus service connecting to higher order centres, and an active travel spine at Station Road through the centre of Edenbridge which KCC and SDC intend to improve via LCWIP.

- The Site is pastoral and is of low ecological value. The development is not constrained by ecology, and it is expected that 10% BNG can be easily achieved on the Site.

- Development can be positioned outside the areas of flood risk, which cover only a small proportion of the Site. These areas provide opportunities for open space and ecological enhancement through the provision of new/more varied habitats.

- BMV Agricultural Land covers large parts of Sevenoaks and the need to develop on Grade 3a land is necessary to address the Council's significant housing requirement. BMV is not considered to be a constraint to development and its loss outweighed by the significant housing need.

- The layout can be sensitively planned around the nearby listed buildings.

- The Site can provide a Country Park which can meet the needs of existing and future residents particularly where the Local Plan Evidence Base points to an under provision of open space in northern Edenbridge.

- The Site will deliver a link road from Swan Lane which will deliver significant benefits to the existing town in terms of traffic calming along Swan Lane and improved active travel connections.

- Alongside these locational advantages, the Transport Delivery Note includes a Sustainable Transport Strategy which provides commitment to a package of measures designed to encourage the uptake of active and sustainable travel modes. This includes:

    - Infrastructure improvements to pedestrian, cycle and bus provision;

    - Improvement and enhancement of the PROW network; and

    - Implementation of a Travel Plan including a Car Club, travel incentives and journey planning.

5.7.2 Overall, the Site is located in a highly sustainable and accessible location. The Site is relatively unconstrained, with no constraints identified that would prevent it coming forward for housing-led development. The development of the Site for housing would provide the opportunity to support the acute Local Housing Need of the Sevenoaks District, by delivering growth and contributing to the viability of Edenbridge. Furthermore, it would provide an important contribution towards the supply of housing and diversification of sites in line with the NPPF.

5.8 CONCLUSION

5.8.1 The Site suitable, available and achievable now and would make a valuable contribution to addressing the Council's current signficant housing shortfall and underdelivery of housing.

5.8.2 Given the scale of housing need SDC needs to Plan for, and the extremely fragile delivery position within the Reg. 19 Plan, it is considered additional sites are required. It is entirely justified to focus growth around the biggest towns, such as Edenbridge, which are already well served by facilities and services.

5.8.3 The Site should therefore be included as a new Site allocation under Policy ST4 (Greenfield Grey Belt Site Allocations Housing and Mixed Use).

6 DEVELOPMENT MANAGEMENT POLICIES

6.1 POLICY H1: HOUSING MIX

6.1.1 No objection in principle is raised in respect of Policy H1, which seeks to ensure a mix of housing is provided which meets identified needs in the district. This aligns with the aims of the NPPF (paragraph 63).

6.1.2 Flexibility is also essential to align with the aims of the Council's density policy (Policy H7), which seeks higher/more ambitious densities to make the most efficient use of sites. The achievement of these density ranges is simply not possible if accounting for the high proportion of bungalows which are being sought on site, alongside the high proportion of houses, including 3- and 4-bedroom homes.

6.1.3 See extract from the Council's Targeted Review of Local Housing Need (October 2025) below.

Table ES1 Overall dwelling type/size mix recommendations by tenure

Dwelling type/size	Market	Social/ Affordable Rented	Affordable home ownership	Overall range
1/2-bedroom house	10-15%	20-25%	25-30%	10-15%
3-bedroom house	30-35%	15-20%	45-55%	30-35%
4 or more-bedroom house	30-35%	5-10%	0%	25-30%
1-bedroom flat	0-2%	10-15%	2-5%	2-5%
2 or more -bedroom flat	5-10%	5-10%	5-10%	5-10%
1/2- bedroom bungalow/level-access	5-10%	25-30%	5-10%	10-15%
3 or more-bedroom bungalow/level-access	5-10%	2-5%	2-5%	5-10%
Dwelling type	**Market**	**Social/ Affordable Rented**	**Affordable home ownership**	**Overall range**
House	70-75%	50-55%	70-75%	70-75%
Flat	2-5%	10-15%	2-5%	5-10%
Bungalow/level-access	20-25%	30-35%	20-25%	15-20%
Number of bedrooms	**Market**	**Social/ Affordable Rented**	**Affordable home ownership**	**Overall range**
1	2-5%	20-25%	5-10%	5-10%
2	20-25%	30-35%	35-40%	25-30%
3	45-50%	30-35%	55-65%	35-40%
4	20-25%	10-15%	0%	25-30%

TABLE 6.1, COUNCIL'S TARGETED REVIEW OF LOCAL HOUSING NEED (OCTOBER 2025)

6.1.4 As set out in our Regulation 18 Representation, there is therefore an inherent conflict between the aims of Policy H1 and H7, with Policy H7 driving smaller properties to achieve the densities outlined.

6.1.5 On review of the Local Plan & CIL Viability Assessment - Stage 1 - Residential Assumptions, it is also apparent that no account has been taken of the impact of providing bungalows and impacts this might have on cost and the overall viability of developments.

6.1.6 Based on the above, Criterion 3a) of the Policy fails to be Justified or Positively Prepared in requiring compliance with either the most current housing needs assessment or another identified need.

6.1.7 Accordingly, it fails to take into account site circumstances, thus potentially driving unacceptable/unsuitable design solutions.

6.1.8 Rewording is proposed as follows in red:

> *a. Proposals should be informed by the dwelling mix profiles set out in the latest housing needs evidence where appropriate whilst also taking into account site specific circumstances to ensure the delivery of developments which are contextually appropriate and deliverable and deliver on the other aims in the Local Plan, unless it can be demonstrated that an alternative mix meets an identified need*

M4(2) Compliance

6.1.9 No objection is raised in principle to the aims of Criterion 3b). However, as set out in the Regulation 18 Representation, it is not considered reasonable that all developments are required to meet M4(2) standards. Houses themselves can generally easily satisfy M4(2) requirements. However, the Building Regulation requirements extend far beyond the home, including impacting the size of parking spaces, the camber of the driveway, pavements and the general approach to the property. Even on the flattest of sites, 100% compliance can still be challenging to achieve and results in additional space implications, once allowing for enlarged parking spaces, which can impact development efficiencies.

6.1.10 The PPG is explicit (para: 008 Ref ID: 56-008-20160519), in stating that

> "Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings".

6.1.11 Allied to the above, there are cost implications with achieving M4(2), which require additional engineering interventions to achieve. It is noted in the Local Plan & CIL Viability Assessment (Stage 1) Appendix 1 – Residential Assumptions Summary, that it only assumes 100% M4(2) compliance on "major sites". It is therefore unclear whether the costs of requiring M4(2) compliance have been properly accounted for on smaller sites, to ensure that this does not frustrate the delivery of non-major developments. It has therefore not been suitably demonstrated that this requirement is deliverable having also had regard to the advice in the PPG regarding assessing viability concerns for setting optional Building Regulation Requirements (Para 003 Ref ID: 56-003-20150327).

6.1.12 Notwithstanding this, the new NPPF 2026 sets the direction of travel for M4(2) compliant units as no less than 40% of new homes on major housing developments to meet the M4(2) accessible and adaptable dwellings standard.

6.1.13 Criterion 3b) must be amended as set out below, to ensure the Policy is consistent with National policy and justified.

For new build housing development, commit to delivering all homes to meet the M4(2) standard for accessible and adaptable homes, where practicable taking into account other design considerations including site specific factors.

6.1.14 Notwithstanding this, the direction of travel of the 2026 NPPF sets out in draft Plan Making Policy PM13 Criterion 1 subsection b(a) that accessibility standards in relation to requirements for M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) of the Building Regulations should be set in accordance with policy HO5).

6.1.15 Draft Plan Making Policy HO5 sets out in Criterion 1 subsection (b) that requirements should ensure that no less than 40% of homes on major developments are delivered to M4(2) standards (subject to any appropriate exemptions set out in the development plan).

M4(3) Compliance

6.1.16 Criterion 3(b) requires *For new build schemes of 20 units or more, commit to delivering at least 5% of homes to meet the M4(3)b standard for wheelchair user dwellings, to be delivered as Social Rent housing.*

6.1.17 Whilst the ambition is supported, flexibility is needed regarding the type of affordable housing tied to M4(3) compliant units. This is because Registered Providers or Affordable Housing Partners may not wish to deliver 5% of homes on the site as Social Rent housing on the Site. This could delay the delivery of homes and make it more difficult to secure Registered Provider partners. It would also have space implications. M4(3) units and infrastructure require even more space per plot than M4(2) units and so this directly conflicts with Policy H7 of the Council's Regulation 19 Local Plan.

For new build schemes of 20 units or more, commit to delivering at least 5% of homes to meet the M4(3)b standard for wheelchair user dwellings, to be delivered as Affordable Housing where practicable, taking into account other design considerations including site specific factors.

6.2 POLICY H2: PROVISION OF AFFORDABLE HOUSING

6.2.1 The Targeted Review of Local Housing Need 2025 identifies a need for 353 affordable homes per annum.

6.2.2 The Targeted Review highlights that affordability has worsened, with median house prices rising across the district. Flexibility is needed to ensure sites are viable and deliverable.

6.2.3 Section 3 of the aforementioned Target Review (Technical appendix) details how the required amount of affordable housing and the proposed tenure split was calculated. It suggests that affordable housing should be split 80% (social rent) and 20% (shared ownership) reflecting the District's need to diversify affordable housing options for those unable to access the open market.

6.2.4 The tenure split as set out in the Targeted Review is subsequently brought forward into Policy H2.

6.2.5 By way of response, the proposed split in Policy H2 does not include affordable rented properties which are part of the current adopted approach by SDC. This omission raises concerns that the significant shift toward social rent may undermine the objective of creating mixed and balanced communities, as outlined in paragraph 64(b) of the NPPF. A balanced tenure mix is essential to meet the diverse housing needs of the population.

6.2.6 In addition, we highlight the contents of the Local Plan & CIL Viability Assessments Preliminary Viability Report (Stage 1) dated October 2025 which identifies the marginal viability position of affordable housing delivery in certain scenarios.

6.2.7 The model assumes an 80/20 split of social rented and shared ownership housing in all scenarios and the Local Plan viability models conclude when assuming the above mix, that 40% affordable housing as a global figure is achievable. However, this does not apply evenly across all sites.

6.2.8 Previously Developed Site-based scenarios are challenging in all scenarios. Although 30% affordable housing results show a more positive viability prospect, some typologies continue to indicate more marginal results in some circumstances, due to higher existing use values associated with PDL sites and typically higher development costs.

6.2.9 Similarly challenging viability prospectives were observed in flatted development scenarios which tend to show viability challenges as low as 20-30% affordable housing. This trend is not unique to Sevenoaks and is confirmed within the report to be apparent in many other plan-making areas.

6.2.10 At 50% affordable housing (as will be required from Grey Belt sites) scenarios are identified to be marginal in the north-west / north-west and south, which are observed to occupy a significant number of proposed housing allocations. The need for flexibility is evidenced by the affordable housing market failure in the last 2 years, resulting from the reduced capacity of Registered Providers to take on sites due to funding constraints, the focus on the refurbishment of existing sites, rent caps and changes to grant funding. This in turn has impacted the delivery of market housing, reliant on Registered Providers to take on the associated component of affordable housing. This primarily impacts smaller sites, however in recent experience this is extending to large sites (>100 homes).

6.2.11 In the absence of a solution to the affordable housing delivery crisis, market homes will not come forward, and the only way developers such as our client have been able to secure the delivery of AH has been through flexibility in tenure requirements.

6.2.12 Given this context, we urge caution in applying a blanket affordable housing policy across the District and for all development types.

6.2.13 Given the above, our client believes that any proposed tenure split should be adaptable to future changes in local housing need and market conditions.

6.2.14 Consequently, rather than SDC just bringing forward the 80% social rent/ 20% shared ownership tenure split as set out in the Target Review and in Draft Policy H2, SDC should revise Policy H2 to:

(1) Allowance to incorporate flexibility for renting tenures (i.e. social or affordable rent);

(2) Allowance to incorporate flexibility in relation to affordable home ownership tenures, such as Discounted Market Sale homes as well as Shared Ownership properties,

(3) Include flexible wording that allows the tenure split to respond to changing needs, and the particular difficulties currently being experienced in the affordable housing market, over the plan period;

(4) Enable developers and housebuilders to present evidence demonstrating that local housing needs have changed or are changing; and

(5) The uplift of affordable housing from 40% to 50% on greenfield Green Belt sites should be made up of an appropriate form of housing that allows for consideration to be given to how the land deal has been structured.

6.2.15 Turning to wider matters, there is some disparity between the proposed affordable housing thresholds and the formal definition of 'Major Development' that requires clarification. The Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) defines 'major development' as:

'development involving any one or more of the following—

(a) the winning and working of minerals or the use of land for mineral-working deposits;

(b) waste development;

(c) the provision of dwellinghouses where—

(i) the number of dwellinghouses to be provided is 10 or more; or

(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);

(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or

(e) development carried out on a site having an area of 1 hectare or more;

6.2.16 As can be seen, the 0.5ha parameter only ever applies when the number of homes isn't known (i.e. outline planning applications). In all other cases, it is 10 units or 1 ha. The table pursuant to policy H2 therefore needs to be made consistent with the legislation.

6.2.17 Finally, we would stress that paragraph: 029 Reference ID: 10-029-20241212 of the planning practice guidance states that where development takes place on land situated in, or released from, the Green Belt and is subject to the 'Golden Rules' set out in paragraph 156 of the NPPF, site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing. However, critically it also states that the government intends to review this Viability Guidance and will be considering whether there are circumstances in which site-specific viability assessment may be considered. With this in mind, the policy needs to be flexibly worded to ensure that any changes to the practice guidance are followed.

6.3 POLICY H4: SPECIALIST AND SUPPORTED HOUSING NEEDS

6.3.1 The Policy (Criterion 2) requires on sites for 50 or more new homes (except 100% affordable schemes) the provision of accommodation for older people. As set out in the Regulation 18 Consultation it must be acknowledged that some of these forms of accommodation, specifically the specialist forms of accommodation require a minimum number of units to be viable (often upwards of 50 units or more to account for service charges). As such, these forms may not be suitable in all instances, particularly in market areas without sufficient demand to support the minimum number of units needed to make older persons' housing viable in a 50 or more dwelling scheme. Flexibility is therefore essential and amendments must be introduced to make this policy sound and consistent with national policy.

> *(2) Developments of 50 or more dwellings (except 100% affordable housing schemes), in appropriate locations subject to the criteria above (where appropriate), will be expected to consider providing units for older people. This is to be informed by the latest evidence including up-to-date Local Housing Needs Surveys. The inclusion of housing suitable for older people on smaller sites is also encouraged.*

6.4 POLICY H7: HOUSING DENSITY AND INTENSIFICATION

6.4.1 Policy H7 seeks to achieve densities of between 30-60 dwellings per hectare (dph) in rural areas, 40-60 dwellings per hectare on the edge of urban confines of higher tier settlements and in excess of 150 dph in town centres, which is also believed to be the basis for the proposed allocation capacities. These guidelines are in reference to the net density of a site and excludes for example, public open space.

6.4.2 Our client considers delivery of such densities will be challenging in a semi-rural Green Belt authority, largely constrained by two National Landscape designations and their setting.

6.4.3 Land use change statistics in England were last updated in 2023 for the period 2021-22 (MHCLG). The publication identifies:

> *(1) The average density of residential addresses surrounding a newly created residential address was 31 addresses per hectare, a decrease of 11 compared to 2020-21.*

(2) The average density surrounding new residential addresses created on previously non-developed land was 24 addresses per hectare, an increase of 1 compared to 2020-21.

(3) The average density surrounding new residential addresses created within land designated as Green Belt was 15 addresses per hectare, a decrease of 2 compared to 2020-21.

(4) It should also be noted that these statistics pre-date the introduction of Biodiversity Net Gain (BNG) and updated drainage principles, both of which require additional land for landscaping and mitigation.

6.4.4 Whilst it is agreed that maximising the efficient use of sites released from the Green Belt is both of significant strategic importance and consistent with the objectives of the Framework (paragraph 129), densities must be realistic and consider the evidence which points towards the need for family sized 3 to 4 bedroom housing and the character of the area.

6.4.5 Returning to the land use statistics set out in paragraph 6.4.3 of this representation, the densities proposed for a number of site allocations are therefore at odds with 'normal' residential densities at a national level.

6.4.6 Even if these densities were workable, it is not considered that these would deliver the highest quality residential development and design.

6.4.7 Whilst it is agreed that maximising the efficient use of sites released from the Green Belt is both of significant strategic importance and consistent with the objectives of the Framework (paragraph 129), policy H1 has regard to housing mix and states that proposals should be informed by the dwelling mix profiles set out in the latest housing needs evidence (Targeted Review of Local Housing Needs 2025). This evidence subsequently points towards the need for family sized 3-to-4-bedroom housing i.e. lower density development, yet this is not reflected in the allocation projections. See Table 6.1 of this Report.

6.4.8 In simple terms, there is unresolved tension between the need to make efficient use of land, but to also deliver the types of homes the development industry is willing to build and the types of homes that are needed. Indeed, it can be seen from the commentary of site promoters, it is clear that even those with proposed allocations are concerned about the deliverability of the site for the quantum identified.

6.4.9 As a first priority, the housing delivery policies and associated development briefs need to be clear as to the area of land that has been set aside for landscaping, BNG and infrastructure delivery on each site and the net density that has been applied to identify a capacity. Without this evidence, the Plan allocations are not considered to be sound.

6.5 POLICY H8: SELF & CUSTOM HOUSE BUILDING

6.5.1 Based on the Targeted Review of Local Housing Needs (2025), a total of 358 households are currently on the Council's custom / self-build register which covers a 10-year period from 2035. This extrapolates to an annualised need for 36

self/custom homes, albeit it is noted that typically households will be on multiple local authority registers within their preferred region and therefore there is likely a small degree of double counting with neighbouring authorities.

6.5.2 As set out in our previous representations we welcome Criterion 2) in principle which provides for the non-provision of self/custom build housing subject to evidence of no demand. However, the Criterion should also allow for a reduced percentage also informed by evidence of demand. As currently worded the policy provides for either 5% or nothing, which is not suitably flexible and could lead to unnecessary over provision where there is some demand but not for the 5% currently sought.

6.5.3 In line with the Council's evidence base the percentage for self/custom build homes should be reduced to 4%. Based on the Targeted Review of Local Needs Housing 2025, the requirement for 5% seems to stem from a more general observation that Council's typically seek 5%-10%.

6.5.4 So, for the policy to be Justified, Effective and Consistent with National policy, Criterion 2 should be amended as follows:

As on residential development sites of 10 dwellings or more, at least ~~5%~~ 4% of plots must be made available, rounded to the nearest whole plot, for self-build or custom housebuilding, as demonstrated by the latest local housing needs evidence, unless it can be demonstrated that:

(a) There is no demand for such plots, as evidenced by the Council's Self and Custom Build Register;

(b) There is demand, as evidenced by the Council's Self and Custom Build Register, but this demand is less than 4% of the total homes proposed, in which case the proportion of self/custom build homes can be reduced accordingly; or

(c) The provision would make the development unviable.

6.6 POLICY HEN1: PROTECTING AND ENHANCING THE HISTORIC ENVIRONMENT

6.6.1 This is the only policy which addresses designated heritage assets. In accordance with the provisions in the NPPF (para 215), where there is harm to a designated heritage asset then that harm can be weighed in the planning balance against the public benefits.

6.6.2 The Policy as currently written omits to consider any weighing of the public benefits of proposals referencing only conservation and enhancement. This is contrary to the provisions in the NPPF and is therefore an overly restrictive policy which is not Justified nor consistent with National policy. The Policy must therefore be amended to align with the provisions in the NPPF.

6.7 POLICY NE1: LANDSCAPE & NATIONAL LANDSCAPES

6.7.1 The opening paragraph of the policy requires *"The landscape character of the District's countryside, outside of the National Landscapes, should be conserved and, where possible, enhanced".*

6.7.2 The NPPF (para 189) gives great weight to "conserving and enhancing" National Landscapes.

6.7.3 As set out in our Regulation 19 representation, the language used in the opening paragraph to the policy therefore applies the same level of protection awarded to National Landscapes to all other landscapes, which is incorrect and contrary to the NPPF.

6.7.4 There is also an inherent conflict in the policy wording, where landscapes cannot necessarily be conserved through the introduction of development, which the Local Plan is also tasked with delivering, and will likely result in some harms through the changes it inevitably introduces.

6.7.5 This, therefore, sets an impossible bar for developments including sites supported for development in the Local Plan, which is also contrary to the NPPF.

6.7.6 The opening paragraph to the Policy is therefore too restrictive, not Justified and fails to accord with the NPPF.

6.7.7 To make the policy Justified, Effective and consistent with National Policy, the paragraph must be amended as follows:

> ~~*The landscape character of the District's countryside, outside of the National Landscapes, should be conserved and, where possible, enhanced.*~~
>
> *Outside of National Landscapes, development proposals should contribute to and where possible enhance the character of the District's countryside.*

6.7.8 The proposed wording aligns with the NPPF 2024 (paragraph 187).

6.8 POLICY CC4: TREE PLANTING

6.8.1 In general, the aim for developments to deliver 2 new trees per new dwelling and/or per 500 sqm of new non-residential floorspace is supported. However, we consider that greater flexibility is needed. Tree planting should be informed by the landscape, ecology and habitat typologies. Some landscape characters may be more receptive to tree planting than others. This flexibility should be integrated into the policy.

6.8.2 Moreover, this amount of tree planting would reduce the achievable density of housing. This amount of new planting, particularly for strategic sites, and brownfield sites would not be likely to be deliverable within boundaries.

6.8.3 However as raised in the Regulation 18 Representation,

(1) the proposed policy requires that new tree planting should be from a "bio secure source". There is no definition or description of what it means for species to be "bio secure".

(2) As currently drafted the policy lacks clarity regarding where the new trees need to be planted i.e. if trees would be confined to each plot or if they could be located anywhere in the proposed development.

6.8.4 This needs to be more clearly defined and the following amended wording is proposed:

(1) All major residential development must plant a minimum of two new trees for every new dwelling (excluding proposals for conversions and changes of use) unless it can be demonstrated not to be practicable due to site constraints or landscape character area. These trees can be planted anywhere within the site boundary.

(2) All major non-residential development must plant a minimum of one new tree for every 500 square metres of new floorspace, unless it can be demonstrated not to be practicable due to site constraints. These trees can be planted anywhere within the site boundary.

6.9 POLICY DE1: COMMUNITY ENGAGEMENT

6.9.1 As set out in our Regulation 18 representation Para 2.34 of the Council's Statement of Community Involvement (adopted 2020) sets out that:

> *For each stage of the planning application process, and for the different types of application, the Council will consider whether greater involvement is appropriate and how it can support developers in involving people more effectively.*

6.9.2 It is therefore evident that the need for public engagement is already built into the Council's consideration of planning applications and the need for this, including the method will be considered on a site-by-site basis as part of the pre-application process.

6.9.3 The requirement to seek feedback from Town or Parish Councils' and other local stakeholders like residents' associations would result in excessive delays in bringing applications forward for development, let alone decision making. The policy should therefore be removed since it is not considered to be Justified and would fail to make the Plan Effective, unnecessarily delaying the delivery of much needed homes, especially in combination with the separate requirements of Policy DE2.

6.10 POLICY DE2: DESIGN REVIEW

6.10.1 This requires new development to engage with the Council's Design Review Panel. However, in supporting paragraph 5.7 of this Plan,

a multi-functioning Design Advisory Panel (DAP) will be created comprising a pool of experienced design professionals from a range of disciplines (for example:

architecture, highways, landscaping, master-planning, sustainability) who the Council will be able to draw upon to provide specialist input into the application process in multiple ways, including;

- *Input into the Council's pre-application service;*
- *Participation in Design Review Panels;*
- *Supporting policy development;*
- *Training for officers, members and CRP.*

6.10.2 Supporting paragraph 5.8 adds that:

> *Where appropriate larger scale development will form a site-specific Design Review Panel to build an ongoing relationship and understanding of the site and ensure the ongoing delivery of design excellence.*

6.10.3 Supporting Paragraph 5.9 states that:

> *Further detailed guidance on the Design Advisory Panel and Community Engagement will be produced.*

6.10.4 As set out in the Regulation 18 stage, it is not considered either necessary or appropriate to have a requirement to engage with the Design Advisory Panel as a planning policy. This is a matter that can be considered on a site-by-site basis and will be informed by pre-application discussions with Officers. The policy should therefore be removed.

6.11 POLICY DE3: ENSURING DESIGN QUALITY

6.11.1 In general no objection is raised, other than in respect of the final requirement.

6.11.2 As set out in the PPG (para 001 Reference ID: 61-001-20190315) the purpose of the Plan is to set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy.

6.11.3 New Development proposals of 10 or more units will normally be expected to submit a 3D digital model of the buildings and trees on the site for inclusion in the 3D mapping tool of the District.

6.11.4 The above requirement contributes to none of these functions therefore fails to be Justified or consistent with National policy. This requirement must therefore be removed.

6.12 POLICY AQ1: AIR QUALITY

6.12.1 As set out in our Regulation 18 representation, in principle there is no objection regarding the aims of the Air Quality policy in ensuring development proposals do not have unacceptable impacts. However, it is not reasonable and contrary to the PPG to seek developments to have a positive or a "neutral" impact.

6.12.2 The PPG states that the role of air quality considerations in the development management process is to ensure that development does not significantly alter air quality at the construction or operation stage or result in poor air quality outcomes for living conditions. There is no blanket requirement for developments to have a neutral impact.

6.12.3 Whilst the aim for development is to have the lowest possible impact, complete neutrality might not be possible, depending on the baseline i.e. if air quality is good, and some impacts can still be acceptable (not contrary to Government Guidance), where it falls within established limits.

6.12.4 The first sentence to criterion 1 should therefore be amended as set out below, to make the Policy Justified and consistent with National planning policy.

> *New development should ~~result in a positive or neutral impact~~ not have an unacceptable impact on air quality for new residents, the existing surrounding area and other areas connected to the development. It is expected that proposals should:*

6.13 POLICY HEN4: LOCALLY LISTED BUILDINGS & ASSETS

6.13.1 As set out at the Regulation 18 stage Policy HEN4 fails to accord with the NPPF (para 216) because as currently drafted the Policy affords Locally Listed Buildings and Assets the same/similar level of protection as a Listed Building or other designation heritage asset.

6.13.2 With reference to the NPPF and the accompanying definitions, Locally Listed Buildings and Assets do not fall within the definition of "designated heritage assets". As such great weight is not given to the asset's conservation (para 212).

6.13.3 Non-designated heritage assets are separately addressed at para 216 of the NPPF which simply *requires "the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

6.13.4 The policy as currently worded goes significantly beyond this in adopting the position that loss or harm of Local Assets would merit the refusal of an application unless clearly outweighed by the benefits. This is irrespective of the significance of the Asset. This is not reflective of the wording in the NPPF

6.13.5 This is clearly highly restrictive, noting para 7.16 to the policy explains assets can include places, areas or landscapes, thus could significantly frustrate or prevent otherwise acceptable developments from coming forward.

6.13.6 The Policy is clearly not Justified and fails to be consistent with National planning policy. The Policy therefore must either be removed or re-worded to align with the intentions of the NPPF, specifically para 216.

6.14 POLICY BW3: BIODIVERSITY IN DEVELOPMENT

6.14.1 In cases where off-site BNG is required it is not reasonable to require new BNG habitats to be delivered within or provide connections between areas of noted conservation value such as designated sites. This is a matter controlled by the company/organisation delivering the off-site habitat and/or will depend on where the BNG site is located. This is simply a matter that cannot be controlled, and the section below must therefore be removed.

6.14.2 Off-site provision within Sevenoaks District should be delivered within or provide connections between areas of noted conservation value such as designated sites, priority habitats, Local Wildlife Sites, Nature Reserves and irreplaceable habitats. Regard should be had to the:

- interim Strategic Significance guidance (until the LNRS for Kent and Medway is published) Kent and Medway Local Nature Recovery Strategy (once published)

6.14.3 The NPPF (para 16d) requires policies to be unambiguous, so that it is evident how the decision maker should act.

6.15 POLICY ED1: EDUCATION

6.15.1 As set out at the Regulation 18 stage, the purpose of the Policy is unclear and provides no guidance as to when S106 contributions will be sought, outside of CIL or where land might be needed for schools. The policy is therefore incapable of practicable implementation. The Policy therefore needs to be removed or amended to clarify what is actually being sought.

6.15.2 However, critically it is not evident how allowances for additional education contributions outside CIL have been accounted for in the Local Plan & CIL Viability Assessment Preliminary Viability Report (Stage 1), October 2025.

6.15.3 Where additional contributions are sought outside of CIL this must be clearly accounted for in the viability testing and any such requirements must be identified clearly, especially in the case of allocated sites to ensure these remain deliverable.

6.16 POLICY SL1: SPORTS AND LEISURE FACILITIES

6.16.1 Subsection (4) of this policy (newly introduced with the Regulation 19 Plan) sets out that:

Major residential developments of 600 dwellings or more must provide on-site outdoor sports facilities where the Council's Playing Pitch and Outdoor Sports Strategy or other up to date evidence identifies a quantitative or qualitative shortfall that the development would exacerbate.

On-site provision must include multi pitch sites with appropriate ancillary facilities (such as clubhouse/ changing accommodation, storage and car parking) designed in accordance with relevant national governing body guidance. Single pitch sites

will not be supported, as they do not provide long term, sustainable provision for the relevant sports.

Subsection (5) sets out that:

Major residential developments below 600 dwellings must provide financial contributions towards addressing identified shortfalls in existing sports provision proportionate to the needs generated by the development and informed by the Council's latest evidence. Contributions will be directed to specific projects identified in the Council's sports and leisure evidence base or Infrastructure Delivery Plan.

All proposals must demonstrate that:

(a) The identified shortfall is addressed through on-site provision or financial contributions, as appropriate;

(b) Facilities are designed to competition-capable standards, reflecting national governing body requirements;

(c) Facilities are accessible and inclusive for all users;

(d) Long term management and maintenance arrangements are secured; and

(e) Community access is provided where appropriate, secured through a community use agreement.

Subsection (6) sets out that:

Where on-site provision for large scale developments is demonstrated to be technically unfeasible or would fail to deliver facilities that meet identified needs to the required standard, the Council may consider alternative mitigation. This will only be accepted where it is clearly evidenced that equivalent or better provision can be delivered off-site in a suitable location.

6.16.2 It is considered that these newly introduced subsections (4 – 6) to Policy SL1 are not sufficiently evidenced and are not necessary or appropriate. This is a matter that can be considered on a site-by-site basis and will be informed by pre-application discussions with Officers and by infrastructure contributions secured by CIL and / or Section 106 Agreements. These subsections of the Reg. 19 policy wording should therefore be removed.

6.17 POLICY UD1: UTILITIES & DIGITAL INFRASTRUCTURE

6.17.1 This policy requires proposals to demonstrate that there will be sufficient capacity within the utilities infrastructure to meet the needs of the development and require infrastructure and applicants to work together (Criterion 2). It further sets out (Criterion 3) that through the use of planning conditions, developers will be required to ensure any necessary water or wastewater upgrades are in place before the occupation of a development to avoid adverse impacts such as sewer flooding, pollution or issues of low/no water pressure.

6.17.2 As set out in the Ministry of Housing, Communities and Local Government's letter to Tonbridge and Malling dated 4 September 2026, the emerging Local Plan should progress to Regulation 19 Consultation despite water capacity issues. It is not the place of the Local Planning Authority to regulate the water industry.

6.17.3 This direction of travel is clear in the 2026 NPPF. This sets out in DM7 (Relationship with other regulatory regimes) subsection 2 that Planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes other than where there is a development plan policy in place applying optional technical standards for the development proposed.

6.17.4 As we set out at the Regulation 18 stage, if there are concerns regarding the availability of utilities infrastructure then it is incumbent on the Local Planning Authority to address this through the Local Plan process, to ensure that this does not delay the delivery of homes and to ensure provision is made for the upgrade of facilities in the Plan to make the Plan "Effective". This reflects the requirements of the NPPF (para 16c) which requires Plans to be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees. The need for the Local Planning Authorities to collaborate with utility providers is further emphasised at para 27 of the NPPF to ensure the relevant investment plans for infrastructure providers are taken into account.

6.17.5 It is unreasonable and fails to meet the objectives and the legal requirement of Local Plans to deliver sustainable development by foisting the requirement to consider more closely utility capacity issues on developers, which is likely to result in planning delays. Utility providers are slow and without a planning permission have no imperative to respond and a patchwork of responses where developments can only be required to mitigate their own impacts. New development cannot nor can it be expected to address existing or wider utility infrastructure provision.

6.17.6 Furthermore, it is unreasonable to condition the provision of offsite works that are outside the control of the developer and is secured under separate legislative regimes, such as in the case of water, where developers pay contributions separately to ensure utility infrastructure is provided.

6.17.7 Criterion 7 of the Policy also sets out that the expansion and improvement of digital infrastructure across the District is supported, in line with the latest Building Regulations, including the provision of gigabit-capable broadband and enhanced mobile connectivity. All new development proposals will be expected to demonstrate how they contribute to the improvement of digital infrastructure, with particular emphasis on addressing gaps in connectivity and supporting underserved areas. Proposals that facilitate the expansion of broadband networks, mobile coverage, and future-proofed digital systems will be supported in principle.

6.17.8 This is not a Justified requirement, nor is it for developments to address gaps in infrastructure which are unrelated to its proposals. This is a matter for service and statutory providers, and such a requirement must be removed for the Policy to satisfy the tests of soundness.

6.17.9 Fundamentally, Policy UD1 must be substantially rewritten to satisfy the tests of soundness and to meet the direction of travel set by the updated NPPF 2026 which confirms that planning conditions and decision making should not duplicate other consenting regimes.

7 CONCLUSIONS

7.1.1 These representations raise serious concerns over the Plan as a whole in terms of its flawed approach to accommodating its housing need; and specifically, to question the rationale for excluding EDEN16 from the Reg. 19 Plan in terms of:

(1) The ability of the Plan to deliver the District's Housing Need, with specific reference to:

(a) Density ambitions (Policy H7)- the Reg. 19 Local Plan implies very high densities on the sites proposed to be allocated for development, which are not appropriate for the District and unlikely to be delivered. Additional sites are needed to meet the Council's housing need.

(b) Over reliance on Strategic Sites with ambitious housing delivery projections.

(c) Absence of Development Management Policies or guidance in Development Briefs for Site Allocations to help guide development in an appropriate way, raising doubts of the effectiveness of the Plan (a test of soundness).

(d) Lack of Green Belt release meaning that the delay in the delivery of any large-scale sites will result in a substantial shortfall in delivery for which the Local Plan has no wider remedy for.

(2) Addressing the unreasonable conclusions within the Council's Evidence Base to exclude EDEN16 from the Regulation 19 Local Plan, with specific reference to the sustainability of the Site and the role of Edenbridge in the settlement hierarchy.

(3) Reviewing the Council's other proposed housing allocations and looking in detail about the soundness of the Plan.

7.1.2 Overall, on behalf of BDW, we consider that Land at Swan Lane should be reallocated for development at the Regulation 19 Stage for up to 650 units.

7.1.3 Allocating this Grey Belt, relatively unconstrained site would provide significant benefits by securing a more certain housing trajectory and creating greater diversity in the housing supply across the Plan period in a sustainable location adjacent to the third largest Town in the District.

7.1.4 Barratt Redrow is uniquely positioned and has the financial capacity and resources to deliver multi-tenure models and multiple house types. The Site would potentially utilise all three brands (Barratt, David Wilson and Redrow). By utilising these three brands our client can deliver at speed, which would help to deliver houses early on during the new Plan period.

7.1.5 Additional housing at Swan Lane would complement the existing emerging allocations in Edenbridge and would contribute towards the maintenance of existing services and infrastructure upgrades at Edenbridge. The new housing would allow for greater footfall for shops and services in Edenbridge and could help contribute to pupil numbers needed to deliver the land set aside for the new

secondary school. This would assist the Town in maintaining its vitality and viability whilst reducing trips outside of the Town to other schools.

7.1.6 A publicly accessible Country Park would also be provided as well as much needed affordable housing units in line with Golden Rules for Grey Belt land.

7.1.7 As set out in the accompanying Vision Document, the sustainability credentials of Land at Swan Lane would be enhanced by providing a new Local Centre including retail and community space as well as housing for older persons to assist in creating healthy and balanced communities. This too would contribute towards meeting the needs of the ageing population of the district.

7.1.8 This is pertinent where the presumption in favour of sustainable development applies in the 2026 NPPF supporting development adjacent to existing settlements in Decision Making Policies, particularly Policy S5 subsection (j) part (i).

APPENDIX
1



Barratt Redrow

LAND AT SWAN LANE

EDENBRIDGE

VISION DOCUMENT

September 2026
Rev: -

gdmarchitects

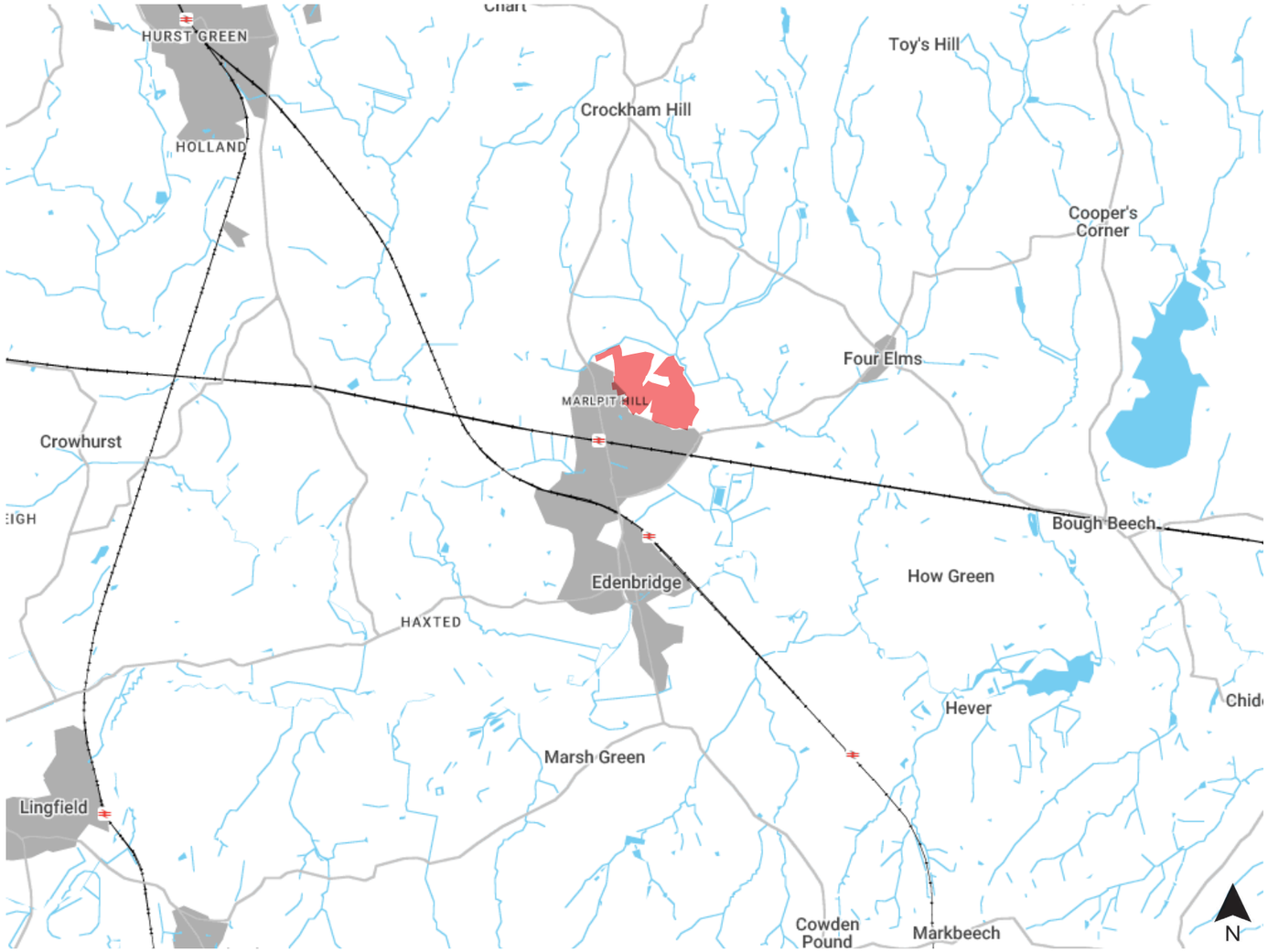
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01 Land at Swan Lane, Edenbridge

INTRODUCTION

1.0 THE VISION

A LANDSCAPE-LED, CONNECTED NEW NEIGHBOURHOOD FOR EDENBRIDGE.

The vision for Swan Lane is to create a high-quality and sustainable new neighbourhood that forms a natural extension to Edenbridge, shaped by the site's landscape and connected to the existing town.

New homes, a significant Country Park, a new Local Centre and improved movement connections will come together within a strong landscape framework, creating a distinctive place with landscape and community at its heart.

MORE THAN NEW HOMES – A NEW PLACE FOR EDENBRIDGE.



FOR ILLUSTRATIVE PURPOSES ONLY

LANDSCAPE LED

Country Park, Green Infrastructure and Biodiversity enhancement.

HOMES FOR EDENBRIDGE

Up to 650 new homes, including 50% affordable housing.

COMMUNITY FOCUSED

A new local centre providing a focal point for community life.

CONNECTED

Rail, bus, walking and cycling connections integrated throughout the neighbourhood.

1.1 WHY SWAN LANE?

LOGICAL EXTENSION TO EDENBRIDGE
Immediately adjoining the existing settlement edge.

HIGHLY SUSTAINABLE LOCATION
Much of the proposed development lies within approximately 800m of Edenbridge Station, with Strong access to rail, bus, walking and cycling, with opportunities to improve movement through the area.

GREEN BELT OPPORTUNITY
Land assessed as making a limited contribution to key Green Belt purposes.

NEW COMMUNITY INFRASTRUCTURE
Opportunity for a Local Centre, Country Park and significant publicly accessible open space.

LANDSCAPE-LED GROWTH
Existing hedgerows, trees, ponds and landscape sensitivity shape the framework plan.

DELIVERABLE GROWTH
Previously assessed through the 2025 SHLAA as suitable, sustainable and deliverable.

IMPROVED TRAVEL CONNECTIONS
Improvements to surrounding infrastructure in Edenbridge - walking routes, train station and social infrastructure



A SUSTAINABLE LOCATION FOR GROWTH

Swan Lane provides an opportunity to create a natural extension to Edenbridge, combining a highly accessible location with an established landscape framework.

Much of the proposed development lies within approximately 800m of Edenbridge Station, while existing hedgerows, woodland, ponds and Public Rights of Way provide the foundations for a landscape-led new neighbourhood.

The opportunity is therefore not simply to deliver new homes, but to create a connected new place centered around a Local Centre and substantial new Country Park, delivering benefits for both new and existing residents.

02 Land at Swan Lane, Edenbridge

THE OPPORTUNITY

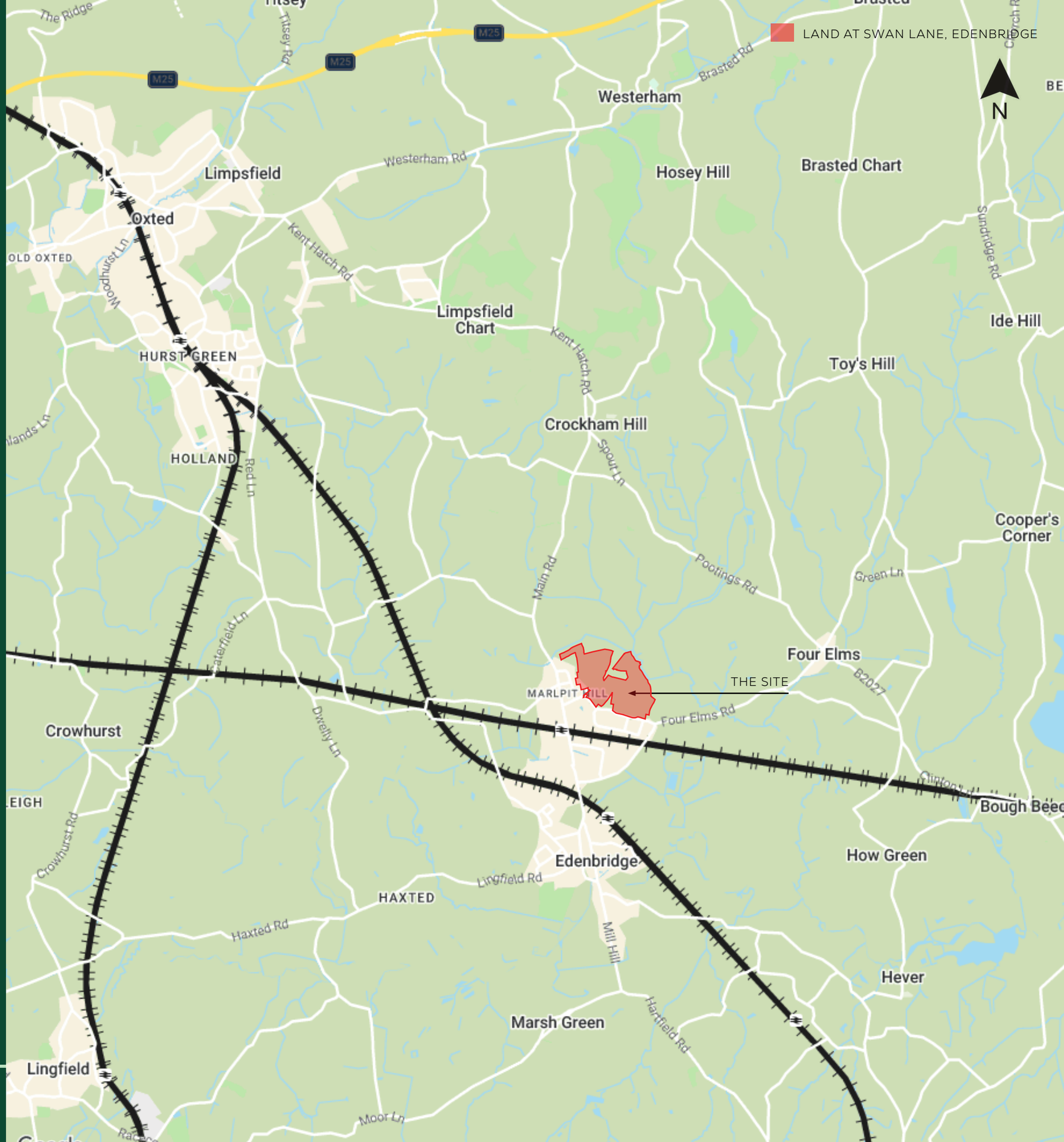
2.0 STRATEGIC LOCATION

LAND AT SWAN LANE, EDENBRIDGE

Located on the northeastern edge of Edenbridge, the site occupies a highly sustainable location that is well related to the existing built form of the town. This vision document presents an opportunity to deliver a carefully planned extension to Edenbridge, creating a distinctive new neighbourhood that is fully integrated with the existing community whilst respecting the surrounding landscape.

Edenbridge is one of the District's principal towns, alongside Sevenoaks and Swanley, and represents an appropriate focus for sustainable growth due to its accessibility and established range of everyday services and amenities. As a thriving market town, Edenbridge offers primary schools, healthcare provision, local shops, employment opportunities and leisure facilities, together with two railway stations. These existing services provide a strong foundation to support sustainable future growth.

The site benefits from excellent accessibility, with direct connections to Swan Lane and Four Elms Road, and convenient access to the wider highway network via the A25 and M25. Edenbridge Town and Edenbridge stations provide regular rail services to London, making the town an attractive and well-connected place to live. Existing Public Rights of Way and surrounding green infrastructure also provide opportunities to strengthen walking and cycling connections between the development, the town centre and the wider countryside.



2.1 PLANNING CONTEXT

2.96 YEARS
HOUSING LAND SUPPLY
Sevenoaks District Council (2025)

25%
HOUSING DELIVERY TEST
Sevenoaks District Council (2025)

c.600 HOMES
PREVIOUSLY IDENTIFIED
Through the Regulation 18 Local Plan process

A CLEAR CASE FOR SUSTAINABLE GROWTH

Swan Lane has previously been promoted through the emerging Sevenoaks Local Plan and was identified through the Regulation 18 process for approximately 600 homes. The site has also been assessed as suitable, available and deliverable for residential development, demonstrating its potential to contribute towards meeting the District's housing needs.

The 2026 National Planning Policy Framework supports development addressing evidenced unmet housing need where it is physically well related to an existing settlement and can be accommodated by existing or proposed infrastructure. This is particularly relevant in Sevenoaks, where there is a significant shortfall in housing land supply.

Swan Lane responds strongly to these circumstances. The site directly abuts the existing settlement edge of Edenbridge and provides an opportunity for a well related and sustainable pattern of growth. Its proximity to existing services, facilities and rail connections further strengthens its sustainability credentials.

The site's Grey Belt status, together with the absence of overriding constraints, provides an opportunity to deliver much-needed new homes alongside significant landscape, community and infrastructure benefits.

2026 NATIONAL PLANNING POLICY FRAMEWORK

" Development addressing unmet housing need is supported where it is physically well related to an existing settlement and can be accommodated by existing or proposed infrastructure."

THE CASE FOR SWAN LANE

PREVIOUSLY IDENTIFIED FOR GROWTH
The site was identified through the Regulation 18 Local Plan process for approximately 600 homes.

SUITABLE, AVAILABLE AND DELIVERABLE
The site has previously been assessed as a suitable, sustainable and deliverable location for development.

LIMITED CONSTRAINTS TO DEVELOPMENT
There are no identified constraints considered to have a substantial adverse impact on the principle of development, allowing the proposals to respond positively to the site's landscape and environmental context.

GREY BELT OPPORTUNITY
The site comprises Grey Belt land and provides an opportunity to deliver development in accordance with the relevant national policy requirements.

A SUSTAINABLE EXTENSION TO EDENBRIDGE
The site directly adjoins the existing settlement and would create a well related pattern of growth, alongside new green, movement and community infrastructure.

GREY BELT
Limited contribution to Green Belt purposes

SUSTAINABLE LOCATION
Directly adjoining Edenbridge with access to services, facilities and public transport

TWO RAILWAY STATIONS
Much of the site within approximately 800m of Edenbridge Station

DELIVERABLE SITE
Sustainable, available and deliverable

2.2 SURROUNDING CONTEXT & DESIGNATIONS

Land at Swan Lane occupies a sustainable edge-of-settlement location on the north-eastern edge of Edenbridge, where the town meets the wider Low Weald landscape. The site is framed by existing residential development to the south and west, with open countryside extending to the north and east, providing an opportunity to create a well-defined and landscape-led transition between the built and rural environments.

The site lies entirely within the Metropolitan Green Belt. However, Sevenoaks District Council's Stage 2 Green Belt Assessment (2025) concludes that the Swan Lane parcels (ED-01 to ED-06) do not contribute to Green Belt purposes (a), (b) or (d). The site is therefore considered to fall within the NPPF definition of Grey Belt.

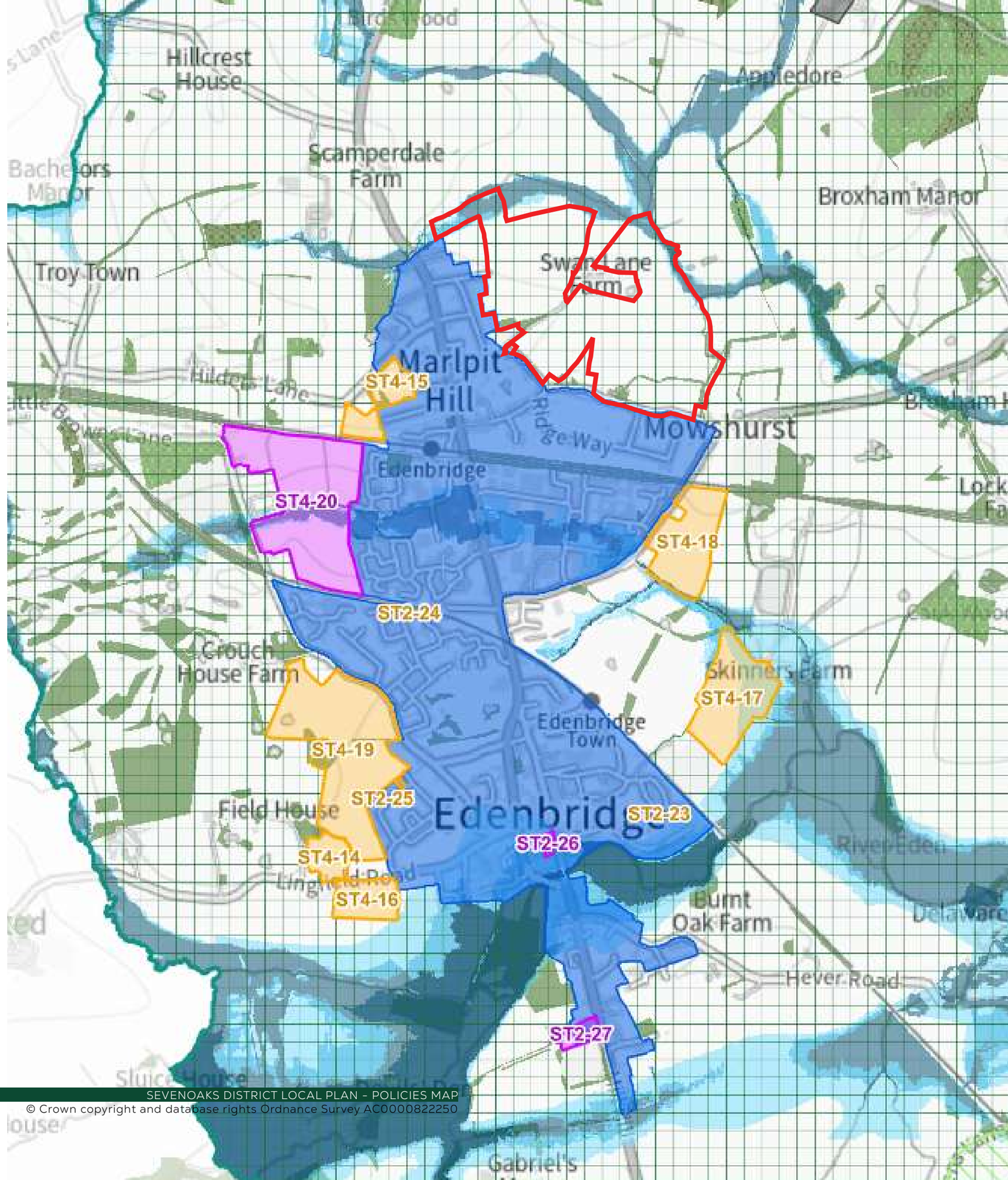
Whilst located within the wider Green Belt, the site is not within the Kent Downs National Landscape and avoids nationally designated landscape areas. Existing woodland, mature hedgerows and the surrounding green infrastructure provide a strong landscape framework that will shape the emerging framework plan and help reinforce Edenbridge's green setting

EDENBRIDGE'S WIDER GROWTH STRATEGY

The emerging Local Plan identifies a number of opportunities for growth around Edenbridge, including new housing and mixed-use sites.

This Site allows for immediate growth to the north east of Edenbridge. This could be considered in conjunction with new housing and mixed use sites proposed in the Council's emerging Regulation 19 Local Plan.

- Land at Swan Lane, Edenbridge
- Revised Metropolitan Green Belt to meet proposed emerging local plan site allocations (July 2026)
- Ancient Woodland - not located in direct connection to the site
- Woodland
- Town Settlement
- Mixed Use Site
- Housing Site
- Flood Zone 3b
- Flood Zone 3a
- Flood Zone 2



SEVENOAKS DISTRICT LOCAL PLAN - POLICIES MAP
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2.3 PUBLIC TRANSPORT AND SUSTAINABLE MODES OF TRAVEL

Swan Lane occupies a highly sustainable location on the edge of Edenbridge, with much of the proposed development located within approximately 800m walking distance of Edenbridge Station. Existing rail, bus, walking and cycling infrastructure provides opportunities to reduce reliance on the private car and connect the new neighbourhood with the wider town and surrounding area.
The site is identified as one of the most sustainably located sites in Edenbridge according to the DfT Connectivity Tool.

WALKING

- Existing Public Rights of Way cross and adjoin the site
- Established pedestrian connections towards Edenbridge
- Town centre and everyday facilities within walking distance
- Opportunity to integrate existing routes within the new green infrastructure network

CYCLING

- Existing cycle connections through Edenbridge and the surrounding area
- Opportunities to strengthen links between the site and town centre
- Connections to local schools, facilities and railway stations
- Emerging proposals can encourage active travel through a connected movement network

PUBLIC TRANSPORT

- Much of the proposed development within approximately 800m of Edenbridge Station
- Existing 231 and 233 bus services connect Swan Lane with the town centre, with a combined hourly service and approximately 9–11 minute journey time.
- Edenbridge Town Station is approximately 1.7km.
- Rail services provide connections towards London and the wider region

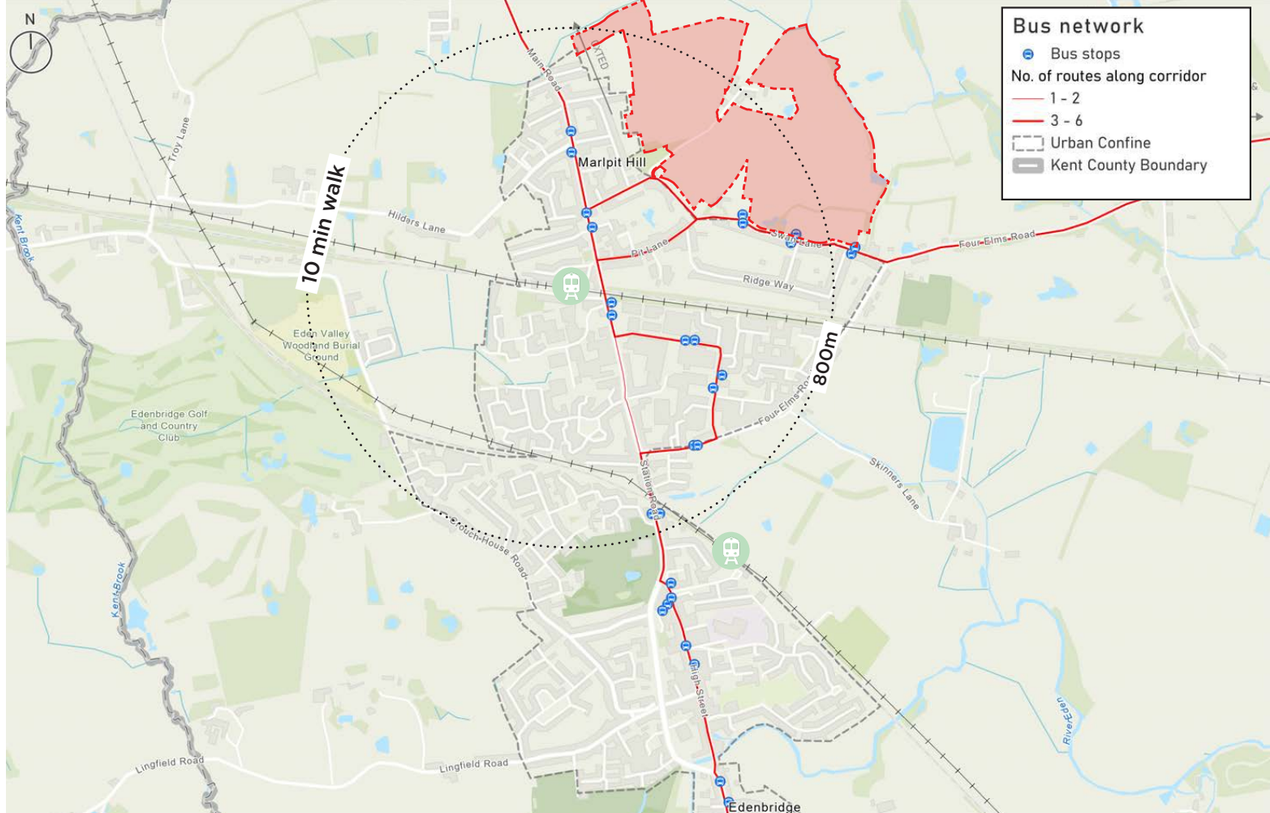
HIGHWAY NETWORK

- Access to the site from Swan Lane and the surrounding highway network
- B2026 / Main Road provides connections through Edenbridge
- B2027 / Four Elms Road provides connections eastwards
- Good links to the wider road network, including the A25 and A21

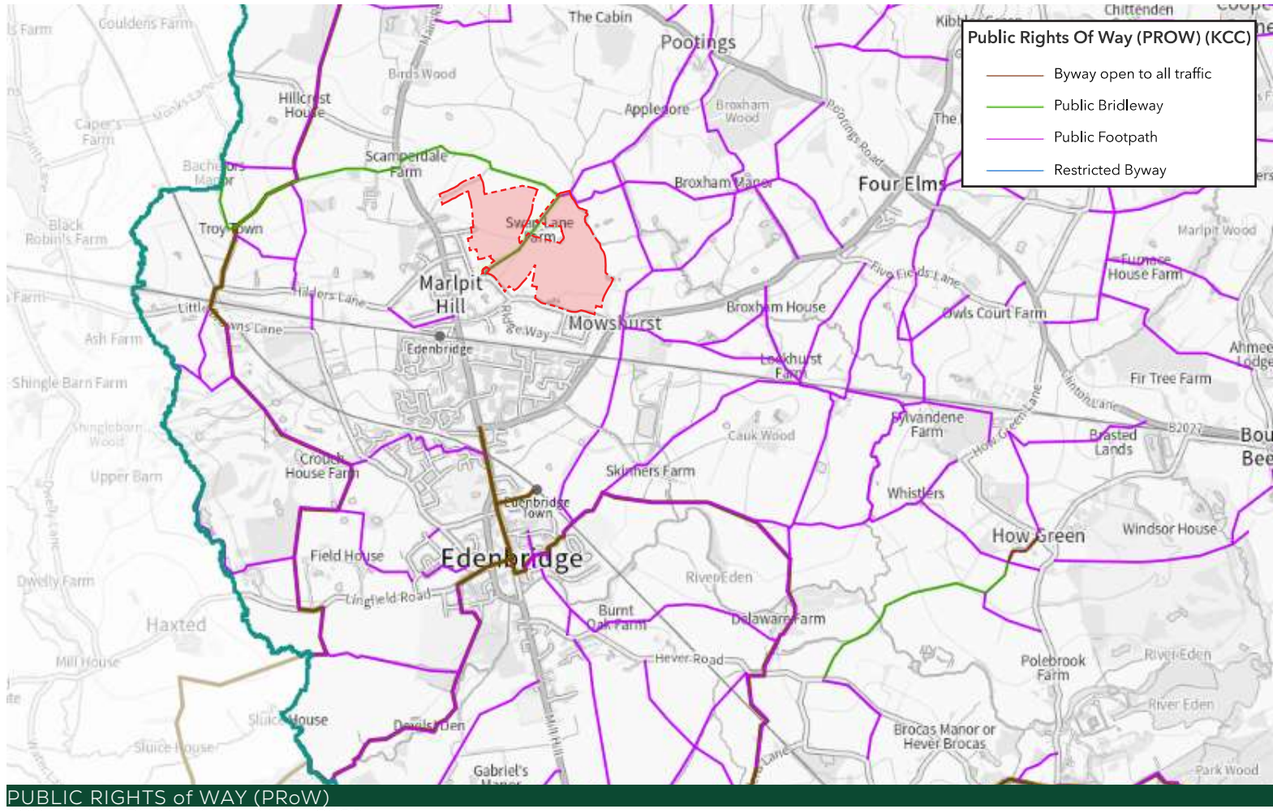
KEY DESTINATIONS

DESTINATION	WALKING	CYCLING
Swan Bridge/Ridgeway Bus Stops	0-5 min	-
Edenbridge High Street	15–20 min	5–7 min
Edenbridge Train Station	8-10 min	2-4 min
Edenbridge Town Train Station	25–30 min	8–10 min
Local Shops & Services	10–20 min	3–7 min
Primary School	15–20 min	5–7 min
Healthcare Facilities	15–20 min	5–7 min

(Journey times are indicative based on location within the 41.84ha site)



PUBLIC TRANSPORT - BUS NETWORK
Sevenoaks District Council - Edenbridge_Local_Cycling_and_Walking_Infrastructure_plan



PUBLIC RIGHTS of WAY (PRoW)
KCC - Public Rights of Way Map - 2026

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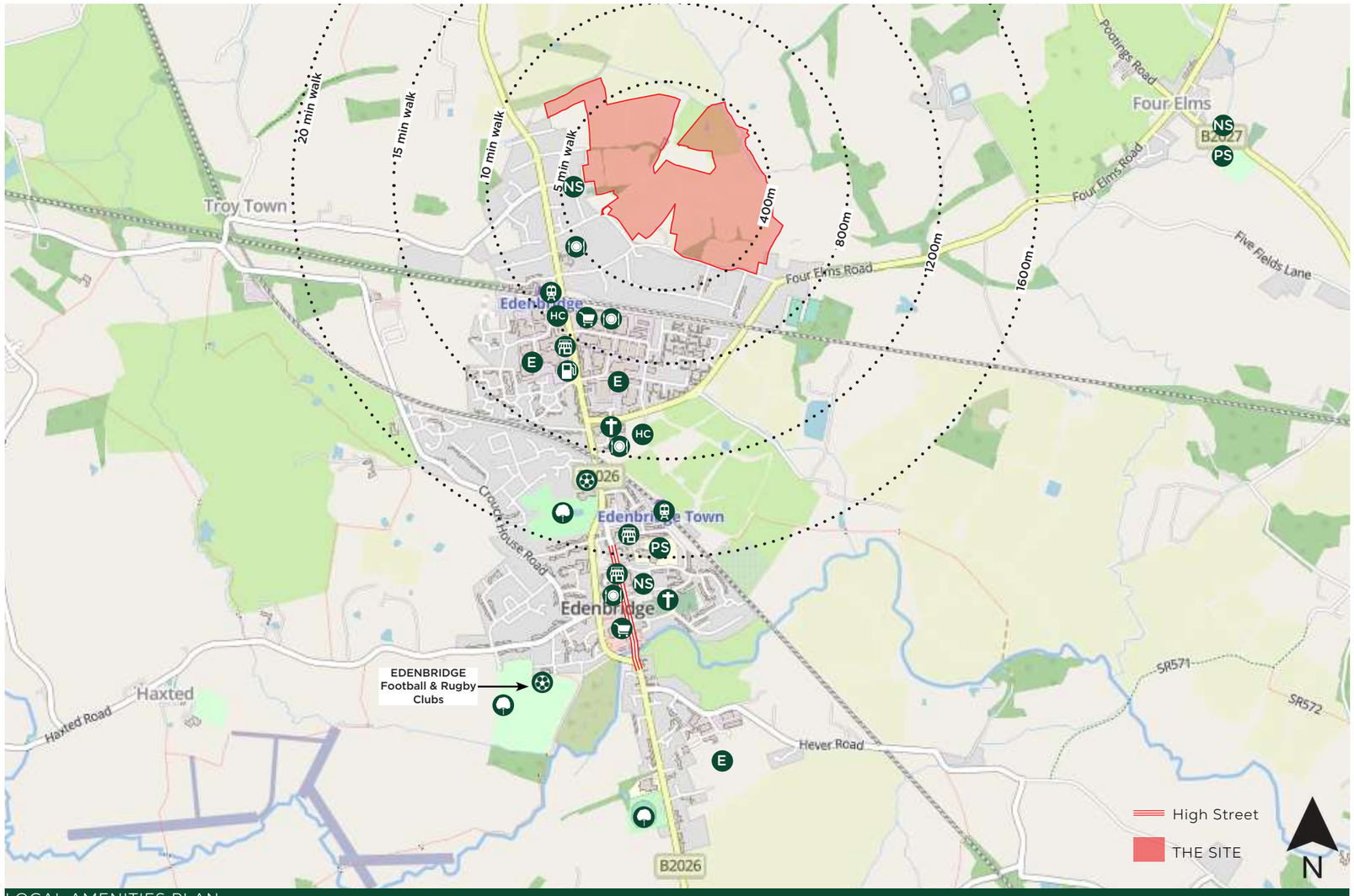
2.4 LOCAL FACILITIES

The site occupies a highly sustainable location on the edge of Edenbridge, with strong connections to the town centre, railway network, local bus services and existing walking and cycling routes. The site provides a strong basis for a development that prioritises sustainable and active travel.

The proximity of the town centre and existing facilities provides opportunities to encourage walking and cycling for everyday journeys, while the vision will complement these with new community facilities within the development.

KEY POINTS

- Edenbridge High Street within approximately 15–20 minutes' walk.
- Key amenities within a 10 minute walk include a Nursery, Restaurant, Train Station, Health Care Centre and Lidl Supermarket.
- Local schools and nursery provision within easy reach.
- Access to healthcare, shops, recreation and everyday services.
- Two railway stations serving Edenbridge and the wider area.
- Opportunity to strengthen pedestrian and cycle connections into the town.
- New Local Centre to complement, rather than compete with, existing facilities.



LOCAL AMENITIES PLAN

E Employment Area
Recreation/Sports
Pub/Restaurant/Eatery
Place of Worship
Supermarket
Local Shop
Fuel Station
PS Primary School
NS Nursery School
HC Health Care/Dental
Recreation Space/Park
Train Station



EDENBRIDGE HIGH STREET – approximately a 15-20 minute walk from the site, providing a range of independent shops, cafés and everyday services.

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03 Land at Swan Lane, Edenbridge

UNDERSTANDING THE SITE

3.0 EXISTING SITE CHARACTER

SITE DESCRIPTION

Land at Swan Lane extends to approximately 41.84 hectares of agricultural land on the north-eastern edge of Edenbridge. Existing hedgerows, woodland and tree belts create a strong landscape framework, defining a series of well-contained parcels that form a natural transition between the town and the surrounding countryside.

KEY SITE CHARACTERISTICS

- Approximately 41.84 hectares of agricultural land.
- Bridleway SR393A passes centrally through the site, connecting with the wider PRoW network to the north.
- Mature hedgerows, woodland and tree belts define the site.
- A strong defensible boundary created by the watercourse / flood zones running across the northern boundary.
- Public Rights of Way connect the site to the wider countryside.
- Gently undulating topography creates opportunities for landscape-led design.
- Strong relationship with both the town and surrounding rural landscape.

The following pages examine the site's physical characteristics in greater detail, demonstrating how the existing landscape, topography and environmental features have directly informed the emerging framework plan.

SITE SUMMARY	
Total Site Area	41.84 ha
Existing Use	Agricultural grassland
Landscape Character	Low Weald farmland
Existing Boundaries	Mature hedgerows, woodland and tree belts
Adjacent Use	Residential, agricultural land and countryside
Topography	Gently undulating



SITE BOUNDARY MAP


VIEW IN FROM SOUTH EAST CORNER

3.1 LANDSCAPE STRUCTURE & FLOOD RISK

LANDSCAPE FRAMEWORK

The site is defined by a mature network of hedgerows, tree belts and woodland that divide the land into a series of well-contained landscape parcels. These established features create a strong landscape structure, provide valuable habitats and establish the framework that has informed the emerging framework plan.

VEGETATION & HABITATS

Existing vegetation forms an important part of the site's identity, creating green corridors, visual containment and ecological connectivity. The vision seeks to retain and strengthen these features, ensuring they continue to shape the character of the development while delivering measurable biodiversity enhancements.

No ecological designations are located within or adjacent to the site.
The nearest is Staffhurst Wood SSSI/LNR approximately 3.3 km north-west, outside its impact zone. Great Crested Newt surveys have also found no evidence of GCN within the site's ponds.

WATER & DRAINAGE

Natural drainage features and surface water flow paths are concentrated within the site's lower lying areas. The landscape framework provides opportunities to integrate sustainable drainage, creating multifunctional green spaces that support biodiversity, manage water naturally and contribute to the overall character of the development.

KEY SITE CONSIDERATIONS

- Mature hedgerows, tree belts and woodland define the site structure.
- Existing vegetation creates strong landscape and ecological corridors.
- Surface water follows natural drainage routes through the site.
- Green infrastructure provides the framework for the emerging framework plan.
- Existing landscape features will be retained, strengthened and integrated throughout the development.

The existing landscape framework forms the foundation of the framework plan, with mature vegetation, green corridors and natural drainage shaping the layout and creating a distinctive landscape-led neighbourhood.

Site Boundary

Flood Zones 2 & 3

Existing Trees / Hedgerows

Surface Water



FLOOD, SURFACE WATER & VEGETATION DIAGRAM

3.2 SWAN LANE CHARACTER

SWAN LANE & CONNECTIONS INTO THE SITE

Swan Lane forms an important part of the site's relationship with the existing settlement. Its character transitions from a more residential environment close to Edenbridge to a narrower and increasingly rural lane enclosed by mature hedgerows, trees and vegetation.

The lane currently accommodates local and through traffic, while a Public Right of Way provides an established pedestrian connection from Swan Lane into and through the site. Together, these routes provide an important existing movement framework and connect the site with the wider network of routes around Edenbridge.

KEY CHARACTERISTICS

- Transition from the existing settlement into the countryside.
- Existing homes and local accesses along Swan Lane.
- Existing Public Right of Way provides pedestrian access into and through the site.

Swan Lane has a distinctive semi-rural character defined by mature vegetation, changing levels of enclosure and established connections into the surrounding landscape.



KEY MAP



1



2



3



4

5



6



3.3 EXISTING SITE CHARACTER - SOUTHERN PARCELS

The southern part of the site comprises a series of agricultural fields contained by mature hedgerows, tree belts and established vegetation. These landscape features create a relatively enclosed character, with individual fields experienced as distinct compartments and views generally contained by existing landscape structure.

These parcels have a strong relationship with the existing settlement edge and form the less sensitive part of the wider site. The combination of visual containment, proximity to Edenbridge and established landscape boundaries provides the opportunity to accommodate new homes while retaining the principal landscape structure.

KEY CHARACTERISTICS

- Strongly defined agricultural field pattern.
- Generally enclosed landscape character.
- Mature hedgerows and tree belts.
- Views largely contained by vegetation.
- Close relationship with the existing settlement edge.

The southern parcels are characterised by a strongly defined field pattern, mature vegetation and a generally enclosed landscape character.



KEY MAP


1


2


3


4


5

3.4 EXISTING SITE CHARACTER - NORTHERN PARCELS

NORTHERN SITE CHARACTER

The northern part of the site comprises a series of agricultural fields defined by mature hedgerows, tree belts and established field boundaries. The degree of enclosure varies across the area, creating a changing landscape character between individual parcels.

Some fields, including those shown in views 2 and 3, have a more enclosed character, with surrounding vegetation containing views and creating clearly defined landscape compartments. Elsewhere, the landscape becomes more open, with larger fields and longer views towards the surrounding countryside.

KEY CHARACTERISTICS

- Mix of enclosed and more open fields.
- Mature hedgerows and tree belts.
- Varying levels of visual enclosure.
- Longer views from the more open parcels.
- Strong rural landscape character.

The northern parcels transition between enclosed fields and more open areas with longer countryside views.



KEY MAP



1



2



3



4



5



6

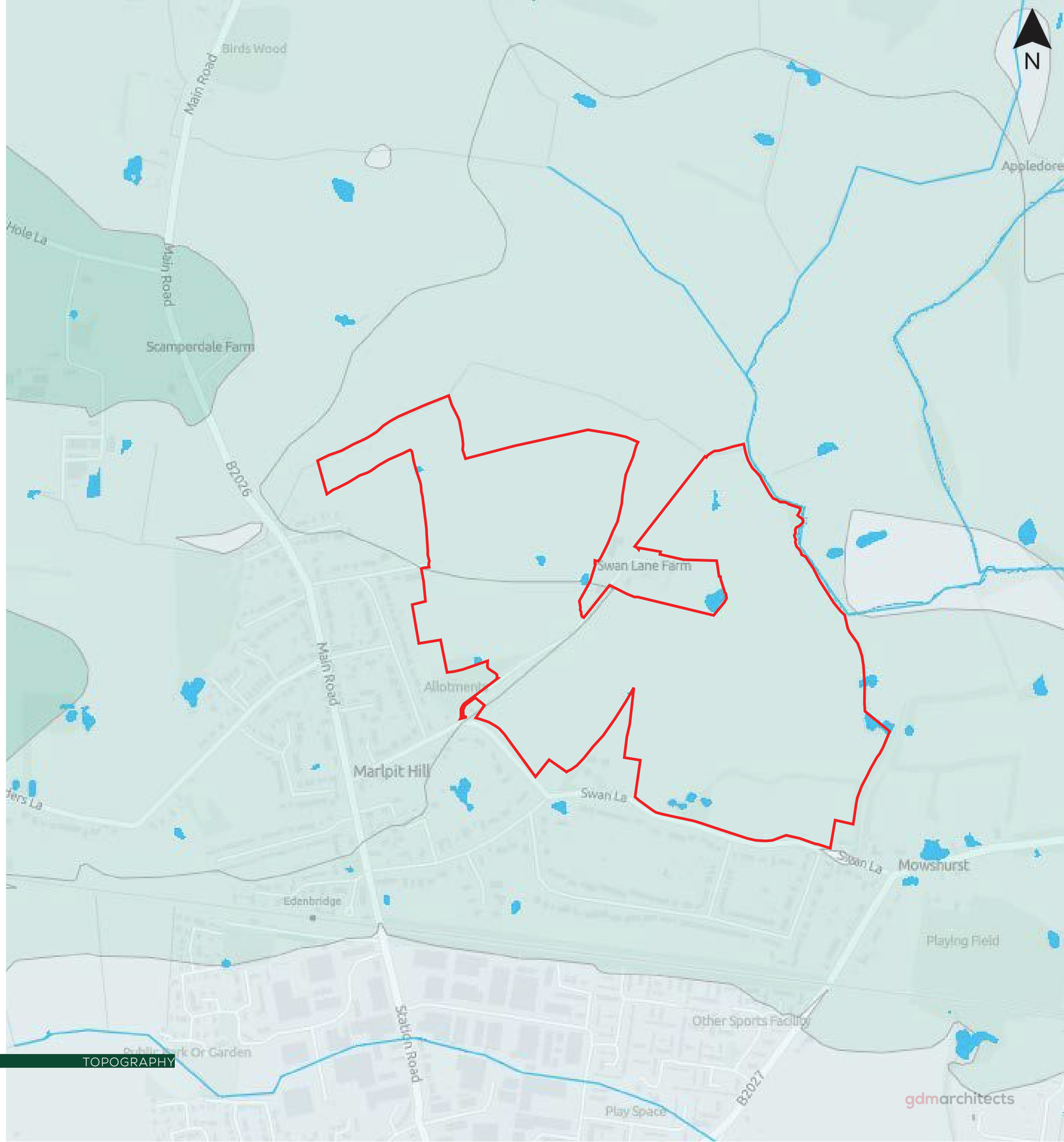
3.5 LANDFORM

The site occupies gently undulating land on the north-eastern edge of Edenbridge, with levels generally falling from the south-west towards the north and east. This varied landform creates a series of naturally defined parcels, provides visual interest and has played a key role in shaping the landscape-led framework plan.

KEY CHARACTERISTICS

- Gently undulating landform typical of the Low Weald.
- High points located towards the south-west of the site.
- Land falls naturally towards the northern and eastern boundaries.
- Existing topography defines a series of well-contained landscape parcels.
- Development responds to the site's natural landform, minimising earthworks and integrating with the surrounding landscape.

The emerging framework plan has been designed to work with the site's natural landform, ensuring development responds positively to the existing landscape and minimises the need for significant changes in level.



TOPOGRAPHY

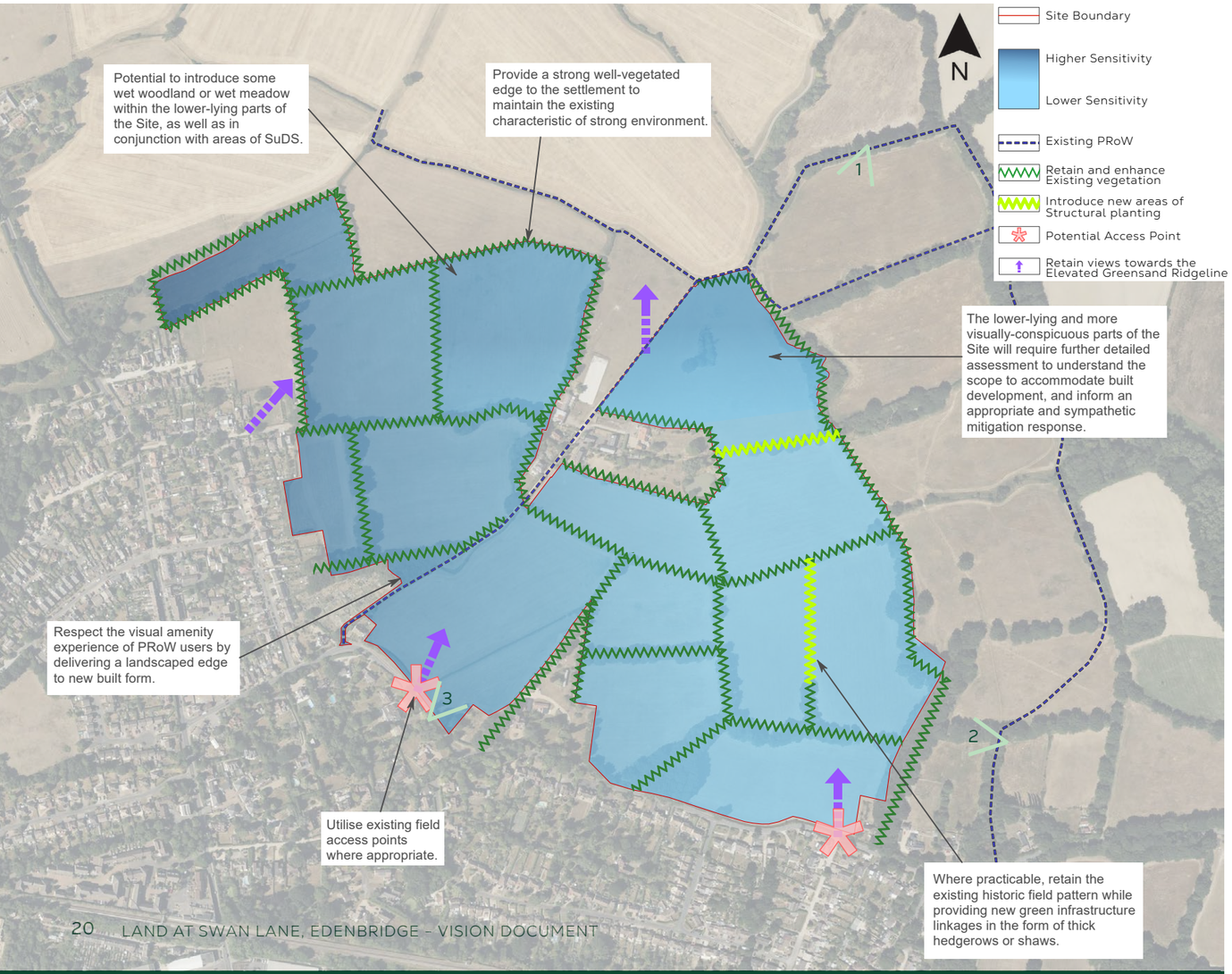
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3.6 LANDSCAPE FRAMEWORK & SENSITIVITY

The site lies within the Sevenoaks Low Weald (11a) Landscape Character Area and forms part of the wider Low Weald landscape.

Structured by a mature network of hedgerows, tree belts and woodland that define a series of distinct landscape parcels. Rather than imposing development upon the site, the emerging framework plan has evolved from this existing framework, using the landscape to shape movement, green infrastructure, public spaces and the overall pattern of development.

The majority of the site has been identified as having relatively low landscape sensitivity, with greater sensitivity associated with parts of the northern site. This variation has directly informed the emerging development parcels, landscape buffers and areas of open space.




1 VIEW FROM PROW TO THE NORTH


2 VIEW FROM PROW - SITE BEHIND TREE BELT

3 VIEW IN FROM SWAN LANE

