

# Sevenoaks Local Plan Regulation 18 Consultation – Questions and Answers

South Darenth Pop-up Session – Thursday 20 November 2025

## Development Strategy

Question	Answer
Pedham place is national landscape (AONB prior). Why is this even under consideration in the first place?	Our development strategy focuses on strategic scale growth outside the National Landscape. Option 1 does not include Pedham Place, but this option does not meet full need. In relation to Pedham Place, which is both in the Green Belt and National Landscape (AONB), we have been very clear that this site is outside our development strategy, which seeks to avoid strategic scale growth in this designated landscape area. However, we want to test an option which meets full need (17,175) and option 2 meets this need. We have undertaken additional landscape evidence which considers that Pedham is the least impactful and most capable of mitigation option in the National Landscape. This is available on our evidence base page.

## Green Belt and grey belt

Question	Answer
<p>Why is the gap between Swanley and Hextable valid to not be grey belt as Hextable isn't a town?</p>	<p>In terms of ensuring a gap between settlements and stopping settlements merging, government has been clear (through the new definition of grey belt), that they are primarily concerned with the merging of towns (and have literally spelt out that villages are not considered towns). Swanley is a town and Hextable is a service settlement (not a village) in the settlement hierarchy. For the purposes of our Green Belt/grey belt assessment, the 'service settlements' across the District are considered to have the same status as towns, and therefore we can take into consideration whether development would result in the merging of Swanley and Hextable (and hence several parcels in this area are not considered to be grey belt as they perform strongly against this purpose as they stop these two settlements from merging</p>

## Housing

Question	Answer
The current housing target of 770 odd homes a year, are you currently on target for this? If not, how will you deal with another 63%?	Our housing target as part of the Regulation 18 2023 consultation was 704 dwellings per annum. That consultation sets out a number of proposed allocations to meet this need. This current Regulation 18 consultation updates this position and sets out two options to meet the updated housing need of 1,145 dwellings per annum (representing the 63% increase), with one option setting out a method to meet the housing need in full. Option 1 falls just short of the total need of 17,175 units over the 15-year plan period, whereas Option 2 exceeds this figure and provides a small buffer. We are asking for your views on these proposed options.
What is the current housing need in SDC based on housing list and any other data you hold	The housing need in the Local Plan is calculated using the Government's standard method, which calculates need using a stock-based approach. These homes are intended for people already living in the district, as well as future generations, such as young people, families and older residents, so they can stay in the area. It also helps meet demand arising from those moving into the district, who work locally and those who need affordable housing options. Emerging Policy H2, Provision of Affordable Housing, sets the housing requirement for different types of sites, depending on number of units, size and location (i.e. within urban areas, brownfield or green belt). This figure is based on evidence surrounding what developers can realistically deliver whilst still making sites viable. In line with national policy. Policy H2 also sets a number of additional requirements for affordable housing provision, with the aim that on site provision of affordable homes will be achieved wherever possible. We will be preparing a new Affordable Housing SPD ahead of the Regulation 19 publication in Summer 2026 and this will be available for public consultation. The Targeted Review of Local Housing Needs (TRLHN) 2025 sets a recommended
Affordable housing, how do you define that? Who will live there and who will decide this?	
Affordable housing is high priority - 80 % social- if providers can't take up social housing how will this be delivered?	
Who will use the affordable housing and how does it get to them?	

	affordable housing tenure split of 80% Social Rent / 20% Shared Ownership, which has been informed by local evidence such as the Council's Housing Register and the Local Housing Needs Surveys, amongst other datasets.
While the local plan is being implemented, how do the active planning applications affect the housing number target?	Granted planning applications are taken account of as part of the total housing supply, under the 'Extant Permissions' category. This includes any granted units which are currently not started or under construction. At this Regulation 18 consultation, this equates to just shy of 4,000 units and this total is included in the figures set out at Options 1 and 2. The extant figure is updated annually, base dated at 31 March, following the end of each monitoring year.
Do the target housing figures include adhoc private applications?	
Where did the 192 Gypsy and Traveller figure come from?	The Gypsy and Traveller Accommodation Assessment (GTAA) 2025 identifies that Sevenoaks District needs 192 new pitches by 2042. So far, promoters of suitable sites have come forward with 23 proposed pitches and additional work will be undertaken ahead of Regulation 19 to identify pitches to meet the remaining 169 pitches need. It is expected and recommended through the GTAA 2025 that many of these pitches are able to be met on existing sites (i.e. temporary permissions to permanent or new pitches on existing sites). There will be further consultations when new site options are put forward, offering more chances for community input. Since May 2022 (when our previous GTAA was published), we have granted permission for 31 permanent pitches across the district. The GTAA 2025 is available to view on our evidence base webpage and can be commented on as part of this Regulation 18 consultation.
Do you know how many Gypsy and traveller sites were permissioned in the last ten years in the district?	

## Transport and Infrastructure

Question	Answer
How will SDC hold developers to account to ensure they deliver on the infrastructure?	The delivery of infrastructure, including that constructed on-site or financial contributions made towards delivery off-site, are secured through a legal agreement (Section 106) between the infrastructure provider and the developer, and are enforced. These legal agreements set out the infrastructure to be provided as part of a development and when (e.g. roads, schools, GP surgeries, community facilities or utilities).
How will infrastructure for pedham come in?	<p>We have worked closely with all infrastructure providers that serve Sevenoaks District to understand what's needed to support the growth proposed in the emerging Local Plan. This has helped us identify infrastructure requirements and also any existing pinch-points and capacity constraints that need to be addressed. The emerging projects that have been identified are set out in the Infrastructure Delivery Plan Statement October 2025 and is available to view and comment on as part of the public consultation. It can be viewed online here: <a href="https://www.sevenoaks.gov.uk/info/20069128/emerging_local_plan/691/sevenoaks_district_local_plan_%E2%80%93_evidence_base_documents">https://www.sevenoaks.gov.uk/info/20069128/emerging_local_plan/691/sevenoaks_district_local_plan_%E2%80%93_evidence_base_documents</a></p> <p>We engage with infrastructure providers, such as health and education authorities, who determine the most appropriate evidence to inform their response to the Infrastructure Delivery Plan (IDP). Their input identifies what improvements are required to accommodate planned growth.</p> <p>Between now and Regulation 19 in Summer 2026, we will continue to engage with infrastructure providers to refine the Infrastructure Delivery Plan. By that stage, the IDP will include more specific detail on what projects are needed, when they will be delivered, the costs and who is expected to pay, and how they</p>
Is there a proposal to build a new hospital in the District, if these new developments go forward?	
You mentioned Unanswered transport and other infra questions for pedham development, when will clarity be given on these- hard to make a judgement without	

	will be delivered. This iterative approach ensures that infrastructure provision remains responsive, deliverable, and aligned with our strategic objectives.
Single use roads around south downs retirement village, will they be enlarged?	We are working closely with KCC Highways to model and measure the expected impact that the growth proposed in the emerging Local Plan will have on the transport network across the District. A second stage Transport Assessment has been undertaken to determine the transport implications of the proposed site allocations, and this is available to view and comment on as part of the public consultation. As the Local Plan progresses, further transport modelling work will be undertaken to better understand the traffic flow, capacity issues and mitigation required to accommodate the proposed growth. All transport improvement projects identified will be set out in the Infrastructure Delivery Plan by Regulation 19.
Why put more traffic on the m25 bypass road?	
How are you going to improve the M25 junction 3?	
Does the increase in numbers of cars as a result of the new developments, considered if a development is taken forward?	
Are SDC supportive of the Lower Thames Crossing?	Yes, SDC is supportive of the Lower Thames Crossing recognising that it would allow road users greater choice to cross the Thames, improve travel journey times and improve the flow of traffic across the north section of the Kent strategic road network. Our pre-examination response can be viewed here: <a href="https://cds.sevenoaks.gov.uk/ecSDDisplayClassic.aspx?NAME=SD3425&amp;ID=3425&amp;RPID=45693735&amp;sch=doc&amp;cat=13704&amp;path=13114%2c13704&amp;J=2">https://cds.sevenoaks.gov.uk/ecSDDisplayClassic.aspx?NAME=SD3425&amp;ID=3425&amp;RPID=45693735&amp;sch=doc&amp;cat=13704&amp;path=13114%2c13704&amp;J=2</a>
Do you have the NHS response to Broke Hill?	A planning application is currently under consideration for Broke Hill, planning application reference: 25/02129/OUT. The NHS consultation response to this can be viewed by searching the planning application reference on our planning portal: <a href="https://pa.sevenoaks.gov.uk/online-applications/">https://pa.sevenoaks.gov.uk/online-applications/</a>
Roads and schools - are these taken into consideration?	We have worked closely with all infrastructure providers that serve Sevenoaks District to understand what's needed to support the growth proposed in the emerging Local Plan. This

	<p>has helped us identify infrastructure requirements and also any existing pinch-points and capacity constraints that need to be addressed. The emerging projects that have been identified are set out in the Infrastructure Delivery Plan Statement October 2025 and is available to view and comment on as part of the public consultation. It can be viewed online here: <a href="https://www.sevenoaks.gov.uk/info/20069128/emerging_local_plan/691/sevenoaks_district_local_plan_%E2%80%93_evidence_base_documents">https://www.sevenoaks.gov.uk/info/20069128/emerging_local_plan/691/sevenoaks_district_local_plan_%E2%80%93_evidence_base_documents</a></p> <p>We engage with infrastructure providers, such as health and education authorities, who determine the most appropriate evidence to inform their response to the Infrastructure Delivery Plan (IDP). Their input identifies what improvements are required to accommodate planned growth.</p> <p>We are working closely with KCC Highways to model and measure the expected impact that the growth proposed in the emerging Local Plan will have on the transport network across the District. A second stage Transport Assessment has been undertaken to determine the transport implications of the proposed site allocations, and this is available to view and comment on as part of the public consultation. As the Local Plan progresses, further transport modelling work will be undertaken to better understand the traffic flow, capacity issues and mitigation required to accommodate the proposed growth. All transport improvement projects identified will be set out in the Infrastructure Delivery Plan by Regulation 19.</p> <p>We will continue to engage with infrastructure providers to develop the Infrastructure Delivery Plan further as the Local Plan progresses, with projects being refined and more detail added on phasing, costs and delivery mechanisms. This iterative approach ensures that infrastructure provision remains responsive, deliverable, and aligned with our strategic objectives.</p>
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## Consultation

Question	Answer
Option 1 and 2 both include wasps. So, what do we do if we don't want wasps?	Wasps is included in Option 1 and 2 as it is considered a suitable site in the SHELAA process. Respondents that support Option 1 or 2 but not specific sites can do so by explaining this caveat in the free text box below the question.



## Settlement Hierarchy

Question	Answer
Horton Kirby is a hamlet, smaller than a village by definition. There are no services to support a large increase in houses. How will it accommodate 90 new houses?	The two site allocations in Horton Kirby are PDL/ Partially PDL, meaning they align with the methodology set out in Policy ST1 that states that development should be focused on areas within the boundaries of existing settlements and prioritising the use of previously developed 'brownfield land'.
How do you define higher tier settlements? Are they villages?	Our Settlement tiers are laid out in the 2025 update to the Settlement Hierarchy. 'Higher tier' Settlements include the following: Principal Town, Towns, Primary/ Secondary Service Settlements. In short, it is all the tiers above defined Villages in the Settlement Hierarchy.
Secondary service settlements - what is that?	Secondary Service Settlements is a new category included within the 2025 update; this category was previously known as 'Service Villages'

## Health and Wellbeing

Question	Answer
Noise pollution from wasps' site - concerts etc.?	Air quality, noise, and health are considerations taken into place in all planning applications and any sites would be expected to prove they can mitigate any potential air quality, noise issues, or other health planning issues on site. If these are unable to mitigate issues in regard to these it may mean a site would be considered unacceptable.
From a health and wellbeing point of view would the recreation ground be safe to use during construction as access runs along the side of this recreation ground	

## Natural Environment

Question	Answer
<p>Concerned about visual impact of proposed Pedham Place from Lullingstone Park Ave.</p>	<p>Following the last consultation, we commissioned work from Arup which looked at both the landscape and visual impact of the sites in the National Landscape (formerly AONB), including Pedham Place, considered through that consultation. This forms part of our evidence base which can be accessed on our website and can be reviewed and commented on. This includes potential mitigation measures, such as the careful positioning of development and substantive native woodland planting on the ridgeline to screen views which would reflect the characteristic ridgeline ancient woodlands found in the wider area. Should this site be allocated, the applicant will be expected to undertake their own Landscape and Visual Impact Assessment and to set out how they would minimise the landscape and visual impact on the National Landscape and where possible, enhance it.</p>
<p>The council has just passed a resolution to recognise people's right to nature, particularly with regard to the river Darent. will you take account of this</p>	<p>The Rights of the River Darent motion was put forward by Cllr Manston to full council on 18 November and it was approved. This relates to the rights of the river, rather than people, and sets out the Council resolves to consider any impact on the River Darent, including when making future decisions on planning, land use and water management and to encourage developers to consider water neutrality so that any new development does not increase the overall rate of water abstraction. Our draft policies already address factors such as avoiding increasing flood risk on-site and elsewhere (policy W1), managing surface water so that it does not increase flood risk, on-site or elsewhere and the inclusion of water conservation measures (policy W3). In many instances, ecological surveys and impact assessments, as necessary, will be required and depending on the scale and/or location of some of the sites, an Environmental Impact Assessment will also be required. Consideration as to how to take this motion into account will be undertaken as part of the next stage of the plan-making process.</p>

## Site Selection Process

Question	Answer
How many of the unsuitable sites are identified as brownfield and could in turn become suitable?	There is a total of 389 Sites that are defined as unsuitable inc. (Unsuitable, Contrary to Strategy, Discounted)
Could you explain what is the definition of 'mixed use'?	A mixed-use site is typically a site which proposes residential development and another use, such as employment, community or gypsy and traveller use. A mixed-use could be any mix of uses. We expect further details to be submitted by site promoters as part of this consultation and these will be taken account of ahead of Regulation 19, where there will be another opportunity for public comment.
In the light of government directives to identify sites, will SDC review all sites refused in the past as some are now are eminently suitable for development	All sites which have been submitted to the Local Plan process since 2021 (a total of 521 sites) have been reassessed against the updated Development Strategy and new National Planning Policy Framework (NPPF) 2024, including the introduction of grey belt.

## Site Specific Queries

Question	Answer
What is the mixed use site near the south downs development going to be?	A mixed-use site is typically a site which proposes residential development and another use, such as employment, community or gypsy and traveller use. A mixed-use could be any mix of uses. We expect further details to be submitted by site promoters as part of this consultation and these will be taken account of ahead of Regulation 19, where there will be another opportunity for public comment.
What constitutes mixed development off Skinny Lane at South Darenth?	
Any development in south downs retirement village, will it be for over 55s as it is at present?	Yes, there are five sites proposed within Southdowns Retirement Community, and these are all proposed as C2 housing (homes for older persons). It is expected that sites coming forward within Southdowns Retirement Community will be in keeping with the existing use.
Is the development in south downs proposed for older people?	
Where would the access be for the proposed properties on Holmesdale Hill?	We will be expecting site promoters to submit detailed access proposals, as well as other details such as masterplans, design etc., as part of this current consultation. We will also be expecting site-specific comments from Kent County Council Highways team with regards to access. These details will feed in to decisions and proposals for Regulation 19 publication next Summer 2026.

## Other queries

Question	Answer
Housing target is 33% increase on now vs population growth in SD forecast at 9.8%, can this allow a lower than target number to be put to the Examiner?	The Local Plan is evidence led. As a starting point, the Council is seeking to meet the identified housing need in full through the Local Plan process. However, ultimately, if evidence suggests that the Council do not have enough sites / units to meet the identified housing needs, we will need to consider submitting a Plan which falls short of housing need. It is imperative that all decisions made on sites is fully evidenced and justified in order to have a defensible position and examination.
What happens if Sevenoaks's doesn't fulfill their circa 17 thousand quotas? Eg can other areas that can over deliver on I planning targets make up the shortfall?	
As only one plan gets us just past the quota, what will happen if sites are removed through the process of plan approval and that brings it below the quota	
Is compulsory purchase an option?	The Council has not previously used Compulsory Purchase powers. Whilst this is an available option, this decision would need to be taken at a strategic level in relation to the Council's Property and Commercial team (which is separate from Planning) and is not a planning decisions. We are not currently aware of any intention to utilise Compulsory Purchase powers.
What will happen about the new 800m from a station being suitable for development?	We are aware that Central Government is planning to consult on making a further update to national policy towards the end of the year. Early indications are that this will include an expectation that land around train stations are looked upon more favourably. We have no further detail on this yet, and at the moment it is not clear what specific criteria will include, for example, the 800m guidance or whether this would exclude land in the National Landscape. Once the details come out, we will consider if there is an impact on our current process. The Government has made it very clear that we are to get plans in place as soon as possible, and so we do not anticipate the changes resulting in a significant delay for us.
How will the expected updates to the NPPF impact on the reg18 and reg 19 process?	
Can railway hubs be considered suitable in national landscape for development?	

<p>There are applications for solar panels - will these be brownfield sites in 30 years?</p>	<p>Solar farm sites do not automatically become brownfield land at the end of their lifecycle. The planning permission includes decommissioning conditions, requiring the panels and other associated structures to be removed once they cease operation. It's possible that landowners/developers may seek planning permission for a different use following the end of the solar farm's operation, however there would be a range of considerations including whether the site is a sustainable location for housing. Quite often these sites are very rural, remote and unsustainable places for housing. The fact that they have previously been used as a solar farm would not normally weigh in favour of then subsequently granting planning permission for housing.</p>
<p>Between Barn end Road to portobello inn there will be 3,621 homes without Pedham, with it 6200 +28k stadium - that's 36% of entire build in 8 mile route.</p>	<p>No comment - please submit your response to the consultation</p>