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# Strategic Environmental Assessment for the Sevenoaks Town Neighbourhood Plan

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Environmental Report to accompany the submission version of the Sevenoaks Town Neighbourhood Plan

Sevenoaks Town Council

April 2022

#### Quality information

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#### **Revision History**

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Front cover: Sevenoaks Town Centre, taken from an article on Kent Online.

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# **Non-Technical Summary**

# What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Sevenoaks Town Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socioeconomic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

# What is the Sevenoaks Town Neighbourhood Plan?

The Sevenoaks Town Neighbourhood Plan (hereafter referred to as the "STNP") has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

# **Purpose of this Environmental Report**

This Environmental Report, which accompanies the submission version of the STNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (September 2021), which includes information about the STNP area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the STNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the STNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the STNP has been assessed.
- The consideration of alternative approaches for the STNP.
- The likely significant effects of the STNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the STNP.
- The next steps for the STNP and accompanying SEA process.

# Consideration of reasonable alternatives for the Sevenoaks Town Neighbourhood Plan

The SEA Regulations highlight that the Environmental Report 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. For SEAs for Neighbourhood Plans, 'reasonable alternatives' are typically considered for alternative approaches to locating development in a neighbourhood area.

The Neighbourhood Plan does not seek to allocate land for development. However, STC recognises that there are sites that may come forward for development during the plan period, either as windfall or through allocations in the new Local Plan, which have potential to deliver benefits that should be secured through the design, layout and use of each site. In this respect, the STNP's planning policies seeks to shape development more broadly in the neighbourhood area without allocating specific sites.

In the context of the above, the SEA has not assessed sites or packages of sites as reasonable alternatives. Whilst the STNP has presented planning policies for a number of key sites in the neighbourhood plan area, it does not seek to preclude high quality development on these sites. In this respect, the STNP is design focused, and has been informed by the outputs from the Northern Sevenoaks Masterplan, the Sevenoaks Residential Character Area Assessment SPD (accessible <u>here</u>), STC's Green Community Investment Plan (as an appendix to STC's Community Investment Plan 2019-2023, and accessible <u>here</u>) and extensive community consultation. It is also recognised that the Sustainability Appraisal (SA) process for the new Local Plan will consider the sites, including associated with the likely distribution and type of development. In the longer term, it is also anticipated that further work on the sites will be undertaken through detailed masterplanning.

# Assessment of the submission version of the Sevenoaks Town Neighbourhood Plan

The submission version of the STNP presents 35 planning policies and twelve aims for guiding development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received through community consultation, Regulation 14 consultation, and through recommendations and suggestions proposed through the SEA process to date.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the submission version of the STNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the submission version of the STNP. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Air Quality.
- Biodiversity and Geodiversity.
- Climate Change.

- Landscape and Townscape.
- Historic Environment.
- Land, Soil, and Water Resources.
- Community Wellbeing; and
- Transportation.

In the context of the above, the assessment has concluded that the submission version of the STNP is likely to have significant positive effects in relation to the 'Community Wellbeing' SEA Theme. This principally links to the STNP's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), improve availability and accessibility to services, facilities and amenities, and support the regeneration of key opportunity areas within the STNP area (such as town and local centre environments) which will encourage employment opportunities. These policy provisions will support social inclusion, and community and economic vitality. The STNP is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthier and active lifestyles. These policy provisions will support the quality of life of residents.

The STNP will also bring positive effects in relation to the 'Landscape and Townscape' and 'Historic Environment' SEA Themes. These benefits largely relate to the STNP's emphasis on protecting and enhancing the relationship between the natural and built environment (i.e. between the town and the open countryside), delivering high-quality design which respects and enhances local distinctiveness and sense of place, protects important landscape and townscape features, facilitates improvements to quality of the public realm, and increases awareness, understanding and appreciation of the historic environment. Given the Sevenoaks Residential Character Area Assessment SPD and the Northern Sevenoaks Masterplan also set out a comprehensive range of provisions relating to the natural and built environment, this will help provide an appropriate basis for any development proposals which may come forward during the plan period.

Additionally, the STNP will bring positive effects in relation to the 'Biodiversity and Geodiversity' SEA Theme by encouraging proposals to protect existing and establish new habitats and wildlife corridors, enhance ecological networks (including through green infrastructure enhancements), and embrace opportunities for nature conservation.

Regarding the 'Climate Change' SEA Theme, the STNP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (i.e. flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the STNP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.

The STNP will also initiate several beneficial approaches regarding the 'Transportation' and 'Air Quality' SEA Themes, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting the principles of healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation.

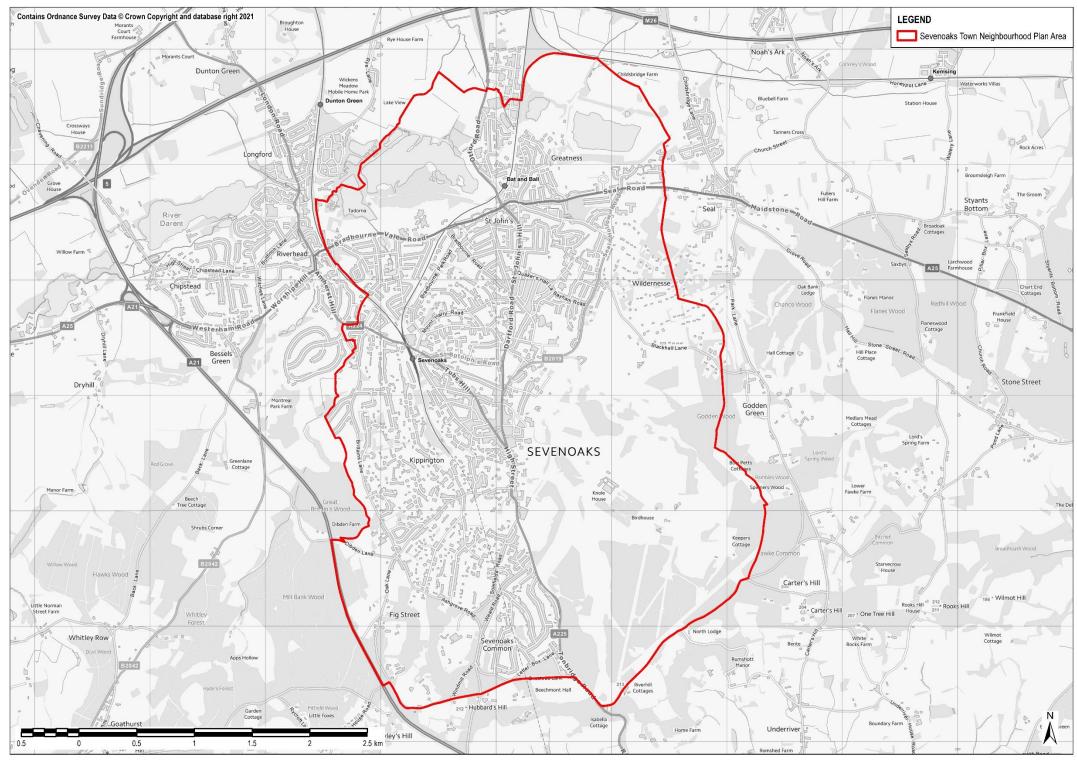
More broadly in relation to the 'Land, Soil, and Water Resources' SEA Theme, the STNP outlines several provisions will help support the capacity of the landscape to regulate soil and water quality. As the STNP does not contain any site allocations for development, it is also not likely that the STNP (in its current form) would result in the loss of any areas of productive agricultural land.

# **Next steps**

The SEA Environmental Report accompanies the submission version of the STNP to the responsible authority, Sevenoaks District Council, for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, the STNP will be subject to a referendum, organised by Sevenoaks District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the STNP will become part of the development plan for the STNP area.



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# 1. Introduction

# Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Sevenoaks Town's emerging Neighbourhood Plan.
- 1.2 The Sevenoaks Town Neighbourhood Plan (hereafter referred to as "the STNP") is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The STNP is being prepared in the context of the Sevenoaks Local Plan, the key documents of which include the Core Strategy Development Plan and the Allocations and Development Management Plan. Due regard is also given to the emerging Sevenoaks Local Plan.
- 1.3 It is currently anticipated that the STNP will be submitted to Sevenoaks District Council later in 2022 for independent examination. Key information relating to the STNP is presented in **Table 1.1**.

Name of Responsible Authority	Sevenoaks Town Council
Title of Plan	Sevenoaks Town Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	The STNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Sevenoaks Local Plan, the key documents of which include the Core Strategy Development Plan and the Allocations and Development Management Plan. Due regard is also given to the emerging Sevenoaks Local Plan.
	The STNP will be used to guide and shape development within the Neighbourhood Plan area.
Timescale	To 2038
Area covered by the plan	The STNP area covers the civil parish of Sevenoaks, located in Sevenoaks District (in Kent).
Summary of content	The STNP will set out a vision, strategy, and range of policies for the Neighbourhood Plan area.
Plan contact point	Georgie Elliston, Planning Committee Clerk for Sevenoaks Town Council
	Email address: <u>planning@sevenoakstown.gov.uk</u>

Table 1.1: Key facts relating to the STNP

# SEA Screening for the Sevenoaks Town Neighbourhood Plan

- 1.4 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, Neighbourhood Plans are more likely to be screened in as requiring an SEA if <u>both</u> the following apply:
  - 1) the Neighbourhood Plan is being prepared within a neighbourhood area with significant environmental constraints, such as, for example, within an AONB, World Heritage Site, SSSI or large concentrations of heritage assets; and
  - 2) the Neighbourhood Plan is likely to allocate sites for development.<sup>1</sup>
- 1.5 Following consultation with the statutory consultees on an SEA screening opinion in May 2021, Historic England advised that in their view an SEA process was likely to be required for the Neighbourhood Plan. This was given the significant historic environment constraints present in the neighbourhood area and Historic England's view that the Neighbourhood Plan (as consulted on during screening) allocated land for development. Based on the information presented, Natural England and the Environment Agency were content that an SEA was not required for the Neighbourhood Plan.
- 1.6 In light of this screening outcome, an SEA process has been undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 1.7 Since SEA screening was undertaken in May 2021, the STNP has been updated, and Historic England have confirmed that they agree that the Neighbourhood Plan does not allocate land for development.
- 1.8 Whilst there is a case for the Neighbourhood Plan to be rescreened (given one of the two key screening considerations highlighted in Section 1.4 above now longer applies), the SEA process has been continued to support the evidence base for the Neighbourhood Plan.

# **SEA** explained

- 1.9 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.10 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the STNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.11 This is the second document to be produced as part of the SEA process. The first was the SEA Scoping Report (September 2021). This Environmental Report accompanies the submission version of the STNP.

<sup>&</sup>lt;sup>1</sup> DLUHC (February 2022): Chief Planner's Newsletter, February 2022 "Strategic Environmental Assessment for Neighbourhood Plans: Timely and effective screening" accessible <u>here</u>

# **Structure of this SEA Environmental Report**

1.12 This document is the SEA Environmental Report for the Sevenoaks Town Neighbourhood Plan and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

Environmental Report question		In line with the SEA Regulations, the report must include <sup>3</sup>
[	What is the plan seeking to achieve?	<ul> <li>An outline of the contents and main objectives of the plan.</li> </ul>
What's the scope of the SEA?	What is the sustainability 'context'?	<ul> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection objectives established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	What is the sustainability 'baseline'?	<ul> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>
	What are the key issues and objectives?	• Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?		<ul> <li>Outline reasons for selecting the alternatives dealt with.</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>
What are th findings at	ne assessment this stage?	<ul> <li>The likely significant effects associated with the submission version of the plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.</li> </ul>
What happens next?		• The next steps for the plan making / SEA process.

# Table 1.2: Questions that must be answered by the SEA Environmental Report to meet the regulatory<sup>2</sup> requirements

<sup>&</sup>lt;sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>&</sup>lt;sup>3</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

# 2. Local Plan context and vision for the **Neighbourhood Plan**

## Local Plan context for the STNP

- 2.1 Sevenoaks District Council (SDC) is currently undertaking a review of the current Local Plan for Sevenoaks<sup>4</sup>. The emerging Sevenoaks Local Plan (hereafter referred to as "the new Local Plan") will replace the current Local Plan, the key documents of which include:
  - The Core Strategy Development Plan Document (DPD)<sup>5</sup>, adopted in • February 2011.
  - The Allocations and Development Management Plan<sup>6</sup>, February 2015; and •
  - The Kent Minerals and Waste Local Plan 2016 (as amended by the Early . Partial Review 2020 and Mineral Sites Plan 2020)7.
- There is an identified housing need in the STNP area, and several suitable 2.2 sites have been identified through the Neighbourhood Planning process to date, including through the preparation of the Northern Sevenoaks Masterplan<sup>8</sup> (later discussed in Chapter 4 of this Environmental Report). Although the new Local Plan allocations could contribute towards local housing needs, SDC are currently considering their next steps. In this respect, the following statement is included in the proposed submission version of the STNP:

"The new Local Plan was submitted to the Secretary of State for Independent Examination in April 2019 and Hearings were held in September and October 2019. However, the Planning Inspector had concerns about the soundness of the new Local Plan and called a halt to proceedings."

- 2.3 A revised Local Development Scheme (LDS)<sup>9</sup> was approved and published by SDC in November 2021 which sets out the proposed timetable for the new Local Plan. Consultation on the draft Local Plan is expected to be undertaken in Spring 2022 (under Regulation 18 of the Local Plan Regulations) and a statutory consultation on a Pre-submission Local Plan (under Regulation 19 of the Local Plan Regulations) in Winter 2022/23. The timetable will be kept under review as the production of the new Local Plan progresses. Further information is available on SDC's webpages.
- 2.4 Neighbourhood plans will form part of the development plan for Sevenoaks District, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Sevenoaks District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

<sup>&</sup>lt;sup>4</sup> Sevenoaks District Council (2021): 'Emerging Local Plan: Overview and Background', [online] available to access here

<sup>&</sup>lt;sup>5</sup> Sevenoaks District Council (2011): 'Sevenoaks Local Plan: Core Strategy Development Plan', [online] available here <sup>6</sup> Sevenoaks District Council (2015): 'Allocations and Development Management Plan', [online] available to access here

 <sup>&</sup>lt;sup>7</sup> Kent County Council (2020): 'Minerals and waste planning policy', [online] available to access <u>here</u>
 <sup>8</sup> Sevenoaks Town Council (2017): Northern Sevenoaks Masterplan', [online] available to access <u>here</u>

<sup>&</sup>lt;sup>9</sup> Sevenoaks District Council (2021): 'Revised Local Development Scheme – November 2021', [online] available to access here

# Vision, aims, and objectives for the Sevenoaks Town Neighbourhood Plan

2.5 Developed during the earlier stages of plan making and via community consultation, the vision for the STNP is as follows:

## "

'Sevenoaks will continue to be a successful and friendly market town set on the Greensand Ridge that takes advantage of its good connections and easy access to open countryside and to London. It will continue to have a strong sense of community with an active network of volunteers. The town will be proud of its history and the legacy of fine historic buildings, spanning six centuries, that contribute to an attractive townscape in its leafy streets.

However, Sevenoaks will not be stuck in the past but firmly wedded to the future and the quality of life of its children and their children to come. As one of the UK's first carbon zero towns, Sevenoaks will be environmentally responsible and resource efficient. Despite its undulating topography, walking and cycling will be the standard mode of travel with a network of safe walking and cycling routes that provide access to the town's excellent schools and to recreational and employment opportunities. New buildings in Sevenoaks will be built to the highest environmental standards and the town will celebrate its connection with the surrounding landscape that the views to the Kent Downs provide.

The town centre will continue to provide a good mix of shops, including many independent traders, and provide a rich cultural offer within an emerging cultural quarter and thriving markets. The centre will be easy to access and provides attractive streets and spaces for locals and visitors alike. Residents will live in a variety of homes set within well-kept neighbourhoods and also benefit from convenient neighbourhood centres at St John's, Tubs Hill and Hollybush Lane.

Knole Park, Sevenoaks Wildlife Reserve, Greatness Lake and Recreation Ground will provide a unique and rich natural environment for both active sports and quiet contemplation, and the town is proud of its remarkable trees.

The town will be protective of its landscape assets but also recognises the need to plan for and deliver new homes and community facilities to provide for future generations. Sevenoaks will celebrate its uniqueness, protects its special assets and plan for future prosperity!'

Vision Statement for the Sevenoaks Town Neighbourhood Plan

"

2.6 The vision statement for the STNP is underpinned by strategic objectives for development during the plan period which are grouped under the following seven themes: character, heritage and identity; landscape and blue & green infrastructure; movement and public realm; local economy; community and culture; sports and recreation; and development and housing.

# 3. What is the scope of the SEA?

# **Summary of SEA Scoping**

- 3.1 The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies".
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.<sup>10</sup> These authorities were consulted on the scope of the SEA in September 2021.
- 3.3 The purpose of scoping was to outline the 'scope' of the SEA through setting out the following information:
  - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the STNP.
  - Baseline data against which the STNP can be assessed.
  - The key sustainability issues for the STNP.
  - An 'SEA Framework' of objectives against which the STNP can be assessed.
- 3.4 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

#### Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Historic England Historic Places Adviser (email response received on 28 <sup>th</sup> Od	ctober 2021)
Thank you for inviting Historic England to comment on the draft Scoping report for SEA of the Sevenoaks Town Neighbourhood Plan. We do not wish to comment in detail and just offer the following observations.	Comment noted.
We found this a useful document that identifies the distribution of many of the parish's notable heritage assets. However, we note some heritage assets scoped in this report sit beyond the boundary of the Neighbourhood plan area. We recommend this is clarified.	Comment noted. Potential impacts to heritage assets (and their wider settings) associated with STNP proposals are considered through the appraisal of the STNP policies. This is presented within Chapter 5 of the Environmental Report, specifically within the Historic Environment section.

<sup>&</sup>lt;sup>10</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'.'

Consultation response	How the response was considered and addressed
To ensure the plan is appropriately informed we suggest including an assessment question for the historic environment to read: "Is the option/proposal supported by appropriate information on the significance of heritage assets that could be affected including the results of archaeological investigation/research where needed to understand its affects and has necessary mitigation of any harmful impacts been identified and included in the plan policies."	Comment noted. The historic environment assessment questions within the SEA Framework have been revisited and enhanced as recommended.
We note the draft scoping report has not identified any issues affecting the conservation areas or other heritage assets. The conservation areas all have Conservation Area Appraisals and Management Plans, which have identified issues and threats that have affected both their character and appearance. Poor quality infill development is highlighted consistently throughout these documents as one such issue, and so we suggest this should be identified in the baseline evidence as an impact to the area's heritage, as future developments could, possibly, have a cumulative impact.	Comment noted. The documents have been a useful source of reference during the preparation of the Neighbourhood Plan and through the SEA process, and have been included within the baseline information in Appendix A.
We hope these comments are of assistance but would be pleased to answer any queries relating to them or provide further information as necessary.	Comment noted.
Environment Agency Sustainable Places Team (email response received on 29 <sup>th</sup>	September 2021)
We are unable to provide any bespoke comments but have attached our standard advice. We hope this is useful.	Comment noted. The advice has been a useful reference point during the subsequent stages of the SEA.
Natural England Consultations Team (email response received on 27 <sup>th</sup> Octo	ber 2021)
Natural England has no specific comments to make on this neighbourhood plan SEA scoping.	Comment noted. The advice within the annex has been a useful reference
However, we refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.	point during the subsequent stages of the SEA.

3.5 Baseline information (including the context review and baseline data) is presented in **Appendix A**. The key sustainability issues and SEA Framework are presented below.

# Key Sustainability Issues

#### **Air Quality**

- Nitrogen dioxide (NO<sub>2</sub>) is the key pollutant of concern within the Neighbourhood Plan area, with the Air Quality Management Areas (AQMAs) primarily designated for exceedances in the annual mean concentration objective of 40µg/m<sup>3</sup>.
- It will be important to consider any potential traffic and congestion issues arising within and surrounding the Neighbourhood Plan area as a result of new development proposals.

#### **Biodiversity and Geodiversity**

- Most of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward during the plan period (i.e. residential, rural-residential, or rural non-residential development types).
- Local Wildlife Sites (LWS) and Biodiversity Opportunity Areas (BOAs) represent some of the most significant areas of semi-natural habitat in Sevenoaks District outside of statutory protected sites.
- There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of deciduous woodland, good quality semi-improved grassland, lowland dry acid grassland, lowland heathland, and traditional orchard.
- The Environmental Records Centre for Kent and Medway contains records of protected or notable species within the Neighbourhood Plan area. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles.

#### **Climate Change**

- The District Council declared a climate emergency in 2019, and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- The Neighbourhood Plan should seek to maximise opportunities to support actions in tackling climate change. This may include through encouraging sustainable transport technologies, such as the use of electric vehicles (EVs), and through the use of sustainable drainage systems.
- The River Darent has previously flooded in 1968, 2000, 2002 and 2013/14. Areas of Flood Zone 2 and Flood Zone 3 (i.e. areas with the highest risk of fluvial flooding within the STNP area) are broadly confined to the areas of and surrounding the River Darent.
- Surface water run-off from development can exacerbate the risk of flooding by increasing the run-off from land to water courses. There are several areas of Sevenoaks which have a medium-high surface water flood risk, primarily impacting the local road network.

#### Landscape and Townscape

- Sevenoaks is surrounded by the Kent Downs AONB and the Metropolitan Green Belt and the town's relationship with the countryside is an important part of its character. This has also restricted growth options.
- The town centre is the focal point for most of Sevenoaks' shops, leisure, and commercial uses but it is not uniform in character.
- Many of the areas not covered by the Sevenoaks Residential Character Area Assessment Supplementary Planning Document (SPD) have been identified by the Town Council's town-wide questionnaire as areas the public would like to see improved.
- Improvements to the quality of the arrival experience into the town has been identified and recognised as a potential opportunity for the STNP.
- New development has the potential to lead to incremental changes in landscape and townscape quality in and around the STNP area.

#### **Historic Environment**

- According to the National Heritage List for England, the Neighbourhood Plan area contains 213 listed buildings, including two Grade I listed buildings, 14 Grade II\* listed buildings and 197 Grade II listed buildings. It is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.
- There is one scheduled monument within the Neighbourhood Plan area, specifically: Bowl barrow in Millpond Wood.
- The Grade I listed 'Knole' Registered Park and Garden covers an extensive area of land within the south eastern section of the STNP area.
- There are eight conservation areas which wholly or partly overlap with the Neighbourhood Plan area, specifically: High Street, The Vine, Vine Court, Hartslands, Granville and Eardley Roads, Kippington and Oakhill Roads, Wildernesse, and Brittains Farm.
- The conservation area appraisals and management plan documents contain an overview of the special qualities and characteristics for each area, along with several management and enhancement principles. These documents do not, however, cover the whole of the town. This leaves certain areas (including parts of the town centre and other non-residential areas) without any specific character-related design guidance.
- Following a high-level review of the Kent Historic Environment Record (HER) and Local List SPD, records within the Neighbourhood Plan area includes: archaeological notification areas; important buildings; open spaces; distinctive walls; and Roman, Medieval, and Post Medieval features of interest.

#### Land, Soil, and Water Resources

• The River Darent flows through the northern section of the STNP area. New development areas should seek to minimise the risk of surface-water run-off into this watercourse.

- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.
- New development areas located outside of the town boundary has the potential to impact upon the integrity of mineral resources. Consultation with Kent County Council might be required to determine the potential impacts to mineral resources and mineral safeguarding.

#### **Community Wellbeing**

- Population growth is not evenly spread across the Neighbourhood Plan area. For example, Sevenoaks Town Centre has experienced three times the level of average annual population growth (1.9%) compared to northern Sevenoaks (0.6%).
- The services and facilities within the STNP area supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the area.
- As the requirements of the working population continue to change, particularly in response to the Covid-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.
- Knole Park, Sevenoaks Wildlife Reserve, Bradbourne Lakes, Hollybush Recreation Ground, The Vine, and Greatness Lake and Recreation Ground provide a unique and rich natural environment for both active sports and quiet contemplation.

#### Transportation

- Parts of the northern and south eastern sections of the STNP area are relatively rural in character and are less well connected in comparison to the central and southern sections (which encompass the town).
- The recovery from the Covid-19 pandemic has the potential to change travel patterns in the short, medium and (potentially) longer term.
- There is a need to promote an effective pedestrian, cycling and movement strategy for the Neighbourhood Plan area.
- Pedestrian connectivity to Bat and Ball Station in particular is recognised as a potential area of improvement.
- Traffic congestion across the town is a key concern, and improvements to public transport options within the town centre environment is key.

#### **SEA Framework**

3.6 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the current version (i.e., the submission version) of the STNP will be assessed consistently using the framework.

#### Table 3.2: SEA Framework of objectives and assessment questions

SEA Objective	Assessment questions to consider for the allocations / proposals within the Sevenoaks Town Neighbourhood Plan
Air Quality	5
Deliver improvements in air quality within the Neighbourhood Plan	Will the option/proposal help to:
	Reduce emissions of pollutants from transport?
area	Promote the use of low emission vehicles?
	<ul> <li>Promote enhancements in sustainable modes of transport, including walking, cycling and public transport?</li> </ul>
	<ul> <li>Promote enhancements to green infrastructure networks to facilitate increased absorption and dissipation of nitrogen dioxide and other pollutants?</li> </ul>
Biodiversity and Geodiver	sity
Protect and enhance	Will the option/proposal help to:
biodiversity and geodiversity	<ul> <li>Support the integrity of the nationally and locally designated biodiversity sites located within proximity to the Neighbourhood Plan area?</li> </ul>
	<ul> <li>Protect and enhance priority habitats and species?</li> </ul>
	<ul> <li>Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks?</li> </ul>
	<ul> <li>Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>
	<ul> <li>Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>
Climate Change	
Reduce the contribution to climate change made	Will the option/proposal help to:
by activities within the	Reduce the number of journeys made?
Neighbourhood Plan area	Reduce the need to travel?
	<ul> <li>Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> </ul>
	<ul> <li>Increase the number of new developments meeting or exceeding sustainable design criteria?</li> </ul>
	Generate energy from low or zero carbon sources?
	<ul> <li>Reduce energy consumption from non-renewable resources?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals within the Sevenoaks Town Neighbourhood Plan
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<ul> <li>Will the option/proposal help to:</li> <li>Ensure that inappropriate development does not take place in areas at higher risk of flooding?</li> <li>Improve and extend green infrastructure networks in the Neighbourhood Plan area to support adaptation to the potential effects of climate change?</li> <li>Sustainably manage water run-off, reducing surface water runoff (either within the Neighbourhood Plan area or downstream)?</li> <li>Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> </ul>
	Encourage the use of sustainable drainage techniques through new infrastructure provision?
Landscape and Townscap	e
Protect and enhance the	Will the option/proposal help to:
character and quality of landscapes and townscapes.	<ul> <li>Seek to protect the integrity of the Kent Downs AONB, in line with the latest available Management Plan?</li> </ul>
	<ul> <li>Seek to prevent detriment to the openness of the Metropolitan Green Belt?</li> </ul>
	<ul> <li>Conserve and enhance the special qualities of the Neighbourhood Plan area?</li> </ul>
	<ul> <li>Conserve and enhance locally important landscape and townscape features within the Neighbourhood Plan area?</li> </ul>
	Conserve and enhance local diversity and character?
	<ul> <li>Protect and enhance locally important viewpoints which contribute to the unique sense of place and visual amenity of the Neighbourhood Plan area?</li> </ul>

SEA Objective	Assessment questions to consider for the allocations / proposals
	within the Sevenoaks Town Neighbourhood Plan
Historic Environment	
Protect, conserve, and enhance heritage assets within the Neighbourhood Plan area	<ul> <li>Will the option/proposal help to:</li> <li>Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> </ul>
	<ul> <li>Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> </ul>
	<ul> <li>Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts?</li> </ul>
	<ul> <li>Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the Kent HER?</li> </ul>
	<ul> <li>Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> </ul>
	<ul> <li>Conserve and enhance archaeological remains, including historic landscapes?</li> </ul>
	• Provide appropriate information on the significance of heritage assets that could be affected, including the results of archaeological investigation/research (where needed), to ensure that any necessary mitigation of any potentially adverse impacts have been identified and considered?
Land, Soil, and Water Res	sources
Ensure the efficient and	Will the option/proposal help to:
effective use of land.	<ul> <li>Promote any opportunities for the use of previously developed land, or vacant / underutilised land?</li> </ul>
	<ul> <li>Affect the integrity of waste infrastructure within and surrounding the STNP area?</li> </ul>
	Protect the integrity of mineral resources?
Protect and enhance	Will the option/proposal help to:
water quality and use and manage water resources in a sustainable manner.	<ul> <li>Avoid impacts and support improvements to water quality?</li> </ul>
	<ul> <li>Ensure appropriate drainage and mitigation is delivered alongside development?</li> </ul>
	Protect waterbodies from pollution, including SPZs?
	Maximise water efficiency?

SEA Objective	Assessment questions to consider for the allocations / proposals within the Sevenoaks Town Neighbourhood Plan
Community Wellbeing	
Ensure growth in the Neighbourhood Plan area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul> <li>Will the option/proposal help to:</li> <li>Provide everyone with the opportunity to live in good quality, affordable housing?</li> <li>Support the provision of a range of house types and sizes?</li> <li>Meet the needs of all sectors of the community?</li> <li>Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population?</li> <li>Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>Encourage and promote social cohesion and active involvement of local people in community activities?</li> <li>Facilitate green infrastructure enhancements?</li> <li>Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>Minimise fuel poverty?</li> </ul>
	• Maintain or enhance the quality of life of existing residents?
Transportation	·
Promote sustainable	Will the option/proposal help to:
transport use and reduce the need to	Encourage modal shift to more sustainable forms of travel?
travel.	<ul> <li>Facilitate working from home and remote working?</li> </ul>
	Improve road safety?
	<ul> <li>Reduce the impact on residents and the built environment from the road network?</li> </ul>

# 4. What has plan making / SEA involved up to this point?

# Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include...
  - An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, the following sections describe how the SEA process to date has informed the consideration of different approaches for key elements of the STNP.

## Overview of plan making / SEA work undertaken to date

- 4.3 Significant public consultation has been carried out to date to support the emerging STNP. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included (but is not limited to) the following key events, community surveys, and evidence base studies for the STNP (the results of which are accessible on the Neighbourhood Plan's webpages):
  - Series of open meetings with the community, with agendas, minutes, and other documents all made publicly available via STC's website (accessible <u>here</u>) and the Neighbourhood Plan website (accessible <u>here</u>). STC also established a dedicated <u>Twitter</u> account to publicise the STNP.
  - A town-wide <u>survey</u> in 2014 to gather public opinions and perceptions of the town, with a view to informing and shaping the vision and objectives for the STNP. Subsequently, consultation events took place in December 2015 at Sevenoaks Station and the Stag Theatre to discuss the proposed themes and objectives for the STNP.
  - Preparation of evidence base studies to inform the development of the STNP, including the Sevenoaks Town Sport Strategy, the Sevenoaks Cultural Strategy, and the Sevenoaks Urban Area Economic Study (accessible <u>here</u>).
  - Through the preliminary work on the STNP, STC identified Northern Sevenoaks as a key location in the town that was suitable for larger scale new development opportunities. It was also seen as an area with untapped potential that could benefit from regeneration. The <u>Northern Sevenoaks</u> <u>Masterplan</u> was developed through a series of meetings and workshops with local people and stakeholders (including local landowners and organisations) with a formal public consultation taking place in May 2017.

- Regulation 14 consultation on the draft STNP was completed between January and March 2020. Comments received after the close of the consultation period were also accepted and considered. To support the consultation process, events were held at several locations around the town, and an online <u>questionnaire</u> was available to complete.
- Preparation of STC's Green Community Investment Plan (as an appendix to STC's Community Investment Plan 2019-2023) which brings together and publicises STC's climate change initiatives. The initiatives have been designed to encourage community involvement and are grouped into the following themes: buildings; transport and movement; making Sevenoaks greener; consumption; and access to information.

# Assessing reasonable alternatives through the SEA

- 4.4 The SEA Regulations highlight that the Environmental Report 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. For SEAs for Neighbourhood Plans, 'reasonable alternatives' are typically considered for alternative approaches to locating development in a neighbourhood area.
- 4.5 There is an identified housing need within the STNP area, and several potential site options for new development have been identified through the neighbourhood planning process to date. The sites were identified from the following sources:
  - A review of the current Local Plan and the new Local Plan (and associated evidence base documents).
  - Findings and recommendations as presented within the Northern Sevenoaks Masterplan; and
  - Sites promoted by STC (and the STNP Committee) which included existing areas of vacant or under-utilised land, or areas which were considered to undermine the character of the town in their current form (and could therefore benefit from regeneration).
- 4.6 In the context of the above, STC sought to consider the various sites which were available in the Neighbourhood Plan area for development. This was with a view to shaping development at these locations through the introduction of appropriate Neighbourhood Plan planning policies. The identified sites are those which the STNP Committee consider as having the greatest potential to provide benefits in terms of delivering high quality development which meets the vision and objectives of the STNP.
- 4.7 Following recent engagement with the LPA and stakeholders, and a reconsideration of the sites in light of the development of a new Local Plan for Sevenoaks District, STC has decided to not allocate land for development through the Neighbourhood Plan. However, STC recognises that there are sites that may come forward for development during the plan period, either as windfall or through allocations in the new Local Plan, which have potential to deliver benefits that should be secured through the design, layout and use of each site. In this respect, the STNP's planning policies seeks to shape

development more broadly in the neighbourhood area without allocating specific sites.

- 4.8 In the context of the above, the SEA has not assessed sites or packages of sites as reasonable alternatives. Whilst the STNP has presented planning policies for a number of key sites in the neighbourhood plan area, it does not seek to preclude high quality development on these sites. In this respect, the STNP is design focused, and has been informed by the outputs from the Northern Sevenoaks Masterplan, the Sevenoaks Residential Character Area Assessment SPD (accessible here), STC's Green Community Investment Plan (as an appendix to STC's Community Investment Plan 2019-2023, and accessible here) and extensive community consultation. It is also recognised that the Sustainability Appraisal (SA) process for the new Local Plan will consider the sites, including associated with the likely distribution and type of development. In the longer term, it is anticipated that further work on the sites will be undertaken through detailed masterplanning.
- 4.9 As such, for the purposes of the SEA, the planning policies proposed for the identified sites have been assessed as part of the plan appraisal presented in **Chapter 5** of this Environmental Report.

### Current approach in the Sevenoaks Town Neighbourhood Plan and the development of policies

#### Preferred approach in the Neighbourhood Plan

- 4.10 It is important to acknowledge that the submission version of the Neighbourhood Plan does not allocate sites for new development. Nevertheless, the STNP (through Policy D1 and Policy D2) outlines the potential benefits of development at several locations within the town which would (amongst other considerations):
  - Encourage a master planning approach to new development areas which incorporate excellent place-making principles as informed by the Northern Sevenoaks Masterplan, the Residential Character Area Assessment SPD, and wider STNP policy provisions.
  - Facilitate a mix of housing (i.e. type, tenure, and affordability) which is accessible and adaptable for all users; and
  - Unlock potential opportunity areas for employment and community uses which have been identified in the STNP area, aligning with local and national policy requirements.
- 4.11 This is further discussed as part of the plan appraisal presented in **Chapter 5** in the main body of this Environmental Report.

#### **Neighbourhood Plan policies**

4.12 To support the implementation of the vision statement for the Neighbourhood Plan, the submission version of the STNP puts forward 35 policies and twelve aims<sup>11</sup> to guide new development within the Neighbourhood Plan area.

<sup>&</sup>lt;sup>11</sup> In the STNP, planning policies are labelled 'Policy', and the non-planning related policies are identified as 'Aim'. Policies will be used by planning officers to determine planning applications. Aims represent other strategies that will be pursued by STC during the lifetime of the STNP. Policies and aims are grouped under the objectives of the STNP, as included in Table 4.1.

- 4.13 Earlier draft versions of the policies have been revisited and updated in light of the responses which were received at Regulation 14 consultation, and through recommendations and suggestions proposed the SEA process.
- 4.14 Policies were developed following extensive community consultation and evidence gathering and are listed below in **Table 4.1**.

Table 4.1: Neighbourhood Plan policies and aims (grouped by objective)

	Character, Heritage, and Identity
Objective 1	To respect the town's character and heritage and ensure that all new development is responsive to its context and enhances the setting of the town's historic assets.
	Policy C1 and C4; and Aim C2, C3, C5, C6, and C7.
Objective 2	To protect the setting of local landmarks and the landscape setting of the town.
Objective 2	Policy C8 and C9.
Objective 3	To enhance the gateways / arrival points into the town to create a more welcoming impression.
	Policy C10.
	Landscape and Blue & Green Infrastructure
Objective 4	To protect and enhance blue and green infrastructure, enhance biodiversity, and respond to climate change.
	Policy L1 and L2.
Objective 5	To recognise the significant contribution that trees and hedgerows make to the town's character and biodiversity.
	Policy L4; and Aim L3.
Objective 6	To protect, improve and enhance access to existing publicly accessible open spaces and create new publicly accessible open spaces and green infrastructure.
	Policy L5 and L8; and Aim L6 and L7.
	Movement and Public Realm
Objective 7	To work with the District Council, and Kent County Council, in consultation with neighbouring parish councils, to identify a long-term strategic approach to transport in Sevenoaks to respond to and mitigate any impacts of new development on the existing network.
Objective 8	To promote a co-ordinated approach to transport and movement that encourages the use of sustainable transport modes, including walking and cycling, and reducing pollution levels, whilst ensuring that the centre is still accessible by car.
	Policy M1, M2, M3, M4, M5. M6, M7, M8, and M9; and Aim M10.
	To deliver public realm enhancements to improve the pedestrian experience in the town.
Objective 9	Policy M11; and Aim M12.

	Local Economy
Objective 10	To support local businesses and retailers and encourage a more collaborative and entrepreneurial business environment in the centre.
	Policy E1 and E3; and Aim E2.
Objective 11	To consolidate and enhance both the town centre and secondary shopping areas.
	Policy E4 and E5.
	Community and Culture
Objective 12	To deliver enhanced community assets for the town.
	Policy COM1 and COM2.
Objective 13	To develop and promote a cultural quarter in the town centre and to enhance the town's cultural offer and improve access to existing cultural assets.
	Policy COM3; and Aim COM4.
	Sports and Recreation
Objective 14	To deliver enhanced recreational and sports facilities for the town.
	Policy S1 and S2.
	Development and Housing
Objective 15	To promote high quality development that enhances the town and consolidates vacant or under-utilised land.
	Policy D1 and D2.
Objective 16	To deliver a range of new homes to meet local needs.
	Policy D3 and D4.
Objective 17	To provide homes that are energy efficient and minimise environmental impact
	Policy D5 and D6.

# 5. What are the appraisal findings at this current stage?

## Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the STNP. This chapter presents:
  - An appraisal of the current version (i.e., the submission version) of the STNP under the eight SEA theme headings.
  - The overall conclusions at this current stage.

## Appraisal of earlier versions of Neighbourhood Plan policies

- 5.2 Prior to the finalisation of the submission version of the STNP, the SEA team undertook an appraisal of earlier versions of STNP policies. At that stage, the following recommendations were made to plan makers for further improving the sustainability performance of the STNP.
- 5.3 These recommendations included (organised by SEA theme):

**Biodiversity and Geodiversity** 

 Opportunity to strengthen Policy L1 to encourage proposals to deliver measurable net gains through design, in line with national policy. For example, proposals could be encouraged to utilise the latest biodiversity metric tools to calculate net gains. Natural England have recently developed a biodiversity metric tool specifically for smaller sites (accessible here), which may be appropriate.

**Climate Change** 

- Policy D6 could encourage applications to ensure that any retrofits to historic buildings considers Historic England's latest guidance, accessible <u>here</u>.
- Potential to include a statement within a relevant policy which encourages proposals to source construction materials locally and use recyclable materials wherever possible. Whilst this is difficult to enforce, it will demonstrate a positive and proactive response to the climate crisis by supporting proposals which seek to reduce embedded carbon and work towards delivering carbon neutrality through design.

Historic Environment

• With reference to the setting of designated and non-designated heritage assets (including views into and out of these features), development proposals could be encouraged to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas. This will ensure that appropriate mitigation is provided to assuage any concerns by Historic England.

 For areas of land which have been identified for their archaeological importance, new development proposals could undertake archaeological evaluations prior to construction, with any findings appropriately reported and documented on the local historic environment record in line with best practice guidance.

Land, Soil, and Water Resources

- Encouraging proposals to ensure that appropriate drainage infrastructure is available to serve new development areas in order to not overbear the existing network or add to difficulties with local water supplies, sewerage and sewage treatment, and waste disposal.
- 5.4 Alongside the responses received at Regulation 14 consultation, it is anticipated that these recommendations will be considered by plan makers during updates to the STNP.

## Approach to this appraisal

- 5.5 The appraisal of the submission version of the STNP is presented below and is structured under the eight SEA themes.
- 5.6 For each SEA theme, 'significant effects' of the submission version of the STNP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment, as appropriate.
- 5.7 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the STNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

# **Air Quality**

- 5.8 Increased population levels and economic and employment growth in Sevenoaks District have led to an increased demand for travel that is impacting on traffic levels within the area, particularly on the approaches to the key local centres (including Sevenoaks Town Centre). Increases in traffic flows have led to an emerging pattern of congestion on key corridors, with increasing delays and journey times. These issues have contributed to the designation of Air Quality Management Areas (AQMAs) in Sevenoaks District, including No. 10 (Sevenoaks High Street) and No. 13 (the A25) which pass through the STNP area. These AQMAs have observed increases in the annual mean concentration objective of 40 μg m<sup>-3</sup> for nitrogen dioxide (NO<sub>2</sub>).
- 5.9 One of the main objectives of the STNP is to identify a long-term strategic approach to transportation in Sevenoaks Town which prioritises sustainable transport modes and encourage opportunities for active travel (i.e. walking and cycling). This will have indirect and positive benefits to air quality through

aiming to reduce the reliance on private vehicles and encourage the transition to low-traffic and healthier neighbourhoods. Key policies in this respect include Policies M1 - M9. This will positively contribute to the key objectives of the draft Sevenoaks' Air Quality Action Plan (AQAP) (accessible <u>here</u>) which seek to reduce levels of pollution within the AQMAs to below objective levels and improve air quality more widely.

5.10 More broadly, the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution (i.e. particulate matter, sulphur dioxide, nitrogen dioxide and ozone). Biodiversity net gain can also deliver air quality benefits at the microscale. Key policies in this respect includes Policy L1 and Policy L4, with proposals expected to incorporate resilient green infrastructure and boost biodiversity. The provisions of these policies will also facilitate increased absorption and dissipation of NO<sub>2</sub> and other pollutants.

# **Biodiversity and Geodiversity**

- 5.11 One of the key objectives within the STNP is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological interest and 2) support the resilience of green infrastructure networks. This is further discussed below.
- 5.12 Published in July 2021, paragraph 174 (d) within the revised NPPF<sup>12</sup> states that planning policies and decisions should contribute to and enhance the natural and local environment by 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks', with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government's 25-Year Environment Plan<sup>13</sup> (which was published in January 2018) and the Environment Act<sup>14</sup> (which received Royal Assent in November 2021). In this respect, Policy L1 encourages proposals to deliver biodiversity net gains through design, retaining natural features and establishing ecological networks. Emphasis is given to the use of native species which respond to the local context and character of the area. As the STNP does not allocate sites for new development, it is anticipated that the provisions of Policy L1 (in its current form) is likely to enhance the natural environment of the STNP area, even if no specific targets are mentioned.
- 5.13 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the STNP also sets out provisions which will support and enhance habitats, species, and ecological networks.
- 5.14 For example, Policy L4 and Aim L3 requires proposals to demonstrate how the design options creatively incorporate existing trees and hedges into new development areas, maximising the potential for new trees and hedges to be

<sup>&</sup>lt;sup>12</sup> DLUHC (2018): 'Revised National Planning Policy Framework', [online] available to access here

<sup>&</sup>lt;sup>13</sup> DEFRA (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access here

<sup>&</sup>lt;sup>14</sup> GOV.UK (2021): 'Environment Act', [online] available to access <u>here</u>

planted. Policy L1 and Aim L6 also seek to improve green corridors within the STNP area and embrace opportunities for nature conservation. A coordinated approach is encouraged to maximise the positive outcomes for wildlife and the local community. These provisions will safeguard and enhance areas which are likely to provide roosting and foraging sites for protected species, maintaining habitat connectivity and reducing fragmentation.

5.15 Overall, Neighbourhood Plan policies should help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which may come forward during the plan period, whilst also delivering net gains.

# **Climate Change**

- 5.16 The UK Government has outlined a commitment to secure a 'green recovery' from the Covid-19 pandemic. Reflecting the conclusions of the Institute for Government's 'Net Zero' report<sup>15</sup>, a green recovery is only likely to happen if net zero becomes a core part of the Government's thinking and its economic policy. Within the report, net zero is described as *"decarbonising not just the power sector but much more difficult sectors including transport, housing and agriculture, where progress has long been stalled and the UK is off track"*. In this respect, policies within the STNP support these principles by reducing the reliance on fossil fuels and supporting the introduction of low carbon solutions.
- 5.17 A key policy in this respect is Policy D5 which seeks to ensure that proposals deliver energy efficient dwellings, including construction materials which reduce the impacts to the environment (i.e. low and zero carbon energy sources). Additionally, Policy D6 promotes retrofitting existing homes to increase their energy efficiency. In this respect, it will be important for proposals to consider the latest available guidance (such as Historic England's Energy Efficiency and Historic Buildings guidance, accessible <u>here</u>) to ensure that any retrofits are delivered sympathetically and with respect to the character of the surrounding environment. In terms of tackling the climate crisis, the provisions of these policies will also help to positively contribute to SDC's aspiration for net zero carbon emissions by 2030.
- 5.18 Further contributing to climate change mitigation efforts, the STNP also outlines several proposals which seek to reduce the reliance on fossil fuels. Such proposals include delivering more active travel infrastructure, encouraging a healthy-streets approach to the design of new development areas by enhancing opportunities for walking and cycling, and improving public transport options (including the number and frequency of journeys). Key policies in this respect include Policies M1 M9, as discussed in more detail within the 'Transportation' appraisal, below.
- 5.19 With regards to adapting to the effects of climate change, Policy L2 and Policy L5 encourage the use of permeable materials through design (including through sustainable drainage solutions, open spaces, and natural public realm features) to address any flood risk concerns. Policy L2 goes on to state that all proposals should clearly demonstrate how new developments provide for surface water drainage and capacity of the sewer systems. Additionally, the

<sup>&</sup>lt;sup>15</sup> Institute for Government (2020): 'Net zero: how government can meet its climate change target' [online] available to access <u>here</u>

protection of open spaces and habitats within the STNP area through the provisions of Policy L1 and Policy L4 will safeguard natural carbon sequesters located within the landscape (i.e. trees and hedgerows). These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues.

### Landscape and Townscape

- 5.20 Landscape and townscape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape and townscape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. The relationship between the STNP area, the Kent Downs AONB and the Metropolitan Green Belt, for example, is a defining feature and contributes strongly to the Neighbourhood Plan area's sense of place and quality of its environment. As the submission version of the STNP does not contain any site allocations for development, significant adverse impacts to nationally protected landscapes are not anticipated. Nonetheless, proposals within the STNP have a strong focus on protecting the sense of place and special qualities which contribute to its character.
- 5.21 With reference to new development proposals which may potentially come forward during the plan period, Policy C9 is supportive of proposals providing that it can be demonstrated that the landscape setting and character of the town (including its relationship and visibility with the open countryside) is protected and enhanced. Policy C1 and C4 requires all new development to complement, enhance and positively contribute to local character and identity, including with respect to the provisions in the Residential Character Area Assessment SPD. This will facilitate opportunities for high quality design and layout to be incorporated within new development areas which are sensitive to the character of the surrounding environment. Additionally, Aim C2 affirms that STC will work with key stakeholders to encourage development of vacant and under-utilised sites, particularly those which are considered to negatively impact upon townscape character in their current form. Aim C7 also states that STC intends to collaborate with key stakeholders to prepare design guidance for areas which are not included in the Residential Character Area Assessment SPD. These policies and aims will help to facilitate opportunities for high quality design and layout to be incorporated within new development areas, enhancing the quality of landscapes and townscapes.
- 5.22 Further contributing to the quality of the natural and built environment, Policy L1 and Policy L4 also encourages proposals to make a positive contribution to the public realm through biodiversity and green infrastructure provision. Specifically, the provisions should help to deliver net greening within the STNP area, retaining mature trees and hedges, and integrating species which are appropriate for each location. Through supporting the preparation of spatial strategies for town and local centre environments which appropriately consider elements relating to public realm and appearance (see Policy M11 and Policy E5), the STNP signals a strong commitment to delivering positive longer-term outcomes and aspirations with regards to landscape and townscape character.

These provisions should further ensure that proposals reflect the sense of place and local distinctiveness at key locations in the town.

5.23 Overall, the STNP policies have a strong focus on protecting and enhancing landscape and townscape character, the quality of the public realm, sense of place, and local distinctiveness.

# **Historic Environment**

- 5.24 The STNP area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their heritage interest. This includes 213 listed buildings, one scheduled monument, Knole Registered Park and Garden, and eight conservation areas. Most of the town's listed buildings are located within these conservation areas. As the submission version of the STNP does not contain any site allocations for development, significant adverse impacts to the historic environment are not anticipated. Nonetheless, the sensitivities listed above are reflected by STNP policies and proposals which focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings.
- 5.25 For example, Policy C1 requires proposals to ensure that the design of future developments sustains and enhances the significance of heritage assets and their settings. Policy C1 and C4 stipulate that new development within the STNP area shall also be expected to be taken forward in conjunction with the provisions of national and local design guidance, including within the National Design Guide, conservation area appraisals, and the Residential Character Area Assessment SPD. Given these documents set out a comprehensive range of provisions relating to the built environment, this will help provide an appropriate basis for the conservation and enhancement of the historic environment surrounding any new development areas which may be brought forward during the plan period.
- 5.26 Historic environment sensitivities are further reflected by proposals which seek to avoid the loss or damage to heritage features, incorporate heritage features into new development areas, and provide opportunities for enhancing their fabric and setting. Key policies and aims in this respect include Policy C8, Policy C10, Aim C3, and Aim C5, which outline that proposals should:
  - ensure the retention and management of historic features (including local landmarks).
  - provide elements of characterisation in the design of schemes (such as naming streets to reflect people and places of historic significance to the town); and
  - facilitate heritage-led regeneration through the preparation of guidance on the treatment of locally listed buildings and any other buildings of heritage value (including the gateway and arrival points into the town).
- 5.27 The provisions of these policies are likely to provide further opportunities for the STNP to positively contribute to the historic environment through incorporating high-quality design which reflects the historic character and special qualities of the STNP area.

- 5.28 Policy M11 encourages proposals which promote the vitality of town centre destinations within the STNP area (including Sevenoaks Town Centre, which has the greatest concentration of listed buildings within the STNP area). This is providing that, amongst other considerations, proposals are informed by the historic sensitivities and heritage significance of the town centre environment. Policy M11 and Policy E5 also encourage the preparation of spatial strategies for town and local centre environments (including Sevenoaks Town Centre, Northern St John's, Southern St John's, and Tubs Hill Parade) which focus on enhancing the function, accessibility, heritage assets and character of the areas. It is anticipated that these policy provisions will positively respond to the role that local distinctiveness and heritage assets have in creating a sense of place within the STNP area.
- 5.29 More broadly, delivering net gains in biodiversity and facilitating green infrastructure enhancements can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. Key policies in this regard include Policy L1 and Policy L4, which are discussed in more detail within the 'Biodiversity and Geodiversity' appraisal, above. In addition to supporting enhancements to the setting of features and areas of historic environment interest, it has the potential to support and strengthen the character of the built environment. Additionally, policies which support the principle of walkable neighbourhoods and healthy streets (including Policies M1 M9) has the potential to facilitate pedestrian accessibility to heritage assets and areas, which in turn can enhance the understanding and appreciation of their special qualities. This will help to rejuvenate areas with historic interest.

# Land, Soil, and Water Resources

- 5.30 As the proposed submission version of the STNP does not contain any site allocations for development, it is not likely that the STNP (in its current form) would result in the loss of any areas of productive agricultural land. Nonetheless, the STNP has a strong focus on encouraging development at vacant and under-utilised sites within the town (see Policy D1, Policy M11, and Policy E5), unlocking potential opportunity areas within Northern Sevenoaks (as informed by the masterplan for this area), Sevenoaks Town Centre, Northern St John's, Southern St John's, and Tubs Hill Parade. Several policies also seek to protect key features of landscape and biodiversity interest and promote green and open spaces. Key policies in this regard include Policies L1 - L2 and Policies L4 - L5. While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features. This will help support the capacity of the landscape and townscape to regulate soil and water quality.
- 5.31 Concerning the protection of water resources, Policy L2 affirms that new development areas should not increase the risk of surface water run-off. The policy also outlines that no development in sensitive locations (i.e. adjacent or close to water courses) shall commence until full details of the proposed drainage schemes and infrastructure for surface and foul water have been provided. This will indirectly contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off.

# **Community Wellbeing**

- 5.32 It is important to acknowledge that the submission version of the Neighbourhood Plan does not allocate sites for new development. Nevertheless, the STNP (particularly through Policy D1 and Policy D2) outlines the potential benefits of development at several locations within the town which would (amongst other considerations):
  - Encourage a master planning approach to new development areas which incorporate excellent place-making principles as informed by the Northern Sevenoaks Masterplan, the Residential Character Area Assessment SPD, and wider STNP policy provisions.
  - Facilitate a mix of housing (i.e. type, tenure, and affordability) which is accessible and adaptable for all users; and
  - Unlock potential opportunity areas for employment and community uses which have been identified in the STNP area, aligning with local and national policy requirements.
- 5.33 Additionally, the STNP does not seek to preclude high quality development in other locations within the STNP area which meet the policies and objectives of the Neighbourhood Plan. This is further considered below.
- 5.34 The quality of development is a key influence on the quality of life of residents. In this respect, several policies provide criteria and guidance for potential proposals with a view to implementing high quality design and layout within new development areas. The provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe, attractive, inclusive, and accessible, and in keeping with the surrounding environment. Key policies in this regard include Policy D1, Policy D2, Policy L1, Policy L4, Policy L5, and Policy L11.
- 5.35 Policies within the STNP also set out a range of provisions which will support and enhance residents' quality of life. For example, Policy D5 and Policy D6 promotes the delivery of energy efficient and low carbon developments. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living. In this respect the STNP will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents. Measures to help increase sustainability, connectivity, accessibility and reduce the need to travel are included in Policies M1 - M3 and Policies M8 - M9, which primarily support active travel and encourage opportunities for walking and cycling (i.e. healthier modes of transport). This is considered in further detail within the 'Transportation' appraisal, below.
- 5.36 A key aspect of the STNP is to ensure that the provision of community facilities continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. STNP policies are therefore consistent with the NPPF (paragraph 93), which encourages planning policies and decisions to *"plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports*

venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities" and "ensure an integrated approach to considering the location of housing, economic uses and community facilities and services." Key policies in this respect include Policies COM1 - COM2 and Policies S1 - S2 which seek to protect and support the provision of local services and facilities to enable people to live locally. This includes (but is not limited to): a new community centre, health and education provision, sports facilities, and outdoor play and recreational facilities.

- 5.37 The STNP also seeks to promote the economic vitality of the STNP area and supports local employment opportunities. Key policies in this regard include Policy M1 and Policy E5 which recommend proposals to promote the vitality of town and local centre environments within the STNP area. Specifically, the policies encourage the preparation of spatial strategies for Sevenoaks Town Centre, Northern St John's, Southern St John's, and Tubs Hill Parade (i.e. key service and employment areas within Sevenoaks Town) which focus on enhancing their function and accessibility. Further supporting the local economy, Policy E1, Policy E4 and Policy E5 seek to preclude the loss of existing employment land, and supports new business, commercial, and employment development in key locations within the STNP area (subject to the criteria listed within the policies). Furthermore, Aim E2 and Policy COM3 states that STC shall work with key stakeholders to develop a tourism strategy and cultural strategy for the town which supports the visitor economy.
- 5.38 Overall, the STNP is likely to have positive effects in relation to the local economy through the protecting the integrity and function of town and local centre environments, and encouraging initiatives which seek to enhance key sectors for the STNP area (such as the visitor economy, leisure and culture sector, indoor and outdoor markets, and start-up businesses).
- 5.39 More broadly, STNP policies and proposals have a strong emphasis on delivering public realm improvements (including through green infrastructure provision). Green infrastructure provides space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation<sup>16</sup>. Key policies and aims in this respect include Policy L5, Aim L6, Aim L7, Policy L8, and Policy M11. The quality of the living environment will also be supported by policies which encourage the delivery of adequate and well-located public and private amenity space of an appropriate size and type, see Policy S1 and Policy S2. This will support physical and mental health and wellbeing of the local community.

# **Transportation**

5.40 The impact of the Covid-19 pandemic means that the future baseline of travel demand is likely to be different for all residents. In the longer term it is hard to predict how behaviours will evolve and whether some of the travel responses observed during the national lockdowns will be maintained in some form. However, reflecting the results of the National Travel Attitudes Study, 94% of

<sup>&</sup>lt;sup>16</sup> Natural England (2021): 'Green Infrastructure Network Framework' [online] available to access here

respondents thought it likely that they would continue to rely on active travel methods (walking and cycling) once travel restrictions were removed<sup>17</sup>.

5.41 Regarding connectivity and accessibility within the STNP area, policies and proposals seek to maximise the ability for residents to make trips by public, sustainable, and active modes of transport. Key policies and aims in this regard include Policies M1 - M3, Policies M8 - M9, Aim M10, and Policy M11. This includes through prioritising and safeguarding walking, cycling, and public transport (aligning to the modal hierarchy for transport users), delivering more active travel infrastructure, improving the pedestrian experience within town and local centre destinations, supporting the principle of low-traffic neighbourhoods, and providing a more reliable and resilient public transport network. This should also support the creation of mixed and vibrant places that are designed for people rather than vehicles.

### Conclusions at this current stage

- 5.42 In the context of the above, the assessment has concluded that the submission version of the STNP is likely to have significant positive effects in relation to the 'Community Wellbeing' SEA Theme. This principally links to the STNP's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), improve availability and accessibility to services, facilities and amenities, and support the regeneration of key opportunity areas within the STNP area (such as town and local centre environments) which will encourage employment opportunities. These policy provisions will support social inclusion, and community and economic vitality. The STNP is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthier and active lifestyles. These policy provisions will support the quality of life of residents.
- 5.43 The STNP will also bring positive effects in relation to the 'Landscape and Townscape' and 'Historic Environment' SEA Themes. These benefits largely relate to the STNP's emphasis on protecting and enhancing the relationship between the natural and built environment (i.e. between the town and the open countryside), delivering high-quality design which respects and enhances local distinctiveness and sense of place, protects important landscape and townscape features, facilitates improvements to quality of the public realm, and increases awareness, understanding and appreciation of the historic environment. Given the Sevenoaks Residential Character Area Assessment SPD and the Northern Sevenoaks Masterplan also set out a comprehensive range of provisions relating to the natural and built environment, this will help provide an appropriate basis for any development proposals which may come forward during the plan period.
- 5.44 Additionally, the STNP will bring positive effects in relation to the 'Biodiversity and Geodiversity' SEA Theme by encouraging proposals to protect existing and establish new habitats and wildlife corridors, enhance ecological networks (including through green infrastructure enhancements), and embrace opportunities for nature conservation.

<sup>&</sup>lt;sup>17</sup> Department for Transport (2020): 'National Travel Attitudes Study: Wave 4 (Provisional)': [online] available to access here

- 5.45 Regarding the 'Climate Change' SEA Theme, the STNP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (i.e. flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the STNP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.
- 5.46 The STNP will also initiate several beneficial approaches regarding the 'Transportation' and 'Air Quality' SEA Themes, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting the principles of healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation.
- 5.47 More broadly in relation to the 'Land, Soil, and Water Resources' SEA Theme, the STNP outlines several provisions will help support the capacity of the landscape to regulate soil and water quality. As the STNP does not contain any site allocations for development, it is not likely that the STNP (in its current form) would result in the loss of any areas of productive agricultural land.

## 6. What are the next steps?

- 6.1 The SEA Environmental Report accompanies the submission version of the STNP to the responsible authority, Sevenoaks District Council, for Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, the STNP will be subject to a referendum, organised by Sevenoaks District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the STNP will become part of the development plan for the STNP area.

# Appendix A Context Review and Baseline

### A.1 Air Quality

### **Policy Context**

**Table A1.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A1.1: Plans, policies, and strategies reviewed in relation to air quality

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The Clean Air Strategy	2019
UK plan for tackling roadside nitrogen dioxide concentrations	2017
A Green Future: Our 25 Year Plan to Improve the Environment	2018
Sevenoaks Air Quality Action Plan	2009
Sevenoaks Low Emission and Electric Vehicle Strategy	2021
Sevenoaks Draft Air Quality Action Plan (2022-2027)	2022

The key messages emerging from the review are summarised below:

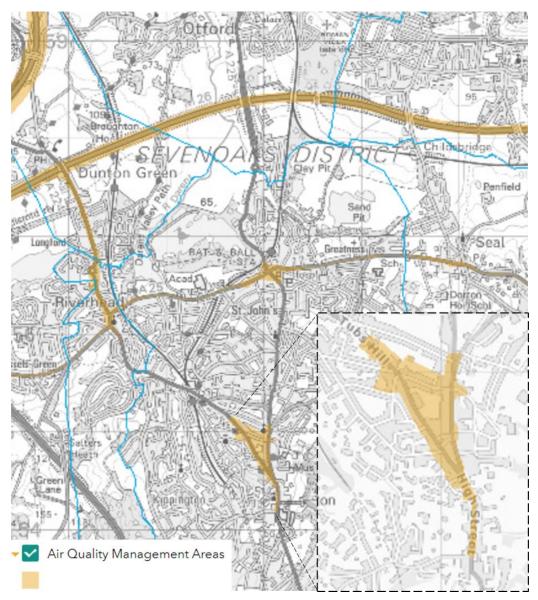
- The STNP will be required to be in general conformity with the NPPF, which
  predominantly seeks early planning to reduce/ mitigate air quality impacts in
  development and to take advantage of opportunities to improve air quality.
  Measures to improve air quality include traffic and travel management and green
  infrastructure provision. Strategic development is expected to be focused in
  locations that have or will be provided with high levels of accessibility; supporting
  both a reduced need to travel and offering a genuine choice of transport modes.
  Smaller-scale development should consider the potential for cumulative effects in
  relation to air quality.
- To improve air quality across the UK, national strategies have, in the last few decades, focused on regulatory frameworks, investment by industry in cleaner processes and a shift in the fuel mix towards cleaner forms of energy (largely at point sources). Whilst there are dedicated strategies to reducing roadside emissions (as a significant source of nitrogen dioxide emissions), recent objectives outlined in the Clean Air Strategy seek to recognise wider sources (including smaller contributors and diffuse sources) that contribute to poor air quality. These include power generation, heating homes, producing food, manufacturing consumer goods, and powering transport.
- The STNP will also be required to be in general conformity with the adopted Local Plan which contains polices relating to air quality, alongside the policies of the emerging Local Plan.
- Air Quality Management Areas (AQMAs) are declared in areas which exceed national objectives for levels of particulates, nitrogen dioxide, sulphur dioxide, ozone, benzene, polycyclic aromatic hydrocarbons, butadiene, carbon monoxide, lead and/ or nitrogen oxides. Where exceedances exist, areas are

declared as Air Quality Management Areas (AQMAs) and local authorities are required to produce an Air Quality Action Plan (AQAP) to improve air quality in the area.

• There are two AQMAs in Sevenoaks District as of 2021. The Sevenoaks District Air Quality Action Plan (AQAP) has identified measures to improve air quality and improve the lives of those living within AQMAs as well as the wider population.

### **Current Baseline**

The AQMAs within the STNP area (**Figure A1.1**) have been primarily designated for exceedances in the annual mean concentration objective of  $40\mu g/m^3$  for nitrogen dioxide (NO<sub>2</sub>).



### Figure A1.1: AQMAs within and surrounding the STNP area

The 2021 Air Quality Annual Status Report (ASR)<sup>18</sup> for Sevenoaks District highlights that "the District is traversed by three major motorways and these have a considerable flow of continental HGVs using the port at Dover and the Channel

<sup>&</sup>lt;sup>18</sup> Sevenoaks District Council (2021): 'Air Quality Annual Status Report', [online] available to access here

Tunnel. Local journeys, school runs, commuting to London or connection with London contribute significantly to a number of hot spots in Sevenoaks, Swanley and in several small towns along the A25 road."

Traffic passing through the town centre uses the historic streets and this undermines the environmental quality, particularly on London Road and High Street, and exacerbates air pollution issues. This also includes heavy goods vehicles passing through Sevenoaks town centre which detract from the environment and increase air pollution.

The ASR concludes that "significant improvements in local air quality have been identified in 2020 with only one monitoring location showing levels of NO<sub>2</sub> in exceedance of air quality objectives. The priority [moving forward] is for the finalisation of the new Air Quality Action Plan and for progress to begin on the delivery of the measures detailed within the plan."

Table A1.2 provides further information on the AQMAs within the STNP area.

AQMA	Date designated	Location	Actions outlined in AQAP
No. 13 (A25) <sup>19</sup>	January 2014	Within the northern part of the Town, spanning the length of the A25 from the border with Tonbridge and Malling in the East to the border with Tandridge on the West.	The AQAP for Sevenoaks District was completed prior to the designation of the AQMA. However, the most recently completed ASR for Sevenoaks District states that air quality has improved along this route, but monitoring is encouraged at some locations (albeit outside of the STNP area) to determine whether there are any exceedances of the one-hour NO <sub>2</sub> objective.
No. 10 (Sevenoaks High Street) <sup>20</sup>	September 2006	Within the central section of the Town, encompassing Sevenoaks High Street and sections of Tubs Hill.	The AQAP includes measures which seek to address congestion issues within the AQMA. This includes recommendations such as redesigning and redeveloping the bus station to improve capacity and access and enforcing no parking and waiting time restrictions at the A225 junction between High Street and Buckhurst Lane.

### Table A1.2: AQMA Overview

### **Future Baseline**

New housing and employment provision taken forward within the Neighbourhood Plan area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants.

Improvements to future air quality are dependent, in part, on whether the measures within the AQAP and the Local Transport Plan (later discussed in the Transportation section of Appendix A) are successfully implemented.

<sup>&</sup>lt;sup>19</sup> DEFRA (2021): 'UK AIR: AQMA Details – AQMA No. 13 (A25)'. [online] available to access here

<sup>&</sup>lt;sup>20</sup> DEFRA (2021): 'UK AIR: AQMA Details – AQMA No. 10 (Sevenoaks High Street)', [online] available to access here

### A.2 Biodiversity and Geodiversity

### **Policy Context**

**Table A2.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A2.1: Plans, policies, and strategies reviewed in relation to biodiversity and geodiversity

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
Biodiversity 2020 Strategy	2011
Environment Act	2021
UK Biodiversity Action Plan	2007
The Natural Environment and Rural Communities Act	2006
Kent Biodiversity Action Plan	1997
Kent Nature Partnership Biodiversity Strategy (2020- 2045)	2020

The key messages emerging from the review are summarised below:

- The STNP will be required to be in general conformity with the NPPF, which provides significant emphasis on improving biodiversity and securing measurable net gains in development, alongside protection and conservation of designated sites and important species and habitats. This includes utilising a strategic approach to maintaining and enhancing networks of habitats and green infrastructure at the wider catchment or landscape scale. Support is given to establishing coherent ecological networks that are more resilient to current and future pressures, particularly in consideration of climate change.
- Over the past decade policy (e.g. The Natural Environment White Paper and Biodiversity 2020) has demonstrated a move away from the traditional approach of protecting biodiversity, to a wider landscape approach to enhancing biodiversity, as part of the overall aims to halt biodiversity loss.
- The 25 Year Environment Plan places emphasis on improvements to the natural environment; identifying the need to *"replenish depleted soil, plant trees, support wetlands and peatlands, rid seas and rivers of rubbish, reduce greenhouse gas emissions, cleanse the air of pollutants, develop cleaner, sustainable energy and protect threatened species and habitats."* Working at a landscape scale transformation is expected to connect habitats into larger corridors for wildlife.
- The Environment Act provides further provisions in relation to biodiversity when granted royal assent. The Act sets parameters for biodiversity gain as a condition of planning permission, as well as biodiversity gain site registers and biodiversity credits. The Act also identifies a general duty to conserve and enhance biodiversity, including through biodiversity reports and local nature recovery strategies. Local nature recovery strategies will identify biodiversity priorities for the strategy area as well as a local habitat map. Furthermore, habitat maps are expected to include recovery and enhancement areas which are (or have the potential to become) important for biodiversity.

- The Kent Biodiversity Action Plan and Nature Partnership Biodiversity Strategy provide guidance to enable the conservation and enhancement of biodiversity in the County.
- The STNP will also be required to be in general conformity with the adopted Local Plan which contains policies directly relating to biodiversity and geodiversity, and emerging policies in the emerging Local Plan.

### **Current Baseline**

#### International and nationally designated sites

There are no internationally designated sites within the Neighbourhood Plan area. The nearest internationally designated sites are over 15km to the north east and to the south of the STNP area, specifically: Thames Estuary & Marshes Ramsar and Special Protection Area, and Ashdown Forest Special Area of Conservation.

Sites of Special Scientific Interest (SSSI) are protected by law to conserve their wildlife or geology. Natural England is a statutory consultee on development proposals that might impact on SSSIs. There are three SSSIs located within and adjacent to the boundaries of the Neighbourhood Plan area, described in further detail below.

### Sevenoaks Gravel Pits SSSI

Designated in January 1989 and covering an area of approximately 73.7 ha, Sevenoaks Gravel Pits SSSI (also designated as a Kent Wildlife Trust Reserve and known locally as Sevenoaks Wildlife Reserve) is located within the north western section of the STNP area. The SSSI is one of the area's most valuable ecological assets. It serves both as a recreational and educational resource. The SSSI provides a wonderful tranquil environment, with a network of paths that provide access to bird hides alongside the water bodies. In 2020 Kent Wildlife Trust introduced a circular walk which enhances the appeal of the SSSI further for walkers. Kent Wildlife Trust also have ambitions to construct a new 'Nature and Wellbeing Centre' on the site of their current visitor centre. This will help attract new visitors to the Reserve. The citation for the SSSI states<sup>21</sup>:

"The interest of this group of lakes, formed by the flooding of the former gravel workings and fed by the River Darenth, centres on its breeding bird populations. Extensive landscaping to create shallows, spits and islands, and the planting of trees and aquatic plants have provided conditions suitable for both breeding and wintering birds.

"The most numerous breeding species are Canada and greylag geese, mallard and tufted duck. Many other water birds breed including great-crested grebe, kingfisher, moorhen, and coot. Wintering and passage wildfowl include pochard, shelduck, teal and shoveler, and passage waders are also attracted including greenshank and green sandpiper. The uncommon little ringed plover is a regular breeding species here.

"The woodland and reed beds support a typical range of song birds including whitethroat, reed, and sedge warblers. There is also a large rookery, and a sand martin colony in a sand face in the south of the site."

<sup>&</sup>lt;sup>21</sup> Natural England (no date): 'Sevenoaks Gravel Pits SSSI', [online] available to access here

Based on the most recently completed condition assessments for the Sevenoaks Gravel Pits SSSI in 2009, the site was classified as being in a 'favourable' condition.

### Greatness Brickworks SSSI

Designated in November 1987 and covering an area of approximately 7.7 ha, Greatness Brickworks SSSI is located at the northern extent of the STNP area, at the boundary between Sevenoaks Civil Parish (CP) and Otford CP. The citation for the SSSI states<sup>22</sup>:

"This pit is a classic Cretaceous ammonite locality and is of vital importance in biostratigraphic research on the Gault of the Weald. The celebrated and extremely fossiliferous 'lautus Zone nodule bed' which represents local condensation (thin, very slowly deposited beds), and containing faunal elements of nitidus, daviesi and cristatum Subzone ages, is well exposed near the top of the succession. The lautus Zone Gault is absent or greatly attenuated over much of the Weald and therefore its presence here fills a considerable gap in the local succession."

Based on the most recently completed condition assessments for the Greatness Brickworks SSSI in 2012, the site was classified as being in a 'favourable' condition.

### Knole Park SSSI

Designated in March 1991, Knole Park covers most of the south eastern section of the STNP area and is a relatively extensive area comprising approximately 383.3 ha of acidic grassland, parkland, woodland, and several ponds. The citation for the SSSI states<sup>23</sup>:

"The first emparkments took place in the fifteenth century and probably included woodlands and have been managed as parklands to the present day. This continuity of habitat and management has led to the development of a parkland with ancient pollards believed to provide a direct link with the wildwood, together with more recent plantations. The soils which derive from these strata are generally acidic and welldrained and support woodland stands dominated by sessile oak Quercus petraea, beech Fagus sylvatica and sweet chestnut Castanea sativa with some field maple Acer campestre, ash Fraxinus excelsior, downy birch Betula pubescens, sycamore Acer pseudoplatanus and hawthorn Crataegus monogyna.

"The central plateau supports species-poor acidic grasslands between the woodland areas. Common bent Agrostis capillaris dominates the turf, with sheep's fescue Festuca ovina, sweet vernal-grass Anthoxanthum odoratum, heath grass Danthonia decumbens, tormentil Potentilla erecta, sheep's-sorrel Rumex acetosella and heath bedstraw Galium saxatile. The sward contains numerous ant hills. More fertile grasslands occur on the golf course and in the valley bottoms.

"The site supports a range of nationally rare and nationally scarce invertebrate species which depend upon the parkland and woodland habitats, particularly on their dead wood components. Many species of fungus have [also] been recorded from the site. Among the many which have restricted distributions are some living under trees, such as an earth star Geastrum fornicatum and a tube-gilled toadstool Boletus pruinatus, and many associated with dead wood."

<sup>&</sup>lt;sup>22</sup> Natural England (no date): 'Greatness Brickworks SSSI', [online] available to access here

<sup>&</sup>lt;sup>23</sup> Natural England (no date): 'Knole Park SSSI', [online] available to access here

Based on the most recently completed condition assessments for Knole Park SSSI between 2012 and 2021, approximately 27.3% of the SSSI is classified as being in a 'favourable' condition. The remaining 72.4% of the SSSI is classified as being in an 'unfavourable – recovering', condition.

### Additional SSSIs

In the wider context, there are six additional SSSIs located within an approximate 2km radius from the STNP area, including: Otford to Shoreham Downs SSSI (to the north); Oldbury and Seal Chart SSSI (to the east); One Tree Hill and Bitchet Common SSSI (to the east); Hubbard's Hill SSSI (to the south); Scords Wood and Brockhoult Mount SSSI (to the south west); and Dryhill SSSI (to the west) which is also designated as a Local Nature Reserve.

### SSSI Impact Risk Zones

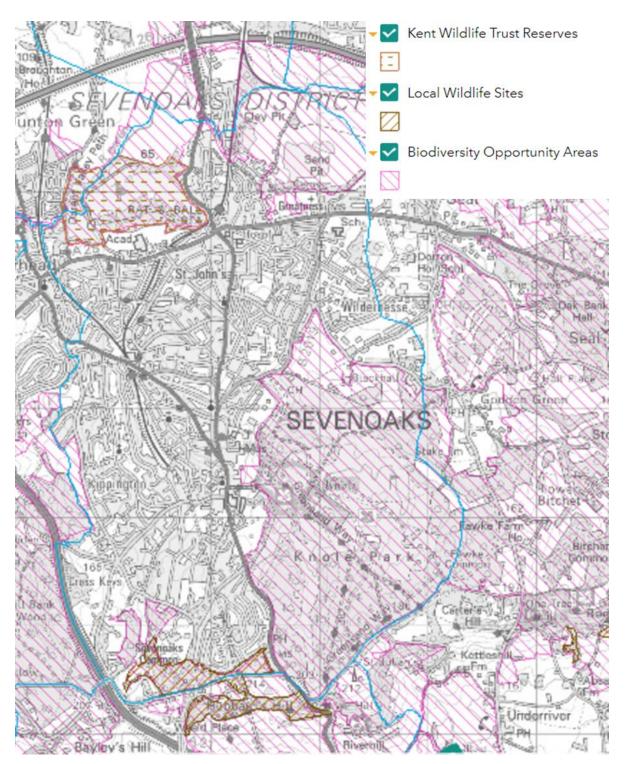
SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential, and rural non-residential.

Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, most of the Neighbourhood Plan area overlaps with one or more SSSI IRZs for the types of development likely to come forward during the plan period (i.e. residential, rural residential, and rural non-residential development types).

### Locally important sites

There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of deciduous woodland, good quality semi-improved grassland, lowland dry acid grassland, lowland heathland, and traditional orchard.

Local Wildlife Sites (LWS) and Biodiversity Opportunity Areas (BOAs) represent some of the most significant areas of semi-natural habitat in Sevenoaks District outside of statutory protected sites. As shown in **Figure A3.1** below, most of the areas surrounding Sevenoaks Town comprise LWS and BOAs, sharing overlapping designations with the SSSIs discussed earlier in this chapter.



### Figure A3.1: Locally important ecological sites within the STNP area

The Environmental Records Centre for Kent and Medway<sup>24</sup> contains records of protected or notable species within the Neighbourhood Plan area. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority

<sup>&</sup>lt;sup>24</sup> Kent and Medway Biological Records Centre (2021): 'Kent's Local Environmental Records Centre' [online] available to access <u>here</u>

Habitats and ecological designations within and surrounding the Neighbourhood Plan area are likely to support populations of protected species.

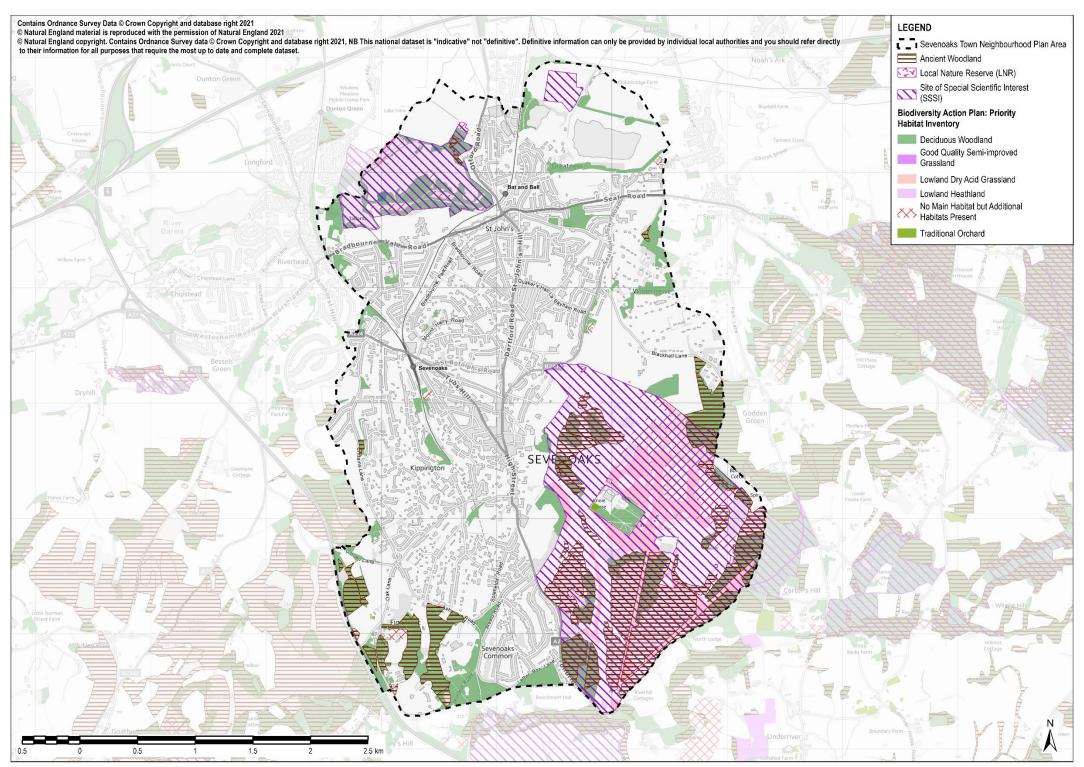
The figure below shows the location of the designated sites and BAP Priority Habitats within and within proximity to the Neighbourhood Plan area.

### **Future Baseline**

Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

International and nationally designated sites are particularly sensitive to air quality issues and recreational pressures. Regarding air quality, exceeding critical values for air pollutants may result in changes to the chemical status of habitat substrate, accelerating or damaging plant growth, altering vegetation structure and composition and thereby affecting the quality and availability of nesting, feeding or roosting habitats. Additionally, the nature, scale, timing, and duration of some human activities can result in the disturbance of species at a level that may substantially affect their behaviour, and consequently affect the long-term viability of their populations.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment, and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.



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### A.3 Climate Change

### **Policy Context**

**Table A3.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A3.1: Plans, policies, and strategies reviewed in relation to climate change

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
UK Climate Change Act	2008
UK (second) National Adaptation Programme 2018 to 2023	2018
The Clean Air Strategy	2019
Clean Growth Strategy	2019
UK Sixth Carbon Budget	2020
25-Year Environment Plan	2019
National Infrastructure Assessment	2018
UK Climate Change Risk Assessment	2017
Flood and Water Management Act	2010
National Flood and Coastal Erosion Risk Management Strategy	2020
How Local Authorities Can Reduce Emissions and Manage Climate Change Risk	2012
The National Design Guide	2021
Heat Networks: Building a Market Framework	2020
Summary of Climate Change Risks for England Report	2017
Kent and Medway Energy and Low Emissions Strategy	2020

The key messages emerging from the review are summarised below:

- The STNP will be required to be in general conformity with the NPPF, which requires proactive planning to both mitigate and adapt to climate change. Planning policies are expected to improve the resilience of communities and infrastructure to climate change impacts, avoid inappropriate development in the flood plain, and support the move to a low carbon economy. The NPPF recognises the potential for planning to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and deliver long-term resilience, including through reuse, regeneration, and conversion.
- The Clean Growth Strategy, Clean Air Strategy and the 25-year Environment Plan are a suite of documents which seek to progress the government's commitment under the UK Climate Change Act to becoming net zero by 2050. The documents set out detailed proposals on how the government will tackle all sources of air pollution, whilst maintaining an affordable energy supply and increasing economic growth. This parallels with the 25-year Environment Plan, which further seeks to manage land resources sustainably, recover and reinstate nature, protect soils and habitats, increase resource efficiency, improve water quality, and connect people with the environment. The documents also interlink

with the government's commitment to decarbonising transport, a recognised challenge that needs more work in a timely manner if government are to achieve net zero targets. Furthermore, the decarbonisation plan recognises the twinned need to undertake action to adapt the transport sector and increase resilience to climate change risks; and this challenge is more directly addressed through the UK's National Adaptation Programme.

• The STNP will also be required to be in general conformity with the adopted Local Plan which contains policies relating to climate change mitigation and adaptation, including flood risk, green infrastructure (GI) development, resource efficiency, air quality, water quality, sustainable transport, and accessibility. The STNP will also need to acknowledge the policies in the emerging Local Plan.

### **Current Baseline**

### Contribution to climate change

In June 2019 the government committed to reaching 'net zero' carbon emissions by 2050. At the Sevenoaks District Council Full Council meeting on 19 November 2019 the Council agreed the aspiration to be Net Zero by 2030. The Council's proposed actions for 2021/22 include (amongst others):

- Improving energy and water efficiency measures in buildings
- Supporting and promoting green travel
- Making the best use of green spaces
- Reporting carbon emissions and measures to reduce these emissions
- Encouraging and supporting sustainable new buildings and renewables.

CO<sub>2</sub> emissions from the built environment are monitored and recorded at Local Authority level. In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change<sup>25</sup> suggests that Sevenoaks has broadly similar per capita emissions in comparison to Kent, South East England, and England as a whole, since 2005. Sevenoaks has also seen a 37% reduction in the percentage of total emissions per capita between 2005 and 2019, slightly lower than the reductions for Kent (51%), South East England (43%), and England (42%).

Road transport is the largest emitter of GHG in the UK, with cars contributing 55% of UK domestic transport emissions. Kent has a high dependency on private vehicles, with a large proportion of the population commuting by car. The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions.

In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030. Based on a high-level search using Google Maps, there are four ULEV charging points in Sevenoaks, with three more just outside the Neighbourhood Plan area. Two of these charging points are along the A25.

<sup>&</sup>lt;sup>25</sup> UK Gov (2017): 'Local Authority CO<sub>2</sub> emissions estimates 2005-2017 (kt CO<sub>2</sub>) - Full dataset' [online] available here

### Effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)<sup>26</sup> team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the South East during the period 2020-2039 compared to the period 1981-2000, are likely to be as follows:<sup>27</sup>

- A central estimate of increase in annual mean temperatures of between 0°C and 1°C; and
- A central estimate of change in mean precipitation of 0 to +10% in winter and 0 to -10% in summer.

During the period 2040-2059 this is estimated further as:

- A central estimate of increase in annual mean temperatures of between 1°C and 2°C; and
- A central estimate of change in annual mean precipitation of 0 to +20% in winter and -10% to -20% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100-year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

### Flood risks

Sevenoaks is at risk from several types of flooding, including fluvial, surface water, groundwater, sewage, and drainage. The main source of flooding in the Neighbourhood Plan area is the River Darent which flows through northern

<sup>&</sup>lt;sup>26</sup> Data released 26th November 2018 [online] available here

<sup>&</sup>lt;sup>27</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available here

Sevenoaks. Climate change and more extreme weather situations could increase the risk of flooding in the future.

According to the Strategic Flood Risk Assessment (SFRA) for Sevenoaks District<sup>28</sup>, the River Darent has previously flooded in 1968, 2000, 2002 and 2013/14. Areas of Flood Zone 2 and Flood Zone 3 (i.e. areas with the highest risk of fluvial flooding within the STNP area) are broadly confined to the areas of and surrounding the River Darent. This includes areas of land within Sevenoaks Wildlife Reserve (overlapping with Bradbourne Lakes). Most of Sevenoaks Town is within Flood Zone 1 and has a low fluvial flood risk.

Surface water run-off from development can exacerbate the risk of flooding by increasing the run-off from land to water courses. There are several areas of Sevenoaks which have a medium-high surface water flood risk, primarily impacting the local road network. Specifically, the SFRA states:

"The primary source of surface water flooding [is] attributed to heavy rainfall overloading carriageways and drains/gullies, but other sources of flooding have been caused by blockages or high levels within receiving watercourses impeding free discharge from surface water drains and gullies."

Fluvial flood risk and surface water flood risk areas within and surrounding Sevenoaks Town is shown within **Figure A3.1** and **Figure A3.2** below.

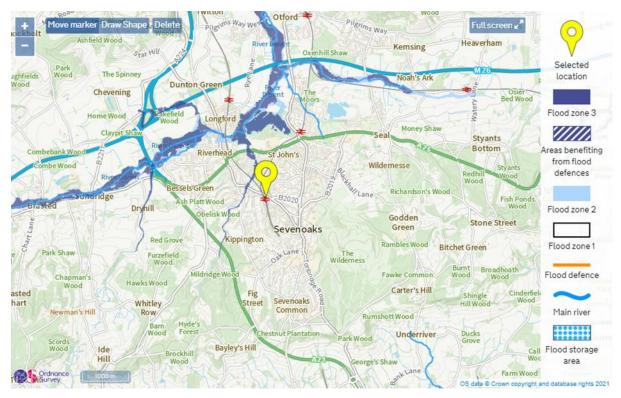
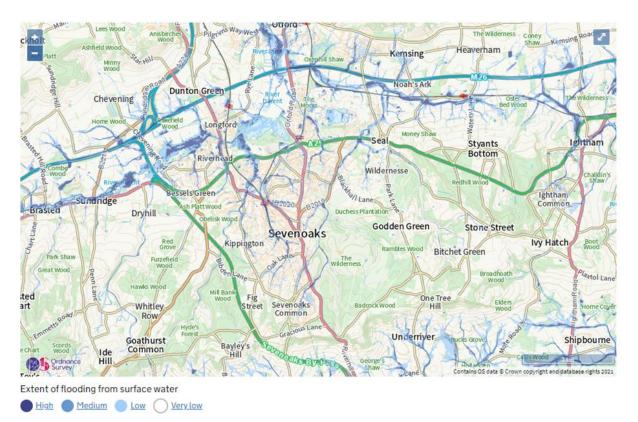


Figure A3.1: Fluvial flood risk in the Neighbourhood Plan Area<sup>29</sup>

<sup>&</sup>lt;sup>28</sup> Sevenoaks District Council (2017): Strategic Flood Risk Assessment – Main Report', [online] available to access here

<sup>&</sup>lt;sup>29</sup> GOV UK (2020): 'Flood Map for Planning', [online] available to access <u>here</u>



### Figure A3.2: Surface water flood risk within the Neighbourhood Plan area<sup>30</sup>

### **Future Baseline**

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

<sup>&</sup>lt;sup>30</sup> GOV UK (2020): 'Flood Map for Planning', [online] available to access here

### A.4 Landscape and Townscape

### **Policy Context**

**Table A4.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A4.1: Plans, policies, and strategies reviewed in relation to landscape

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
The National Design Guide	2019
National Model Design Code	2021
Kent Downs AONB Management Plan	2021
Sevenoaks Residential Character Area Assessment Supplementary Planning Document (SPD)	2012

The key messages emerging from the review are summarised below:

- The STNP will be required to be in general conformity with the NPPF which gives great weight to conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- The NPPF recognises the role of green infrastructure in landscape settings, as well as the importance of designated biodiversity sites, habitats, woodland, historic features, agricultural land, and cultural landscapes. The positive contribution that land remediation can make in terms of addressing despoiled, degraded, derelict, contaminated and unstable land is also recognised.
- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces.
- The STNP will also be required to be in general conformity with the adopted Local Plan which contains polices relating to landscape and townscape quality, alongside the policies of the emerging Local Plan.

### **Current Baseline**

Nationally protected landscapes

### Kent Downs AONB

Sevenoaks is surrounded by the Kent Downs Area of Outstanding Natural Beauty (AONB) and the town's relationship with the countryside is an important part of its character. The setting of the Kent Downs has great value and was a principle reason for the Kent Downs AONB designation.

The rich landscape of the Kent Downs AONB is made up of landscape components with special characteristics and qualities which together distinguish it as a landscape of national and international importance and underpin its significance and natural beauty. The Covid-19 pandemic has brought a new spotlight on the importance of contact with nature and beauty and places as people sought to reconnect and escape to open and green spaces. The key landscape components of Kent Downs have been identified as:

- Dramatic landform and views; a distinctive landscape character;
- Biodiversity-rich habitats;
- Farmed landscape;
- Woodland and trees;
- A rich legacy of historic and cultural heritage;
- Geology and natural resources; and
- Tranquillity and remoteness.

The Kent Downs AONB Management Plan sets out the vision of the future of this special landscape. It seeks to address key issues and threats and sets out aims, and policies and actions for the positive management of the Kent Downs for a five-year period overseen by a 20-year vision, as follows:

"In 2041... the qualities and distinctive features of the Kent Downs AONB, the dramatic south-facing scarp, far-reaching views, secluded dry valleys, network of tiny lanes, isolated farmsteads, churches and oasts, orchards, dramatic cliffs, the ancient woodlands and delicate chalk grassland along with the ancient, remote and tranquil qualities, are valued, secured and strengthened."

The goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, maintained, and strengthened well into the future.

### Metropolitan Green Belt

Paragraph 137 within the NPPF states that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence."

In the context of the above, most of the land which surrounds the town is part of the Metropolitan Green Belt and this has both protected the countryside setting from development and restricted opportunity for growth.

### Landscape and townscape character

The STNP covers an extensive area of approximately 1,600 ha that encompasses both the built-up portion of the town and a significant area of the open countryside within which it is set, including Knole Park. Sevenoaks is set within rolling countryside with attractive views northwards to the Kent Downs.

To the north of the town the landscape has been exploited to extract sand and gravel, and this provides a legacy of waterbodies and waterside habitats at the Sevenoaks Wildlife Reserve.

The town centre is the focal point for most of Sevenoaks' shops, leisure, and commercial uses but it is not uniform in character. Much of the built fabric is historic but different parts of the centre are influenced by the activities and uses that take place within them. This is reflected in the scale and massing of buildings, the way buildings animate the streets, the streets, and spaces themselves and the layout of development. Some parts of the centre are more attractive than others and, in some areas, there is opportunity for change and enhancement. The town centre has been classified into the following eight townscape character areas:

- Character Area 1: London Road / Station Approach: a predominantly linear area that follows the London Road corridor between the town centre and Sevenoaks station).
- **Character Area 2: South Park:** on the south-western edge of the town, it is a small, but distinctive, area characterised by post-war commercial buildings.
- Character Area 3: London Road and High Street: development follows a traditional high street pattern with a fine grain of continuous frontages and active uses at ground floor.
- **Character Area 4: Bligh's Meadow:** a modern shopping development located between London Road and High Street in the northern part of the town centre, and it is a pleasant location for pedestrians to wander around the shops.
- **Character Area 5: The Shambles:** important area within the commercial part of the town and includes picturesque streets and paths which provide a tranquil environment away from the main streets and an opportunity to sit outside.
- **Character Area 6: Upper High Street:** provides an attractive approach into the town from the south and includes the former Royal Oak Hotel, Sevenoaks School, Knole House, and St Nicholas Church (one of the town's most important landmarks) are accessed from the area and this causes local congestion.
- Character Area 7: Suffolk Way / High Street Backlands: fragmented part of the town largely composed of a series of service yards, car parks and vacant plots. The town's bus station is located within the area on Buckhurst Lane. The area has historically suffered from a lack of investment.
- **Character Area 8: Cultural Quarter:** located to the eastern edge of the town centre. It includes the town's leisure centre, library, and museum as well as a number of office buildings. Hidden from the town centre, wayfinding and connections between this area is poor.

The District Council prepared and adopted a Residential Character Area Assessment in 2012. This identifies the locally distinctive character and provides design guidance for residential areas within Sevenoaks to assist the Council in making decisions about the appropriateness of development proposals. The Character Area Assessment identifies 15 residential character types, and design guidance for each is provided. These are shown below in **Figure A4.1**.

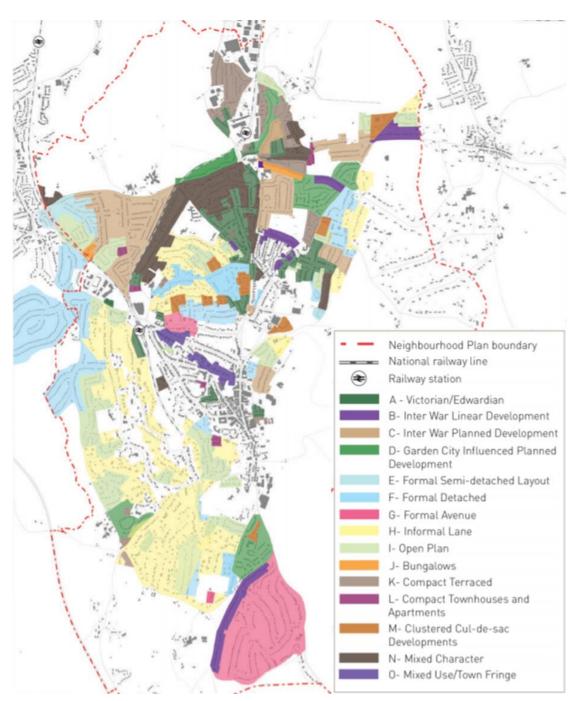


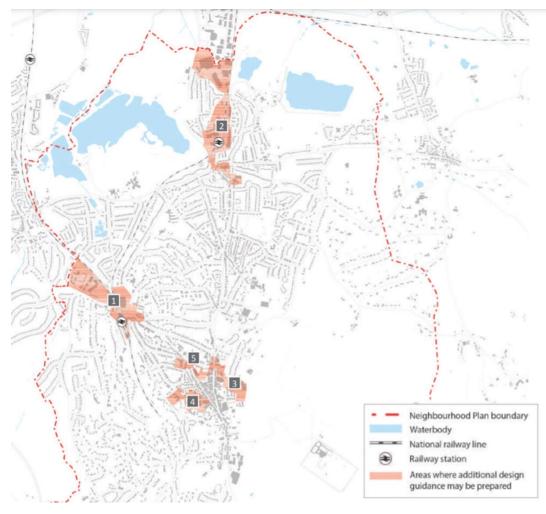
Figure A4.1: Residential Character Areas (taken from the draft STNP)

The Sevenoaks Residential Character Area Assessment Supplementary Planning Document (SPD) is particularly relevant as it is specific to Sevenoaks and identifies distinctive local features of interest.

It is useful to note that many of the areas not covered by the Residential Character Area Assessment have been identified by the Town Council's town-wide questionnaire as areas the public would like to see improved. This includes the following areas (as shown in **Figure A4.2** below):

- 1. The area around Sevenoaks station;
- 2. Around Bat and Ball station and other areas in Northern Sevenoaks;
- 3. Buckhurst Lane area including the Sencio Leisure Centre, the library and museum and associated car parks;

- 4. The South Park area including The Stag and Post Office / BT Exchange;
- 5. Around the Sevenoaks District Council offices on London Road / Argyle Road.



### Figure A4.2: Areas where additional design guidance may be prepared

Site visits and public consultation carried out as part of the preparation of the STNP also revealed several locations where the public realm could be improved. The following issues were identified:

- Poor quality and badly signed routes between town centre destinations including the cultural facilities, town centre car parks, main shopping areas and open spaces (such as Knole and The Vine);
- Unattractive secondary connections along lanes and alleys connecting the town centre to car parks on Buckhurst Lane and to the leisure centre, library and museum;
- Sub-standard crossing facilities within the town centre and at junctions including High Street with Pembroke Road and London Road with Pembroke Road;
- Narrow footways especially along London Road in the town centre, on Seal Road and in St John's neighbourhood centre; and
- The prevalence of street clutter across the town centre including bins, shop displays, advertising A-boards, dated poor quality signage and tables and chairs, and a lack of co-ordination in the design of street furniture.

### Locally valued landscape and townscape features

A particular feature of Sevenoaks is its trees. Sevenoaks is famed for its oaks but there are many other species and individual trees that are important to the character of the town. Sevenoaks District Council have also designated Tree Preservation Orders (TPOs) in the interest of their amenity value (**Figure A4.3**).

Whilst many of the town's trees benefit from the protection afforded by TPOs many others, that contribute to the town's character, are not protected. The Sevenoaks Society has been locating, recording, and celebrating some of the most important trees under a project known as 'The Remarkable Trees of Sevenoaks'. Trees were grouped into the following categories: champion trees, heritage trees, ancient trees, and unusual trees. However, the results of this exercise have not been formally recorded.

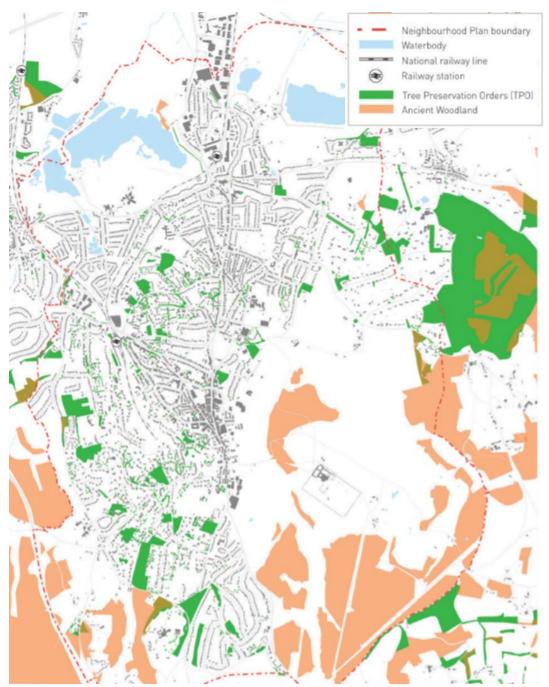


Figure A4.3: Important trees within the STNP area

Gateways and arrival points into the town which contribute to the local character of the STNP area include (as shown in **Figure A4.4** below):

- 1. Sevenoaks station / Station Square;
- 2. Otford Road;
- 3. Seal Road;
- 4. Tonbridge Road;
- 5. Bradbourne Vale Road;
- 6. Bat and Ball junction and station;
- 7. The junction of Seal Road with Greatness Lane and Hospital Road;
- 8. The Vine;
- 9. London Road / High Street junction; and
- 10. London Road / Pembroke Road junction.

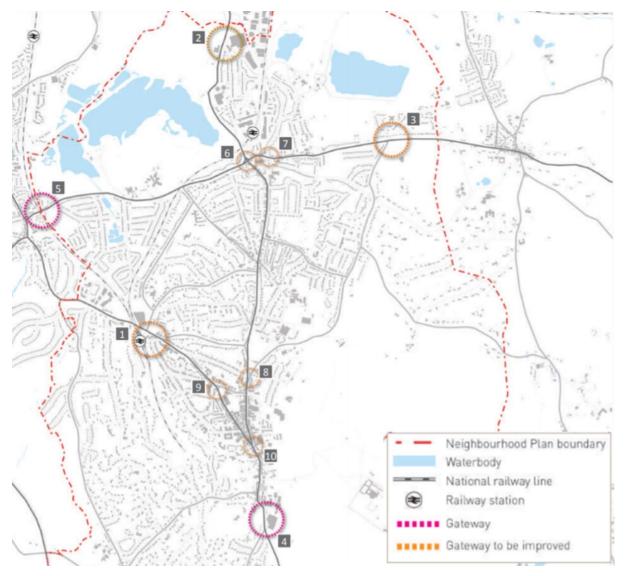


Figure A4.4: Gateways and arrival points into the town

Local landmarks include St John's United Reformed Church; Bandstand and The Vine Pavilion; Old Market House, High Street; St Nicholas Church tower, High Street; War Memorial; and Knole House in Knole Park.

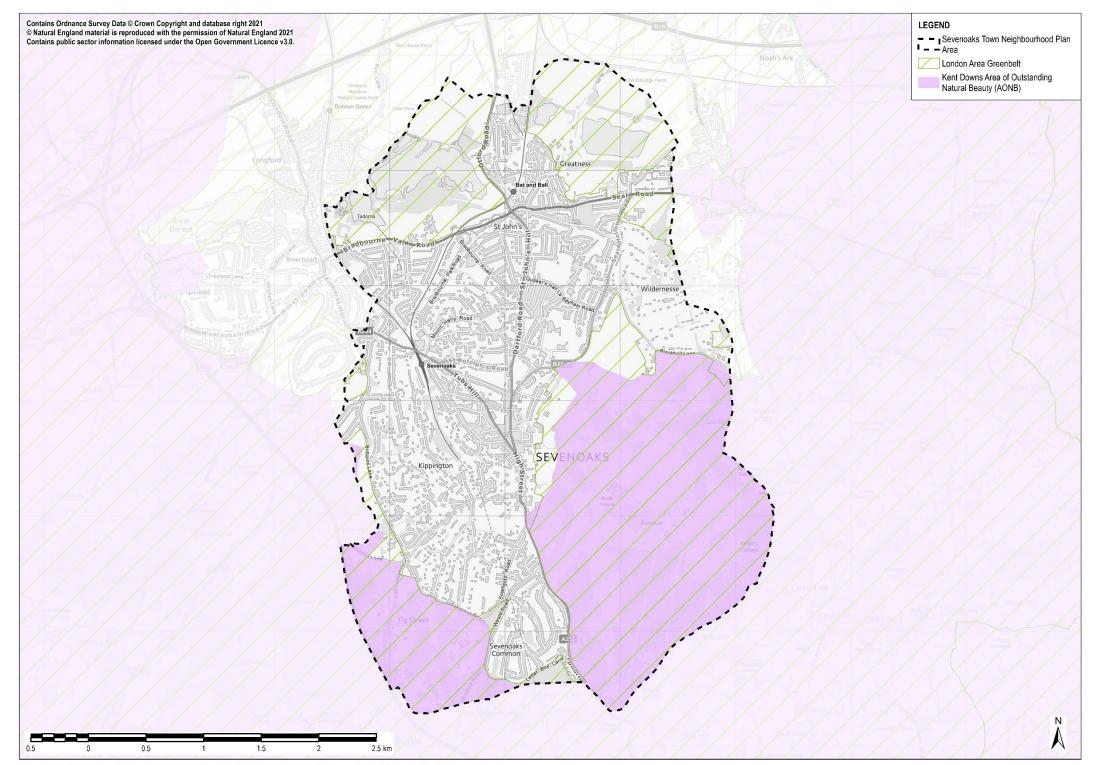
### Visual amenity

The undulating nature of the topography, with the town centre located on elevated land, means that views to the surrounding Kent Downs are experienced from numerous locations such as The Vine, Quaker's Hall Allotments and Hollybush Recreation Ground. These enhance the sense of connection with the landscape and add to the overall character of the town.

### **Future Baseline**

New development, including infrastructure development, has the potential to lead to incremental changes in landscape and townscape quality in and around the STNP area. In the absence of the Neighbourhood Plan, more speculative development may come forward within the open countryside or countryside setting, which could place increased pressure on local settings. This may negatively impact upon the landscape and townscape features which contribute to the distinctive character, in particular the unique and special qualities of the Kent Downs AONB and Metropolitan Green Belt.

However, locally distinctive landscape and townscape features, characteristics and special qualities can be protected, managed, and enhanced through the Neighbourhood Plan. New development that is appropriately designed and landscape-led has the potential to support the area's inherent landscape character and quality. This may, for example, include regeneration and brownfield development that improves the town setting, delivering green infrastructure improvements and/ or new recreational opportunities and enhanced framing of key views.



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### A.5 Historic Environment

### **Policy Context**

**Table A5.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A5.1: Plans, policies, and strategies reviewed in relation to the historic environment

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The 25 Year Environment Plan	2018
The National Design Guide	2019
National Model Design Code	2021
Historic England Advice Note 1: Conservation Area Appraisal, Designation and Management	2019
Historic England Advice Note 3: The Setting of Heritage Assets	2017
Historic England Advice Note 8: Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	2016
Sevenoaks High Street Conservation Area Appraisal and Management Plan	2008
Sevenoaks, The Vine: Conservation Area Appraisal and Management Plan	2009
Sevenoaks, Vine Court: Conservation Area Appraisal and Management Plan	2009
Sevenoaks Hartslands Conservation Area Appraisal and Management Plan	2011
Sevenoaks, Granville and Eardley Road: Conservation Area Appraisal and Management Plan	2009
Sevenoaks Kippington and Oakhill Road: Conservation Area Appraisal and Management Plan	2009
Sevenoaks, Brittains Farm: Conservation Area Appraisal and Management Plan	2011
Sevenoaks, Wildernesse: Conservation Area Appraisal and Management Plan	2010

The key messages emerging from the review are summarised below:

- The key high-level principles for the conservation and enhancement of the historic environment are as follows:
  - o The historic environment is a shared resource
  - Everyone should be able to participate in sustaining the historic environment
  - o Understanding the significance of places is vital
  - Significant places should be managed to sustain their values
  - Decisions about change must be reasonable, transparent, and consistent
  - Documenting and learning from decisions is essential.

- The significance of places is the key element which underpins the conservation and enhancement of the historic environment as well as gives conserving and enhancing protected landscapes, as well as landscape character and scenic beauty. Significance is a collective term for the sum of all the heritage values attached to a place, be it a building an archaeological site or a larger historic area such as a whole village or landscape.
- The 25-year Environment Plan and National Design Guide complement each other with their aims for a cleaner, greener country which puts the environment first and celebrates the variety of natural landscapes and habitats. Design is focused on beautiful, enduring, and successful places, which respond to local character and provide a network of high quality green open spaces (which often contribute to the setting of heritage assets).
- The STNP will be required to be in general conformity with the NPPF, which ultimately seeks to conserve and enhance historic environment assets in a manner appropriate to their significance. The NPPF seeks planning policies and decisions which are sympathetic to local character and history without preventing or discouraging appropriate innovation of change. Planning Practice Guidance expands on the NPPF recognising the proactive rather than passive nature of conservation.
- The role of the historic environment, as part of healthy and thriving ecosystems, landscapes, and cultural values, including settlement identity, is reiterated through the key messages of the 25 Year Environment Plan and National Design Guide.
- Historic England's Advice Notes provide further guidance in relation to the conservation and enhancement of the historic environment. Of relevance for the STNP is the emphasis on the importance of:
  - Understanding the different types of special architectural and historic interest which underpin designations, as well as how settings and/ or views contribute to the significance of heritage assets.
  - Recognising the value of implementing controls through neighbourhood plans, conservation area appraisals and management plans; and
  - Appropriate evidence gathering, including clearly identifying those issues that threaten an area or assets character or appearance and that merit the introduction of management measures.
- The STNP will also be required to be in general conformity with the Local Plan which contains policies directly relating to the historic environment, townscape, and landscape. The Neighbourhood Plan will also need to acknowledge the emerging policies in the emerging Local Plan.
- In addition to conserving the historic environment, the STNP should seek to identify opportunities to enhance the fabric and setting of the historic environment. It should also seek to rejuvenate features and areas which are at risk of neglect and decay.

### **Current Baseline**

#### Historic character of Sevenoaks

An overview of the historic character and evolution of Sevenoaks Town is provided below and has been collated and summarised from the draft version of the STNP.

"Early records of Sevenoaks date back to the 13th Century when a market was first held here. Flemish weavers settled in the area in the 14th Century and their industry was to flourish in the district for 300 years. Tradition has it that Sevenoaks is named after a conspicuous group of oak trees that existed over 1,000 years ago near the summit of the hill on Sevenoaks Common.

"Most early development in Sevenoaks focused around the town centre along the main roads (London Road and High Street). This original core area has been well preserved and is a highly recognisable and distinctive part of the town. The settlement grew from the 15th Century after the construction of Knole House, between 1456 and 1486. The house, which still stands today, has been extended many times through history and is now one of England's largest homes and an important local landmark.

"The structure of the town, with the market located within The Shambles area between the High Street and London Road, was well established by the 17th Century, providing the area with a rich assortment of productive occupations. Land to the north of Sevenoaks was largely agricultural with a number of estates including Wildernesse, Bradbourne, Greatness and Montreal.

"The railway arrived in Sevenoaks in the mid-19th Century. The first station, Bat and Ball, opened in 1862, followed by Sevenoaks station in 1868. Both stations were located to the north of the town centre. This spurred a northward expansion of the town with streets of new houses providing a mix of terraced, semi-detached and detached properties.

"Expansion of the town continued throughout the 20th Century. However, the designation of the Green Belt and the presence of other important landscapes, including Knole Park and the Kent Downs AONB, has limited the potential for further expansion of the town through the post-war years."

### Designated heritage assets and areas

The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.

An overview of the designated historic environment assets present in the Neighbourhood Plan area is provided below.

### Listed buildings

Listed building are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.<sup>31</sup> According to the National Heritage List for England<sup>32</sup>, the Neighbourhood Plan area contains 213 listed

<sup>32</sup> Historic England (2020): 'National Heritage List for England – Advanced Search', [online] available to access here

<sup>&</sup>lt;sup>31</sup> Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available to access here

buildings, including two Grade I listed buildings, 14 Grade II\* listed buildings and 197 Grade II listed buildings. The Grade I and Grade II\* listed buildings are as follows:

- Garden Walls adjoining Knole (Grade I)
- Knole (Grade I)
- Almshouses (Grade II\*)
- 13, High Street, Sevenoaks (Grade II\*)
- 15, High Street, Sevenoaks (Grade II\*)
- 17, High Street, Sevenoaks (Grade II\*)
- Chantry House including entrance gateway and screen wall to courtyard (Grade II\*)
- Bradbourne Farmhouse (Grade II\*)
- Archway connecting to the Almshouses (Grade II\*)
- Side screen walls connecting the Almshouses (Grade II\*)
- The Old House (Grade II\*)
- The Red House including entrance gateway, railings, and side brick walls to forecourt (Grade II\*)
- Church of Saint Nicholas (Grade II\*)
- Wickhurst Manor (Grade II\*)
- Long Barn (Grade II\*)
- Sevenoaks School (Grade II\*)

The town-wide questionnaire carried out as part of the evidence base for this Plan revealed that a vast majority of respondents thought that buildings of historical significance should be preserved (79% of 883 respondents ranked this as high priority).

### Scheduled monuments

The Ancient Monuments and Archaeological Areas Act (1979)<sup>33</sup> allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites which are protected under the Act. In this regard, there are is one scheduled monument within the north eastern section of the Neighbourhood Plan area, specifically:

• **Bowl barrow in Millpond Wood:** The monument includes a bowl barrow situated on the crest of a prominent sandy ridge. The barrow has an oval mound 33m east-west by 28m north-south and is 1.8m high. Surrounding this is a ditch from which material was quarried during the construction of the monument. Although no longer visible at ground level, having become infilled over the years, the ditch survives as a buried feature c.3m wide<sup>34</sup>.

<sup>&</sup>lt;sup>33</sup> Ancient Monuments and Archaeological Act (1979) [online] available to access here

<sup>&</sup>lt;sup>34</sup> Historic England (2021): 'Bowl barrow in Millpond Wood', [online] available to access here

### Historic parks and gardens

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. In this respect, the Grade I listed 'Knole' Registered Park and Garden covers an extensive area of land within the south eastern section of the STNP area (sharing an overlapping designation with the Knole Park SSSI, as previously discussed within Chapter 3 of this Scoping Report).

"The registered site comprises 10.5 ha of walled ornamental gardens, surrounded by a further 378 ha of deer park, woodland, and golf course. The park lies on undulating ground which rises generally from the north-west to the crest of an east to west ridge to the south. The southern half of the western boundary is formed by the A225 while the northern half abuts the edge of the centre of Sevenoaks and the buildings of Sevenoaks School. To the north and east, the park is bordered by well-wooded farmland dotted with hamlets and enjoys extensive views to the North Downs."<sup>35</sup>

### **Conservation areas**

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>36</sup>.

Much of Sevenoaks' historic character has been preserved to this day and this forms an important part of the town's identity. This is recognised by the District Council with the designation of eight Conservation Areas located wholly or partly within the Neighbourhood Plan area, specifically: High Street, The Vine, Vine Court, Hartslands, Granville and Eardley Roads, Kippington and Oakhill Roads, Wildernesse, and Brittains Farm. Many of the towns listed buildings are located within these Conservation Areas.

These areas (alongside local assets of interest) are viewable on the Sevenoaks District Planning Map<sup>37</sup> and this mapping tool will be utilised during the subsequent stages of the SEA process. An image still from the mapping tool is provided below in **Figure A5.1**.

It is important to note that conservation area appraisals and management plans have been prepared for all eight conservation areas located within the STNP area (as references within **Table A5.1** above). The documents contain a detailed overview of the characteristics and special qualities for each area, alongside several management and enhancement principles, and will be an essential source of evidence during the next stages of the SEA process.

These documents do not, however, cover the whole of the town. This leaves certain areas (including parts of the town centre and other non-residential areas) without any specific character-related design guidance.

<sup>&</sup>lt;sup>35</sup> Historic England (2021): 'Knole', [online] available to access here

<sup>&</sup>lt;sup>36</sup> Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access <u>here</u>

<sup>&</sup>lt;sup>37</sup> Sevenoaks District Council (2021): 'Sevenoaks District Planning Map', [online] available to access here

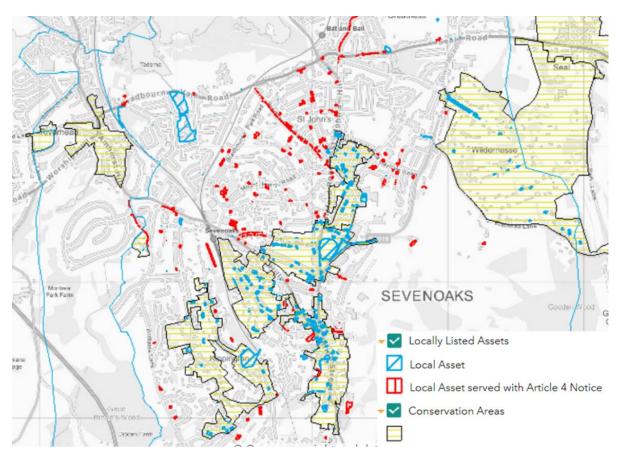


Figure A5.1: Conservation areas and local assets within the STNP area

### Locally important heritage features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work, or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

Accessed via the Heritage Gateway<sup>38</sup>, the Kent Historic Environmental Record (HER) identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the Neighbourhood Plan area. Following a high-level review of the HER, records within the Neighbourhood Plan area includes: archaeological notification areas; important buildings; open spaces (such as The Vine Cricket Ground, Bradbourne Lakes, and Kippington Meadow); distinctive walls; and Roman, Medieval, and Post Medieval features of interest.

Additionally, the Local List Supplementary Planning Document (SPD)<sup>39</sup> contains many historic and modern buildings, structures and open spaces which are of local architectural and historic interest or make a significant contribution to the character and appearance of Sevenoaks District.

During the subsequent stages of the SEA process, the Kent HER and Local List SPD will be reviewed in greater detail to determine which heritage features are likely to be

<sup>&</sup>lt;sup>38</sup> Heritage Gateway (2020): 'Detailed Search' [online database] available to access here

<sup>&</sup>lt;sup>39</sup> Sevenoaks District Council (2017): 'Local List SPD', [online] available to access here

impacted by the preferred development strategy within the Neighbourhood Plan (and reasonable alternatives).

### Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2020 Heritage at Risk Register for South East England<sup>40</sup>, there are three heritage assets at risk within Sevenoaks District, none of which are within the boundaries of the Neighbourhood Plan area.

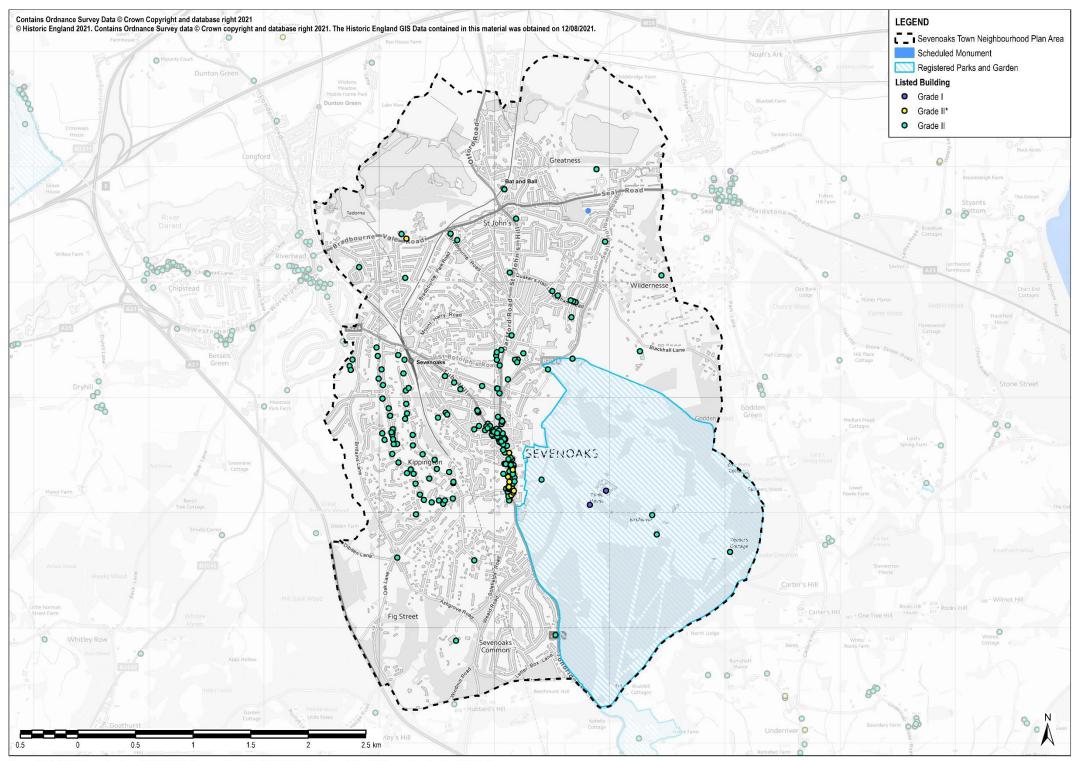
It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.

### Future Baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the town, support historic landscape character and better reveal assets' heritage significance.

<sup>&</sup>lt;sup>40</sup> Historic England (2020): 'Heritage at Risk Register: South East England' [online] available to access here



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### A.6 Land, Soil, and Water Resources

### **Policy Context**

**Table A6.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A6.1: Plans, policies, and strategies reviewed in relation to land, soil, and water resources

Year of publication
2021
2018
2009
2011
2011
2013
2015
2016

The key messages emerging from the review are summarised below:

- The STNP will be required to be in general conformity with the NPPF, which seeks to protect high quality soil resources, and improve the water environment; recognising the wider benefits of natural capital and derived from ecosystem services. The NPPF recognises the need to take account of the long-term implications of climate change and build resilience in this respect. The NPPF encourages efficient land use, utilising brownfield land opportunities and land remediation schemes where appropriate and delivering environmental gains.
- The 25-year Environment Plan presents a focus for environmental improvement in the next couple decades, with aims to achieve clean air, clean and plentiful water, and reduced risk from environmental hazards. This includes measures to improve soil quality, restore and protect peatlands, use water more sustainably, reduce pollution, maximise resource efficiency and minimise environmental impacts. This leads on from and supports the soil strategy for England (Safeguarding our soils) which seeks to ensure that all England's soils will be managed sustainably and degradation threats tackled successfully by 2030, as well as the national water strategies which seek to secure sustainable and resilient water resources and improve the quality of waterbodies, and the national waste plan which seeks to identify measures being taken to move towards a zero waste economy.
- The STNP will also be required to be in general conformity with the Kent Minerals and Waste Plan, which form part of the Local Development Frameworks for the area. The Plan sets out the vision and strategy for waste management and mineral provision up until the year 2030. It also contains a few development management policies for evaluating minerals and waste planning applications.
- Furthermore, the STNP will also be required to take note of and be in general conformity with the adopted Local Plan, which contains policies specifically

relating to efficient land use, water resources and the sustainable use of resources. It will also be necessary for the STNP to be in general conformity with the emerging Local Plan.

# **Current Baseline**

### Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'nonagricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality BMV agricultural land.

In terms of the location of BMV agricultural land, most of the STNP area is urbanised. A detailed classification has not been undertaken for the rural areas of the STNP area (i.e. areas of land within the northern and south eastern sections). The provisional ALC dataset provided by Natural England<sup>41</sup> indicates that the undeveloped areas in the STNP area are primarily underlain by 'other land primarily in non-agricultural use'. This includes the entirety of Knole Park.

#### Water resources and quality

The Neighbourhood Plan area is located within the Thames River Basin District. The main watercourse is the River Darent which passes to the north of the Sevenoaks Town. Additional water resources located within the Neighbourhood Plan area include lakes and ponds associated with the Sevenoaks Wildlife Reserve, and drainage ditches alongside field margins.

As shown on the Environment Agency's Catchment Data Explorer, the most recently completed water quality assessments undertaken in 2019 classifies the Darent (specifically the 'Upper Darent', which is the section of the watercourse which passes through the STNP area) as having a 'moderate' ecological status and a 'fail' chemical status<sup>42</sup>. The reasons for not achieving good status (RNAGs) are primarily attributed to the following activities: groundwater abstraction, ecological discontinuity (barriers), poor soil and livestock management, and riverbank erosion.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. In this respect, the SPZs within and surrounding the STNP area are presented below in **Figure A6.1**.

<sup>42</sup> Environment Agency (2020): 'Catchment Data Explorer – Upper Darent', [online] available to access here

<sup>&</sup>lt;sup>41</sup> Natural England (2010): 'Provisional ALC map for London and the South East', [online] available to access here



Figure A6.1: SPZs within and surrounding the STNP area

#### Mineral resources

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance<sup>43</sup>.

Policy CSM5 within the Kent Minerals and Waste Local Plan (2013-2030) focuses on safeguarding economic mineral deposits within Kent. The accompanying policies map for Sevenoaks District states that the STNP area contains the following mineral safeguarding areas:

• Land to the north of the Town contains areas of Sub-Alluvial River Terrace Deposits and River Terrace Deposits (associated with the River Darent).

<sup>&</sup>lt;sup>43</sup> GOV.UK (2014): 'Minerals Guidance', [online] available to access here

- Land to the south of the Town contains areas of Limestone Hythe Formation (Kentish Ragstone).
- Land to the south east and east of the Town contains areas of Silica Sand/Construction Sand Sandstone (Folkstone Formation).

# Future Baseline

Given that the Neighbourhood Plan encourages development on previously developed land, and the surrounding rural areas are Grade 4 land, it is not anticipated that Neighbourhood Plan proposals would result in the permanent loss of best and most versatile agricultural land.

Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

# A.7 Community Wellbeing

# **Policy Context**

**Table A7.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A7.1: Plans, policies, and strategies reviewed in relation to community wellbeing

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
National Planning Practice Guidance – Healthy and Safe Communities	2019
The 25 Year Environment Plan	2018
Health Equity in England: The Marmot Review 10 Years On	2020
Planning for Sport Guidance	2019
Sevenoaks Urban Area Economic Study	2019
Sevenoaks Economic Development Strategy 2018-2021	2018
Sevenoaks Cultural Strategy	2019/20
Northern Sevenoaks Masterplan	2017

The key messages emerging from the review are summarised below:

• The STNP will be required to be in general conformity with the NPPF, which overall seeks to retain and enhance access to community services and facilities, including health facilities, educational facilities, and open space. The NPPF recognises the benefits of a range of local provisions supporting community needs, including in rural areas. The framework seeks to protect settlement and community identities. Furthermore, the NPPF recognises the benefits of creating cohesive communities, in safe environments where crime and the fear of crime do not undermine the quality of life of residents.

- The district housing, homelessness, and community strategies each seek to support the appropriate delivery of housing and community infrastructure. The strategies recognise the importance of targeting resources at those most at risk/ most vulnerable and supporting all residents needs for affordable, safe, and good quality housing in the right places. Furthermore, the strategies recognise the need to create choice in terms of securing a long-term stable home and create adaptable homes supported by high levels of accessibility.
- The 2020 Health Equity in England Report identifies that the health gap between less and more deprived areas has grown in the last decade, where more people can expect to spend more of their lives in poor health, and where improvements to life expectancy have stalled, or even declined.
- The Planning for Sport Guidance seeks to help the planning system provide formal and informal opportunities for everyone to take part in sport and be physically active. The Guidance outlines 12 'planning-for-sport' principles.
- The STNP will also be required to be in general conformity with the Local Plan which contains policies directly relating to town uses, the economy and community facilities. The STNP will also need to acknowledge the emerging policies in the emerging Local Plan.
- Through the preliminary work on the STNP the Town Council's Neighbourhood Plan Steering Committee identified Northern Sevenoaks as one of the only areas of the town that was suitable for larger scale new development. It was also seen as an area with untapped potential that could benefit from regeneration. A dedicated Masterplan was prepared for the area was also consulted upon as part of the District Council's Local Plan 'Issues and Options' Consultation (receiving positive support).

# **Current Baseline**

#### Population

- 6.4 The Town is the principal settlement within Sevenoaks District and has a population of 20,409 (2011 census). Based on mid-2019 estimates, the total population of Sevenoaks has grown to 22,061 residents<sup>44</sup>, which is an increase of approximately 8.1% since 2011 levels.
- 6.5 The Sevenoaks Neighbourhood Plan<sup>45</sup> highlighted that population growth is not evenly spread across the Neighbourhood Plan area as Sevenoaks Town Centre has experienced three times the level of average annual population growth (1.9%) in comparison to northern Sevenoaks (0.6%).

#### Age structure

- 6.6 **Table A7.1** (below) shows the distribution of residents within the Neighbourhood Plan area in line with age (based on 2011 Census data). The largest group of residents in the Neighbourhood Plan area are in the 25-44 age category (26.9%). This is higher than the totals for Sevenoaks District (24.0%), similar to South East England (26.5%) and lower than England (27.5%).
- 6.7 The total percentage of working age residents within the Neighbourhood Plan (i.e. those within the 25-44 and 45-59 age categories) is 46.2%. This is slightly

<sup>&</sup>lt;sup>44</sup> City Population (2021): 'Sevenoaks Parishes', [online] available to access here

<sup>&</sup>lt;sup>45</sup> Sevenoaks Town Council (2021): 'Sevenoaks Town Neighbourhood Plan 2020-2038', [online] available to access here

higher than the totals for Sevenoaks District (45.2%) and just lower than the totals for South East England (46.4%) and England (46.9%).

6.8 Regarding the younger age categories, 30.8% of residents within the Neighbourhood Plan area are under 25 years old. This is higher than the totals for Sevenoaks District (28.8%) and South East England (30.2%), but the same as England as a whole (30.8%).

Age Band (% of total)	Sevenoaks Town	Sevenoaks	South East	England
0-15	21.9%	19.5%	19.0%	18.9%
16-24	8.9%	9.3%	11.2%	11.9%
25-44	26.9%	24.0%	26.5%	27.5%
45-59	19.3%	21.2%	19.9%	19.4%
60+	23.2%	26.0%	23.3%	22.3%
Total population	20,409	114,893	8,634,750	53,012,456

# Table A7.1: Age Band (% of total)<sup>46</sup>

# Household deprivation

For those households which demonstrate deprivation in the Neighbourhood Plan area, most are deprived in one dimension. This is shown below in **Table A7.2** and is lower than the regional and national trends. A higher percentage of households in the Neighbourhood Plan area (58.5%) are not deprived in any dimension in comparison to the regional and national trends.

# Table A7.2: Household Deprivation<sup>47</sup>

Household Deprivation (% of total)	Sevenoaks Town	Sevenoaks	South East	England
Household not deprived in any dimension	58.5%	50.8%	47.7%	42.5%
Deprived in 1 dimension	26.9%	31.5%	32.2%	32.7%
Deprived in 2 dimensions	11.9%	14.6%	16.0%	19.1%
Deprived in 3 dimensions	2.5%	2.9%	3.7%	5.1%
Deprived in 4 dimensions	0.2%	0.2%	0.4%	0.5%

# Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

<sup>&</sup>lt;sup>46</sup> ONS (2011) Table KS102EW

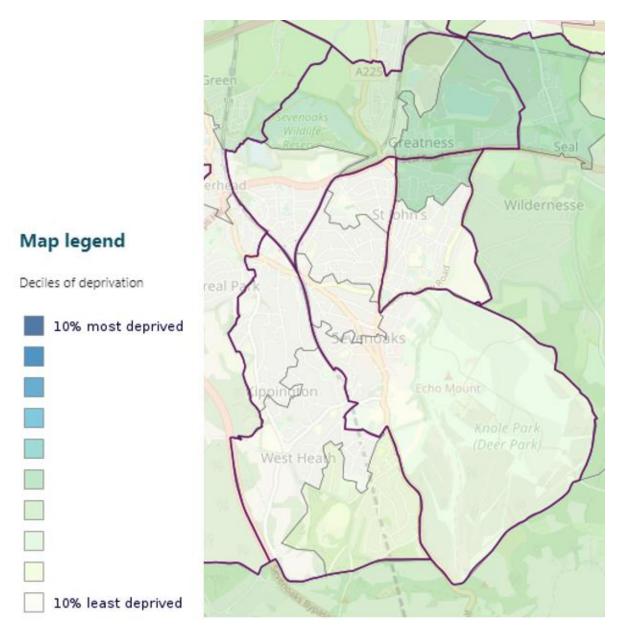
<sup>&</sup>lt;sup>47</sup> ONS (2011) Table QS119EW

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- Education, Skills and Training: The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - 'Geographical Barriers': relating to the physical proximity of local services
  - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - 'Indoors Living Environment' measures the quality of housing.
  - 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
  - Income Deprivation Affecting Children Index: The proportion of all children aged 0 to 15 living in income deprived families.
  - Income Deprivation Affecting Older People Index: The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs)<sup>48</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived.

Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales. A map of the IMD in the Neighbourhood Plan area (within the 'Overall' deprivation domain) is shown in **Figure A7.1** (below). The 'warmer' colours show more deprived populations in the Neighbourhood Plan area and the 'cooler' colours show less deprivation. In this respect, the Neighbourhood Plan area is within the top 10% least deprived neighbourhoods in England, with Sevenoaks Town Ward LSOA ranked 30,497 out of 32,844.

<sup>&</sup>lt;sup>48</sup> DCLG (2019): Indices of Deprivation Explorer', [online] available to access here



# Figure A7.1: Overall deprivation levels within the STNP area

# Housing tenure

Based on 2011 Census data, most residents in the Neighbourhood Plan area own their own homes. This total for the Neighbourhood Plan area (68.0%) is lower than the totals for Sevenoaks District (72.7%), however, it is higher than the totals for South East England (67.6%) and England (63.3%). A lower percentage of residents in the Neighbourhood Plan area live within socially rented accommodation in comparison to the regional and national trends. A total of 16.0% of residents live in private rented accommodation which is in line with the trends for South East and England, although, it is over 5% more than the percentage for Sevenoaks District<sup>49</sup>.

# Education and skills

Primary and secondary schools are located throughout the town. These include a mix of private and state schools, including the Weald of Kent (Boys) Grammar School. The number of school children in Sevenoaks has recently grown with the

<sup>49</sup> ONS (2011) Table QS405EW

opening of Trinity School in 2013. Delivering safe routes to schools that offer alternatives to vehicle modes is increasingly important.

Most residents in the Neighbourhood Plan area hold qualifications, with 46.1% have a level 4 qualification or above. This is higher than the comparative totals observed for Sevenoaks District (32.0%), South East England (29.9%), and England  $(27.4\%)^{50}$ .

## Employment and economy

The town is home to a skilled resident workforce with good access to employment opportunities. People both commute into and out of the town for work to and from central London and other parts of the district and beyond. Based on 2011 Census data, the most representative occupational categories within the STNP area are as follows<sup>51</sup>:

- Professional occupations (27.2%);
- Associate professional & technical occupations (17.1%); and
- Managers, directors, senior officials (16.4%).

In total, approximately 60.7% of working residents within the Neighbourhood Plan area are employed in one of the three occupation categories listed above. This is higher than the totals for Sevenoaks District (48.1%), South East England (44.8%) and England (41.2%). Fewer residents are employed in the following three occupation categories in comparison to the regional and national trends:

- Process plant / machine operatives;
- Sales & customer service occupations; and
- Caring, leisure & other service occupations.

There are currently around 17,800 jobs in the STNP area, accounting for around a third of all jobs in Sevenoaks District. This represents 3,600 more people employed in the area than five years ago, and the area has experienced over double the level of growth seen across the rest of Kent and England. The STNP area is characterised by micro-sized businesses (up to nine employees), which represent 87% of the area's total business base.

Knole House also plays an important role in the local economy with up to 60 staff members and between 450 and 500 volunteers, many of whom live within proximity to the property. Knole also provides a valuable educational resource to pre-school children, schools, and adult learners.

The Sevenoaks Economic Development Strategy also identifies that tourism is a major contributor to the economic viability and growth of the district and contributes £230 million to the local economy, annually.

#### Community assets and infrastructure

The town centre is the focal point for most of the town's shops, leisure, and commercial uses (**Figure A7.2** below). The town hosts a variety of national chain shops, restaurants and independent retailers and businesses. The town is also

<sup>&</sup>lt;sup>50</sup> ONS (2011) Table QS501EW

 $<sup>^{\</sup>rm 51}$  ONS (2011) Tables KS608EW and KS610EW

home to three markets: a charter market on the High Street every Saturday, a general market on the car park on Buckhurst Lane every Wednesday, and every Saturday at Bligh's Meadow Shopping Centre.

As well as the town centre, there are three neighbourhood centres: Lower St John's; Upper St John's (Hollybush Parade); and Tubs Hill Parade.

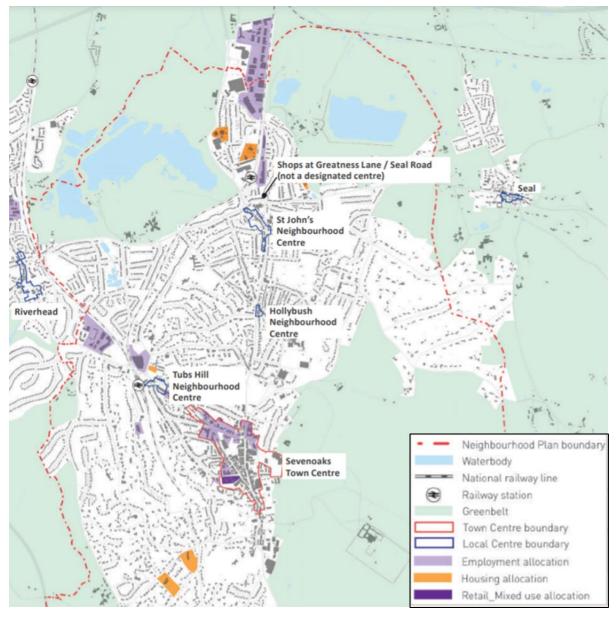


Figure A7.2: Town and neighbourhood centres within the STNP area

The Town Council has recently delivered a new community centre, the 'Bat & Ball Centre', adjacent to Bat and Ball station. The listed station building at Bat and Ball has been refurbished to provide a café and community meeting spaces, and includes a large event space, business hub facility, a small hall, meeting room, kitchen area, and public toilets. There is also a separate nursery on the site.

There are also approximately 240 allotment plots towards the north of the town accessed from Allotment Lane off Quaker's Hall Lane. There is also a smaller allotment site off Bradbourne Vale Road of around 32 plots.

Most of the town's cultural attractions are in the town centre (see **Figure A7.3** below). These include The Stag Theatre and cinema, the library and museum and several small private galleries. Theatre space is also available in a number of the town's schools.

Sevenoaks Hospital is located to the north of the town on Hospital Road, close to St John's neighbourhood centre and Bat and Ball station.



# Figure A7.3: Community infrastructure and facilities within the STNP area

Additionally, there are two significant sports 'clusters' in the town:

- A cluster to the north-east of the town centre around The Vine / Hollybush Recreation Ground / Knole Paddock and the leisure centre; and
- A cluster to the north of Bradbourne Vale Road including Greatness Recreation Ground and the Community Centre adjacent to Bat and Ball station.

# Green infrastructure networks

Access to the nation's gardens, parks, woodlands, and rivers have played a huge part in helping people through the pandemic. Almost nine in ten adults surveyed in England reported that being in nature makes them very happy and nearly three quarters of adults were concerned about biodiversity loss in England (People and Nature Survey, Natural England). The research also revealed the importance of local parks and green spaces to the nation's mental and physical wellbeing. In the context of the STNP area, Knole Park abuts the town centre to the south-east and this 400 ha deer park is a huge asset for the town. It, along with a number of other open spaces distributed across the town (as shown in **Figure A7.4** below), makes a significant contribution to local character and also to the health and wellbeing of Sevenoaks residents.

For example, Knole Park, Sevenoaks Wildlife Reserve, Bradbourne Lakes, Hollybush Recreation Ground, The Vine, and Greatness Lake and Recreation Ground provide a unique and rich natural environment for both active sports and quiet contemplation, and the town is proud of its remarkable trees.

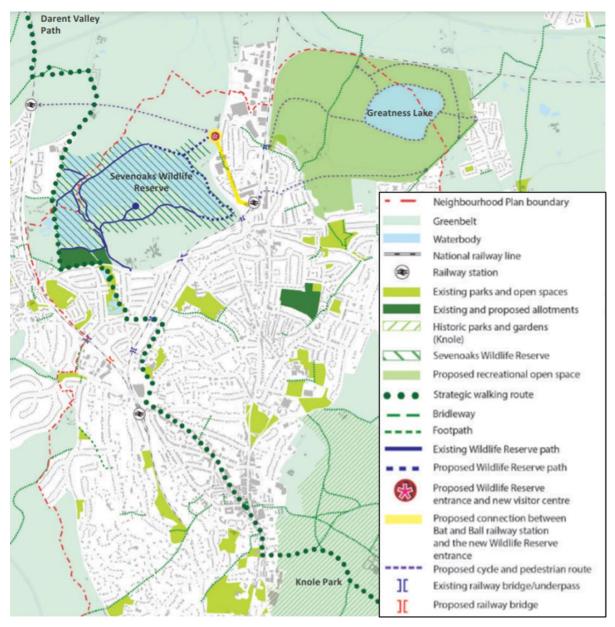


Figure A7.4: Green and blue infrastructure networks (and possible enhancements and new connections proposed through the STNP)

# **Future Baseline**

As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community in certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities. The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the emerging Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

The Covid-19 pandemic has also changed the way people work and shop. For many people working from home is likely to continue to form part of a more flexible approach. The pandemic's long-term impact on town centres and high streets are yet to be fully realised but the switch to internet sales is likely to lead to a reduction in retail floor space and a greater focus on the quality of the wider town centre offer to attract visitors.

Through the preliminary work on the STNP, the Town Council's Neighbourhood Plan Steering Committee identified Northern Sevenoaks as one of the only areas of the town that was suitable for larger scale new development. It was also seen as an area with untapped potential that could benefit from future regeneration.

# A.8 Transportation

# **Policy Context**

**Table A8.1** below presents the most relevant documents identified in the policy review for the purposes of the STNP.

Table A8.1: Plans, policies, and strategies reviewed in relation to transportation

Document title	Year of publication
National Planning Policy Framework (NPPF)	2021
The Transport Investment Strategy – Moving Britain Ahead	2017
Kent Local Transport Plan 4 (2016-2031)	2016
Kent County Council's Right of Way Improvement Plan (ROWIP) (2018- 2028)	2018
Sevenoaks District Cycling Strategy	2012
Sevenoaks District Strategy for Transport (2010-2026)	2010

The key messages emerging from the review are summarised below:

- The STNP will be required to be in general conformity with the NPPF, which seeks the consideration of transport issues from the earliest stages of planmaking and development proposals to address any known issues and maximise opportunities to increase accessibility, particularly by walking, cycling and public transport. Larger developments are expected to be delivered in areas which are or can be made sustainable by limiting the need to travel and offering a genuine choice of transport modes. However, it is recognised that sustainable transport solutions will vary between urban and rural environments.
- National transport strategies set out investment priorities which ultimately all seek to improve the connectivity, effectiveness and reliably of transport networks, whilst reducing impacts on the natural environment (including through decarbonisation). Furthermore, they place great emphasis on making cycling and walking the natural choice for shorter journeys, or as part of a longer

journeys. This includes investment in new and upgraded infrastructure, changing perceptions, and increasing safety.

- Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this respect, the Kent Local Transport Plan 4: Delivering Growth without Gridlock (2016-2031) is a strategic policy tool through which the council exercises its responsibilities for planning, management, and the development of transport in the county.
- One of the ROWIP's key themes is evolution of the network to achieve the objective of a modal shift to cycling and walking to, amongst other things, reduce road air pollution.

## **Current Baseline**

## Rail network

The town is served by two railway lines. The principal station is on the Southeastern line and provides northbound services to London Charing Cross, Cannon Street, London Bridge and Waterloo East; and southbound to Ashford International, Ramsgate via Dover Priory or Tunbridge Wells and Hastings.

Bat and Ball station is located on a branch line and provides services to London Blackfriars, St Pancras, and London Victoria (via Otford and Swanley). Whilst the Sevenoaks station building is in fairly good condition the quality of the environment and arrival experience at the station is poor. However, the station building at Bat and Ball has recently been sympathetically refurbished.

Pedestrian connectivity to Bat and Ball Station is recognised as a potential area of improvement.

#### **Bus network**

Bus networks play a key role in terms of the public transport provision across Sevenoaks. The current bus network provides an important transport link for those people without access to a car.

Sevenoaks is served by a large number of bus routes. These are focused on the main vehicular routes, the A25 and A225, and provide services to Sevenoaks town centre, Seal and Riverhead and more regional links to locations such as Bromley, Tunbridge Wells and Gravesend. Most services are low frequency. Sevenoaks bus station is located within the town centre at Buckhurst Lane.

Bus services in the town are limited by poor co-ordination, a lack of service information and an unattractive environment around the bus station. Initiatives to improve bus services within the STNP area are encouraged.

#### Road network and congestion

Sevenoaks Town is located on one of the principal commuter railway lines to London and benefits from proximity to the M25 and M26 motorways. The town is connected to the M25 and M26 by the A21 (the Sevenoaks Bypass) that runs in a north to south direction to the west of the town, and the A25 which runs in an east to west direction in the northern part of the town. The A225 is the main route running through Sevenoaks in a north to south direction and passes through the town centre as the High Street. The road network within and surrounding the STNP area is shown below in **Figure A8.1**.

Parts of the northern and south eastern sections of the Neighbourhood Plan area are relatively rural in character and therefore less well connected in comparison to the central and southern sections (which encompass the town).

Increased population levels and rapid economic and employment growth have led to an increased demand to travel that is impacting on the district's traffic levels, particularly on the approaches to the main urban centres. This has resulted in a higher rate of increase in traffic flows and there is now an emerging pattern of congestion on key corridors serving Sevenoaks District, with increasing delays and journey times and increasing seasonal congestion and peak period delays.

The town experiences traffic congestion in the peak hours on all three of the main approach routes into the town centre, including London Road, Dartford Road to the north and Tonbridge Road to the south.

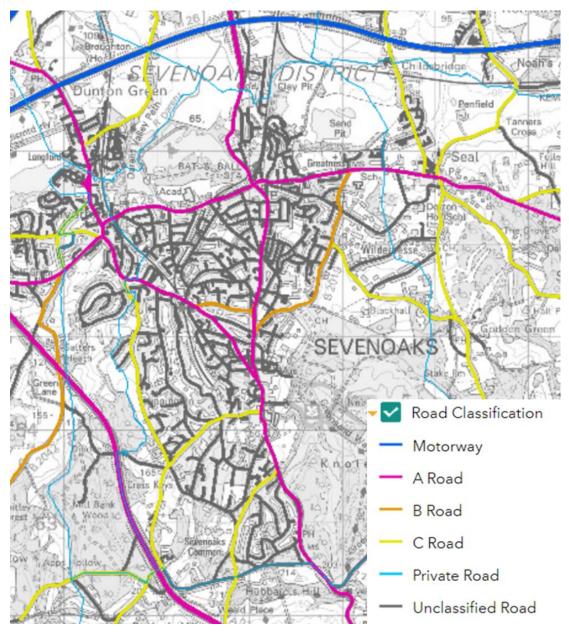


Figure A8.1: Road network within and surrounding the STNP area

# Public rights of way network

Within the town itself walking can be challenging as a result of topography and transport infrastructure. In some parts of the town, particularly in the southern residential areas and on older streets to the north of the town (e.g. Hartslands, Bethel and Prospect Roads) footways are narrow, incomplete, or absent. This impacts on the quality of the pedestrian experience. There is, however, a wide network of walking routes and public rights of way that link Sevenoaks to the countryside that surrounds it.

Department of Transport figures published in October 2020 show that between May and July 2020, 39% of people reported walking more and 38% reported cycling more than before the outbreak of the pandemic.

The Neighbourhood Plan area is relatively well served by a network of footpaths and cycle paths. This includes the Darent Valley Path which is a strategic walking route extending north to south through the STNP area (through Sevenoaks Wildlife Reserve, Bat and Ball Station, and Knole Park) and connecting Dartford to Sevenoaks.

An additional right of way includes The Greensands Way which extends from Haslemere (in the west) to Hamstreet on the edge of Romney Marsh to the east (near to Ashford). In the context of the STNP area, The Greensands Way passes through Knole Park and Sevenoaks Common.

Challenges for pedestrians occur at:

- The junction of Pembroke Road and London Road;
- Outside Sevenoaks station;
- To the north of Sevenoaks station where access under the elevated rail line has been blocked.
- Bat and Ball junction to the north of the town; and
- North of Bat and Ball station where there is only a simple pedestrian bridge over the rail line at the western end of Watercress Drive.

In this respect, one of the key aims within the STNP states that the Town Council will identify locations across the town where repairs and improvements to paths and pavements are required to improve the pedestrian environment.

There is very little provision for cyclists within Sevenoaks, either in terms of dedicated routes or cycle parking; however, Sevenoaks District Council and Kent County Council, supported by Sevenoaks Town Council, prepared the Sevenoaks District Cycling Strategy in 2012. The Strategy advocates new cycle routes, safer cycling, cycle parking and greater promotion of cycling as a means to move around the town.

# **Future Baseline**

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours). This is significant in the local context, due to the pressures from the local road network. However, development within the Neighbourhood Plan area has the potential to lead to enhancements to the transport network in order to promote more sustainable modes of travel, such as the existing right of way network.

Despite Sevenoaks having a good network of pedestrian routes, the District has the lowest percentage of walking / cycling to work and education in the country. One of the ways to tackle this situation could involve enhancing the safety and security on existing routes via improved surfacing, lighting, and road crossings.

Additionally, there are opportunities to improve public transport networks within the Neighbourhood Plan area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

