

Sevenoaks Town Council's full and collated response to the District Council's Local Plan Regulation 18 Public Consultation October-December 2025 – as approved for final submission at the full Council meeting on 8th December 2025

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1. EXECUTIVE SUMMARY OF SEVENOAKS TOWN COUNCIL'S RESPONSE TO THE DISTRICT COUNCIL'S DRAFT LOCAL PLAN – REGULATION 18 2025

Approved 1st December 2025

Sevenoaks Town Council welcomed the opportunity to comment on Sevenoaks District Council's draft Local Plan Regulation 18 public consultation.

Sevenoaks Town Council recognised the pressure to deliver significant volumes of new homes in the coming 15 years. The Local Plan as drafted would increase the size of Sevenoaks Town by almost 50%, and would have a very significant, transforming impact upon the town. It is vital that the Local Plan objectives, policies and guidance make the impact positive overall for the District's communities.

Sevenoaks Town has borne the cost of the lack of Local Plan in the District. Without a plan, and under the 'tilted balance', Sevenoaks has seen several significant, controversial and inappropriate developments gain planning permission which conflict directly with the adopted Sevenoaks Town Neighbourhood Plan. Developments in the town almost never deliver affordable housing due to viability calculations. It is not unusual for approved plans to be in direct conflict with the character, building heights, and density of the surrounding area.

A Local Plan is essential to delivering high-quality growth for the community. It must be unambiguous and robust in how it will deliver not only the required housing numbers, but also in how the priorities and interests of local residents will be delivered and protected. As drafted in the current consultation, Sevenoaks Town Council was disappointed by the lack of vision of the future state of the district. An overall, uniting vision is essential to drive the policies, and it was therefore extremely disappointed to find that, in an era of climate emergency, climate policy is not placed front and centre.

As a local representative of Sevenoaks Town residents, Sevenoaks Town Council resolved not to comment on sites outside of the parish, except where they are adjacent to its boundary. It recorded, however, its deep concern at the concentration of the required housing in urban areas to the detriment of villages which will also need to grow to thrive. The Town Council considered the burden of a 50% uplift in the number of homes in Sevenoaks to be a

significant challenge which would require a great deal of community engagement, partnership working and infrastructure improvement to do successfully.

In particular, Sevenoaks Town Council recorded its concern for the protection and enhancement of natural resources such as the River Darent and its aquifers. The open spaces proposed for development serve important purposes as green spaces, wildlife habitat and migration space and rare chalk streams.

Sevenoaks has a chronic and worsening shortage of affordable homes, particularly social rented. The Town Council recognised and welcomed that grey belt land will have to deliver 50% affordable homes in a way which cannot be negotiated out. It stipulated however, that any such grey belt development must be delivered in a way which protects and improves the natural resources of the area and brings with it timely infrastructure delivery to meet the needs of current and future residents.

The Local Plan must make clear what infrastructure will facilitate new schemes, not only mitigating their impact but actively improving the town for all of the District's communities. Infrastructure delivery must be front-loaded to ensure that residents of new schemes are able to access, for example, buses, cycle routes, surgeries and schools from the moment of occupation. Strategic infrastructure must prevent, not remedy, capacity issues in the highways and utility networks.

Sevenoaks Town Council was pleased to see that the draft plan specifically references the Sevenoaks Town Neighbourhood Development Plan and the emerging Masterplans which it has commissioned for Sevenoaks Town Centre and St Johns. These three policy documents have been produced in close collaboration and consultation with stakeholders and residents, and the Town Council would therefore expect them to be given significant weight in planning decisions going forwards.

The following key priorities of Sevenoaks Town Council have guided its responses to the various policies and proposed land allocations within the draft Local Plan:

- **Responding to climate change** and adopting this stance into every possible element of the Local Plan – see comments in particular under Objectives OB3, OB5, OB8, OB9 and OB10, as well as Policy CC1.
- **Identifying infrastructure requirements with local detail** informed by local residents and their representative Town and Parish Councils. See comments in particular under Policies TLC1, DE1, DE2, DE4, DE5, DE6, and IN1.
- **Environmental protection** – encompassing wildlife and nature, green spaces, biodiversity and water supply. See comments in particular under Objective OB19 as well as Policies H8, W2, W3, AQ1, and BW1.
- **Enhanced community involvement** throughout the entire planning process, with significant housing schemes designed alongside, and with, active engagement from local people – see comments in particular under Policies TLC1, DE1, DE2, DE4, DE5, and DE6.
- **Protecting the local character and amenity** enjoyed within residential areas and integrating new development into the existing character of the town – with respect given **in particular to building heights**. See comments in particular under Objectives OB6, OB12, OB13 and OB17, as well as under Policies H7, DE3, DE4, DE6, and HW3.
- **Placing the historical environment** at the forefront of planning, seeking not only the protection of historic assets and significant views, but also opportunities to recognise

and promote the historic character of Sevenoaks. See detailed comments in particular under Objective OB20.

- **Community building and place making** – See comments in particular under Policies H4, TLC1, DE4, DE5, DE6, and HW1.
- **Creation of a Cultural Quarter** and enhancing the local economy – see comments in particular under Policies TLC1 and SEV1.

2. COMMENTS ON THE LOCAL PLAN'S PROPOSED VISION

Approved 1st December 2025

Sevenoaks Town Council recommended that the Vision – as set out on page 29 of the draft Local Plan and which focuses solely on a spatial vision – should be expanded to become an ambitious descriptive vision of the future state of the District in 2042.

The descriptive approach was used in the Sevenoaks Town Neighbourhood Plan, setting out a Vision for the future Sevenoaks Town, and concluding that Sevenoaks should celebrate its uniqueness, protect its special assets and plan for future prosperity. It was received particularly favourably by the Independent Examiner, who confirmed in his report that implementation of the seventeen Objectives within the Neighbourhood Plan would ensure the Vision is successfully achieved.

Currently, the vision statements on pages 30-31 read as summaries for the objectives. They don't set out a future state, and they are neither measurable nor ambitious.

The Town Council also commented that Figure 0.5, (page 28) of the draft Local Plan, is not particularly easy to understand. The "improved connectivity" lines, for instance, do not appear to denote anything particular.

3. COMMENTS ON THE LOCAL PLAN'S PROPOSED OBJECTIVES

Approved 1st December 2025

Page 30 sets out a table of strategic objectives, referenced OB1 to OB20, which will help to deliver the seven key aspects of the Spatial Vision.

Each Chapter is prefaced by one of more of these Objectives, however they are not referenced in correlation with the below table which is provided on page 30. For instance, **there are two versions of "OB16"** – the first of which is on page 109 and reads "OB16: Safeguard and optimise the use of existing employment land" and the second of which is on page 214, which reads "OB16: Continue to support development that protects and enhances the District's historic environment and ensures that it can be enjoyed by future generations".

Sevenoaks Town Council advised that this should be rectified for clarity.

Vision V1. Promoting healthy communities:

Incorporating green space and healthy design principles, to encourage good physical and mental health. Recognition of health as a principle that cuts across all policies of the Plan.

Both of these Objectives support Chapter 6 (Health and Wellbeing)

Approved 1st December 2025

Objective OB1: Recognise the link between the places and spaces that we live in and the quality of residents' mental and physical health.

Sevenoaks Town Council did not consider "recognising a link" to be a planning action, and recommended that it needs to be woven into the approaches to strategy, detailed plans, design work and community engagement.

Objective OB2: Work closely with healthcare providers to develop policies that promote good physical and mental health as an outcome.

Sevenoaks Town Council commented that partnership work should also drive forwards delivery of good primary and community-based health and social care, and that this work should also extend to collaborations with Public Health and Adult Social Care bodies.

Vision V2. Tackling the challenge of climate change:

Minimising carbon emissions and adapting to a changing climate.

All three of these Objectives support Chapter 4 (Climate Change)

Approved 1st December 2025

Objective OB3: Ensure that tackling the challenges of climate change strongly influences development taking place in the District.

Sevenoaks Town Council recommended that responding to and reducing the impact of climate change should be at the very forefront of the Local Plan, decision making and how the District approaches planning for the future.

The Sevenoaks Town Neighbourhood Plan was restructured from earlier drafts to do just this, with its key focus and priorities having been amended to respond directly to environmental issues, climate change and achieving Net Zero. Sevenoaks Town Council implored the District Council to adopt this approach and place mitigating and adapting to the impacts of climate change as the most important goal and driving point behind all the Local Plan policies. It recommended that this should be the first issue addressed in the Local Plan, with all other objectives, chapters and their ensuing policies updated to reflect how they will contribute to this vision and exploring their themes within the context of climate change.

	Sevenoaks Town Council has recommended via its response to Policy CC1 that this objective be moved to chapter one and updated to be much stronger and ambitious, sitting behind a strong goal of reducing the District's CO2 emissions. It further recommended that Vision 2 and its corresponding objective be similarly upgraded in precedence.
Objective OB4: Provide sufficient flexibility in policies to implement changing national standards, best practice and evidence base updates that will inevitably occur over the Local Plan period.	
Objective OB5: Empower residents to make lifestyle choices that positively contribute to minimising carbon emissions.	Page 154 features a large graph demonstrating that a striking majority of the District's CO2 emissions are made up from transport and domestic emissions. Sevenoaks Town Council was particularly concerned that this is not addressed more within the Local Plan's proposed policies, with little focus on reducing domestic emissions and no policies addressing the transport issues. It therefore implored the District Council to implement this Objective much more materially throughout the Plan by introducing policies which would contribute towards its success.

Vision V3. Delivering design excellence - in our built environment that responds to our distinctive local character and creates the heritage of the future:

Demanding well-designed spaces that deliver exceptional places to live, work and relax, provide innovative ways to support mental and physical wellbeing.

Both of these Objectives support Chapter 5 (Design)

Approved 1st December 2025

Objective OB6: Deliver a character-led approach to development that demonstrates the Government's priorities for well-designed places. (National Design Guide, 2021: The Ten Characteristics of Place).	Sevenoaks Town Council expressed its support for this objective and considered that it should be more robustly reflected within the proposed policies – particularly with reference to Residential Character Area Assessments and responding to surrounding building heights.
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Objective OB7: Require the production of design codes for new development that meet the provisions of national planning guidance.

Vision V4. Supporting the delivery of strategic infrastructure:

To meet the needs of all residents, businesses and visitors we want to deliver a sustainable movement network, provide high quality open spaces that offer health, wellbeing and social benefits, deliver excellent education, health and sports facilities close to where people live, and ensure appropriate investment in robust utilities and digital infrastructure.

Objective OB10 supports Chapter 9 (Infrastructure and Community)

Objectives OB8 and OB9 support Chapter 10 (Transport)

Approved 1st December 2025

Objective OB8: Work with stakeholders to address barriers that prevent residents from making sustainable transport choices.

Sevenoaks Town Council recommended that Objective OB8 should be amended to recognise the main barrier against residents being able to make sustainable transport choices – being the lack of bus services.

It further requested that Objective OB8 be strengthened by addressing the need to deliver sustainable transport solutions, equitably, to residents across the District.

Furthermore, neither of the three Objectives which are proposed to support the Vision of supporting strategic infrastructure delivery – being OB8, Ob9 and OB10 – make reference to climate change, nor to the modal shift required to support more sustainable modes of transport. The Town Council requested that they be amended to recognise this.

Objective OB9: Support equal access to public transport services for all residents.

Neither of the three Objectives which are proposed to support the Vision of supporting strategic infrastructure delivery – being OB8, Ob9 and OB10 – make reference to climate change, nor to the modal shift required to support more sustainable modes of transport. The Town Council requested that they be amended to recognise this.

Objective OB10: Co-ordinate the delivery of necessary infrastructure to support planned growth.

Sevenoaks Town Council requested that Objective OB10 be strengthened, and proposed the following alternative wording: “Ensure the timely delivery of modernised, appropriate infrastructure to meet existing need, support growth, and respond to the pressures of climate change”.

	Furthermore, neither of the three Objectives which are proposed to support the Vision of supporting strategic infrastructure delivery – being OB8, Ob9 and OB10 – make reference to climate change, nor to the modal shift required to support more sustainable modes of transport. The Town Council requested that they be amended to recognise this.
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Vision V5. Homes to meet local needs:

Boosting the supply of homes including much needed affordable homes across the District.

All three of these Objectives support Chapter 2 (Housing Choice for All)

Approved 1st December 2025

Objective OB11: Deliver market and affordable homes to reflect the latest information on housing needs.	Table 1, located on pages 30-31 list Objectives 11-13 as referenced above under OB11-13, however they appear on Page 75 in Chapter 2 (Housing Choice for All) under the references OB8, OB9 and OB10. Sevenoaks Town Council advised that this should be rectified for clarity, and all references to Objectives corrected throughout the Local Plan document.
Objective OB12: Optimise the supply of new homes in existing settlements.	Table 1, located on pages 30-31 list Objectives 11-13 as referenced above under OB11-13, however they appear on Page 75 in Chapter 2 (Housing Choice for All) under the references OB8, OB9 and OB10. Sevenoaks Town Council advised that this should be rectified for clarity, and all references to Objectives corrected throughout the Local Plan document. The Town Council further requested that this Objective recognise the importance of respecting and responding to local character, including bulk, massing and building heights.
Objective OB13: Ensure new housing development makes best and most efficient use of land.	Table 1, located on pages 30-31 list Objectives 11-13 as referenced above under OB11-13, however they appear on Page 75 in Chapter 2 (Housing Choice for All) under the references OB8, OB9 and OB10. Sevenoaks Town Council advised that this should be rectified for clarity, and all references to Objectives corrected throughout the Local Plan document.

	The Town Council further requested that this Objective recognise the importance of respecting and responding to local character, including bulk, massing and building heights.
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Vision V6. Agile and competitive economy and resilient town centres:

Through vital and viable, unique and flexible town centres, capitalising on the strategic location of the District and its functional economic links. Ensuring the delivery of the right type of employment space and supporting the rural economy are equally important in encouraging economic competitiveness.

All five of these Objectives support Chapter 3 (Employment and Economy).

Approved 1st December 2025

Objective OB14: Promote resilient and agile town centres that are able to respond to change.

Objective OB15: Support the delivery of new employment land which meets the needs of a modern economy.

Objective OB16: Safeguard and optimise the use of existing employment land.

Objective OB17: Support the diversification of the rural economy.

Objective OB18: Grow the tourism sector with a particular focus on providing more visitor accommodation.

Vision V7. Protecting the natural and historic environment:

Our District's valuable natural and historic built environment makes an important contribution to the quality of life of our residents and all who visit.

Objective OB20 supports Chapter 7 (Historic Environment)

Objective OB19 supports Chapter 8 (The Natural Environment)

Approved 1st December 2025

Objective OB19: Ensure the District retains a high quality natural environment over the

Table 1, located on pages 30-31 lists Objective 19 under the reference OB19, however it appears on page 234 under

period of the Local Plan including delivering biodiversity net gain on new development.	Chapter 8 (The Natural Environment) with the reference OB15. Sevenoaks Town Council advised that this should be rectified for clarity, and all references to Objectives corrected throughout the Local Plan document. The Town Council further requested that this Objective 19 (Ensure the District retains a high quality natural environment over the period of the Local Plan including delivering biodiversity net gain on new development) be strengthened via removal of the word “retain” in favour of seeking further enhancements. Finally, Sevenoaks Town Council requested that this Objective be amended to assert the District Council’s key priority of securing all Biodiversity Net Gain within Sevenoaks District.
Objective OB20: Continue to support development that protects and enhances the District’s historic environment and ensures that it can be enjoyed by future generations.	Table 1, located on pages 30-31 lists Objective 20 under the reference of OB20, however it appears on page 214 under Chapter 7 (Historic Environment) under the reference OB16. Sevenoaks Town Council advised that this should be rectified for clarity, and all references to Objectives corrected throughout the Local Plan document. The Town Council further requested that this Objective 20 (“Continue to support development that protects and enhances the District’s historic environment and ensures that it can be enjoyed by future generations.”) be amended to include <u>existing generations</u> in addition to future generations. Finally, the Town Council considered that the protection and recognition of significant heritage assets should be strengthened in the Local Plan, and brought to the forefront and very early stages of how development design is approached. Raising the profile and recognition of historic assets should be a key aim and source of inspiration, as opposed to an afterthought which places a larger focus on how designs can <i>modified</i> to mitigate harm.

4. PREFERRED OPTION (1 or 2)	
Approved 1 st December 2025	
Sevenoaks Town Council abstained from selecting either Option 1 or Option 2 as its preferred housing allocation approach, on the grounds that the additional stand-alone settlement which differentiates Option 2 from Option 1 is not located within Sevenoaks Town. Furthermore, and as per the Town Council's response to the previous iteration of the draft Local Plan consulted on in 2024 (Regulation 18 Part 2), Sevenoaks Town Council refrained from responding to any proposals which are located outside of its boundary, on the grounds that these are not within its area of representation. The following comments as submitted in 2024 was been reiterated: <i>"Sevenoaks Town Council is very mindful of the risks of having a Local Plan which does not meet governmental housing targets, and is already seeing the difficult consequences of the tilted balance in planning decisions. It is very important to the Town Council that there is a Local Plan in place which allows for managed and predictable development appropriate to the existing community. Its response is focused on issues relating to the Sevenoaks Town area only, and the Town Council makes no comment on sites outside of the town or which do not directly impact the infrastructure for the town residents."</i> Therefore, Sevenoaks Town Council selected "None of the above", on the grounds that both Options 1 and 2 include significant developments outside of the Town Council's boundary which it does not have the remit to comment on.	

5. POLICY COMMENTS
Approved 8 th December 2025

ST1	A Balanced Strategy for Growth: Development within existing settlements with optimised densities, reuse of brownfield land, sustainable locations (close to services, accessible), efficient use of land and social value. Compliance with Neighbourhood Plans.
Approved 8 th December 2025	
Sevenoaks Town Council expressed its general support of this policy, however considered that the emphasis of developing existing settlements and towns should be expanded to include smaller villages in order to ensure that growth, development, and infrastructure improvements are evenly distributed across the whole district. It advised that the survival of the rural economy should not be overlooked in favour of developing larger towns.	

ST2	Housing and Mixed-Use Site Allocations: Specific sites proposed for allocation, separated by area (see allocation summary document for more details on Sevenoaks Town sites).
Approved 8 th December 2025	
<i>The Town Council noted that this isn't so much a "policy" setting out a particular stance or development requirement, but more as a means of giving the proposed allocations policy-status. The Town Council has therefore submitted comment on the allocations within Sevenoaks Town via site, as opposed to this policy.</i>	

H1	Housing Mix: Design criteria for new housing, to meet housing mix needs, accessible/adaptable homes with wheelchair provision in new build schemes over 20 units as well as Social Rent housing, environmentally sustainable designs and meeting of space standards.
Approved 8th December 2025	
Sevenoaks Town Council particularly agreed with the technical and design criteria set within this Policy under 3b (accessible and adaptable homes), 3c (5% of schemes 20+ units to be wheelchair accessible and social rent) and 3e (national space standards), however considered that the criteria under 3d (high sustainability) should be more clearly defined. The Town Council further recommended that an external reference explicitly stating what sustainability means should be provided either within this Policy or in the supporting text.	

H2	Provision for Affordable Housing: Setting % thresholds based on number of dwellings proposed, and whether it's within a Designated Rural Area or not. Alternative delivery mechanisms are explored for on-site provision versus financial contributions, as well as mitigation of unviable schemes – including late-stage viability reviews. On-site provision is proposed 80% social rented and 20% shared ownership unless otherwise agreed.
Approved 8th December 2025	
Sevenoaks Town Council expressed its particular support of a Policy which increases the deliverability of affordable housing and made the following comments on its contents: Affordable Housing Contributions – Thresholds, Paragraph 2: - A minimum number of affordable units should be set for each threshold, with the resulting required number of units being rounded up to a whole number. For instance, a scheme of 5 homes on a site 0.5 hectares or more would, under the current threshold, require 0.5 affordable units. The Town Council advised that this should be rounded up to 1. - The Town Council noted that the threshold of 10 homes or more on a brownfield site is proposed to require 30% affordable housing, which is a reduction from the current policy requirement of 40%. While it recognised that the existing requirement has historically not been achieved for recently approved developments, the Town Council was hesitant to support the reduced requirement without seeing evidence that the 30% is more likely to be achievable. Tenure Mix, Section 8: Sevenoaks Town Council welcomed the proposed 80% social rent and 20% shared ownership tenure split for on-site affordable housing, however requested an explanation as to the circumstances under which this mix may be otherwise agreed by the District Council's Housing Service. Viability, Section 9: The Town Council expressed concern that the contents of Paragraphs 10 and 11 could allow the existing issue of scheme viability and consistent non-provision of affordable housing to persist. It suggested the introduction of a clear mechanism for under or non-provision of affordable housing, where this would be by exception and with District Council Members' explicit agreement, via a clear and transparent Committee process.	

H3	Housing in Rural Areas: Conditions for rural exception housing schemes outside of urban areas.
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on this Policy, as it is not located within a rural area.	

H4	Housing for Older People: Includes technical and design criteria for retirement home proposals, as well as a dwelling threshold (being 50+) which activates a requirement to provide units for older people.
Approved 17th November 2025	
Sevenoaks Town Council is concerned with the lack of housing proposed for the District's ever-growing aged population. The threshold of 50 units which is proposed to trigger the requirement for older people housing is much too high and should be decreased, with the % requirement determined by the evidence base at a local level. This approach for allocating the % of units required for older people housing provision per development site and in response to local housing need is considered the most suitable, on the grounds that it would be more effective in the building of communities and reduction in social isolation. In practice, delivering a mix of Build to Rent, Older People Housing, Social Rent, Affordable Housing etc will only provide a small number of units from each category. While this works for the purpose of smoothly integrating affordable housing into a scheme – for instance with no visible differentiation between affordable and market price houses – applying it to the provision of housing for older people is less effective due to their increased need for a community environment that facilitates a reciprocal exchange of support and socialisation. Rockdale Housing is a prime example of how this model of housing older people with a wide range of needs, independence, mobility and means can create a much more self-sufficient community and enhanced way of living. Sevenoaks Town Council therefore recommends that this Policy be amended to enable a more appropriate approach to allocating % of required housing provision for older people, depending on the development and sustainability of the location. This would help to deliver the “Community and Shared Facilities” principle proposed by the Housing our Aging Population Panel for Innovation (HAPPI) and endorsed in Policy H4 – for instance, shared external spaces and facilities such as laundry rooms are much more impactful when serving a larger density of people who have a particular need for them. The Town Council further supports all ten design principles of the HAPPI – in particular low windows, installation of plug sockets at an easily reached height, and preference for showers over baths.	

H5	Build to Rent: Includes technical and design criteria for Build to Rent, including sustainable location, single ownership, 3 year minimum tenancy, 20% affordable housing, environmental sustainability, and a unit threshold (being 100+) for developments to provide Build to Rent units.
Approved 8th December 2025	
Sevenoaks Town Council reiterated its recommendation from Policy H1 that the criteria relating to high sustainability (paragraph 1d) should be more clearly defined. The Town	

Council recommended that an external reference explicitly stating what sustainability means should be provided either within this Policy or in the supporting text.

Criteria 1c states that “where appropriate, the Council may seek a proportion of affordable housing to be delivered as Social Rent or another tenure...”. The mechanism and criteria for when this would apply is not stated, and the Town Council considered that this should be amended and all application of the criteria 1c in Build to Rent schemes should prioritise provision of Social Rent and Affordable Market Rent in the first instance.

H6	Smaller Sites: Includes technical and design criteria including efficient use of land, healthy spaces, meeting housing need / mix, avoiding / replacing employment, retail or community use, and high sustainability.
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Approved 8th December 2025

Sevenoaks Town Council reiterated its recommendation from Policy H1 that the criteria relating to high sustainability (paragraph 1d) should be more clearly defined. The Town Council recommended that an external reference explicitly stating what sustainability means should be provided either within this Policy or in the supporting text.

H7	Housing Density and Intensification: Proposes minimum thresholds for number of homes to be delivered on a site, depending on the sustainability of the location.
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Approved 8th December 2025

Sevenoaks Town Council was mindful that higher density developments will be a necessity to meet the District’s targets and deliver much needed housing, and was openminded to this, particularly if it delivers affordable housing. The Town Council stipulated, however, that the character and parameters of the existing location **must** be respected, with building heights required to conform with, and complement those of surrounding buildings.

The Town Council further noted that an ideal application of this Policy where a denser form of housing could benefit its inhabitants, is in the provision of a larger proportion of homes for older people. This was on the grounds of there being particular opportunity to create a community in urban, accessible locations where the use of space could be maximised by providing shared spaces such as space rooms, utilities and services.

H8	Self-build and Custom Housebuilding: Conditions under which self-build and custom house builds will be supported, as well as a unit threshold (being 10+) for developments to provide plots for this.
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Approved 8th December 2025

Sevenoaks Town Council stipulated that self-build and custom house build developments should not be exempt from fulfilling either local or national developer obligations – particularly Biodiversity Net Gain.

The Town Council further expressed its caution that the self build classification allows, and could be utilised by developers, to circumvent such obligations where they otherwise should have been a requirement.

GT1	Provision for Gypsy and Traveller Community: Proposes four <u>specific sites</u> for provision of additional permanent Gypsy and Traveller pitches being two in Edenbridge, one in Halstead, and one in Swanley Village.
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on this Policy, as it does not contain any sites proposed for allocation as Gypsy and Traveller pitches.	

GT2	Gypsy and Traveller and Travelling Showperson Accommodation: Sets criteria for accommodation proposals, including sustainable location (near services and facilities), accessibility, acceptable living environment, minimal impact on surrounding character, and meeting of identified needs.
Approved 8th December 2025	
Sevenoaks Town Council strongly supported the provision of Temporary Traveller sites, and considered this to be a priority given the lack of any existing sites within Kent to facilitate this.	

EMP1	Delivering Economic Success: Identifies significant demand for employment space to be met in Town Centres and storage space to be met in Swanley and at the Sevenoaks Vestry Estate. Also includes flexible workspace, improving digital connectivity, growing the visitor economy and strengthening sense of place.
Approved 8th December 2025	
Sevenoaks Town Council noted that the rise in remote working could create a gap in current housing standards, which omit consideration of acceptable workspace standards within the home. This combined with the reduced social interaction opportunities for remote workers could create a heightened need for flexible workspaces, and the Town Council therefore requested that consideration be given towards producing a strategy to facilitate delivery of neighbourhood remote working nodes within new developments.	

EMP2	New Employment Land: Specific sites proposed for allocation, separated by area, two of which are in Sevenoaks Town (Bakers Yard and Otford Road Depot). Also includes criteria to be met on the sites, including efficient use of land, active travel access opportunities, impact on highways, amenity, natural and built environment, landscape etc.
Approved 8th December 2025	
Sevenoaks Town Council welcomed the proposed allocation of a childcare centre on the Conway site at Bartram Farm (SEV26). The Town Council wished to raise attention, however, to the lack of a definition as to what would be considered “unacceptable” under section 2 of this Policy, in terms of loss of existing use (2b), impact on highways (2e), impact on natural and built environments (2g) and impact on landscape and visual amenity (2h). It requested that a clear criteria be set defining what would be considered unacceptable, as well as setting out the process and persons responsible for deciding this.	

EMP3	Retaining and Optimising Existing Employment Land: Protects employment land use and sets criteria for its expansion – both within built-up area boundaries and the Green Belt (where policy-compliant).
Approved 8th December 2025	
Sevenoaks Town Council expressed its supports of the protection and retention of existing employment land, with note that the loss of office space particularly within the Town Centre is a reoccurring issue. The Town Council therefore requested that a commentary be added to this Policy, setting out a criteria for when the loss of office use to residential use would be acceptable. In addition, the Town Council noted that it is not clear whether the criteria provided under section 3 of this policy require all of the four sub-clauses to be met before employment uses in Classes B2, B8, E(c) or E(g) may be lost, or if it is only one. It was therefore recommended that this be clarified within the policy.	

EMP4	Rural Diversification: Sets criteria allowing diversification of agricultural or other land-based business uses.
Approved 8th December 2025	
Sevenoaks Town Council noted that it is not clear whether all nine of the criteria provided under this policy are required to be met before agricultural or other land-based businesses use may be diversified, or if it is only one of the nine. It therefore recommended that this be clarified within the policy.	

EMP5	Tourism and Visitor Economy: Sets criteria allowing existing tourist accommodation use to be changed (i.e. unsuitable for use). Sets criteria to be met in proposals for new or upgraded visitor attractions / accommodation, including impact mitigation, accessibility, impact on highways, amenity, natural and built environment and landscape etc.
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on this Policy.	

TLC1	Resilient Town and Local Centres: Prioritises place-making, active and retained town centre uses, active shop fronts (supporting residential above). Also sets a unit threshold (being 100+) for developments to provide accessible small-scale retail and sets criteria for town centre development to meet including environmental design and active travel options.
Approved 8th December 2025	
Sevenoaks Town Council requested that clarification be added as to how and when the “Town Centres first” would be applied, particularly when considering planning applications for which there is a requirement that they be decided on their own merits and not in relation to whether they may be better delivered at an alternative location. The Town Council also requested that a definition be added either within this policy or supporting text as to what the sequential test is. Furthermore, the Town Council noted the omission of any nighttime economy promotion as well as cultural event spaces from this policy, and recommended that a further clause be added to actively support and promote these. This is particularly important for Sevenoaks	

Town Centre, which is proposed to be developed as a Cultural Quarter within the Sevenoaks Town Neighbourhood Plan.

Where a development is proposed for 100 units or more, the Town Council also requested that a detailed spatial masterplan, produced with active public engagement, be a requirement. It clarified that this should precede any Design Code and acknowledge the wider area and infrastructure, in order to ensure that the proposed development will integrate with and complement the surrounding area.

Finally, Sevenoaks Town Council strongly implored the District Council to engage Town and Parish Councils as key partners in all fundamental decisions relating to their respective towns and their development.

This is on the grounds that Town and Parish Councils are ideally-placed at the most local level to identify where the existing infrastructure is and is not working – a contribution which will only increase in light of Local Government Reorganisation and the creation of new unitary councils.

SEV1	Sevenoaks Town Centre: Promotes the STNP as well as the emerging Town Centre & St John's Hill Area Masterplans to guide future development.
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Approved 8th December 2025

Sevenoaks Town Council welcomed the inclusion of both the Sevenoaks Town Neighbourhood Plan as well as the Town Council's emerging Masterplans for the Town Centre and St John's Hill Area and expressed its anticipation for these being embedded in local planning policy to guide future development proposals for the Town.

The Town Council considered local views to be crucial in achieving the best possible design outcomes which balance housing provision with respectful and well-integrated schemes.

Although they form part of the Sevenoaks Town Neighbourhood Plan as part of its Appendices and evidence base, the Town Council requested that its Northern Masterplan and Cultural Strategy also be recognised as important guidance documents within this Policy.

Furthermore, two key priorities of the Sevenoaks Town Neighbourhood Plan which the Town Council considered to have been omitted from the list of guiding principles for development under paragraph 2 of this Policy are recognising the important contribution of trees and hedgerows to the character of the town, as well as creating a Cultural Quarter in the town centre.

The Town Council therefore requested that the following amendments be incorporated:

- Priority 1 under paragraph two be updated to read "raising the profile of its best assets – its historic town centre and origins as a market town, its array of independent shops, verdant green character and the impressive Knole",
- Priority 2 be updated to read "expansion of its cultural scene, creation of a strong Cultural Quarter and diversifying the town's offer to match other prominent towns [...]"
- Key project 4i to be updated to read "Strengthening and greening connections to Knole Park
- Key project 4ii to be updated to recognise the key priority of creating a strong Cultural Quarter, to read "Eastern town centre revitalisation and incorporation into the Town Centre via development of a strong Cultural Quarter"

- Key project 4iii to be updated to read “high streets streetscape enhancement, including greening key links and planting”

Sevenoaks Town Council emphasised that recognition of the Sevenoaks Town Neighbourhood Plan’s aspiration for the production of a strong Cultural Quarter within Sevenoaks Town is particularly important and must not be lost to alternative uses or superseding policy.

SWN1	Swanley Town Centre
EDN1	Edenbridge Town Centre
WST1	Westerham Town Centre
NAG1	New Ash Green Town Centre
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on these Policies.	

CC1	Mitigating and Adapting to the Impacts of Climate Change: Places requirements on developments to contribute to the mitigation and adaptation to climate change, including via active travel options, sustainable building materials and construction, maximising blue green infrastructure, reducing flood risk and mains water consumption etc.
Approved 8th December 2025	
Page 154 features a large graph demonstrating that a striking majority of the District’s CO2 emissions are made up from transport and domestic emissions. Sevenoaks Town Council expressed deep concern that this is not addressed more within the Local Plan’s proposed policies, with little focus on reducing domestic emissions and no policies addressing the transport issues. It considered that responding to and reducing the impact of climate change should be at the very forefront of the Local Plan, decision making and how the District approaches planning for the future. The Sevenoaks Town Neighbourhood Plan was restructured from earlier drafts to do just this, with its key focus and priorities having been amended to respond directly to environmental issues, climate change and achieving Net Zero. Sevenoaks Town Council implored the District Council to adopt this approach and place mitigating and adapting to the impacts of climate change as the most important goal and driving point behind all the Local Plan policies. It recommended that this should be the first issue addressed in the Local Plan, with all other chapters updated to reflect how they will contribute to this vision and exploring their themes within the context of climate change. Furthermore, Sevenoaks Town Council considered the wording of this policy to be lacking in ambition and a framework for delivery. This is a missed opportunity, and the Town Council recommended that the policy be moved to chapter one and updated to be much stronger and ambitious, sitting behind a strong goal of reducing the District’s CO2 emissions.	

CC2	Sustainable Design and Construction: Requires new developments to minimise energy and carbon consumption. Promotes blue-green infrastructure, modifiable buildings, water management and sets a dwelling conversion threshold (being 10+) for conversions to achieve ‘Excellent’ BREEAM rating.
Approved 8th December 2025	
Sevenoaks Town Council requested that the energy and carbon impact caused by the construction works associated with new houses also be recognised within this Policy, and appropriate mitigation measures required. This is on the grounds that a significant number of houses are proposed within Sevenoaks Town alone, the construction of which will cause emission of greenhouse gases at every stage – from manufacture of materials, transport of goods via heavy goods vehicles, demolition and construction using heavy machinery, to the moving in of new residents from further heavy goods vehicles. With the District’s target of 17,175 homes required for delivery within the next 15 years, the Town Council considered it to be remiss not to acknowledge and make provision for the significant impact to air quality and energy and carbon consumption that the building works alone will have.	

CC3	Low Carbon and Renewable Energy: Prioritises renewable and low carbon energy opportunities in development and sets criteria where such proposals will be supported.
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on this Policy.	

CC4	Tree Planting: Requires all major developments (residential and non-residential) to plant new trees and submit landscaping schemes – with two trees per new dwelling and one tree per 500 square metres of non-residential floorspace required.
Approved 8th December 2025	
Sevenoaks Town Council requested that the important contribution of trees and hedgerows to the biodiversity as well as character of residential areas and surrounding countryside be explicitly recognised within this Policy. The Sevenoaks Town Neighbourhood Plan requires that proposals to remove trees and hedgerows be both justified, and mitigated via replacement of a species that is suitable for the location and responds to the character and biodiversity of the site that it is located.	

W1	Flood Risk: Requires flood mitigation and risk assessments in Flood risk Zones.
Approved 8th December 2025	
Sevenoaks Town Council sought clarification as to the seeming contradiction between Policy W1, which directs development away from areas of high flood risk, and the proposed allocation SEV24 (HO/25/00012), which proposes to build 1,500 new homes on an area of comprising both Flood Zones 2 and 3. The Town Council also expressed its concern as to the focus of this Policy, which centres more on managing flood risk as to opposed to planning for development. Finally, the Town Council advised that the referenced “sequential test” should be defined, either in the policy or its supporting text.	

W2	Surface Water Management: Requires developments to include adequate surface water drainage and sets a hierarchy of preferred options to do so. Specifically prohibits discharge into foul-only sewers.
Approved 8th December 2025	
Sevenoaks Town Council expressed concerned that this Policy does not address any retrospective action for minimising the impact of the existing housing stock on flooding caused by surface water. Sevenoaks Town Council recommended that surface water management issues – including promotion of grey water systems for new and existing housing stock – be addressed within the policy, and its isolated focus on new developments be shifted to consider how the District as a whole will deliver on its infrastructure objectives instead.	

W3	Water Supply and Quality: Support in principle for increased water supply and wastewater treatment proposals. Requirement for new developments to minimise impact on water supply, capping this at 110 litres per new resident per day. Prioritises integrity of water supply quality.
Approved 8th December 2025	
Sevenoaks Town Council expressed concern that this Policy does not appear to address where the District’s water supply will come from when its population rises when the forecast development numbers are delivered. Sevenoaks Town’s population will increase by 50%, with most of its water supply currently coming from the River Darent and the recent summer droughts having demonstrated just how unsustainable and at capacity this system is. Furthermore, the Policy does not address any retrospective action for minimising the impact of the existing housing stock on water supply. Most homeowners do not have grey water systems, and reservoirs still haven’t returned to the level of stored water supply expected for this time of the year. Sevenoaks Town Council therefore recommended that water supply issues – including promotion of grey water systems for new and existing housing stock – be addressed within the policy, and its isolated focus on new developments be shifted to consider how the District as a whole will deliver on its infrastructure objectives instead.	

DE1	Community Review Panel: Proposes a new pre-planning Panel comprising residents, visitors and local workers, selected via formal application process. Sets a threshold (being 100+ new dwellings, 10,000 sqm gross floor space, or likelihood of significantly impacting the surrounding area) for developments to engage the Panel at early planning stages.
Approved 3rd November, with revisions on 17th November 2025	
Page 183 of the draft Local Plan indicates a proposed framework for the Community Review Panel, whereby the output of the Panel would be reviewed by the Town or Parish Council before going to a Design Advisory Panel. Sevenoaks Town Council requested that Town and Parish Councils be engaged earlier and as part of the Community Review Panel process as well as, where applicable, a representative of any relevant Residents Association.	

To maximise quality of Councillor input, it recommended that each Town / Parish Council be allowed to elect one Member per Ward to the Panel, on the proviso that only one Town or Parish Councillor would be permitted to engage with the pre-planning project at one time. The grounds for this are that it would not only allow the most locally-informed Town / Parish Ward Councillor to be engaged with that particular proposal, but also provides a degree of flexibility to nominate a substitute Member (ideally from a neighbouring Ward) in the case of the relevant Ward Member's indisposition.

Furthermore, Sevenoaks Town Council recommended that Community Review Panels be engaged alongside Design Advisory Panels and at the **design specification stage** as opposed to only once initial designs have been produced. This would allow local views and priorities to be integrated directly into the Development Brief and any subsequent designs as opposed to retrospectively, and with membership to be agreed per site in order to ensure its representatives comprise the most locally informed people.

The following pre-planning process was therefore proposed to replace the framework on Page 183 as follows:

Joint Community Review and Design Advisory Panels including Town and Parish membership → Creation of Development Brief → Public Consultation (broadening the current proposal to consult Town/Parish Councils only) → Submission of application, with the Design Advisory Panel to continue to oversee the process to submission of application and any subsequent amendments.

Sevenoaks Town Council also recommended that the unit threshold for when both a Community Review and Design Advisory Panel is required should be reduced, in line with Aim C6 of the Sevenoaks Town Neighbourhood Plan. The supporting text of this Aim defines a major application to be one for "10+ dwellings, where the site area is over 0.5Ha and / or where a floorspace of over 1,000sqm is proposed."

Finally, where a development is proposed for 100 units or more, the Town Council requested that a detailed spatial masterplan, produced with active public engagement, be a requirement. It clarified that this should precede any Design Code and acknowledge the wider area and infrastructure, in order to ensure that the proposed development will integrate with and complement the surrounding area.

DE2	Design Advisory Panel: Sets a threshold (being 100+ new dwellings, 10,000 sqm gross floor space, or likelihood of significantly impacting the surrounding area) for developments to engage a Panel of experienced design professionals at early planning stages.
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Approved 3rd November, with revisions on 17th November 2025

Page 183 of the draft Local Plan indicates a proposed framework for the Community Review Panel, whereby the output of the Panel would be reviewed by the Town or Parish Council before going to a Design Advisory Panel.

Sevenoaks Town Council recommended that Design Advisory Panels should be engaged alongside Community Review Panels and at the **design specification stage** as opposed to only once initial designs have been produced. This would allow local views and priorities to be integrated directly into the Development Brief and any subsequent designs, as opposed to retrospectively and should be overseen by the Design Advisory Panel throughout the process.

The Town Council further requested that Town and Parish Councils as well as, where applicable, a representative of any relevant Residents Associations be engaged in this Community Review Panel process and as part of this process as per its response to Policy DE1.

The following pre-planning process was therefore proposed to replace the framework on Page 183 as follows:

Joint Community and Design Panel including Town and Parish membership → Creation of Development Brief → Public Consultation (broadening the current proposal to consult Town/Parish Councils only) → Submission of application, with the Design Advisory Panel to continue to oversee the process to submission of application and any subsequent amendments.

Furthermore, Sevenoaks Town Council recommended that the unit threshold for when both a Community Review and Design Advisory Panel is required should be reduced, in line with Aim C6 of the Sevenoaks Town Neighbourhood Plan. The supporting text of this Aim defines a major application to be one for “10+ dwellings, where the site area is over 0.5Ha and / or where a floorspace of over 1,000sqm is proposed.”

Finally, where a development is proposed for 100 units or more, the Town Council requested that a detailed spatial masterplan, produced with active public engagement, be a requirement. It clarified that this should precede any Design Code and acknowledge the wider area and infrastructure, in order to ensure that the proposed development will integrate with and complement the surrounding area.

DE3	Ensuring Design Quality: Protects local character area, listing reference documents to be followed. Includes District Character Study, Landscape Character Assessment, Historic Review, NDPs and Conservation Area Design Guidance.
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Approved 3rd November 2025
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This policy omits mention of any existing or future Residential Character Area Assessments (RCAAs) and / or Masterplans. The only reference within the draft Local Plan to Residential Character Area Assessments appears to be within a couple of the proposed Development Briefs prepared for some of the allocations.

Sevenoaks Town Council therefore requested that reference both to any RCAAs and Masterplans either be added or, should the RCAA be considered too out of date, wording such as that in Policy HEN1d (which allows flexibility for additional guidance to be added in future) be incorporated. The following potential amendment to Policy DE3, which imitates the wording used in Policy HEN1d was recommended as a suitable amendment:

“Policy D3 [...] Development will also reflect local character and distinctiveness considering the following documents:

- [...]
- Neighbourhood Plan policies, where applicable
- *Other principles set out in relevant local policy/guidance, including current or subsequent versions of any applicable Masterplans, Residential Character Area Assessments or other character area guidance documents adopted by the Council.*

DE4	Delivering Design Quality: Anticipates publication by SDC of a “Design in Sevenoaks” document which will set standards for applications to meet – addressing public realm, accessibility, private amenity space, parking, open space hierarchy, bins and bike storage, affordable housing design standards and daylight and sunlight. Requires applicants to demonstrate compliance with these via Design and Access Statements.
Approved 8th December 2025	
This Policy anticipates the production of a “Design in Sevenoaks” document, which sets standards for applications to meet, including public realm, accessibility, private amenity space, parking, open space hierarchy, bins and bike storage, affordable housing design standards and daylight and sunlight. The following Sevenoaks Town Neighbourhood Plan Policies and Aims support the production of such Design Guidance, each of which notably presuppose the Town Council’s involvement in their preparation either as project-lead or collaborator. • Aim C3: “The Town Council will prepare guidance on the treatment of locally listed buildings and any other buildings with heritage value.” • Aim C7: “The Town Council will work with the District Council and / or other design advisors to prepare guidance for areas not included within the Residential Character Area Assessment.” • Aim L3: “The Town Council will identify areas where trees and hedgerows make a significant contribution to local character and biodiversity.” • Policy M11: Presupposes the production of a town centre-wide strategy to guide public realm improvements. As per its comments on Policy TLC1 and in line with its Neighbourhood Development Plan, Sevenoaks Town Council strongly implored the District Council to engage Town and Parish Councils as key partners in all fundamental decisions relating to their respective towns and their development and include them in the production of this document. Furthermore, the supporting text of DE4 advises that this document will reflect national good practice and standards, however omits security by design principles – such as incorporation of passive surveillance from active ground-floor uses and well lit spaces. Sevenoaks Town Council considered this to be an equally important feature and requested that it be added to the anticipated document. Finally, the Town Council advised that it would expect a document on design standards to not only encompass practical standards for construction and accessibility, but also on architecture, aesthetics and design principles. If this is to be a steering document setting out the minimum standards for a proposed development to meet, then it should also include a local design aspect to cover character and guidance on how a proposed development should assimilate with its surrounding area. Sevenoaks Town Council therefore requested that this be added to the document’s specification, that its emerging guidance build upon and consolidate design standards already set out in Residential Character Assessments – with explicit requirement that new development should integrate and complement the surrounding area’s character and identity. The Town Council further recommended that any resulting design guidance document should be publicly consulted on prior to adoption, in order to ensure that it reflects the priorities and views of local residents.	

DE5	Outline Planning Applications: Sets threshold for Outline planning applications (being 100+ new dwellings) to include a Mandatory Design Principles development, including strategies for building types/materials, public spaces, movement and access, landscape and public realm.
Approved 8th December 2025	
Sevenoaks Town Council reiterated its request under DE1 and DE2, which remain relevant to this Policy; Where a development is proposed for 100 units or more, the Town Council requested that a detailed spatial masterplan, produced with active public engagement, be a requirement. It clarified that this should precede any Design Code and acknowledge the wider area and infrastructure, in order to ensure that the proposed development will integrate with and complement the surrounding area.	

DE6	Design Codes: Sets a threshold (being 100+ new dwellings) for developments to require supporting Design Codes, demonstrating delivery of a well-designed sustainable place and produced in partnership with SDC and local community.
Approved 8th December 2025	
This Policy requires the production of a Design Code for schemes of 100+ new dwellings, and anticipates their production in partnership with the District Council and the local community. Sevenoaks Town Council requested that Town and Parish Councils as well as Residents Associations (including the Sevenoaks Society) and the anticipated Community Review Panel be included in this partnership, and for the consultation stage to occur pre-briefing in order for local views to influence the principles and priorities from the outset, rather than retrospectively. The Town Council also recommended that Design Codes be produced for existing settlements at an urban level, in order to set out key characteristics and elements which should be reflected in new emerging designs within or surrounding them.	

DE1	Community Review Panel: Proposes a new pre-planning Panel comprising residents, visitors and local workers, selected via formal application process. Sets a threshold (being 100+ new dwellings, 10,000 sqm gross floor space, or likelihood of significantly impacting the surrounding area) for developments to engage the Panel at early planning stages.
DE2	Design Advisory Panel: Sets a threshold (being 100+ new dwellings, 10,000 sqm gross floor space, or likelihood of significantly impacting the surrounding area) for developments to engage a Panel of experienced design professionals at early planning stages.
DE3	Ensuring Design Quality: Protects local character area, listing reference documents to be followed. Includes District Character Study, Landscape Character Assessment, Historic Review, NDPs and Conservation Area Design Guidance.
DE4	Delivering Design Quality: Anticipates publication by SDC of a “Design in Sevenoaks” document which will set standards for applications to meet – addressing public realm, accessibility, private amenity space, parking, open space hierarchy, bins and bike storage, affordable housing design standards and daylight and sunlight. Requires applicants to demonstrate compliance with these via Design and Access Statements.

DE5	Outline Planning Applications: Sets threshold for Outline planning applications (being 100+ new dwellings) to include a Mandatory Design Principles development, including strategies for building types/materials, public spaces, movement and access, landscape and public realm.
DE6	Design Codes: Sets a threshold (being 100+ new dwellings) for developments to require supporting Design Codes, demonstrating delivery of a well-designed sustainable place and produced in partnership with SDC and local community.
DE7	Design for Rural Development: Anticipates publication by SDC of a Rural Design Guidance document and requires compliance of small scale rural development sites with this.

Approved 3rd November 2025

Sevenoaks Town Council strongly endorsed the following [advice](#) published by the Central Government, which states that “design review is most effective when applied at the earliest stage of design development. It can be followed up at further stages as projects evolve, including pre-application and are implemented, referencing and building upon recommendations made in previous design reviews.”

The [RIBA Plan of Work](#) published in 2020 further recommends early Design Review Panels, within Stage 1 (Preparation and Briefing) of a project’s development.

Sevenoaks Town Council considered that Design Review Panel and early engagement should be embedded firmly within the planning process, and therefore requested that the minimum unit thresholds required to trigger a Community Review Panel as well as a Design Review Panel be reduced to 10+ units. This could be accompanied by a criteria of potential exceptions, but with the main objective being to secure high quality design which invests in and enhances the areas in which they are built.

HW1	Health and Wellbeing: Promotes healthy and safe communities and social inclusion through design and location and sets thresholds (being 10+ new housing units or provision of particular non-residential developments) to provide Health Impact Assessments.
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Approved 8th December 2025

Sevenoaks Town Council stipulated that social and community spaces must be secured both at the very earliest stages of a scheme’s design, as well as its delivery. Incorporating placement and space allocations for shared community **amenities at the earliest stages of design** will be important to increasing their functionality as well as integration into the scheme. Securing their delivery during the earliest stages of development will be particularly important for larger schemes which may need to be delivered in multiple phases, as it will foster the creation of communities from the outset.

Furthermore, the Town Council recommended that cycle paths and active travel options should also be delivered from the outset, in order to have available the necessary infrastructure to support car-free residents and reduce the likelihood that new residents will need to depend on cars.

Finally, Sevenoaks Town Council recommended that provision be included within this Policy for shops and local facilities to be delivered within short, walkable distances to new developments. This would facilitate a further reduced reliance on cars, particularly for small essential shopping trips, with the additional benefit of providing social opportunities for community building.

HW2	Hot Food Takeaway and Fast Food, and Evening Economy: Sets criteria where hot food takeaways and fast food outlets will be refused and requires a litter strategy for the vicinity. Requires evening economy proposals to complement the NDP and existing uses, and not significantly impact amenity. Promotes daytime “meanwhile” use and sustainable transport options.
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on this Policy.	

AQ1	Air Quality: Requires proposals to demonstrate zero or positive impact on air quality, with alternative delivery systems including financial contribution or offsite mitigation measures included. Sets a threshold (being 10+ new housing units, or non-minor development near a Strategic or busy road) to provide Air Quality Impact Assessments.
Approved 8th December 2025	
Sevenoaks Town Council urged the District Council to amend this policy to be more ambitious with regards to securing air quality improvements and to remove the allowance for a development to result in “neutral” impact to air quality. The Town Council also requested that air quality impact be managed both during the construction phase as well as post-development. This is on the ground that a significant number of houses are proposed within Sevenoaks Town alone, all of which will be accompanied by a large volume of associated heavy goods vehicles to transport their building materials. With the District’s target of 17,175 homes required for delivery within the next 15 years, the Town Council considered that it remiss not to acknowledge and make provision for the significant impact to air quality that the building works alone will have.	

HW3	Environment and Pollution: Prioritises the quality or mitigation of residential amenity impact of existing and future occupiers, in terms of light pollution, noise, odour, vibration and/or other pollution.
Approved 8th December 2025	
Sevenoaks Town Council stated its resolute opinion that the provision of new housing should not be to the detriment of the amenity of existing residents. While mitigating its impact is an essential component to protecting neighbouring amenity, the Town Council considered the wording of this Policy to be weakened by the presupposing that “unacceptable levels” levels of light, pollution, noise, vibration and/or other pollution would be permitted in the right circumstances. Sevenoaks Town Council requested that this be reworded from “proposals <i>which would</i> result in [...]” to “proposals <i>must not</i> result in unacceptable levels of light [...]”.	

HEN1	Protecting and Enhancing Historic Environment: Requires development proposals for heritage assets – including designated (i.e. listed buildings, conservation areas) and non-designated (i.e. locally listed) assets to conserve and if possible enhance the asset as well as its environment and surrounding character.
Approved 8th December 2025	
Sevenoaks Town Council considered that the protection and recognition of significant heritage assets should be strengthened in the Local Plan, and brought to the forefront and very early stages of how development design is approached. It recommended that raising the	

profile and recognition of historic assets should be a key aim and source of inspiration, as opposed to an afterthought which places a larger focus on how designs can be *modified* to mitigate harm.

Furthermore, while the Town Council considered the protection of the District's important historic assets to be a high priority, it expressed concern that the lack of reference between Policies HEN1 and HEN4 (which concern the protection of historic assets and their setting) with HEN5 (which recognises the need to respond to climate change and retrofit historic homes) could potentially result in their conflict when it comes to applying them to future planning applications.

The Town Council therefore requested that Policies HEN1 and HEN4 in particular be updated to recognise that the retrofitting of historic buildings may be necessary in order to make sure they endure and remain liveable. It stipulated that this should be for the sole reason of removing potential conflict between Policy HEN5, and not result in a loss of protection to historic assets.

It suggested that this could be achieved by adding a further stipulation to the opening paragraph of Policy HEN1, such as "This should be done in consideration with current pressures around climate change and the need for buildings to remain liveable."

HEN2	Sensitively Managing Change in the Historic Environment: Sets criteria for Planning / Design and Access and/or Heritage Statements to meet, including assessment of the affected heritage asset and its setting, how it (and its surrounding character) will be protected or enhanced, and harm mitigation measures.
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Approved 8th December 2025

Sevenoaks Town Council considered that the protection and recognition of significant heritage assets should be strengthened in the Local Plan, and brought to the forefront and very early stages of how development design is approached. It recommended that raising the profile and recognition of historic assets should be a key aim and source of inspiration, as opposed to an afterthought which places a larger focus on how designs can be *modified* to mitigate harm.

HEN3	Archaeology: Requires archaeological assessments for proposals in Archaeological Notification Areas or suspected areas, preservation in situ unless justifiably inappropriate, as well as public recording of any heritage assets lost through alteration or demolition.
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Approved 8th December 2025

Sevenoaks Town Council did not propose any further comment on this Policy.

HEN4	Locally Listed Buildings and Assets: Seeks to retain and preserve Locally Listed Assets as well as secure enhancements where possible.
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Approved 8th December 2025

Sevenoaks Town Council considered that the protection and recognition of significant heritage assets should be strengthened in the Local Plan, and brought to the forefront and very early stages of how development design is approached. It recommended that raising the profile and recognition of historic assets should be a key aim and source of inspiration, as

opposed to an afterthought which places a larger focus on how designs can be *modified* to mitigate harm.

Furthermore, while the Town Council considers the protection of the District's important historic assets to be a high priority, it expressed concern that the lack of reference between Policies HEN1 and HEN4 (which concern the protection of historic assets and their setting) with HEN5 (which recognises the need to respond to climate change and retrofit historic homes) could potentially result in their conflict when it comes to applying them to future planning applications.

The Town Council therefore requested that Policies HEN1 and HEN4 in particular be updated to recognise that the retrofitting of historic buildings may be necessary in order to make sure they endure and remain liveable. It stipulated that this should be for the sole reason of removing potential conflict between Policy HEN5, and not result in a loss of protection to historic assets.

It suggested that this could be achieved by adding a further stipulation to the opening paragraph of Policy HEN1, such as "This should be done in consideration with current pressures around climate change and the need for buildings to remain liveable."

HEN5	Responding to Climate Change in the Historic Environment: Requires conversion proposals to be sensitive to the heritage asset's fabric and appearance, optimise viable use and minimise damage. Retrofitting proposals should use "whole building approaches" to prioritise adaptations that will minimise harm.
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Approved 8th December 2025

Sevenoaks Town Council expressed its support for this Policy, however referred to its advice under Policies HEN1 and HEN4, where it identified the potential for conflict between these Policies due to their not recognising the impact of climate change and potential need to retrofit homes to retain their liveability.

The Town Council also considered the wording under paragraph three of this policy, which states that proposed changes should, "where clearly justified, cause the least harm to the significance of the asset" to be further in conflict with Policies HEN1 and HEN4 – both of which require proposals to conserve and enhance" the assets.

The Town Council recommended that the wording between all three policies should be made to be consistent, in order to avoid any conflict in their applicability and to ensure that historical assets are able to respond to climate change pressures.

HEN6	Shopfronts: Prioritises retention or restoration of historic shopfronts, requiring their design to respond positively to the character, surroundings and existing design.
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Approved 8th December 2025

Sevenoaks Town Council considered that the protection and recognition of significant heritage assets should be strengthened in the Local Plan, and brought to the forefront and very early stages of how development design is approached. It recommended that raising the profile and recognition of historic assets should be a key aim and source of inspiration, as opposed to an afterthought which places a larger focus on how designs can be *modified* to mitigate harm.

Furthermore, Sevenoaks Town Council recommended that this Policy should be updated to include reference to any Neighbourhood Development Plans, where they exist, with the requirement for any development proposals for shopfronts to conform with any relevant guidance within them.

Finally, the Town Council advised of its own approach to recommend refusal of internally illuminated, backlit signage in the conservation areas, on the grounds that it considers these to detract from the significance of the heritage asset, and requested that consideration be given to adopting this stance via Policy HEN6.

HEN7	Historic Parks and Gardens: Prioritises retention and enhancement of both registered Historic Parks and Gardens (Sevenoaks sites being Bradbourne Lakes, New School at West Heath and Upper High Street Gardens) as well as non-registered sites of local or historical importance.
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Approved 8th December 2025

Sevenoaks Town Council did not propose any further comment on this Policy.

NE1	Landscape and National Landscapes: Seeks to protect local landscape character as well as National Landscapes during development
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Approved 8th December 2025

Sevenoaks Town Council requested that the importance of views to and from the open countryside and National Landscapes be explicitly recognised within this Policy, and consideration of these be required when assessing the impact of developments not only *within* National Landscape, but adjacent to them. The Town Council cited the outlook to and from Knole Park as well as the North Downs and Darent Valley as key views which should be protected, particularly in conjunction with the proposed allocation sites of SEV13 (Land East of High Street), SEV20 (Land north of Barnett Field, Blackhall Lane) and SEV24 (Land North of Sevenoaks, West of Otford Road).

BW1	Safeguarding Places for Wildlife and Nature: Seeks protection, retention, restoration and enhancement to the blue-green infrastructure network as part of development proposals.
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Approved 8th December 2025

Sevenoaks Town Council reiterated its comments on Policy NE1 and requested that the importance of views to and from the open countryside and National Landscapes be explicitly recognised within this Policy, and consideration of these be required when assessing the impact of developments not only *within* National Landscape, but adjacent to them. The Town Council cited the outlook to and from Knole Park as well as the North Downs and Darent Valley as key views which should be protected, particularly in conjunction with the proposed allocation sites of SEV13 (Land East of High Street), SEV20 (Land north of Barnett Field, Blackhall Lane) and SEV24 (Land North of Sevenoaks, West of Otford Road).

The Town Council further requested that consideration be given to the contribution of open spaces to adjacent wildlife sites and the species that they support. It cited the proposed allocation sites of SEV20 (Land north of Barnett Field, Blackhall Lane) and SEV24 (Land North of Sevenoaks, West of Otford Road) as particularly important in their support of local wildlife, with SEV20 being home to skylarks and SEV24 being heavily used by migrating birds as a food source and resting place before reaching the adjacent Sevenoaks Nature Reserve.

AF1	Ashdown Forest: Sets 7km protection area zone around the forest, which activates a requirement for any net increase in new dwellings proposed within this zone to submit evidence on visitor impact.
Approved 8th December 2025	
Sevenoaks Town Council did not propose any further comment on this Policy, being outside of Sevenoaks Town.	

BW2	Biodiversity in Development: Seeks protection and enhancement of biodiversity, expanding on statutory requirements by recommending exempt sites seek opportunities to enhance biodiversity and achieve net gain. Prioritises on-site provision in the first instance, and off-site provision to be within Sevenoaks District. Alternative approaches of providing BNG in adjoining or wider planning authority as well as financial contributions also included.
Approved 8th December 2025	
Sevenoaks Town Council advised of a reoccurring trend identified via its regular monitoring of how the Sevenoaks Town Neighbourhood Plan's Policies are applied to local planning applications, whereby Case Officers have opted not to apply its own Biodiversity Net Gain Policy. This is on the grounds that the wording of Policy L1, which requires development proposals to deliver 10% Biodiversity Net Gain <i>wherever possible</i>, allows a degree of flexibility and further refers to the Biodiversity Metric. Citing the requirement for all planning conditions to be considered "reasonable", Case Officers have therefore concluded that the Policy is not robust enough to meet this test – either on the grounds of its flexibility or its reliance on the Biodiversity Metric which may not be applied to exempt applications. Sevenoaks Town Council therefore strongly requested that Policy BW2 be strengthened by the removal of any clauses which could risk its ambiguity or flexibility of application - including "where possible," "encouraged" and "should seek opportunities". Furthermore, the Town Council considered that the District Council as the Local Planning Authority should be doing everything within its power to secure Biodiversity Net Gain within the District and to make the process whereby developers can locate opportunities for offsite provision and secure it via legal agreements as simple as possible. The current wording of the Policy places this responsibility on developers, however the Town Council considered that the District Council should be making efforts to facilitate the process – particularly given the abundant amount of diverse Biodiversity Net Gain opportunities throughout the District. Sevenoaks Town Council therefore recommended that the District Council work with local landowners to produce a map of locations within the District where offsite Biodiversity Net Gain could be delivered and support them in securing these important local investments. Town and Parish Councils, which often own vast quantities of local and green spaces would make an ideal starting point for this. It was noted that the District Council is already pursuing a similar initiative with the Darent Landscape Recovery Project, and the Town Council strongly implored the District Council to expand upon this within Policy BW2 with a statement pledging its clear intention to ensure that spaces are available for securing Biodiversity within the District. The Town Council further recommended that the aim of securing all Biodiversity Net Gain within Sevenoaks District should be added to the overarching Objectives of the Local Plan.	

IN1	Infrastructure Delivery: Requires new development to be supported by appropriate on-site and offsite infrastructure and seeks alternative options where this is not viable. Sets a hierarchy for priority infrastructure to secure contributions to, being Affordable housing, education, health, and then transport.
Approved 8th December 2025	
Sevenoaks Town Council did not consider this Policy to be robust or detailed enough to secure the necessary infrastructure improvements needed to support the volume of new development proposed within the Local Plan. While it states what sort of infrastructure developers would need to provide, it does not provide a detailed delivery mechanism to support this, and the Town Council recommended that a more strategic approach is needed. While it was noted that the District Council’s Infrastructure Delivery Plan (IDP) is an evolving and “live” document subject to frequent updates from key infrastructure providers, the Town Council considered that key and reoccurring requirements such as transport improvements, and sewage and water network capacity should be explicitly embedded within the wording of this Policy. Furthermore, Sevenoaks Town Council strongly implored the District Council to engage Town and Parish Councils as key partners in identifying required infrastructure improvements – both at the initial IDP stage as well as during negotiations with local developers on Section 106 agreements and in allocating projects for Community Infrastructure Levy expenditure. This is on the grounds that Town and Parish Councils are ideally-placed at the most local level to identify where the existing infrastructure is not working – a contribution which will only increase in light of Local Government Reorganisation and the creation of new unitary councils. The Town Council therefore requested that this Policy explicitly recognise Town and Parish Councils as key partners in identifying what infrastructure improvements are needed and communicating the priorities of local residents.	

OS1	Open Space and Recreation: Seeks to retain and protect both designated and undesignated but locally valued open spaces. Requires either new or enhanced open spaces as part of major development proposals.
Approved 8th December 2025	
Sevenoaks Town Council observed that the definition of outdoor sports facilities appears to be particularly limited, given the lack of mapped facilities shown on Figure 9.1, Map 4 on page 260. The Town Council therefore sought clarification as to what this encompasses, and recommended that this definition be added to the key, in addition to a definition of what “Young people and children” provision entails. Furthermore, Sevenoaks Town Council advised that the Bradbourne Vale Road horses field, which is proposed for housing allocation under the reference SEV22, was previously considered an open space under the moniker “Bradbourne Vale Road Open Space”. The Town Council requested that this designation should be reinstated and its importance as a green open space and countryside view be recognised within the Local Plan. Finally, the Town Council particularly welcomed the recognition afforded to the existing community’s needs for open spaces, in point three of this Policy, particularly as the emphasis appears to usually be on the amenity of new residents. It was noted that the Golden Rules set out in Paragraph 156 of the National Planning Policy Framework require the provision of green	

space which is both available to public and within a short walk from their homes, as a criteria for Grey Belt release.

OS2	Children and Young People's Play Space: Sets thresholds for residential developments which activate a minimum delivery requirement for play areas – including informal, locally equipped. Includes alternative for improving or expanding existing facilities.
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Approved 8th December 2025

Sevenoaks Town Council requested that this Policy be updated to include clear reference as to the definition of informal play space, local areas of play (LAPs), local equipped areas of play (LEAPS), and neighbourhood equipped areas of play (NEAPs).

The Town Council also requested that a definition be added to clarify the criteria for requiring a development of 100-499 homes to “consider, *where appropriate*” incorporating neighbourhood equipped areas of play, and further recommended that the wording be strengthened from “to be considered” to “to be provided”.

This is on the grounds that conditions placed on planning applications must be considered “reasonable” in order to prevent their contestation. The current wording was too flexible, and therefore less likely to be applied by Case Officers when they are assessing a planning application.

Finally, the Town Council considered that a development of 100-499 homes would absolutely require enhanced play areas – and would benefit further from their provision by way better integration of the scheme and its residents into the wider community.

ED1	Education: Sets expectation for education facilities to be provided as part of development, either via land, legal agreement or Community Infrastructure Levy contributions.
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Approved 8th December 2025

Sevenoaks Town Council requested that provision requirement for Adult Education facilities – particularly in Urban Centres – be added to this Policy, particularly on the grounds that Sevenoaks Town is no longer served by an Adult Education Centre.

The Town Council further advised of the desperate need for Special Educational Needs provision, and recommended that the last sentence – which pledges the District Council’s intention to work with Kent County Council on secondary school places – be amended to recognise this.

Finally, the Town Council noted the likelihood that, by the time the Local Plan is adopted, the District will be in the late stages of becoming a Unitary authority and may also be undergoing the absorption of Kent County Council’s current responsibilities. As this would include education, the Town Council considered that this Policy should be updated to reflect the upcoming change.

SL1	Sport and Leisure Facilities: Seeks to protect, retain and enhance existing sports facilities and use. Includes community use requirement for sporting facilities in new educational establishments.
Approved 8th December 2025	
Sevenoaks Town Council considered Item 1, which sets out the District Council’s ambition to create a “world cluster of sporting facilities” to take the least precedence against the other provisions within this Policy, which include the protection of existing sport and leisure provision, prioritisation of alternative sports and leisure provision over the loss of a current facility’s use, enhancement of existing assets and community access arrangements. The Town Council requested that the structure of this Policy be revised, with the world cluster set to Item 7, and the protection of sports provision (currently within Item 2) to replace it. This is on the grounds that the Town Council considered grass root sports and community accessibility to take precedence. Furthermore, the Town Council advised that sporting provision – particularly within Sevenoaks Town but also throughout the District – is already close to capacity, if not having already exceeded it. If the District is to support the provision of 17,175 new homes by 2042, then a significant volume of new sporting provision must be secured, and the Town Council therefore requested that consideration be required for all major developments as to the sporting needs of the existing and proposed residents – particularly within urban areas where sporting space is at a premium. This should include coordination and consultation with local Town and Parish Councils, due to their intimate local knowledge as to the particular needs of their sporting clubs and subsequent suitability to recommend the most efficient use of land for shared use between multiple organisations. The Town Council strongly recommended that required provision of a Sports Hub should be added to the Development Brief and infrastructure requirements of the proposed allocation referenced SEV24, at Land North of Sevenoaks, West of Otford Road. Finally, the Town Council requested that Item 6, which requires new educational establishments to include community use provision, to be amended to require their similar compliance with Football Association recommended size guidance, or that of other relevant sporting governing bodies, in order to ensure any new facilities within school sites can be used for competition use.	

COM1	Retention of Community Uses: Prioritises retention of local services and facilities and stipulates that any vacant or redundant community buildings be reused for alternative community use to meet local need.
Approved 3rd November 2025 with additional comments approved 8th December 2025	
The supporting text for this Policy briefly references the Community Right to Bid on Assets of Community Value, but does not give any further material weight to this within the Policy. The current provisions under the Community Right to Bid legislation do not protect registered Assets from being redeveloped and/or their existing use lost, nor does it guarantee sale of the Asset to a community organisation in the event of its disposal. While the latter is not within the power of Local Planning Authority’s to secure via planning policy, the classification of a registered Asset of Community Value to be considered material to planning applications is, due to this being discretionary. Sevenoaks Town Council therefore strongly requested that the District Council formally grant material planning weight to registered Assets explicitly within this Policy.	

The Town Council further requested that this Policy be amended to recognise the important role played by Town and Parish Councils in being the most local form of government and thereby benefitting from more informed views from its community. The indispensability of this local understanding will only increase with Local Government Reorganisation and the subsequent broadening of the Local Planning Authority's remit when it is changed from Sevenoaks District Council, to a new Unitary comprising the District Council and a number of its neighbours.

The Town Council therefore firmly requested that, where "the Council's" agreement is conditioned to permit the loss of a local service or facility, this should be amended to require this decision to be made explicitly in consultation with, or with the approval of, the local Town or Parish Council.

Finally, the Town Council considered the sole focus of this Policy on *retaining* community uses to be a missed opportunity to explore the provision of new or enhanced community facilities to meet the needs of the District's growing population.

The Town Council strongly implored the District Council to amend this Policy to include provision of new or enhanced facilities, particularly in light of the significant increase in housing numbers proposed for delivery throughout the lifetime of the Local Plan.

COM2	Allocations for Community Use: Specific sites proposed for allocation for community use as part of mixed-use schemes. Two Sevenoaks Town sites, being Sevenoaks Station (Community and Car Park) and Land East of High Street (Leisure (F2)).
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Approved 8th December 2025
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Further to its comments on Policy COM1, Sevenoaks Town Council considered the draft wording of Policy COM2 to be a further missed opportunity to secure much needed provision of new or enhanced community facilities within Sevenoaks District.

This Policy focuses solely on particular allocation sites identified for potential community use, however does not display any ambition for ensuring that new developments not identified for community use allocation also deliver new or enhanced facilities. The Town Council further noted with concern that the sites proposed for community-use allocations within this Policy do not include all of the significant development sites identified for housing – particularly allocation SEV24 which proposes to deliver 1,500 houses at Land North of Sevenoaks, West of Otford Road.

The Town Council strongly implored the District Council to amend this Policy to include provision of new or enhanced community facilities on all significant developments – both on the development sites identified for housing within Policy ST2, as well as any further sites which may come forward for development during the lifetime of the Local Plan. This is particularly important considering the significant increase in the District's population resulting from these new housing allocations.

Finally, the Town Council recommended that a threshold should be introduced as to what constitutes a "significant development" and when this Policy requiring the provision of new or enhanced community facilities should be applied.

UD1	Utilities and Digital Infrastructure: Requires applicants to engage with utility providers (water, waste water, sewage treatment, solid waste, gas, electricity, telecommunications) to ensure sufficient capacity. Measures to mitigate potential impact include development phasing and planning conditions.
Approved 8th December 2025	
Sevenoaks Town Council advised that the reference to Thames Water’s “proposal” for a new sewerage treatment works site within the District within supporting paragraph 9.33 is potentially misleading. It recommended clarifying that the potential <i>need</i> for a sewerage treatment works is identified within the Long Reach Management Plan, however this is based on forecast population growth, and further investigation of potential options is predicted within their long-term plan, 10-15 years in the future. Sevenoaks Town Council further advised that the capacity and long term sustainability of the Long Reach sewerage treatment works as the sole recipient of the District’s foul waste is particularly impacted by incorrect connections of storm and surface water sources into the foul network. It requested that the key priority of this policy reflect the imperative need to ensure that foul and storm water collections remain separate as far as possible to protect and extend the lifespan of Long Reach’s capacity, particularly within the significant volume of new developments identified within the District. Furthermore, the Town Council recommended that the policy should also recognise the impact of existing developments and extensions on the foul and surface water network, and requested an additional statement be added, stating that the District Council will use all its powers to ensure there are no missed connections to the foul water network and help mitigate the effects of climate change causing sewer flooding. Finally, the Town Council considered that the District Council should commit to facilitating discussions between applicants and utility providers, and that these should take place at the earliest possible stage of a scheme’s design. It requested that the District Council consider amending Item 2 to reflect this.	

T1	Sustainable Movement Network: Supports improvements to public transport, including interchanges and accessibility. Proposes improvements to enhance Sevenoaks Station including public realm features and a transport hub. Supports active travel options and prioritises a connected network including integration with PRoWs and upgrading these to bridgeway where appropriate.
Approved 8th December 2025	
Sevenoaks Town Council advised that the two main providers of public sector transport within Sevenoaks District are trains, followed closely by taxis, and finally buses. It recommended that new or improved “interchanges” can only work when the supporting infrastructure and funding associated with encouraging residents into this modal shift is provided. Policy M7 of the Sevenoaks Town Neighbourhood Plan provides an ideal baseline within established planning policy for improving transport interchange at Sevenoaks Station and identifies real time travel information for both buses and trains, improved pick-up and drop-off facilities and taxi rank spaces, as well as public realm improvements and removal of pedestrian movement barriers as key interventions. The Town Council requested that these provisions be recognised within Policy T1 both under Item 5, which seeks to strengthen interchanges between different transport modes, as well as	

under Item 7, which relates to Sevenoaks Railway Station improvements specifically. The latter, which also requires public realm improvements at the Station and provision of a transport hub was welcomed by Sevenoaks Town Council, which requested that further reference be made, identifying wayfinding, secure bike storage and live bus information as further key public realm improvements. The Town Council advised that it would also expect any emerging development proposals for this location to include a significant redesign of the problematic junction and inadequate crossing facilities, and would further welcome introduction of bus stands, or at a minimum, improved bus service information, as well as improved taxi ranks to reflect their considerable value at this location.

The following further amendments were requested to this Policy:

- Item 1, which promotes increased safety, air quality and sustainable modes of transport, should be expanded to include “control impact on people-centred spaces”
- Addition of a fifth commitment be added under “Strategic Transport Planning and Collaboration”, to promote improved railway timetabling to reflect the increased demand arising from new residents
- Item 9, which relates to walking, wheeling and cycling routes, must prioritise the **connection** of these routes, to create a wider cycling network. The current cycling routes within Sevenoaks Town do not link up with each other, which creates a barrier against their effective use. The Town Council recommended incorporating similar wording as that in Policy M5 of the Sevenoaks Town Neighbourhood Plan, which identifies poor surfacing, lighting, safety and security of the Town’s cycling routes as a clear deterrent to their utilisation.
- Item 10, relating to cycle parking facilities, should be updated to make provision for larger ebikes and cargo bikes
- Item 11, which supports the delivery of walking and cycling routes, should be strengthened to place the District Council as the **key provider** driving their implementation, not just supported. This should be done on a systematic basis, not development by development, in order to ensure active travel routes are well designed and linked with a wider network.
- Item 12, which promotes the enhancement of existing routes including Public Rights of Way (PROW) was particularly supported in its proposal to upgrade footpaths into bridleways, and Sevenoaks Town Council considered that this could be easily achieved on a blanket basis and at a local level. It further recommended that the railway bridge which goes over Bat and Ball Road, linking the Goya Business Park with Watercress Drive and registered under PROW reference SU3 would be a particularly beneficial location to focus initial PROW improvement works and deliver enhanced social value. Upgrading this bridge to a bridleway would create the opportunity to link the East to West active travel route to the proposed Otford to Sevenoaks route, redirecting the latter from the A225 and making use of existing assets.

T2	Sustainable Movement: Sets principles for new development proposals to follow, including mitigation of transport network impact, introduction and connection of new active travel routes with existing ones, offering alternative transport options.
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Approved 8th December 2025

Sevenoaks Town Council sought clarification as to the definition of major developments, and recommended that this be clearly stated within the Policy. It further requested that the

obligations required of developers be strengthened to secure tangible improvements to the transport network as opposed to encouraging developers to consider incorporating improvements. The current wording was considered to be too flexible and likely to result in such provisions being avoided, and the Town Council therefore requested that all phrases which could bring question to its applicability be removed – particularly “where possible,” “should seek to,” “should consider,” and “is encouraged”.

Furthermore, the Town Council advised that the practical implications of Item 2, which places private vehicle use as the lowest priority when incorporating transport options into development design, could result in inadequate parking provision for disabled drivers and their carers, as well as for delivery vehicles. It therefore requested that a stipulation be added, requiring careful planning which ensures safe stopping places for delivery vehicles and adequate access for disabled drivers and visiting carers to be incorporated into all designs. The Town Council also recommended that consideration of car sharing facilities should also be added under “Other Transport Modes” – particularly in locations which are less served by buses and trains. This is on the grounds that encouraging effective car sharing could reduce the number of vehicles travelling to and from the urban centres on key routes.

The Town Council requested that shared transport options be promoted within this policy, particularly in new developments.

Finally, Sevenoaks Town Council considered it essential for the Local Plan to have regard to parish and town council Highways Improvement Plans, which document hyper-local requests for network improvements including crossings, junction design, speed limits and signage. In addition to being live documents which are regularly reviewed, Highway Improvement Plans benefit from being directly informed by local residents whose infrastructure requests are often directed to town and parish councils, and local Councillors. This renders them highly effective reflections of the most prominent infrastructure improvement priorities and most up to date on urgent and local needs.

Sevenoaks Town Council therefore recommended that recognition of Highway Improvement Plans be added to this Policy, alongside explicit requirement for developers to consult with this, as well as any relevant Neighbourhood Development Plans. The Sevenoaks Town Neighbourhood Plan as an example, captures the Town’s Council’s key policy and aspirations for Movement infrastructure, which it would expect to be reflected fully within local proposals.

T3	Vehicle Parking: Sets and requires compliance with a transport hierarchy, capping number of parking spaces per unit depending on location. Also sets design principles, and requirements for EV charging points and bicycle parking.
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Approved 8th December 2025

Sevenoaks Town Council stipulated that design and parking layout must take into consideration the needs of disabled drivers and passengers, including any related carers who will need regular and guaranteed access to disabled residents.

It recommended that consideration must also be given to improving the accessibility – both of new and existing pavements – to mobility scooters and disabled pedestrians, and the need to incorporate clear parking designations which either discourage or prohibit cars from partially parking on, and blocking, pavement access.

T4	Transport Statements, Assessments and Plans: Requires supporting assessments and plans for new development proposals as per thresholds set by KCC.
Approved 8th December 2025	
Sevenoaks Town Council sought clarification on whether a threshold is proposed, for when a new development will be required to produce a Transport Assessment. It recommended that the threshold should be on the lowest scale possible, in order to ensure that new developments are well designed and respond to local pressures on the transport network.	

6. ALLOCATION COMMENTS
Approved 8th December 2025

Northern Ward proposed allocations
Approved 1st December 2025

Commentary applicable to all sites in Northern Sevenoaks

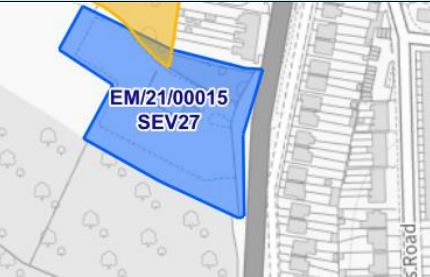
Sevenoaks Town Council wished to register it's concern regarding the overall scale of development, permitted and proposed, in the north of the town and neighbouring villages.

A proposal similar to that contained in SEV24 (Land north of Sevenoaks west of Otford Road) was included in early versions of the Town Council's Northern Masterplan in 2017. **It was highly criticised at the public consultation stage and removed on these grounds, but particularly because it extended past the Town Council's, and designated Neighbourhood Plan's, boundary. The Town Council would be happy to share our findings with the District Council.**

Taking permitted schemes and Local Plan sites together, there are close to 3,000 new homes proposed across Northern Sevenoaks alone – albeit with an undetermined split between Sevenoaks, Otford and Dunton Green in the SEV24 site – in a town which, per the 2021 census, had 8,431 homes. Sevenoaks Town Council expressed its concern that, while the pockets or parts of the several development sites are sometimes too small to warrant either more medical centres, additional education places, better facilities for the elderly or allowances for green spaces on their own merit, their combined impact will indeed be significant enough to generate such a need for these facilities.

Infrastructure will be critical to the success of expansion of the town to the north, and the Town Council advised that it must be front-loaded to ensure that new residents can fully access public transport, cycle paths, community spaces and sports facilities from the outset. The Infrastructure Delivery Plan, Design Panels and Section 106 agreements must consult fully, draft in partnership with local councils and stakeholders and delivery early. These plans should consider the wider needs of the town as a whole and support a thriving High Street, excellent sports clubs and cultural spaces for all.

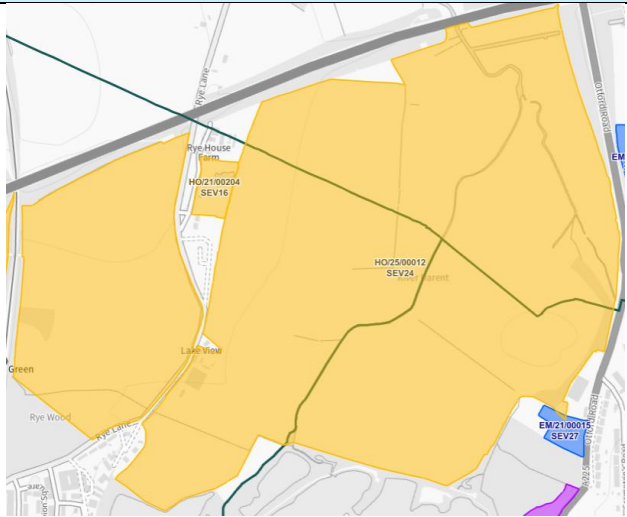
Sevenoaks Town Council strongly advised that a more detailed Masterplan for the area will be necessary to properly assess the cumulative needs and impact of these developments for a growing community.

SDC Allocation Reference: EM/21/00015 SEV27	Address: Otford Road Depot, Otford Road
Ward: Northern	
Allocation proposal: 0.2006 Ha employment space	
New or returning allocation? Returning on PDL	
Approved 1st December 2025	
This site is previously developed land, and has been used as a park and ride and as a Council Depot. It is immediately adjacent to and partly occupied by the Site of Special Scientific Interest (SSSI) nature reserve, with terraced housing both opposite and to the north. There is currently no safe access for pedestrians. This site has already been commented on through the planning application process. Sevenoaks Town Council objected to the proposal largely due to concerns relating to highway and pedestrian safety and the inappropriate siting of a fast food restaurant within walking distance of schools. From a spatial perspective, Ward Members would have preferred this site to be developed for housing to increase the community in this area and to avoid divorcing neighbouring properties from residential character. As with other sites in the north of Sevenoaks, a wider view on cumulative impact on community and infrastructure must be taken by both developer and principle authority, and sites should not be viewed in isolation given the scale of development proposed. Sevenoaks Town Council highlighted that the Sevenoaks Town Neighbourhood Plan, as well as its Highway Improvement Plan identify a number of infrastructure needs either within or in close proximity of this location, which could be facilitated by its development. The Town Council therefore reiterated its comments from Policy T2, whereby it requested an explicit requirement be added to a developer’s responsibilities, for their consultation of any relevant Neighbourhood Development and Highway Improvement Plans to inform infrastructure discussions and Section 106 negotiations. It recommended that this expectation should be added to the site’s Development Brief, recognising the importance of Neighbourhood Plans and Highway Improvement Plans in identifying the most prominent infrastructure improvement priorities and up to date local needs, as well as highlighting the need for Town and Parish Councils to be included as active partners during any emerging Section 106 discussions and designs. Sevenoaks Town Council advised of the following local infrastructure improvements identified and promoted within the Sevenoaks Town Neighbourhood Plan which it strongly recommended be added to the Development Brief for this site. • Incorporation of the Dunton Green to Sevenoaks walking and cycling route through the site, linking it to the Otford to Sevenoaks route at Otford Road. This is as recommended in Policy M3 and further supported by the District Council’s Local Cycling and Walking Infrastructure Plan. • New / enhanced walking route between the above new entrance and Bat & Ball Station – including redesign of the railway bridge comprising PROW SU3, which goes over Bat & Ball Road between Goya Business Park and Watercress Drive to create an	

enhanced link. This is a specific opportunity identified within the supporting text of Policy M1 and further reinforced by Policy M3.

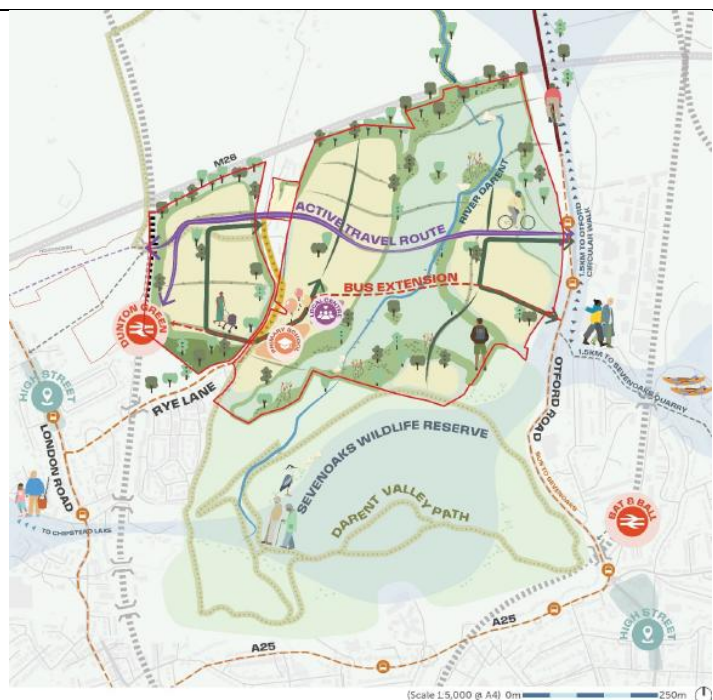
- Financial or infrastructural contribution towards a new entrance to the Sevenoaks Wildlife Reserve from Otford Road just north of the proposed allocation site, as recommended in the Aim L6. The Town Council further recommended that supporting public realm features such as signage, toilets and a café be incorporated into this.
- Additional allotment provision to support the new and existing residents – an identified need within the supporting text of Policy L8 which will be elevated following delivery of any of the significant developments proposed within Northern Ward.

Ward Councillors also recommended that the site be considered for replacement provision of Abacus Furniture – which would allow the Greatness Regeneration Project (proposed allocation HO/21/00059, SEV2) to proceed without loss of this significant valuable asset.

SDC Allocation Reference: HO/25/00012 SEV24	Address: Land north of Sevenoaks, west of Otford Road
Ward: Part Northern, part Dunton Green and Otford	
Allocation proposal: 1500 housing units	
New or returning allocation? New on Greenfield land	
Development Brief details 40-60 dwellings per hectare Approx 1500 residential units arranged over 3 hamlets, a primary school and mixed uses, new local centre, new park to the north of the Wildlife Reserve, pedestrian and cycle routes, new bus connection, active travel route between Bat & Ball Station and Dunton Green Station, green lanes and corridors, connections to PRoWs, upgrade to northern underpass beneath M26, clear wayfinding, enhancement of blue green infrastructure, flexible community use in green spaces, maintenance of rural character, direct connection to Wildlife Reserve and Quarry leisure lake, affordable housing, additional GP capacity, new primary school, defined area identities, active frontage and use at Rye Lane,	

urban frontage along Otford Road with tree planting, landscape led development, EV charging, energy efficient design, sustainable urban drainage.

Requirement for early submission to a Community Review Panel as well as Design Code to be prepared as part of a planning application.



Approved 1st December 2025

A similar scheme was consulted on by Sevenoaks Town Council as part of its early work on the Northern Masterplan in 2017. Whilst there was public support for development at Sevenoaks Quarry, this north-western site did not progress into the Masterplan – nor into the subsequent Sevenoaks Town Neighbourhood Plan. This was on the grounds of significant opposition from local residents and both Otford and Dunton Green Parish Councils,

Sevenoaks Town Council expressed its continued concern about the impact that the site's proposed development would have on the protected chalk stream, flood plains and wildlife, as well as the risk posed to natural landscape and the development itself by the historic landfill with which a significant portion of the site overlaps.

Furthermore, the adjacent nature and wildfowl reserve benefits significantly from the current open access to the wildlife corridor, grazing space and floodplain of this site.

Sevenoaks Town Council advised that, should the proposed allocation be taken forwards to Regulation 19 and future development, the following points must be addressed.

Design

The Development Brief for the site indicates 1,500 homes over several separate hamlets, connected via active travel routes and with parkland through the Flood Zone 2 and 3 areas.

Two hamlets are shown within the boundary of Sevenoaks Town – one hamlet adjacent to the A225 and able to connect to it by the Sainsburys roundabout, and one smaller hamlet west of the current Council Depot site and immediately adjacent to the Nature Reserve. This smaller site is incongruous with the presence of the Nature Reserve and may pose difficulties for wildlife with lighting and noise so close to the waterbody. The Town Council noted that it also appears that this hamlet would be accessed via the Council Depot on Otford Road, which is currently subject to a planning application in which the highway treatment does not anticipate large volumes of traffic. New residents would end up accessing through a small industrial estate, which the Town Council considered to be inappropriate, with a further potential clash identified from the alternative proposals for solar farm in the location.

The Development Brief does not indicate how many homes could be expected in each hamlet. The Town Council considered that the hamlet alongside the A225 may be appropriate if it is sensitively designed and kept at semi-urban housing densities in low-rise form. The densities shown on page 20 of the Development Brief was considered to be broadly appropriate, however it was noted that higher density (50-60dph) areas closer to existing development may be incongruous with the openness of the area.

The District Council vision in the Development Brief describes a place where the Wildlife Reserve and river “establish the landscape character throughout the site and influence how people move, gather and live [...] that blend ecological stewardship with sustainable, connected growth.” **The Town Council stipulated that this aspiration must not be lost.** Public access to the riverside through parkland was considered to be a welcome addition in the north of the town, where the existing community around the Bat and Ball area has no immediate access to open spaces.

Sevenoaks Town Council welcomed the **significant land buffer** indicated in the Development Brief, protecting both the River Darent and the Wildlife Reserve from this new development. It considered this to be vital in protecting the integrity the rare chalk stream and the Sites of Special Scientific Interest’s wildlife, habitats, and visual prominence, and also to protect the new residential areas from flooding.

Should this site progress to Regulation 19, the Town Council stipulated it to be essential for the Development Brief to be worked up in more detail and in close collaboration with all key stakeholders.

Community

Democratically and practically, this site is complicated by being in three parishes and three county council divisions (expected to be the initial boundaries for unitary authority divisions). For the benefit of residents and the ease of management of public spaces and facilities, Sevenoaks Town Council advised that this should be reviewed.

The Town Council raised its concern that there is no mention of **sporting facilities** in this development, despite the findings of the Playing Pitch and Outdoor Sports Strategy – which forms part of the evidence base – reporting a significant shortage of pitch space for rugby and hockey clubs in the Town. The Town Council reported of its own experience, having observed the outgrowing of both these sports from their town centre locations, that they would benefit significantly from more pitches and appropriate clubhouse premises in close proximity to the Town. With undeveloped land being in very short supply in the Town area, this has not been possible to deliver to date, with the risk of very popular clubs with excellent grassroots activity leaving the town. The Town Council considered that this development – should it come forwards – may be an opportunity to solve that problem for the existing and future community.

Sevenoaks Town Council further recommended that **local play areas** for children must be incorporated into designs.

Finally, since this site would constitute Green Belt release under Grey Belt definitions, the developments must adhere to the Golden Rules, which include provision of 50% affordable housing provision. Sevenoaks Town Council welcomed the potential for **significant new social housing** which has proven impossible to deliver for many years in the town, however stipulated that the development of **community facilities must reflect the needs of the residents** who will occupy those homes and those already living locally. For example, the

Abacus Furniture Project could be re-housed locally through the project and would be valuable in the area of Town where incomes are generally lowest.

Infrastructure

Sevenoaks Town Council insisted on the vital importance of all relevant Town and Parish Councils being included as partners and signatories to Section 106 agreements and other infrastructure planning around this complex and very significant development site. Many developments around the country have seen poor outcomes for residents where developers provide community facilities paid for by service charges, resulting in an effective double taxation where Parish Councils are already providing parks and play areas. All three Town and Parish Councils within which this site sits in have structures and experience in managing community spaces and facilities, and have grassroots understanding of local need.

As with other sites in the north of Sevenoaks, a wider view on cumulative impact on community and infrastructure must be taken by both developer and principle authority, and sites should not be viewed in isolation given the scale of development proposed.

Sevenoaks Town Council highlighted that the Sevenoaks Town Neighbourhood Plan, as well as its Highway Improvement Plan identify a number of infrastructure needs either within or in close proximity of this location, which could be facilitated by its development. The Town Council therefore reiterated its comments from Policy T2, whereby it requested an explicit requirement be added to a developer's responsibilities, for their consultation of any relevant **Neighbourhood Development and Highway Improvement Plans to inform infrastructure discussions and Section 106 negotiations**. It recommended that this expectation should be added to the site's Development Brief, recognising the importance of Neighbourhood Plans and Highway Improvement Plans in identifying the most prominent infrastructure improvement priorities and up to date local needs, as well as highlighting the need for Town and Parish Councils to be included as active partners during any emerging Section 106 discussions and designs.

Sevenoaks Town Council advised of the following local infrastructure improvements identified and promoted within the Sevenoaks Town Neighbourhood Plan which it stipulated must be included in any resulting scheme, and therefore requested the addition of to the site's Development Brief:

- Incorporation of the Dunton Green to Sevenoaks walking and cycling route which crosses directly through the site, as well as linking it to the Otford to Sevenoaks route at Otford Road. This is as recommended in Policy M3 and further supported by the District Council's Local Cycling and Walking Infrastructure Plan.
Financial contribution towards a new / enhanced walking route between the above new entrance and Bat & Ball Station – including redesign of the railway bridge comprising PROW SU3, which goes over Bat & Ball Road between Goya Business Park and Watercress Drive to create an enhanced link. This is a specific opportunity identified within the supporting text of Policy M1 and further reinforced by Policy M3.
- Additional allotment provision to support the new and existing residents – an identified need within the supporting text of Policy L8 which will be elevated following delivery of any of the significant developments proposed within Northern Ward.
- Financial or infrastructural contribution towards a new entrance to the Sevenoaks Wildlife Reserve from Otford Road just north of the proposed allocation site, as recommended in the Aim L6. The Town Council further recommended that supporting public realm features such as signage, toilets and a café be incorporated into this.

More broadly, Sevenoaks Town Council considered this scheme to be of a transformative scale for both Sevenoaks Town and Dunton Green Parish. Infrastructure is already under extreme pressure in these areas, particularly in terms of capacity in highways, sewage, drinking water and medical care and it therefore advised that serious, collaborative strategic work and Masterplanning will be required, which must engage with the public early and collaboratively.

Furthermore, Sevenoaks Town Council noted the potential conflict between this proposal for the sites close to the A225, with competing proposals by the District Council for a solar farm and Thames Water for sewage treatment facilities.

The Site Description on page 53 of the draft Local Plan states that “the site could also help alleviate east-west movement through the town.” Sevenoaks Town Council recommended that this aspiration be linked not only to local infrastructure, but also to the longstanding proposal for the delivery of Junction 5 East-Facing Slip Roads connecting the A21, M25 and M26 to deliver new motorway access options and reduce Heavy Goods Vehicle (HGV) and other through-traffic movements. This project is included in Kent County Council’s most recent Transport Strategy and has well-advanced design work. The Town Council considered that, with 1,500 homes at this location, another 1,000 permitted in Sevenoaks to the East of it, and 3,000 being considered at Borough Green Garden Village, the network will need significant change.

Furthermore, the site is in close proximity to two railway stations, at Dunton Green and Bat and Ball. At a conceptual level, this makes it a highly sustainable location, however the Town Council advised that careful work will need to be done to improve the connectivity of these stations. This is on the grounds that currently, fast and frequent connections to London Charing Cross are only available from Sevenoaks Station or, for some, to London Victoria from Otford. Contrastingly, the two stations closest to this site offer less frequent and slower stopping services which limit their current functionality, particularly for new residents who are planning regular commutes. With growth, improved rail service provision should come.

Healthcare is under considerable strain in Northern Sevenoaks, with General Practitioner to patient ratios some of the lowest in the county. Sevenoaks Town Council informed that the Sevenoaks Primary Care Network had recently (31st March 2025) reported their unawareness of the Tarmac development until after the Section 106 agreement had been secured. Whilst the Town Council noted the possible future provision at Sevenoaks Hospital, it reported its strong belief that **provision of a new primary care facility will be essential to the success of the project.**

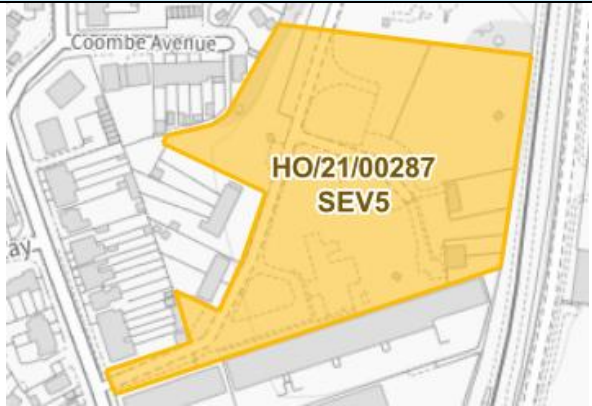
Wildlife and Biodiversity

The site is adjacent to a very important Nature Reserve and is home to a rare chalk stream habitat. There are significant opportunities to improve the biome through improvements to habitat and the river path, as well as improvements to the River Darent path itself which currently does not follow the river throughout this section of the Valley. Sevenoaks Town Council recommended that any resulting development of this site take advantage of the opportunity to deliver an enhanced extension of the Darent Valley path, which follows the attractive river and strengthens its significant identity.

Furthermore, the Town Council stipulated that the impact of development on migration and habitat must be carefully studied before Masterplanning the site to ensure that species such as lapwing, skylark and bats are not impacted. It further stated that there must be a generous

green buffer to the nature reserve, and informal access should be controlled and designed in close collaboration with the Kent Wildlife Trust.

Finally, Sevenoaks Town Council reiterated its comments on Policy NE1 and BW1 and requested that the importance of views to and from the open countryside and National Landscapes be explicitly recognised in conjunction with this site, and consideration of these be required when assessing the impact of developments not only *within* National Landscape, but adjacent to them. It further requested that consideration be given to the contribution of open spaces to adjacent wildlife sites and the species that they support, noting that this site is heavily used by migrating skylarks both as a food source and a resting place before reaching the adjacent Sevenoaks Nature Reserve.

SDC Allocation Reference: HO/21/00287 SEV5	Address: Land at Cramptons Road
Ward: Northern	
Allocation proposal: 50 housing units	
New or returning allocation? Returning on Urban land	
Development Brief details 50-100 dwellings per hectare 71-143 dwellings Design requirements include place-making, landscaping and retention of existing mature trees, providing a new open space to preserve and enhance the trees, respect local character, provide a positive key view from Cramptons Road, heights to respond to existing built form, 2-3 storeys to west and 4-5 storey apartments to north and east, active frontage overlooking public spaces, older persons housing to be considered, ground surveys, sustainable drainage, positive pedestrian environment, cycle storage.	
Approved 1st December 2025	
This is an underused Brownfield site which has been brought forward in previous iterations of the draft Local Plan, and is an underused brownfield site. It is highly sustainable in terms of access to facilities and transport. The site is identified in the Sevenoaks Town Neighbourhood Plan for housing use at a similar scale, although not so tall or dense, stating that “development form should respond to the lower scale properties to the west”. The Development Brief concurs with Sevenoaks Town Council’s view that this site should incorporate public green and play space. There is informal use as a play space currently, being an open, flat and largely grassed area. Although private land, this reflects the lack of public open space in the neighbourhood. Sevenoaks Town Council considered this to be a particularly sustainable location ideal for accommodating older peoples’ housing and establishing a senior community – being located	

close to the Bat & Ball Station, local amenities, two supermarkets, and a General Practice (St John's Medical Practice), and the Town Council welcomed the acknowledgment of this in the Development Brief.

Sevenoaks Town Council noted that the land may be difficult to develop due to water treatment and extraction assets below the surface and at the adjacent water treatment works. It cited documents in the public domain which suggest that the boreholes that supply water for 40,000 people are located on this site, and therefore stipulated that any work which may jeopardise the safety of the water supply or aquifers must be avoided. Please see: https://waterprojectsonline.com/wp-content/uploads/case_studies/2014/Cramptons-Road-WTW-2014.pdf

As with other sites in the north of Sevenoaks, a wider view on cumulative impact on community and infrastructure must be taken by both developer and principle authority, and sites should not be viewed in isolation given the scale of development proposed.

Sevenoaks Town Council highlighted that the Sevenoaks Town Neighbourhood Plan, as well as its Highway Improvement Plan identify a number of infrastructure needs either within or in close proximity of this location, which could be facilitated by its development. The Town Council therefore reiterated its comments from Policy T2, whereby it requested an explicit requirement be added to a developer's responsibilities, for their consultation of any relevant **Neighbourhood Development and Highway Improvement Plans to inform infrastructure discussions and Section 106 negotiations**. It recommended that this expectation should be added to the site's Development Brief, recognising the importance of Neighbourhood Plans and Highway Improvement Plans in identifying the most prominent infrastructure improvement priorities and up to date local needs, as well as highlighting the need for Town and Parish Councils to be included as active partners during any emerging Section 106 discussions and designs.

Sevenoaks Town Council advised of the following local infrastructure improvement identified and promoted within the Sevenoaks Town Neighbourhood Plan which it strongly recommended be added to the Development Brief for this site:

- Incorporation of a pedestrian route linking the Business Centre to Bat and Ball Station as per design guidance under Policy D1.
- Requirement of a financial contribution towards delivering a new or enhanced walking route linking to Bat & Ball Station – including a redesign of the railway bridge comprising PROW SU3 which goes over Bat & Ball Road between Goya Business Park and Watercress Drive. This is a specific opportunity identified within the supporting text of Policy M1 and further reinforced by Policy M3.

SDC Allocation Reference: MX/21/00023 SEV25	Address: Bakers Yard, Otford Road
Ward: Northern	
Allocation proposal: 50 housing units, TBC Ha employment site	

New or returning allocation?

New on Greenfield land



Approved 1st December 2025

This site faces residential properties and a site with permission for residential development to its east, and links to flats to the south. However, it also acts as a buffer currently between the A225 and the Site of Special Scientific Interest, being Sevenoaks Nature Reserve.

The site is currently a mixed employment site with an informal layout and considerable blue-green infrastructure which Sevenoaks Town Council considered may be valuable to retain. It therefore recommended that the site should be analysed carefully to determine where development can go ahead without causing harm.

Highway access was also recommended to need careful design work on this busy road, and the Town Council stipulated that development should be low density and wildlife-friendly due to the site's sensitive location. It further stated that the buffer between the neighbouring SSSI Nature Reserve must be retained through design.

As with other sites in the north of Sevenoaks, a wider view on cumulative impact on community and infrastructure must be taken by both developer and principle authority, and sites should not be viewed in isolation given the scale of development proposed.

Sevenoaks Town Council highlighted that the Sevenoaks Town Neighbourhood Plan, as well as its Highway Improvement Plan identify a number of infrastructure needs either within or in close proximity of this location, which could be facilitated by its development. The Town Council therefore reiterated its comments from Policy T2, whereby it requested an explicit requirement be added to a developer's responsibilities, for their consultation of any relevant **Neighbourhood Development and Highway Improvement Plans to inform infrastructure discussions and Section 106 negotiations**. It recommended that this expectation should be added to the site's Development Brief, recognising the importance of Neighbourhood Plans and Highway Improvement Plans in identifying the most prominent infrastructure improvement priorities and up to date local needs, as well as highlighting the need for Town and Parish Councils to be included as active partners during any emerging Section 106 discussions and designs.

Sevenoaks Town Council advised of the following local infrastructure improvement identified and promoted within the Sevenoaks Town Neighbourhood Plan which it strongly recommended be added to the Development Brief for this site:

- Requirement of a financial contribution towards delivering a new or enhanced walking route linking to Bat & Ball Station – including a redesign of the railway bridge comprising PROW SU3 which goes over Bat & Ball Road between Goya Business Park and Watercress Drive. This is a specific opportunity identified within the supporting text of Policy M1 and further reinforced by Policy M3.

- Financial or infrastructural contribution towards a new entrance to the Sevenoaks Wildlife Reserve from Otford Road just west of the proposed allocation site, as recommended in the Aim L6. The Town Council further recommended that supporting public realm features such as signage, toilets and a café be incorporated into this.

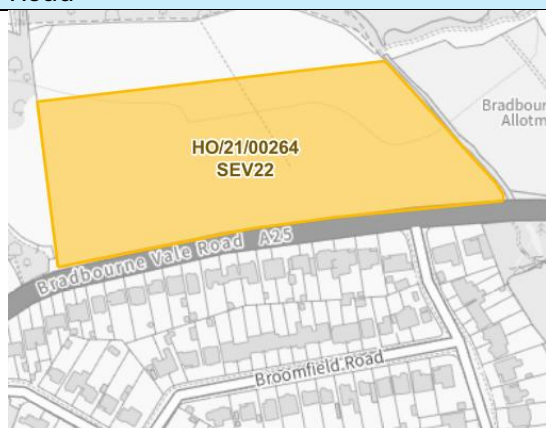
SDC Allocation Reference: HO/21/00059 SEV2	Address: Abacus Furniture, Farm Road Garages
Ward: Northern	
Allocation proposal: 10 housing units	
New or returning allocation? Returning on Urban land	
Development Brief details Mixed Use – residential and employment 50-75 dwellings per hectare 9-13 dwellings Design requirements include flood protection and mitigation, retaining employment use on the northern parcel and either retention or relocation of Abacus Furniture Project, retention of the historic ragstone wall, strengthened building line to southern parcel, public realm enhancements including tree planting, active frontage, soft landscaping, adaptation of existing buildings in the first instance.	
Approved 1st December 2025	
Sevenoaks Town Council considered that the redevelopment of the housing and garages on this site would improve the public realm, reduce antisocial behaviour and replace outdated, hard-to-maintain homes in the flats to the south. It welcomed the recognition of the strong community value of Abacus Furniture Project in the associated Development Brief, as well as the policy protection of EMP3 for requiring robust justification for its loss of relocation. The Town Council requested that the retention – either within this site or elsewhere in Sevenoaks – of Abacus Furniture be given high priority, and that its proposed protection within the Development Brief be strengthened by referencing Policy COM1 to require any loss would be reprovisioned to be equivalent, equally accessible or robustly justified. The Town Council considered that any necessary relocation of the Abacus Furniture Project must be located at a minimum to be within Northern Sevenoaks. This Ward houses the largest proportion of the key demographic using the services, and this need will only grow as Northern Sevenoaks is further developed, often with 40-50% affordable housing. The Town Council advised of its proposal under allocation SEV27, that any necessary replacement provision of the Abacus Furniture Project be prioritised for delivery in the first instance on the Otford Depot site. This is on the grounds that, not only would it make a much	

more appropriate and socially valuable reuse of the site than the current proposals for a drive-through restaurant, but it would also allow for the service to be retained within its current vicinity.

Should the Otford Road Depot drive-through be a requirement in order to make the site's redevelopment financially viable, the Town Council requested that one of the industrial units which have achieved full planning permission be allocated for this reprovision instead.

As with other sites in the north of Sevenoaks, a wider view on cumulative impact on community and infrastructure must be taken by both developer and principle authority, and sites should not be viewed in isolation given the scale of development proposed.

Sevenoaks Town Council highlighted that the Sevenoaks Town Neighbourhood Plan, as well as its Highway Improvement Plan identify a number of infrastructure needs either within or in close proximity of this location, which could be facilitated by its development. The Town Council therefore reiterated its comments from Policy T2, whereby it requested an explicit requirement be added to a developer's responsibilities, for their consultation of any relevant **Neighbourhood Development and Highway Improvement Plans to inform infrastructure discussions and Section 106 negotiations**. It recommended that this expectation should be added to the site's Development Brief, recognising the importance of Neighbourhood Plans and Highway Improvement Plans in identifying the most prominent infrastructure improvement priorities and up to date local needs, as well as highlighting the need for Town and Parish Councils to be included as active partners during any emerging Section 106 discussions and designs.

SDC Allocation Reference: HO/21/00264 SEV22	Address: Land West of allotments, Bradbourne Vale Road
Ward: Northern	
Allocation proposal: 60 housing units	
New or returning allocation? New on Greenfield land	
Approved 1st December 2025	
Sevenoaks Town Council strongly objected to the proposed allocation of the site on the basis that the current use by Bradbourne Riding for the Disabled is of considerable social and community value. The site is also identified for community use within the Sevenoaks Town Neighbourhood Plan, and offers an openness to the nature reserve beyond.	
Policy COM1 of the draft Local Plan prioritises the retention of local services and facilities and seeks to protect community assets serving a local need. The proposed allocation of this site was therefore considered to be contrary to this Policy, unless replacement provision which is	

equally accessible to the Group's stables is provided, unless the facility is no longer needed, or unless there are clear operational reasons for moving the service.

This proposed allocation is also in opposition to the adopted Sevenoaks Town Neighbourhood Plan (Policy L8), which identifies the field as a possible future extension to the Bradbourne Vale Road allotments should its current use no longer be required. The need for additional allotments at this location will only be exacerbated by the significant projected increase of the population of Northern Sevenoaks by over 1,500 new dwellings and the Town Council therefore stipulated that precedence should be given to the site's reuse as an extension to the Bradbourne Vale Road allotments, should its existing use be no longer needed.

For these reasons, Sevenoaks Town Council has registered the site as an Asset of Community Value.

The Town Council issued its strong belief that registered Assets of Community Value should be granted material planning weight, and referenced its comments on Policy COM1 where it has proposed as such.

Should the proposed housing allocation be taken forwards to Regulation 19, Sevenoaks Town Council advised that Policy COM1 must be applied in conjunction with the strong evidence of its community value provided by the Bradbourne Riding for the Disabled Group in its Community Asset nomination, **and** it must be demonstrated that the provision is either no longer needed, or can be replaced nearby with no disruption or impact to their services.

The Town Council further advised that any future use must limit informal access to the Nature Reserve.

As with other sites in the north of Sevenoaks, a wider view on cumulative impact on community and infrastructure must be taken by both developer and principle authority, and sites should not be viewed in isolation given the scale of development proposed.

Sevenoaks Town Council highlighted that the Sevenoaks Town Neighbourhood Plan, as well as its Highway Improvement Plan identify a number of infrastructure needs either within or in close proximity of this location, which could be facilitated by its development. The Town Council therefore reiterated its comments from Policy T2, whereby it requested an explicit requirement be added to a developer's responsibilities, for their consultation of any relevant **Neighbourhood Development and Highway Improvement Plans to inform infrastructure discussions and Section 106 negotiations**. It recommended that this expectation should be added to the site's Development Brief, recognising the importance of Neighbourhood Plans and Highway Improvement Plans in identifying the most prominent infrastructure improvement priorities and up to date local needs, as well as highlighting the need for Town and Parish Councils to be included as active partners during any emerging Section 106 discussions and designs.

Sevenoaks Town Council advised of the following local infrastructure improvements identified and promoted within the Sevenoaks Town Neighbourhood Plan which it strongly recommended be added to the Development Brief for this site.

- Financial provision towards the Dunton Green to Sevenoaks walking and cycling route to the north of the site, linking it to the Otford to Sevenoaks route at Otford Road. This

is as recommended in Policy M3 and further supported by the District Council's Local Cycling and Walking Infrastructure Plan.

- Financial or infrastructural contribution towards a new entrance to the Sevenoaks Wildlife Reserve from Otford Road just north of the proposed allocation site, as recommended in the Aim L6. The Town Council further recommended that supporting public realm features such as signage, toilets and a café be incorporated into this.
- Additional allotment provision to support the new and existing residents – supported by Policy L8 which identifies this site for allotment provision should its existing use be no longer needed, and identifies specific need for further allotments which will be elevated following delivery of any of the significant developments proposed within Northern Ward.

St John's Ward proposed allocations

SDC Allocation Reference: MX/21/00039 SEV15	Address: 109-119 St Johns Hill
Ward: St Johns	
Allocation proposal: 18 housing units, TBC Ha employment site	
New or returning allocation? New on Urban land	
Approved 3rd November 2025	
Sevenoaks Town Council welcomed the proposed allocation of 109-119 St Johns Hill. It falls within the area of the St John's Masterplan and would, if taken forward, contribute to the realisation of the Masterplan. The Town Council advised that the two St John's sites (SEV8 and SEV15) should be considered together to ensure there is coherence of design and infrastructure provision. There is an opportunity to include in the development a rationalisation of the two carparks. Doing so might allow for the release of District Council-land and the creation of more residential and commercial units as well as public space. In accordance with the Sevenoaks Town Neighbourhood Plan and as both sites involve development of more than ten units, the Town Council advised that a Design Review Panel should be established and its output consulted on by the developers as part of the pre-application process and throughout the period of the development. Equally, the Community Advisory Panel should be established early in the process.	

Sevenoaks Town Council requested that the following infrastructure improvements be delivered either as part of the designs, or required for delivery under any future Section 106 agreement:

- Tree planting as recommended in the draft St John's Hill Area Masterplan
- Financial contribution and dedicated space for cultural events as identified as a key opportunity in the draft St John's Hill Area Masterplan
- Contribution towards, or delivery of, a zebra crossing just east of the Bat & Ball junction and linking the northern side of Bradbourne Vale Road to the site, as proposed in Sevenoaks Town Council's Highway Improvement Plan.
- Financial contribution towards, or delivery of a 20mph extension for Mount Harry Road, Hitchen Hatch Lane, St Botolphs Road, St John's Hill / Dartford Road and Seal Hollow Road, as proposed in Sevenoaks Town Council's Highway Improvement Plan

SDC Allocation Reference: ST0 SEV8	Address: DG Autos off Bradbourne Vale Road
Ward: St Johns	
Allocation proposal: 28 housing units	
New or returning allocation? New on Urban land	
Approved 3rd November 2025	
Sevenoaks Town Council welcomed the proposed allocation of DG Autos off Bradbourne Vale Road. It falls within the area of the St John's Masterplan and would, if taken forward, contribute to the realisation of the Masterplan. The Town Council advised that the two St John's sites (SEV8 and SEV15) should be considered together to ensure there is coherence of design and infrastructure provision. There is an opportunity to include in the development a rationalisation of the two carparks. Doing so might allow for the release of District Council-land and the creation of more residential and commercial units as well as public space. In accordance with the Sevenoaks Town Neighbourhood Plan and as both sites involve development of more than ten units, the Town Council advised that a Design Review Panel should be established and its output consulted on by the developers as part of the pre-application process and throughout the period of the development. Equally, the Community Advisory Panel should be established early in the process.	

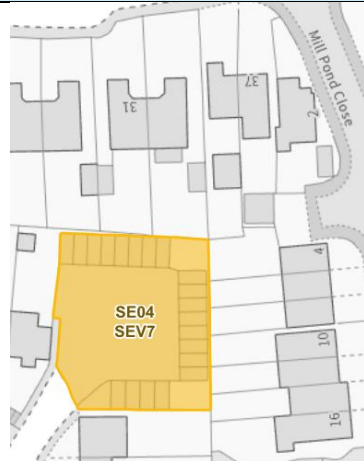
Sevenoaks Town Council requested that the following infrastructure improvements be delivered either as part of the designs, or required for delivery under any future Section 106 agreement:

- Tree planting as recommended in the draft St John's Hill Area Masterplan
- Financial contribution and dedicated space for cultural events as identified as a key opportunity in the draft St John's Hill Area Masterplan
- Contribution towards, or delivery of, a zebra crossing just east of the Bat & Ball junction and linking the northern side of Bradbourne Vale Road to the site, as proposed in Sevenoaks Town Council's Highway Improvement Plan.
- Financial contribution towards, or delivery of a 20mph extension for Mount Harry Road, Hitchen Hatch Lane, St Botolphs Road, St John's Hill / Dartford Road and Seal Hollow Road, as proposed in Sevenoaks Town Council's Highway Improvement Plan

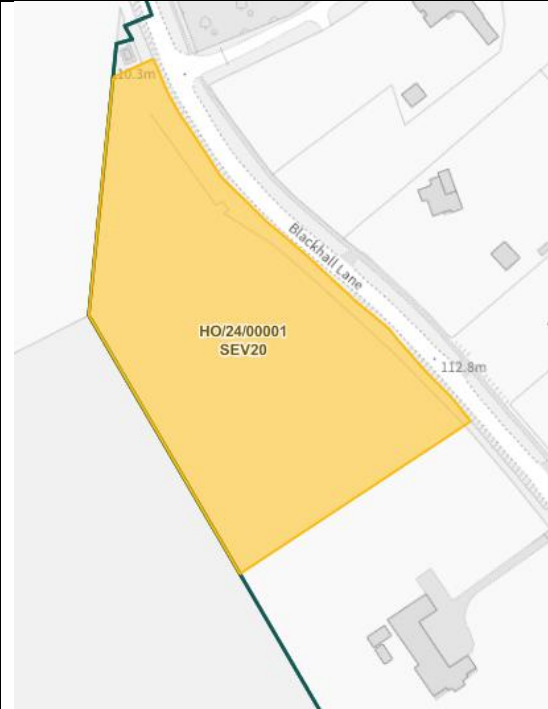
Eastern Ward proposed allocations

SDC Allocation Reference: SE03 SEV6	Address: Garages off Hillingdon Avenue
Ward: Eastern	
Allocation proposal: 11 housing units	
New or returning allocation? New on Urban land	
Approved 8th December 2025	
Sevenoaks Town Council recorded its concern about the potential loss of parking for existing properties as well as provision for parking for any new build and sought clarification as to impact on the bungalows in North View Road from a several storey building.	
The Town Council recommended that any emerging proposals incorporate the following infrastructure requests: • Improvement/landscaping to the Hillingdon Avenue Open Space wooded area which is currently overgrown and inaccessible • Possible incorporation of a small playground as current playgrounds (Greatness and Hillingdon Rise are some distance from this area) • This development along with the other Eastern Ward proposal further underlines the need for completion of the long-awaited crossing at Millpond Close	
The Town Council further requested that the following infrastructure improvements, as per its Highway Improvement Plan, also be considered for delivery as part of any plans or emerging Section 106 negotiations: • A new Keep Clear section at the narrowest part of Hillingdon Avenue	

- Financial contribution towards safe crossing points at Hillingdon Avenue to Trinity School, as required by planning condition for the school's prior expansion
- Safe crossing point or a minimum of safety improvements on Hospital Road outside the Hospital.

SDC Allocation Reference: SE04 SEV7	Address: Garage court off Hillingdon Avenue
Ward: Eastern	
Allocation proposal: 8 housing units	
New or returning allocation? New on Urban land	
Approved 8th December 2025	
Sevenoaks Town Council recorded its concern that additional housing in this area will create significant parking issues for both current and future residents, particularly as some of the houses in this area already have no off-street parking and on street parking is limited. The Town Council recommended that any emerging proposals incorporate the following infrastructure requests: • Improvement/landscaping to the Hillingdon Avenue Open Space wooded area which is currently overgrown and inaccessible • Possible incorporation of a small playground as current playgrounds, on the grounds that Greatness and Hillingdon Rise are some distance on foot from this area • This development along with the other Eastern Ward proposal further underlines the need for completion of the long-awaited crossing at Millpond Close The Town Council further requested that the following infrastructure improvements, as per its Highway Improvement Plan, also be considered for delivery as part of any plans or emerging Section 106 negotiations: • A new Keep Clear section at the narrowest part of Hillingdon Avenue • Financial contribution towards safe crossing points at Hillingdon Avenue to Trinity School, as required by planning condition for the school’s prior expansion • Safe crossing point or a minimum of safety improvements on Hospital Road outside the Hospital.	

Wildernesse Ward proposed allocation

SDC Allocation Reference: HO/24/00001 SEV20	Address: Land north of Barnett Field, Blackhall Lane
Ward: Wildernesse	
Allocation proposal: 10 housing units	
New or returning allocation? New on Greenfield land	

Approved 17th November 2025

Sevenoaks Town Council objected to the proposed housing allocation of this site on the following grounds:

- This is an identified Biodiversity Opportunity Area located within the Green Belt, sitting directly adjacent to the Wildernesse Conservation Area, which is characterised by open spacious, landscaped settings and spacious plots. The Conservation Area Appraisal sets a high importance to views, setting and topography within and surrounding the Wildernesse Conservation Area, including the spacious and “visually secluded” setting of individual houses. One of these important views includes the open view of the National Landscape and Site of Special Scientific Interest from Blackhall Lane, which would be lost to the houses on the other side of Blackhall Lane should this site be built upon.
- The site is located in between three key heritage assets, with the Wildernesse Conservation Area to the north and National Landscape and Site of Special Scientific Interest at Knole Park to the south. Development of this site would have a negative impact on the prominence and openness of the National Landscape, impeding the important views both from the Conservation Area as well as towards it from the National Landscape.
- Nearby houses are typically 0.5 hectares or more, with the proposed allocation of ten units being a significant increase to the surrounding density of sites and inappropriate

for the area. This is supported by the guidance provided in the Appraisal document of the adjacent Conservation Area, which gives high value to the generous size of the plots, modest height and bulk of houses, and overall impression of buildings being subservient to their surrounding landscape. A significantly denser development adjacent to the Conservation Area, interrupting the significant open view of the countryside would have a detrimental impact on the character and setting of the Wildernesse Conservation Area. This is contrary to the design guidance which states that local distinctiveness should be protected – both in the context of the whole conservation area, as well as with the site and its immediate surroundings.

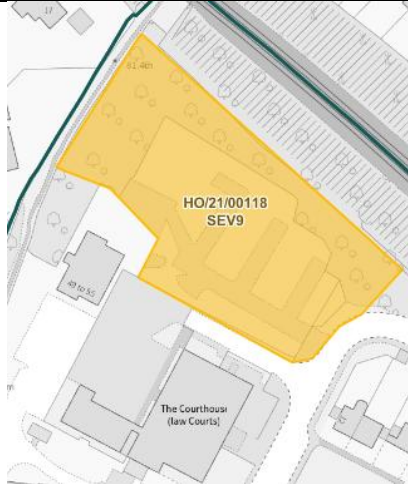
- There is a steep rise to the east onto this plot and no pavement, which would cause significant access issues. Furthermore, Blackhall Lane does not benefit from a bus service, and is over 2km from the nearest train station, making it a particularly unsustainable site to develop new housing. According to isochrone mapping, it would take the average pedestrian over 30 minutes to walk to the Sevenoaks Station, or just under that to reach the Bat & Ball Station.

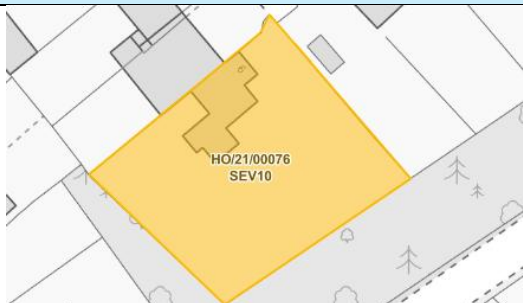
Should the allocation be taken forwards, the following infrastructure provisions must be delivered as part of any resulting development:

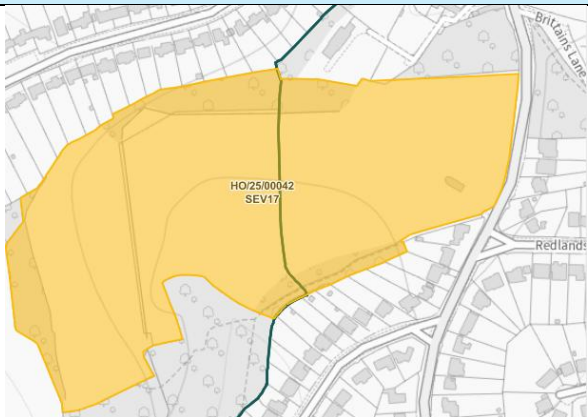
- Minimum of 50% affordable housing
- Financial provision to cover a new bus route to serve Wildernesse Ward and the new housing site
- New safe and appropriate site access, particularly for pedestrians, given the lack of footpath on the west of Blackhall Lane, and subsequent need for any pedestrian exiting the site to cross the road onto the opposite verge
- Adequate surface water mitigation caused by increased hardstanding on this site, which is sloped in nature and would therefore cause increased surface water runoff.
- Mitigation of amenity and views for residents of Wildernesse Conservation Area, as well as those at the Quarry Hill Cottages to the south west of the site.

Finally, Sevenoaks Town Council reiterated its comments on Policy NE1 and BW1 and requested that the importance of views to and from the open countryside and National Landscapes be explicitly recognised in conjunction with this site, and consideration of these be required when assessing the impact of developments not only *within* National Landscape, but adjacent to them. It further requested that consideration be given to the contribution of open spaces to adjacent wildlife sites and the species that they support, noting that this site is heavily used by migrating skylarks both as a food source and a resting place before reaching the adjacent Sevenoaks Nature Reserve.

Kippington Ward proposed allocations

SDC Allocation Reference: HO/21/00118 SEV9	Address: Land off Morewood Close
Ward: Kippington	
Allocation proposal: 69 housing units	
New or returning allocation? New on Urban land	
Approved 3rd November 2025	
Sevenoaks Town Council considered that this site must be considered alongside the Station Development (SEV12) for impact on access points and highways. Active site access here is constrained by the closure of the ‘Morewood Arch’ which would connect it to the Bradbourne Lakes. The Town Council therefore advised of an opportunity to open the site up to pedestrians and cyclists through this arch as well as through access to the Robyn’s Way footpath. Sevenoaks Town Council noted that a planning application was currently underway for this site for only 28 dwellings, for which it had recommended refusal unless the buildings did not exceed four storeys, local amenity was protected and 40% affordable housing was secured. Sevenoaks Town Council requested that the following infrastructure improvements be delivered either as part of the designs, or required for delivery under any future Section 106 agreement: • Removal of the gates under the “Morewood Arch”, located near Morewood Close and running under the railway, and delivery of a new quality walking and cycling route linking northern residential areas with the Station. This as per the Sevenoaks Town Integrated Transport Strategy, which forms an Appendix to the Sevenoaks Town Neighbourhood Plan and identifies the arch as a key opportunity for improving the pedestrian network and recommends that the underpass be upgraded and opened up to active travel movement. • The addition of HGV restrictions on narrow country lanes such as Ashgrove Road, as per Sevenoaks Town Council’s Highway Improvement Plan	

SDC Allocation Reference: HO/21/00076 SEV10	Address: 9 Clare Way
Ward: Kippington	
Allocation proposal: 8 housing units	
New or returning allocation? New on Urban land	
Approved 3rd November 2025	
Sevenoaks Town Council raised no objections to the proposed housing allocation of 9 Clare Way, however highlighted the comments of local residents on the limited and challenging in parking in the area. The Town Council therefore advised that any development must ensure there is sufficient off-road parking. Finally, Sevenoaks Town Council requested that the following infrastructure improvement be delivered either as part of the designs, or required for delivery under any future Section 106 agreement: • Addition of HGV restrictions on narrow country lanes such as Ashgrove Road, as per Sevenoaks Town Council’s Highway Improvement Plan	

SDC Allocation Reference: HO/25/00042 SEV17	Address: Land west of Brittain's Lane
Ward: Part Kippington, part Riverhead	
Allocation proposal: 65 housing units	
New or returning allocation? New on Greenfield land	
Approved 3rd November 2025	
Sevenoaks Town Council noted that the inclusion of this site remains provisional, as the Grey Belt assessment and related evidence regarding Conservation Areas and the Kent Downs National Landscape (AONB) have not yet been published. Based on information currently available, Sevenoaks Town Council recorded its concern regarding the suitability of this Greenfield site for development. The site occupies a prominent and elevated position forming part of the setting of the Kent Downs National Landscape, lies adjacent to ancient woodland, and contributes to the rural character and openness of the area. Development is likely to result in a detrimental visual impact on the	

wider landscape, adversely affect views from the AONB, and harm the setting of the Brittain's Farm Conservation Area.

The Town Council noted the findings of the Inspector's decision (April 2022 / Appeal dismissed), which concluded that:

- The site forms part of a valued landscape that should be protected and enhanced.
- Owing to its topography and openness, any development would be visually intrusive and harmful to the setting of the National Landscape (AONB).
- The scheme would fail to preserve the setting of listed buildings and the historic Brittain's Farmstead.

The Town Council considered these concerns to remain relevant, and no exceptional circumstances to have been demonstrated to justify development in this sensitive location. The Town Council further recorded its concerns as to access feasibility.

Pending publication of the outstanding evidence base, Sevenoaks Town Council therefore did not support allocation of this site in its current form.

Should the site proceed contrary to the above objection, Sevenoaks Town Council advised that the following minimum infrastructure requirements must be secured in order to mitigate impacts:

- Affordable Housing: Minimum of 50% affordable provision secured by S106.
- Highway and Access: Comprehensive transport assessment, safe access arrangements to Brittain's Lane.
- Landscape and Biodiversity:
 - Retention and protection of existing mature trees and ancient woodland buffer zones.
 - Robust landscaping and visual screening to protect views from the Kent Downs and Conservation Area.
- On-site public open space with long-term management plan.
- Sustainability: Integration of low-carbon and energy-efficient design in accordance with Sevenoaks Town Neighbourhood Plan Policy D1.

Joint Town and Kippington Wards proposed allocation (Sevenoaks Station)

SDC Allocation Reference: MX/21/00036 SEV12	Address: Sevenoaks Station and Car Park, Morewood Close
Ward: Town Ward and Kippington Ward	
Allocation proposal: 420 housing units, TBC Ha employment site	
New or returning allocation? Returning on Urban land	

Development Brief details:

Mixed use for residential, retail, community and car parking

150+ dwellings per hectare

Approx. 400 residential dwellings

Proposals are required for early submission to Community Review Panel

Proposals are required to include a Design Code

Proposed typically 4 to 6 storeys, going up to 12 storeys west of the station (see below)



Indicative 3D birds-eye view from Northeast.



Indicative 3D birds-eye view from Southwest.



Indicative Building Heights



Approved 1st December 2025

Sevenoaks Town Council welcomed the significant and strategic redevelopment of this underutilised site to create a new gateway befitting the town.

The Sevenoaks Town Neighbourhood Plan identifies the station area as offering a significant opportunity to transform the sense of arrival into Sevenoaks and could establish a new urban quarter for the town.

In addition, the emerging Sevenoaks Town Centre Masterplan outlines design principles for the development (see below), especially the need for community input at the outset.

Sevenoaks Town Council Town Council considered the Town Centre Masterplan to be a crucial part of the redevelopment planning at the station, particularly as the draft Masterplan is recognised as an important emerging design guidance document in Policy SEV1 of the draft Local Plan.

The Town Council did, however, raise a number of serious concerns about the proposals laid out in the Development Brief for the site (SEV 12), specifically:

- The suggestion, continued from the last Local Plan draft, of several **tower blocks** of between eight and 12 stories. This configuration would be **out of keeping with the adopted policy D1 of the Sevenoaks Town Neighbourhood Plan as well as the character** of the town as a whole. It would place tower blocks behind the Quarry Cottages, as well as affecting views from the Conservation Areas. As such, Sevenoaks Town Council opposed development of this height and suggested, as per the Sevenoaks Town Neighbourhood Plan, a scale typically of four to six storeys to be appropriate. The impact on Littledean Court, Morewood Close and Railway Cottages must be paramount in consideration of all high-rise development.
- Transport and traffic flow, including pedestrian flow. The Development Brief suggests all taxi and other drop-off/pick-up will via the current small car park, parallel to the rail tracks. All such traffic will therefore enter/exit via an entrance which the Town Council advised to already be a notorious pinch point, at the junction of London Road and Oakhill Road and close to the entrance of the Shell garage. In addition, the proposed new multi-story car park would be at the far north of the site and therefore see hundreds of commuters walking back to their cars via London Road. The Town Council emphasised that the location and access to this car park should be considered carefully.
- The lack of community input at the earliest stage. Page 183 of the Local Plan proposes the format for consultation to be to be Development Brief → Community Review Panel → Town and Parish Council → Design Advisory Panel → Submission to Application. Sevenoaks Town Council requested that this be amended to Joint Community and Design Panel, including Town and Parish membership → Creation of revised Development Brief → Public Consultation (broadening the current proposal to consult Town/Parish Councils only) → Submission of application, with the Design Review Panel to continue to oversee the process to submission of application and any subsequent amendments. Membership of both panels should be agreed specific to the site, in order to be best locally informed.

Sevenoaks Town Centre Masterplan

Sevenoaks Town Council welcomed the recognition awarded within Policy SEV1, to the design guidance in the draft Town Centre and St John's Hill Area Masterplans, and requested that this be reiterated within the Development Briefs – particularly as the draft Town Centre Masterplan provides design guidance for this specific site. The Town Council considered that masterplanning must support significant development sites in order to take into account the wider impact of new housing on traffic, pedestrians and cyclists and other supporting infrastructure.

The draft Town Centre Masterplan, which identifies this site as a significant opportunity to transform the sense of arrival into Sevenoaks as well as establish a new urban quarter, provides the following design principles which the Town Council stipulated should be used to guide future proposals:

- “Potential to provide a new station building that provides a welcoming point of arrival and departure for the town;
- This should open out onto a public space 'Station Square' providing an arrival space around which retail and food and beverage uses could be located. The square and station building could be located to straddle the railway tracks;

- Further retail uses could be provided on London Road, with residential uses above;
- The development frontage on London Road should be set back to allow for the provision of generous footways and for the planting of street trees on London Road;
- The current surface level station car park could be re-provided in the form of a multi-storey structure (accessed from the north) freeing up the majority of the station car park for redevelopment as a new urban residential quarter. Given their proximity to the station the new homes would be highly suitable for young professionals commuting into London and the residential mix should cater for this demographic;
- In this highly accessible location development density could be greater than is typical in Sevenoaks. Buildings of 4 to 6 storeys may be appropriate and there may be potential for taller buildings marking the station and for local high points in helping to define key locations in the townscape;
- Advantage should be taken of the existing site levels (the surface car park is set below street level) so that car parking for homes is provided at undercroft level and homes are set within a well landscaped car free (except for emergency access) environment;
- The streetscape around the station should be enhanced and simplified with vehicular access to the station for drop off and taxis focused to the west of the station and pedestrian access to the east. A high-quality public realm scheme should be delivered along London Road. This should provide a clear uncluttered pedestrian friendly environment that minimises street furniture and provides pedestrian crossings where pedestrians want to cross."

Finally, Sevenoaks Town Council advised that an integrated design approach **must** be pursued between the Sevenoaks Station site and the two neighbouring development sites of the former BT building at 160 London Road and the Former Farmers site opposite. Both sites offer significant development opportunities and have been subject to active planning proposals – with 160 London Road having received prior approval for a change of use to dwellinghouses in November 2023, and a planning application to deliver 56 apartments at the Former Farmers being due for a decision on 11th December 2025.

Cohesion between the three sites at this significant gateway will be critical to establishing a new and attractive arrival quarter and ensuring that the three schemes complement and integrate with each other.

Town Ward proposed allocations

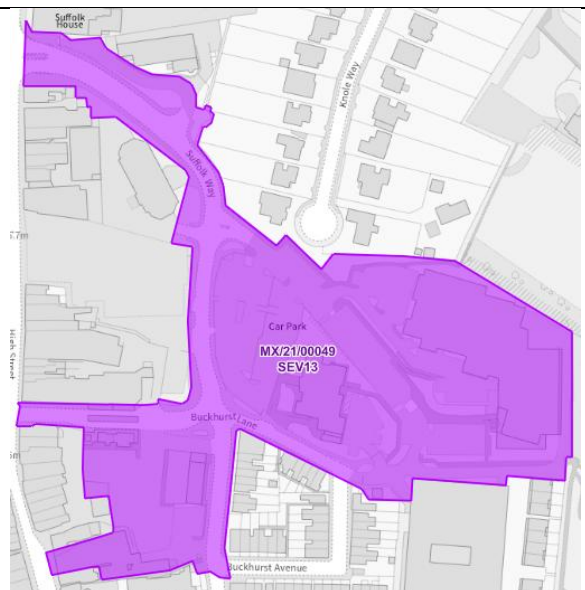
SDC Allocation Reference: MX/21/00049 SEV13	Address: Land East of High Street
Ward: Town	
Allocation proposal: 350 housing units, 0.1 Ha employment site	
New or returning allocation? Returning on Urban land	

Development Brief details

150+ dwellings per hectare

Circa 350 units (including specialist housing)

Design requirements include prioritisation of heritage and sensitive views particularly from Knole Park, sympathetic and integrated building heights, strong building lines with buildings facing primary streets, a public square outside the library, active ground floor uses, integration of bus station and driver resting facilities, frequent tree planting, landscaped drainage features, improved pedestrian connections, improved wayfinding – including signposted connections to Knole Park.

**Approved 3rd November 2025 with additional comments agreed 8th December 2025**

Sevenoaks Town Council requested the addition of a Policy-requirement for any forthcoming development proposals on this site to be preceded by a detailed spatial masterplan, prepared with active public engagement. This should precede any Design Code and build upon the Town Council's emerging Town Centre Masterplan in order to ensure that the proposed development will integrate with and complement the surrounding area.

Furthermore, the Development Brief for this proposed allocation notes that any emerging proposals for this site would need to go through an early-planning Community Review Panel as per Policy DE1, however does not allude to the further Design Advisory Panel which Policy DE2 would also require after this initial stage. The Town Council recommended that this be explicitly added to the Development Brief for clarity, with consideration given also the Town Council's request under Policies DE1 and DE2, for Community Review Panels and Design Review Panels to be engaged jointly as well as earlier in the planning process.

The Town Council highlighted its request for proposals comprising either 10+ units, 0.5Ha or 1,000sqm+ (as per the Sevenoaks Town Neighbourhood Plan) to be referred at the earliest stage of planning to a joint Community Review and Design Advisory Panel - the earliest stage being defined as prior to production of a detailed Development Brief. This is so that the views and priorities of the local community can be incorporated into designs from the outset, and with the intention that the Design Review Panel would continue to oversee the progression of proposals throughout the planning application stage. Membership of both panels should be agreed specific to the site, in order to be best locally informed.

For clarity, this would see the planning process outlined on Page 183 of the draft Local Plan to be amended from "Development Brief → Community Review Panel → Town and Parish Council → Design Advisory Panel → Submission to Application", to "Joint Community and Design Panel including Town and Parish membership → Creation of Development Brief → Public Consultation (broadening the current proposal to consult Town/Parish Councils only) → Submission of application".

Sevenoaks Town Council sought verification as to the definition of the "specialist units" identified for delivery within the Development Brief, and advised that provision of housing for older people would be ideally placed at this location due to its highly sustainable siting.

Furthermore, design guidance for this site is provided both in the Sevenoaks Town Neighbourhood Plan, as well as expanded upon in the draft Town Centre Masterplan. The Town Council stipulated that this should be incorporated into any resulting proposals, particularly as the draft Masterplan was included by the District Council in its second stage of tender procurement for a development partner and is recognised as an important emerging design guidance document in Policy SEV1 of the draft Local Plan.

The draft Town Centre Masterplan, which identifies this site as a poorly defined area with significant development opportunities near a key gateway, provides the following design guidance:

“Development can transform the area providing a mix of uses within street blocks that form a natural extension to, and that are integrated with, the historic centre.

[...]

“As these plans are progressed they should be presented to a Design Review Panel and community engagement must be carried out to ensure that the values of the local community are considered.

“The following design principles will be important to ensuring that the site integrates successfully into the wider town centre:

- Development to be laid out as part of street blocks with buildings defining the streets and spaces and with positive frontages at ground floor level;
- A permeable network of pedestrian friendly routes and spaces to extend through the area helping to integrate and connect the site to the High Street to the west and to the Environmental Park and Knole Park to the east and residential areas to the north and south;
- Active ground floor uses, including the main entrance to the leisure centre and cafe uses, to be located where they are visually prominent and help to aid legibility within the area;
- A 'green spine' to extend from High Street on the alignment of Buckhurst Lane towards an enhanced entrance to the Environmental Park. This route to form a legible, green extension of Knole Park to High Street and incorporate low level planting / raingardens and tree planting as part of a high-quality public realm treatment that provides priority to pedestrians over vehicles;
- The cultural hub and market hall together with the new leisure centre to open onto, and animate a new public space on the site of the current Buckhurst Lane car park;
- Bus stops to be located where they bring passengers close to the centre but do not impact on the pedestrian experience and legibility of the 'green spine' and;
- Development form, scale, height and massing to be of a human scale and respect the character within the wider town centre and respond to the wider landscape setting."

The Town Council noted that Policy SEV1 alludes to the draft Town Centre Masterplan and promotes compliance with any recommendations within this to guide future development. While the Development Brief for the Land East of High Street acknowledges Policy SEV1 and the need for development proposals to conform with this policy and respond to Neighbourhood Plan priorities, it does not include the draft Masterplan in this specification. Sevenoaks Town Council requested that this be added for clarity under Design Requirements and Policy Priorities (under Site Overview) to ensure that the above design guidance is adhered to.

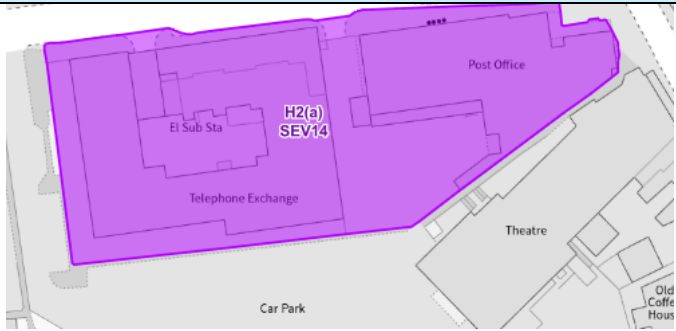
Furthermore, Sevenoaks Town Council requested that all existing and future Development Briefs for proposed allocation sites within Sevenoaks Town Ward make explicit reference to, and contribution towards, the Sevenoaks Town Neighbourhood

Plan's aspiration for the production of a strong Cultural Quarter within the Town Centre. The proposed Cultural Quarter and enhancement of the arts and cultural offering of the Town is particularly important and must not be lost to alternative uses or superseding policy.

Sevenoaks Town Council requested that the following infrastructure requests be considered, both for inclusion in the Development Brief and to inform any future Section 106 negotiations. These as supported by the Sevenoaks Town Neighbourhood Plan and the draft Town Centre Masterplan:

- Provision of a new public space “Buckhurst Square” in the existing Buckhurst Lane car park space, to allow spill-out from the new market hall
- Financial contribution towards cultural events to take place in the above new proposed public space as well as the market hall to enhance the new public space and Cultural Quarter
- Public realm improvements including planting
- Financial provision towards or delivery of an enhanced entrance to the Environmental Park and Knole Park
- Financial contribution towards or delivery of enhanced pedestrian crossing areas linking to the High Street – also as per the Town Council’s Highway Improvement Plan
- Potential infrastructure improvements of the High Street triangle including consideration of one-way or pedestrianisation as per the draft Town Centre Masterplan
- Introduction of HGV “through traffic” movement restrictions, as per the Town Council’s Highway Improvement Plan.

Finally, Sevenoaks Town Council reiterated its comments on Policy NE1 and BW1 and requested that the importance of views to and from the open countryside and National Landscapes be explicitly recognised in conjunction with this site, and consideration of these be required when assessing the impact of developments not only *within* National Landscape, but adjacent to them.

SDC Allocation Reference: H2(a) SEV14	Address: Delivery & Post Office / BT Exchange, South Park
Ward: Town	
Allocation proposal: 100 housing units, TBC Ha employment area	
New or returning allocation? Returning on Urban land	
Development Brief details Mixed use – retail and residential 150+ dwellings per hectare 75-100 dwellings	

Design requirements include prioritisation of adapting existing buildings in the first instance, respecting and enhancing the setting of the Conservation Area scale, form, materials and details, maximum of four storeys on High Street with potential for up to 6 storeys to West (where BT Exchange is located), increase of public space on north eastern corner including landscaping and seating, improved pedestrian links including enhancement of Post Office / Stag Theatre link such as murals, street art, active frontage, active ground floor use for town centre use, expansion of cultural scene and evening activities, retention of Post Office counter facility, coherent strategy for both buildings if they cannot be delivered in tandem, tree-lined streets.

Approved 3rd November 2025 with additional comments agreed 8th December 2025

Sevenoaks Town Council requested the addition of a Policy-requirement for any forthcoming development proposals on this site to be preceded by a detailed spatial masterplan, prepared with active public engagement. This should precede any Design Code and build upon the Town Council's emerging Town Centre Masterplan in order to ensure that the proposed development will integrate with and complement the surrounding area.

Furthermore, the Development Brief for this proposed allocation notes that any emerging proposals for this site would need to go through an early-planning Community Review Panel as per Policy DE1, however does not allude to the further Design Advisory Panel which Policy DE2 would also require after this initial stage. The Town Council recommended that this be explicitly added to the Development Brief for clarity, with consideration given also the Town Council's request under Policies DE1 and DE2, for Community Review Panels and Design Review Panels to be engaged jointly as well as earlier in the planning process.

The Town Council highlighted its request for proposals comprising either 10+ units, 0.5Ha or 1,000sqm+ (as per the Sevenoaks Town Neighbourhood Plan) to be referred at the earliest stage of planning to a joint Community Review and Design Advisory Panel - the earliest stage being defined as prior to production of a detailed Development Brief. This is so that the views and priorities of the local community can be incorporated into designs from the outset, and with the intention that the Design Review Panel would continue to oversee the progression of proposals throughout the planning application stage. Membership of both panels should be agreed specific to the site, in order to be best locally informed.

For clarity, this would see the planning process outlined on Page 183 of the draft Local Plan to be amended from "Development Brief → Community Review Panel → Town and Parish Council → Design Advisory Panel → Submission to Application", to "Joint Community and Design Panel including Town and Parish membership → Creation of Development Brief →

Public Consultation (broadening the current proposal to consult Town/Parish Councils only)
→ Submission of application”.

Design guidance for this site is provided both in the Sevenoaks Town Neighbourhood Plan, as well as expanded upon in the draft Town Centre Masterplan. Sevenoaks Town Council stipulated that this should be incorporated into any resulting proposals, particularly as the draft Masterplan is recognised as an important emerging design guidance document in Policy SEV1 of the draft Local Plan.

“The draft Town Centre Masterplan, which identifies this site as a significant development and public realm improvement opportunity at key gateway, provides the following design guidance:

“The redevelopment of the Post Office and Telecoms building could bring additional life into the western part of the town centre whilst also enhancing the local townscape. The Post Office and sorting office could be delivered independently to the Telecoms building but a comprehensive proposal should be prepared to ensure the longer term vision and opportunity for the site can be delivered. The following design principles will be important when developing the site:

- Delivery of a mix of uses that adds to the vibrancy of this part of the town centre. The potential to extend the Stag Theatre, or provide supporting space / complimentary uses, must be considered and should be part of a longer-term investment strategy. This could take the form of creative studios or a supporting food and drink offer;
- Development should be stepped back from London Road to provide a small public space that could serve as a setting for restaurants and cafes to spill out onto, or for gathering or small-scale events linked to the theatre. The space should be hard paved and include trees, planting and seating;
- Positive frontage that helps to animate the street should be provided on London Road and South Park, with upper floors of buildings to be residential;
- Consideration to be given to the refurbishment / retrofit (rather than the redevelopment) of the Telecoms building to retain the embodied carbon;
- Car parking on South Park should be rationalised and the streetscape enhanced through tree planting and public realm improvements;
- Development proposals must respond to heritage sensitivities (the site is located adjacent to the Sevenoaks High Street Conservation Area and the locally listed Stag Theatre); and
- The site is located on elevated ground with land dropping away to the south and development is likely to be highly visible from a number of locations. The height and massing of development must be carefully considered (three storeys plus an additional set back storey is considered appropriate) and proposals should be tested and modelled in views.”

The Town Council notes that Policy SEV1 alludes to the draft Town Centre Masterplan and promotes compliance with any recommendations within this to guide future development. While the Development Brief for the Post Office/BT Exchange acknowledges Policy SEV1 and the need for development proposals to conform with this policy and respond to Neighbourhood Plan priorities, it does not include the draft Masterplan in this specification. Sevenoaks Town Council requests that this be added for clarity under Design Requirements and Policy Priorities (under Site Overview) to ensure that the above design guidance is adhered to.

Particularly important for this site is the identification of the land outside the Post Office and BT Exchange for a small public space for spill-out from cafes, shops and The Stag Theatre. This should be particularly aimed as a cultural and arts space.

Furthermore, Sevenoaks Town Council requested that all existing and future Development Briefs for proposed allocation sites within Sevenoaks Town Ward make explicit reference to, and contribution towards, the Sevenoaks Town Neighbourhood Plan's aspiration for the production of a strong Cultural Quarter within the Town Centre. The proposed Cultural Quarter and enhancement of the arts and cultural offering of the Town is particularly important and must not be lost to alternative uses or superseding policy.

Finally, the Town Council requested that the following infrastructure requests be considered, both for inclusion in the Development Brief and to inform any future Section 106 negotiations. These as supported by the Sevenoaks Town Neighbourhood Plan and the draft Town Centre Masterplan:

- Financial contribution towards Sevenoaks Town Council's future plans to extend the Stag Theatre as part of the longer-term investment strategy recommended in the draft Town Centre Masterplan's design guidance for this site
- Tree planting and public realm improvements as recommended in the draft Town Centre Masterplan's design guidance for this site
- Delivery of a new public space on London Road to allow seating or small-scale events linked to the theatre, to include trees, planting and seating as proposed in the draft Town Centre Masterplan's design guidance for this site
- Financial contribution towards or delivery of enhanced pedestrian crossing areas where people want to cross – also as per the Town Council's Highway Improvement Plan
- Potential infrastructure improvements of the High Street triangle including consideration of one-way or pedestrianisation
- Introduction of HGV "through traffic" movement restrictions, as per the Town Council's Highway Improvement Plan.

SDC Allocation Reference: HO/21/00273 SEV3	Address: Land rear of Bowerhood House, 15 St Botolphs Road
Ward: Town	
Allocation proposal: 7 housing units	
New or returning allocation? Returning on Urban land	

Development Brief details

50-100 dwellings per hectare

8-16 dwellings

Design requirements include responding to local character from nearby locally listed assets, following building height topography of surrounding area to be up to 3 storeys to the north and up to 3.5 storeys on southern area. Proposes shared amenity space as well as private amenity space for all units, prioritises retention and protection of existing trees.

**Approved 3rd November 2025**

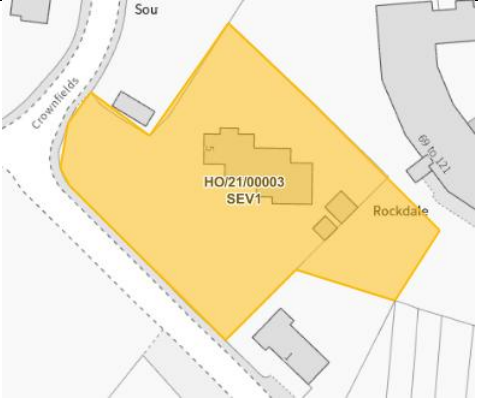
This site is not identified in the Sevenoaks Town Neighbourhood Plan and is an urban infill proposal. While the Town Council did not raise objection to the principal of its development, it expressed objection to the proposed housing numbers and density on the grounds of considering this as overdevelopment – particularly the increased density proposed in the Development Brief.

Sevenoaks Town Council advised that any emerging proposals should consider:

- Housing density suitable to the location, site constraints and that of surrounding plots
- Adequate provision of parking for new residents as well as mitigation of parking impact to existing residents
- Impact to daylight and sunlight, overlooking and residential amenity to existing residents to the west at St Botolphs Avenue, particularly in conjunction with the impact of the proposed Farmers site development. There is potential for the house on St Botolphs Avenue to be significantly overshadowed by development on this higher ground, and for the existing houses to be boxed in by high elevations on both sides.

Finally, the Town Council considered that proposals for this site should be overseen from the outset by a Design Advisory Panel, with the initial Development Brief and key design requirements to be agreed by a joint Community Review and Design Advisory Panel in order to ensure that community views are directly fed into early designs. Membership of both panels should be agreed specific to the site, in order to be best locally informed, with the continued oversight of the Design Review Panel throughout the planning application process.

For clarity, this would see the planning process outlined on Page 183 of the draft Local Plan to be amended from “Development Brief → Community Review Panel → Town and Parish Council → Design Advisory Panel → Submission to Application”, to “Joint Community and Design Panel including Town and Parish membership → Creation of Development Brief → Public Consultation (broadening the current proposal to consult Town/Parish Councils only) → Submission of application”.

SDC Allocation Reference: HO/21/00003 SEV1	Address: Pinetops, 5 Crownfields
Ward: Town	
Allocation proposal: 20 housing units	
New or returning allocation? Returning on Urban land	
Development Brief details? 50-75 dwellings per hectare 14-21 dwellings Design requirements include protection of character of street scene, protects southerly views from properties to the north or east, prioritises landscaping and topography and requires diverse and mature vegetation along the front boundary.	Approved 3rd November 2025
This site is not identified in the Sevenoaks Town Neighbourhood Plan and is an urban infill proposal. While the Town Council did not raise objection to the principal of its development, it expressed objection to the proposed housing numbers and density on the grounds of considering this as overdevelopment. Sevenoaks Town Council advised that any emerging proposals should consider: - Housing density suitable to the location, site constraints and that of surrounding plots - The steep topography of the site and difficult access - Satisfactory mitigation of flooding caused by water-run off due to the topography - Adequate provision of parking for new residents as well as mitigation of parking impact to existing residents. Finally, the Town Council considers that proposals for this site should be overseen from the outset by a Design Advisory Panel, with the initial Development Brief and key design requirements to be agreed by a joint Community Review and Design Advisory Panel in order to ensure that community views are directly fed into early designs. Membership of both panels should be agreed specific to the site, in order to be best locally informed, with the continued oversight of the Design Review Panel throughout the planning application process. For clarity, this would see the planning process outlined on Page 183 of the draft Local Plan to be amended from “Development Brief → Community Review Panel → Town and Parish Council → Design Advisory Panel → Submission to Application”, to “Joint Community and Design Panel including Town and Parish membership → Creation of Development Brief → Public Consultation (broadening the current proposal to consult Town/Parish Councils only) → Submission of application”.	