

General Response to SDC Local Plan Reg 19

Halstead Parish Council OBJECTS to SDC Local Plan 2026, Reg.19

14-9-26

1. Introduction:

Every City, Town or village must have a function to support the population both the residents, those from surrounding areas, further afield in the UK and even from overseas. This function encompasses housing, employment, medical services, transport and other aspects of everyday life. The function of Sevenoaks as described on page 12 of the Local Plan Reg 19 is *“to meets its development needs and protect the environment within the District up to 2042.”*

HPC challenge this statement as it is based on very high housing targets imposed by Government and no other targets that make for a better life for all people.

Yes, SDC needs houses but it also has a much wider responsibility to all the surrounding Boroughs particularly those making up the London Boroughs especially those south of the River Thames. SDC can offer affordable housing – if funds are provided for Registered Providers to manage the affordable houses, it can offer opportunities for walking, cycling, nature exploration, historic buildings and a gateway to Europe. The sign on the border of Kent and the London Borough of Bromley reads “Welcome to Kent, the Garden of England” Our agricultural land, orchards, Green Belt open spaces, Country Parks, Nature Reserves are all threatened by excessive housing. A balanced strategy for growth must be just that, not an overwhelming building programme that once achieved will have ruined the NPPF (Policy HO13) of *“allowing future generations to make decisions without being constrained by rigid historic planning assumptions”*.

Development Strategy 01

- 2.1. SDC state the need for new homes. 4.4 (p.37) states this Plan is in accordance with NPPF para 11 a-b and NPPF Chp.3 Plan-making *“as a platform for local people to shape their surroundings.”* This is not accurate as the district housing need is much less than 1,164 houses per year – this plan is in response to Government demand for 17,460 from 2027 - 2042.
- 2.2. What evidence is there that SDC has challenged Government to the highest level? Yes, there must be growth but in an area that is 93% Green Belt with an external company (Arup) assessing the Green Belt as “Highly performing” especially in the northern areas of the district there are many reasons for maintaining the Green Belt.
- 2.3. SDC states (1.4) “Our plan focuses on growth in existing towns” A mere 4,522 houses are proposed for the existing towns – Sevenoaks, Edenbridge, Swanley & Westerham. Of particular note is the town of Westerham which has only been proposed 31 houses. It has the structure – Drs, Pharmacy, Schools, Community Centre, church, Pubs, Hotels, Historic buildings and more!
- 2.4. Brownfield Land – what evidence is there that SDC have thoroughly researched the availability of brownfield land? HPC documented potential development In Halstead

in 2019, but even after a meeting held between HPC and SDC on 2nd September 2020, there was no recognition that brownfield land would be used.

2.4.1. Co-operation with neighbouring authorities 01.4.13 (p.42.). What evidence is there that SDC has really engaged with neighbouring authorities and every Parish for help in planning new housing developments? There are 18 Statements of Common Ground included in the Evidence documents, 15 of which are unsigned and undated, and they are all on a standard basis with no actual detail about development. For example, ST5-1 is a development of 810 dwellings and impacts the London Borough of Bromley considerably. The London Borough of Bromley Council, and NHS SE London ICB have objected to the proposed plan to develop Site ST5-1. There is no evidence that SDC has approached LBB for housing help or medical services. Instead SDC has annexed the rural village of Pratt's Bottom in the London Borough of Bromley, as a Secondary Service Settlement to support the Plan for ST5-1. HPC has continually tried to engage with SDC and has documented notes of meetings organized by HPC.

2.5. Conclusion: The Development Strategy has not been positively prepared, is not effective, not justified, or sound.

3. Housing Choice for all

3.1. Strategic objectives OB12: *"Optimise the supply of new homes in existing settlements"*. The Local Plan has not made full use of existing settlements but has concentrated on a few areas in the northern districts. A different plan would have reduced numbers in the north of the district, increased the town developments and offered every village the opportunity to share the developments with small estates. There are 27 villages in Sevenoaks District that would all be considered to be unsustainable (i.e. no GPs, pharmacies etc.) but the people who live there are self-sufficient and realistic about managing their lives. Retaining the Green Belt, open space and freedom of movement is essential not just for existing residents but for the hundreds/thousands who visit to improve their health & well-being, appreciate the countryside and the historic environment. It is a privilege to welcome cyclists from Canary Wharf, walkers from Lewisham and hundreds of Duke of Edinburgh Award students doing their Bronze Award.

3.2. A need for new housing – this includes affordable housing in every area in response to local need. This presents a challenge for SDC and the Registered Providers of Housing for Social Rent. Government has recently announced £40 billion in grants to provide the number of Affordable Housing that is, according to Government, required. Registered Providers do not have the capital to purchase houses even at discounted rates.

3.3. SDC example as of Sept. 2026 –

3.3.1. **Chandlers Place**, High Street, Sevenoaks: 107 Luxury Apartments but no affordable units; SDC Housing Supply Department stated that because of lifts in the building social renters would not be able to pay the service charges. Why not a special deal for the affordable flats?

- 3.3.2. **Fort Halstead:** the 1st phase of building is due to commence January 2027: 93 houses, of which 19 are affordable. So far, no Registered provider has taken up the offer.
- 3.3.3. **Clarks Lane, Halstead,** in response to SDC's Housing Needs Survey (2021) with a Rural Exception Policy in place, a Registered Provider (English Rural Housing) started building. Eight years later, the houses are only at roof joists and building has completely stopped. English Rural Housing needs help.

4. Employment & Economy

- 4.1. The employment policy is an aspirational one.
- 4.2. SDC states in the plan that *"40% of people work outside of the district"* yet it will be allocating land for employment use.
 - 4.2.1. The Employment Policy EMP1 identifies EMP2-7 Chelsfield Depot, Badgers Mount, for employment with 7,500m² of floorspace which, according to AI, would generate 500-900 employees. SDC has not explained how this will be implemented because this site is already in use, and lacks justification.
 - 4.2.2. Small commercial estates (Vestry, Goya) exist in Sevenoaks District but the area has never been developed for major manufacturing or commercial use. Due to the development of technology many people are linked with major companies but work from home.

5. Climate Change

- 5.1. Climate Change Policy CC4 1: The Local Plan states that *"For every dwelling built a minimum of 2 trees should be planted"* ... in favour of on-site planting.
 - 5.1.1. Where is this evidenced in regard to proposed developments?
 - 5.1.2. How will SDC monitor this and implement it?

6. Health & Well-being Policy 06

- 6.1. The plan does not promote the quality of existing residents' mental health, or that of the many visitors to the district, such as Duke of Edinburgh trainees, ramblers, cyclists.
- 6.2. The Plan states in OB1 *"recognise link between places and spaces we live in and the quality of residents' mental and physical health"*. The inclusion of large new urban-like developments near existing villages would surely have a negative impact on quality of village residents' mental health.
 - 6.2.1. The plan is in direct conflict to the below statement: *"The quality of the built and natural environment can directly influence healthy behaviours and have positive impacts on reducing health inequalities"*.
 - 6.2.2. HW6.1: *"provision is made to ensure all residents have the opportunity to improve wellbeing"*;

6.2.3. HW6.2: *“Good quality housing in a sustainable location, with access to green open space, can positively benefit social networks and opportunities for active travel”.*

6.3. The Health Impact Assessment is the tool that SDC is using to assess adverse impact on health. Having read this we cannot see how this is implemented to assess adverse impact to residents who are currently living in areas that have been targeted for building.

6.3.1. Also, policy AQ1 1.b: Impact on biodiversity.

6.4. The plan states in policy AQ3 that schemes where unacceptable impacts cannot be overcome by mitigation should be refused. Large developments like ST5-1, ST5-2, ST4-5, ST4-20 and others will have unacceptable impact on biodiversity, noise, and unacceptable light pollution. Therefore, they should be refused under SDC policy.

6.5. SDC states (p.198) The Local Plan *“promotes the health & well-being of residents, workers and visitors to the district, through its role in shaping the built and natural Green Belt land offers not only opportunities for walkers, cyclists, explorers but open space for agricultural activity”.* The 1,700-development proposed right on the boundary of the Kent Wildlife Reserve will hugely impact the renowned nature reserve and potentially cause it to fail as a Reserve.

6.6. Health must include the provision of medical services – Doctors, Dentists, Hospitals, chiropodists, rehab centres. This aspect of development has not been thoroughly examined by SDC and there is heavy reliance on other authorities to provide medical care. NHS Services are provided to the north of the district – all of which are only accessible by private car; the centre and south of the district accesses Tunbridge Wells Hospital at Pembury and it has been up to our local MP Laura Trott to arrange for a bus from Sevenoaks to Tunbridge Wells Hospital (see Appendix 2: Medical Services).

7. Historic Environment HE

7.1. Designated Heritage Assets (p.214). The inclusion of the large development sites in the plan will have a negative impact on the villages in the District. It is contrary to SDC policy OB20, *“To protect and enhance districts historic environment for future generations”.*

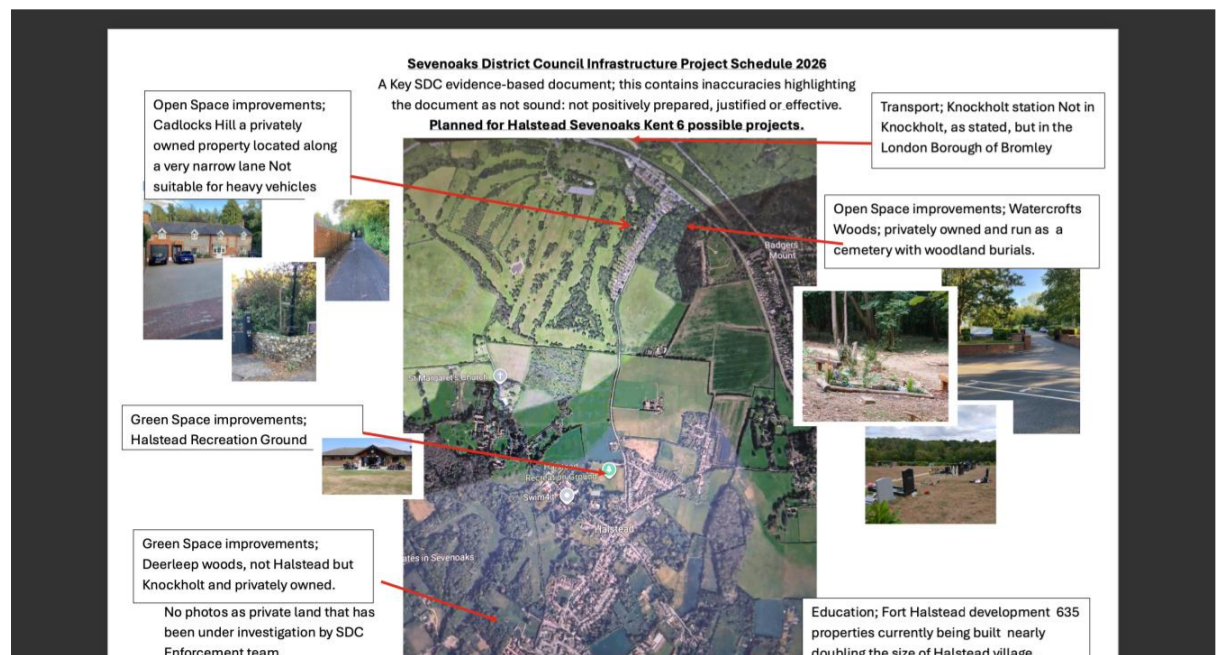
8. Natural Environment

8.1. OB19 Ensures the district protects the natural beauty of the Kent Downs and biodiversity net gain is delivered on any new development. The assessment that was included in the application for ST5-1, for example, identified biodiversity loss, not net gain. Inclusion of this site is, therefore, in conflict with SDC policy.

8.2. The inclusion of ST5-1, ST5-2, and others will have a negative impact on the natural beauty of the landscape of the site. The ‘Public Rights Of Way Act (2000)’ states that *“public authorities should seek to further the purpose of enhancing the beauty of the area”.*

9. Infrastructure and Community Policy IN

- 9.1. The following Questions are relevant:
- 9.1.1. Can development realistically be supported and delivered?
 - 9.1.2. Has the Plan properly assessed congestion, safety and sustainable transport?
 - 9.1.3. Is there sufficient capacity, or is development proposed ahead of essential infrastructure.
- 9.2. SDC states in IN 9.1 that there will be significant investment in infrastructure and upgrading of existing infrastructure. This includes;
- 9.2.1. Transport - public, parking, walking and cycling.
 - 9.2.2. Green and Blue Infrastructure - PROW, Green spaces, protected landscapes (ANOB)
 - 9.2.3. Social infrastructure - Education, Health, Sports and leisure facilities, Emergency services, libraries and Community Centres.
 - 9.2.4. Utilities and hard infrastructure - electricity, gas, water, sewerage, waste and recycling, telecommunications and broadband.
 - 9.2.5. This does not address many areas of infrastructure that the sites in the plan will need. The diagram below shows, in the case of Halstead village, so many inaccuracies that the Infrastructure Development Plan has not been positively prepared and therefore will not be effective and cannot be justified.



10. Transport

- 10.1. T10.2 The plan focuses on the delivery of a sustainable movement network that supports healthy, inclusive and low-carbon patterns of movement and provides realistic choice for how people travel in everyday lives. It aims to reduce the need to travel by private car and supports the creation of well- functioning places. There is nothing in the Local Plan which includes the development of parking spaces in rural

areas. Rural areas need private cars to access all necessary services, so it is important that this is accounted for in the local Plan.

10.2. T10.11 in the Plan recognises that the district has higher-than-average car ownership, particularly in rural areas, indicating the reliance on private vehicles.

10.3. As evidenced in the Local Plan's 'Site Assessment Report' (July 2026) (Table 3.1, p.13) there are fifteen rural locations that are identified as a 'red cluster', which means they are car-dependent and there is a "low potential for modal shift".

11. Summary argument against the Local Plan

11.1. **The Local Plan is not sound because it is not positively prepared.** The scale of development proposed is far beyond what is needed for the District and is not matched by clear evidence of local housing need.

11.2. **The Plan is not justified.** The Council has not shown that reasonable alternatives, including brownfield options and lower-impact sites, have been properly assessed before releasing high-performing Green Belt land.

11.3. **The Plan is not effective.** The proposed housing numbers are not supported by a credible infrastructure plan for roads, public transport, health services, schools, utilities, water supply, sewerage, emergency services or community facilities.

11.4. **The Plan is inconsistent with national planning policy.** Large developments would cause significant harm to Green Belt openness, encourage urban sprawl, damage countryside character and conflict with the purposes of the Green Belt.

11.5. **The scale of development is disproportionate.** In many areas consisting of rural villages, not principal towns or major service centres, the combined allocations would transform their sizes, characters and settlement roles.

11.6. **The Plan undermines sustainable transport objectives.** As many rural villages are car-dependent with low potential for modal shift, major developments will increase reliance on private cars rather than reduce it.

11.7. **The Plan does not adequately protect health and wellbeing.** Loss of accessible green space, increased traffic, noise, light pollution and pressure on services would harm existing residents and visitors who use our rural district for walking, cycling and recreation.

11.8. **The Plan fails to protect the natural and historic environment.** Development at this scale would harm local landscape character, biodiversity, agricultural land, dark skies, public rights of way, heritage assets all over the District.

11.9. **The evidence base contains gaps and inaccuracies.** The descriptions of development sites, the housing figures, assumptions about existing facilities and the settlement hierarchy all require proper scrutiny before the Plan can be considered sound.

- 11.10. The housing densities proposed for these developments in the Local Plan are more suitable to urban areas, rather than rural locations with poor infrastructure, and therefore those densities are not justified.
- 11.11. **For these reasons, the Local Plan should be found unsound unless the allocations are substantially reduced and supported by robust evidence, infrastructure commitments, and proper cross-boundary cooperation.**

12. Regulation 19 representation: legal compliance and soundness concerns

- 12.1. **We acknowledge the need for an up-to-date Local Plan.** A Local Plan is essential to guide development, meet housing and infrastructure needs, protect the environment, and give communities and infrastructure providers certainty about future growth. However, the Regulation 19 version must still be legally compliant and sound before it can be adopted.
- 12.2. **Legal compliance should be questioned.** Regulation 19 is the stage at which comments must focus on legal compliance and soundness. The Plan should demonstrate that it has been prepared in accordance with the statutory plan-making process, supported by adequate consultation, sustainability appraisal, habitats/environmental assessment where required, and proper evidence. The Planning Inspectorate's local plan examination guidance confirms that the Inspector considers legal and procedural requirements as well as soundness.
- 12.3. **Effective co-operation is not sufficiently demonstrated.** The Plan should show clear and ongoing co-operation on strategic cross-boundary matters, including infrastructure, transport, health, education, utilities and impacts on neighbouring areas. The NPPF requires strategic policy-making authorities to maintain effective co-operation, and Planning Practice Guidance explains that plans should address strategic priorities and be supported by evidence and joint working. Where there is overlap impact with neighbouring authorities and infrastructure providers, the evidence should be clear, published and capable of examination.
- 12.4. **The Plan is not positively prepared.** Although Sevenoaks District Council states that the Local Plan is intended to meet the Government's housing target and guide development from 2027 to 2042, the north of the District's allocations appear disproportionate to the settlement's role and local needs. A positively prepared plan should seek to meet objectively assessed development and infrastructure requirements through a sustainable strategy, not simply allocate large numbers of homes without matching services and infrastructure.
- 12.5. **The Plan is not justified.** The Council has not clearly shown that the building strategy in the north of the District is the most appropriate one when considered against reasonable alternatives. The evidence should demonstrate why lower-impact options, brownfield opportunities, alternative distributions of growth, and less harmful Green Belt sites were rejected. Without transparent comparison of reasonable alternatives, the Plan cannot be shown to be justified.

- 12.6. **The Plan is not effective.** The Plan must be deliverable over its period and supported by effective implementation mechanisms. The current infrastructure schedule and policy wording do not appear to provide sufficient certainty that roads, public transport, health care, schools, water, sewerage, utilities, emergency services, community facilities and active travel improvements will be delivered in time to support the scale of housing proposed.
- 12.7. **The Plan is not consistent with national policy.** National policy requires local plans to enable sustainable development and to be consistent with the NPPF. Major growth appears inconsistent with Green Belt purposes, sustainable transport objectives, protection of countryside character, biodiversity, health and wellbeing, and the need to align development with infrastructure.
- 12.8. **Green Belt release has not been adequately justified.** For example, ST5-1, ST5-2, and others would cause harm to Green Belt openness and to the purposes of the Green Belt, including checking unrestricted sprawl, preventing settlements from merging and safeguarding the countryside. The Plan should give substantial weight to Green Belt harm and explain clearly why exceptional circumstances exist for these particular sites.
- 12.9. **The settlement hierarchy appears to have been used inconsistently.** Many villages in the district are ‘washed-over’, not principal towns or major service centres. Reclassifying or relying on settlement status to support exceptional circumstances must be supported by robust, up-to-date and credible evidence of facilities, services and accessibility.
- 12.10. **The Plan risks harmful cumulative impacts.** The combined scale of sites in the Green Belt would alter the size, character and function of historic villages. The cumulative impacts on traffic, landscape, heritage, biodiversity, dark skies, public rights of way, health and local services should be assessed together, not as isolated allocations.
- 12.11. **The evidence base contains unresolved gaps and inaccuracies.** The Plan should be corrected and strengthened where it relies on inconsistent housing figures, outdated descriptions (e.g. of ST5-1), questionable assumptions about local facilities, or insufficient evidence on infrastructure and environmental mitigation.

13. Conclusion.

Halstead Parish Council welcomes the development of a Local Plan, but this Regulation 19 Local Plan, as it stands, is not acceptable and should be questioned on legal compliance and soundness. Unless robust evidence, infrastructure commitments, reasonable-alternative assessment and cross-boundary co-operation are demonstrated, the Plan should be found unsound.

14. Useful policy and guidance links:

- 14.1. Sevenoaks District Council Regulation 19 Local Plan page;
- 14.2. Sevenoaks District Local Plan Regulation 19 Publication version;
- 14.3. National Planning Policy Framework;

- 14.4. Planning Practice Guidance: Plan-making;
- 14.5. Planning Inspectorate Procedure Guide for Local Plan Examinations;
- 14.6. Planning Advisory Service Statement of Common Ground advice and template.

15. Appendices

- 15.1. Appendix 1: Water Infrastructure for Halstead Parish
- 15.2. Appendix 2: Healthcare & Medical
- 15.3. Appendix 3: Infrastructure Delivery Plan response