

The Otford Society's Response to Sevenoaks District Council's Public Consultation on The Emerging Local Plan 2040



Abstract: This document outlines the steps that the Otford Society has taken in its response to Sevenoaks District Council's emerging local plan. It provides details on how the Society conducted an online survey and held a Public Meeting in order to gauge the strength of opinion among residents. It explains how a sub-committee with the goal to protect Otford from inappropriate development was formed and how evidence from experts was gathered. It sets out the detailed evidence-based response that the society made to Sevenoaks District Council, rejecting the emerging local plan in its current form and specifically opposing developments on four sites in and around Otford.

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Introduction

This document sets out The Otford Society's response to Sevenoaks District Council's public consultation on its **Emerging Local Plan 2040**. The Local Plan is the central planning document that guides where and how development will take place across the district over the next two decades. It establishes the policies that shape decisions on housing, employment, transport, environmental protection, and community infrastructure — ensuring that growth is sustainable and consistent with local needs and national planning policy.

Sevenoaks District Council published the **Emerging Local Plan 2040** for consultation 23rd October 2025, with the consultation period running until 11th December 2025. The current "Regulation 18" stage invites comments on the draft proposals before the final version is prepared for submission to the Planning Inspectorate.

As a community organisation committed to protecting Otford's unique character and ensuring balanced, well-informed development, The Otford Society has carefully reviewed the draft policies, housing allocations, and supporting evidence. Our response reflects extensive local engagement, consideration of environmental and heritage factors, and alignment with national and regional planning objectives.

Online Survey to Gather Views

As a democratic and member-driven organisation, The Otford Society was keen to know what its members and other village residents felt about the development proposals before it expressed any opinions. To gather views from village residents a neutral Online Survey was set up to gather views. The survey was publicised by email, Social Media, village notice boards and leaflets delivered to every house in the village. A full summary of the survey results can be found at Appendix IV of this document. The survey revealed the strength and depth of feeling about proposed large developments in and around the village with 92% of respondents being against the largest proposals. The survey also identified the top concerns of residents and gathered a great deal of useful feedback in free text comments. It was clear that a large majority of respondents had a strong desire for The Otford Society to represent them in objecting to the proposals.

Public Meeting

A public meeting was organised on 26th November to play back interim results of the survey and also to gather further feedback from residents. This meeting was so well attended that there was standing room only and the feedback received solidly reinforced the survey results. At the Public Meeting, Society members voted to authorise the use of the "Village Protection Fund, currently standing at £52,000 to fight the proposals.

Formation of The Otford Protection Committee

The Trustees and Management Team resolved to form a separate sub-committee to drive a campaign against the developments. This sub-committee reports to Chris Sutton and explicitly excludes any Trustees and Management Team Members who are also Parish Councillors to avoid any potential or perceived conflict of interest.

Consultation Assistance for Village Residents

Since the SDC Public Consultation was perceived by some residents to be difficult to complete the Otford Protection Committee produced a step by step guide to help people and ran a number of “drop in sessions” to assist with the process of responding to the Public Consultation. It is important to note that the Society’s aim was not to influence people’s responses, simply to assist with their submission.

Publicity & Campaigning

The Otford Protection Committee produced leaflets, flyers for notice boards and three large banners which were placed at strategic locations around the village to encourage participation in the Public Consultation.

Fund Raising

Given the likely costs of fighting the developments, especially as we move towards Regulation 19 stage an urgent need for fund raising has been identified with a target of raising at least another £50,000 in the next 6 months. Residents can donate to the Village Protection fund at <http://otfordsociety.org.uk/donate> and there will be a focused set of appeals running from now on. Our creative team are already engaged and sharing ideas.

Production of the Society’s Own Consultation Response

The Otford Protection Committee recruited representatives with relevant domain knowledge and contacts, collaborating with residents’ groups, experts and other partner organisations to ensure that a robust and high quality response could be produced. A decision was also taken to collaborate and co-ordinate with other campaign groups across the district to enable best practice sharing and to establish contacts which would assist as the process moves forward to Regulation 19 stage and beyond.

Details of the Consultation Response

The remainder of this document details the Society's response to the actual Regulation 18 Consultation.

Key Question - Policy ST1

What is your preferred option?

None of the above

Please explain your answer:

Neither option is suitable.

A different development strategy is needed to tackle the obvious housing needs.

Both of the proposed options contain elements that will:

- Fail to deliver suitable protection of the Green Belt
- lead to the loss of versatile agricultural land,
- have a negative effect on National Landscape
- urbanise sensitive rural landscapes

With regard to transportation, we also believe that there are serious and insurmountable deficiencies in both options.

Government Guidelines say that a local plan should be built around a sustainable transport plan. We suggest that they have not been followed.

1. *The inference from the approach being taken by the Council is that it has chosen to ignore Government policy requirements for planning making and developed the Spatial Strategy in isolation of any consideration to identifying transport solutions.*
2. *This means that the purpose of any future transport evidence produced by the Council would be to justify the Spatial Strategy rather than inform and shape it, as required by Government. Such an approach would clearly be procedurally incorrect*
3. *Moreover, by seeking to justify the Spatial Strategy after it has been established rather than inform its development, the transport strategy will necessarily have to justify that a lesser degree of mitigation is required than is actually the case and / or that mitigation is viable and deliverable "subject to more detailed assessment and design" when it clearly is not. Were this not the case, then the Council would have at the very least, developed and consulted on a high-level transport strategy in parallel with the spatial strategy as part of the Regulation 18 process, as required by the Government so to do. Instead, it currently has no transport strategy and no transport solutions.*
4. *A plan adopted on this basis will fail to adequately manage and control development because when the "more detailed assessment and design" is undertaken by individual developers, it will*

become clear that the mitigation expected is insufficient and / or not deliverable leading either to inadequately mitigated development or unacceptable delay in permitting planning applications whilst alternative mitigation is negotiated.

5. Failure to adequately manage and control development is a poor situation for residents, who will be faced with an unknown quantum of development and associated mitigation, and for developers, who will face delay and uncertainty.
6. Under these circumstances, the Council should withdraw the LP18 spatial strategy currently being consulted on and instead undertake a vision-led transport appraisal of spatial options in order to inform the development of the spatial strategy in parallel with a transport strategy, in which the transport strategy identifies solutions that are realistic and deliverable.

We believe however that "None of the Above" is the only valid response.

Many residents and community members share this perspective.

Are you aware of any additional sites which we have not yet considered?

The Otford Society is focused exclusively on the village of Otford and given that we are not aware of further available sites in the village we do not feel that it is appropriate to comment on sites outside our specific focus area.

Site OT2 – (Site for 150 Houses Adjacent to Hale Lane)

Do you agree with the proposed allocation of this site?

Strongly Disagree

Do you have any further comments on this site?

The Otford Society conducted an online survey of local residents which showed opposition to OT2. On the basis of this opposition, the Otford Society is enclosing (attachment 1) a formal objection to the allocation of Site OT2. This draws on evidence from a number of sources, including an Independent Landscape and Visual Assessment (attachment 2) and an Independent Highway and Transport Appraisal (attachment 3).

After Sevenoaks District Council published an Emerging Local Plan (on 23rd October 2025) which included substantial developments both within and in close proximity to the village. The Otford Society was keen to understand the views of local residents and conducted an online survey between 23rd October and 7th December 2025. The survey was designed to be unbiased and was seeking views on proposals contained in the Sevenoaks District Council Emerging Local Plan. The Society wanted to give residents the opportunity to agree or disagree with the proposed developments and to highlight any concerns, or equally any advantages of the proposals.

As part of the survey, the following question was asked....

"Do you support the building of 150 houses on land adjacent to Hale Lane (OT2) "

- Yes – 7%
- No – 81%
- Don't know – 12%

Respondents were able to enter free text responses at the end of the survey and the following is a summary of the key themes that were mentioned..

Key Themes

- Green Belt and Environment: Frequent objections to reclassifying green belt as "grey belt," citing loss of farmland, wildlife habitats (e.g., pollinators, bats, birds), biodiversity, and floodplains near River Darent. Many argue it contradicts national policy and harms mental health via reduced green spaces.
- Traffic and Infrastructure: Roads (e.g., Rye Lane, Telston Lane, Pilgrims Way) described as inadequate for extra vehicles, causing gridlock, safety risks, and pollution. Concerns include frequent closures, narrow lanes, and no viable access for sites like Hale Lane.
- Public Services: Overstretched GPs, schools (Otford Primary oversubscribed), hospitals, and utilities (water shortages, hosepipe bans, sewage capacity). Doubts about developer promises for new facilities.
- Village Identity: Fear of Otford losing rural charm, becoming a "suburban estate" or merged with Sevenoaks/Dunton Green, eroding heritage and community feel.
- Water and Flooding: Repeated mentions of depleted aquifers, ongoing bans, and flood risks on proposed sites, questioning sustainability amid climate change.

Our formal objection to the potential allocation of Site OT2, is made on the basis that we represent a significant proportion of the population of Otford. Based on evidence from two independent surveys and from elsewhere, we suggest that allocating OT2 will result in....

- Destruction of Greenbelt Land
- Loss of Best and Most Versatile Agricultural Land
- Harm to the National Landscape (Kent Downs)
- Harm to the North Downs way
- The Urbanisation of a sensitive rural landscape
- Create severe impacts on traffic flows

We therefore submit that OT2 should be removed from the local plan.

If this site is developed, how could the development benefit you?

N/A

Three documents were attached to the response that are specific to the OT2 development. These attachments are as follows and can be found at Appendix II, III and IV:

1. OtSoc Site OT2 Consultation 18 Response
2. LANDSCAPE CONSULTANT'S REPORT
3. TRANSPORT AND HIGHWAYS CONSULTANT REPORT

Site SEV24 – (Site for 1,500 Houses between Bat & Ball and Dunton Green)

Do you agree with the proposed allocation of this site?

Strongly Disagree

Do you have any further comments on this site?

The Otford Society, representing residents of Otford strongly objects to the SEV24 allocation. Otford is a designated Primary Service Settlement in the Sevenoaks District settlement hierarchy. Whilst the Otford Society disagrees with this designation and wishes to challenge it, this heightens the concern that the Society has over the proposed SEV24 development.

After Sevenoaks District Council published an Emerging Local Plan (on 23rd October 2025) which included substantial developments both within and in close proximity to the village. The Otford Society was keen to understand the views of local residents and conducted an online survey between 23rd October and 7th December 2025. The survey was designed to be neutral and was seeking views on proposals contained in the Sevenoaks District Council Emerging Local Plan. The Society wanted to give residents the opportunity to agree or disagree with the proposed developments and to highlight any concerns, or equally any advantages of the proposals.

As part of the survey, the following question was asked....

“Do you support the building of 1,500 between Bat & Ball & Dunton Green?

- Yes – 4%
- No – 92%
- Don't know – 4%

This clearly shows that an overwhelming majority of respondents are against the development. The Otford Society also held a Public Meeting on 26th November where the village hall was packed to capacity. It was clear from this meeting that there is very strong local opposition to the SEV24 allocation.

In the online survey respondents were also asked about any concerns that they had as well as any potential benefits of the proposed development. The top concerns with the percentage of respondents selecting them in brackets are shown below:

- Congestion, local traffic and access issues (96%)
- Pressure on local services (e.g. schools & medical services) (95%)
- Destruction of Green Belt (89%)
- Loss of valuable farmland (74%)
- Deterioration in air quality (75%)
- Merging between Otford & Sevenoaks & loss of village identity (86%)
- Building of houses in areas prone to flooding (74%)
- The scale of development will harm our local community (85%)
- None of these (3%)

75% of respondents saw no benefits emerging from the SEV24 scheme.

The Otford Society believes that this allocation also breaches multiple local, district and national planning policies.

Congestion, Traffic and Access Issues:

SEV24 would overload Otford Road, the A25 and Rye Lane—already congested at Bat & Ball and Seal Road junctions—exacerbating delays, rat-running through Otford and unsafe access, in direct conflict with NPPF para 110 (avoiding unacceptable impacts on highways), emerging Policy T1 (safe/convenient access prioritising walking/cycling) and Kent Local Transport Plan 6 (mitigating congestion in constrained corridors). Aspirational bus improvements remain unfunded, entrenching car-dependency contrary to NPPF para 105 (significant modal shift) and Policy ST1 (sustainable locations).

Pressure on Local Services:

Otford's schools, GPs and shops—core to its service centre role—are at capacity, yet SEV24 lacks commensurate on-site provision, driving overspill demand and service failure, breaching NPPF para 92 (accessible services/facilities), Policy IN1 (infrastructure delivery matching growth pace) and IDP evidence on strained health/education capacities in the Darent catchment.

Destruction of the Green Belt:

SEV24 strongly performs Green Belt purpose (c)—safeguarding countryside from encroachment—per 2025 Stage 2 Green Belt Assessment, with “provisional” grey belt status invalidated by NPPF footnote 7 constraints (SSSI/floodplain), rendering release unjustified under NPPF para 149 and inconsistent with Policy BW1 (avoiding Green Belt harm).

Loss of Valuable Farmland:

This greenfield site includes best/most versatile (BMV) soils in the Darent Valley, whose loss without exhausting brownfield alternatives conflicts with NPPF para 152(b) (recognise BMV land value), Policy W3 (protect agricultural land) and national food security objectives.

Deterioration of Air Quality:

Adjacent to M26 AQMA No.3 and feeding A25 NO₂ hotspots, SEV24 worsens pollution exposure, violating Environment Act 2021 duties, NPPF para 189 (avoid worsening AQMAs), Policy T1 (improve air quality) and AQMA Action Plan commitments.

Merging of Settlements and Loss of Village Identity:

SEV24's open land preserves separation between Sevenoaks/Dunton Green and Otford, preventing merger; its urbanisation breaches Green Belt purposes (b)/(d) (prevent merging/preserve setting) per NPPF para 138, Policy ST1 (maintain settlement identity) and Landscape Sensitivity Study (Darent corridor sensitivity).

Flood Risk in Vulnerable Areas:

Extensive Flood Zone 3b along River Darent disqualifies SEV24 under NPPF sequential test (para 161) and Exception Test (para 162), with downstream flood risks to Otford conflicting with Policy W1 (strict flood risk avoidance) and SFRA 2024 (precautionary 3b mapping).

Harmful Scale to Local Community:

This 100ha, 1,500-home scheme overwhelms infrastructure/landscape/ecology (SSSI/chalk stream adjacency), lacking alternatives evidence, breaching NPPF para 143 (Green Belt strategy), Policy CC1/CC2 (climate/biodiversity net gain) and Regulation 18 soundness tests (positively prepared/justified).

The Otford Society demands SEV24's deletion as unsound, prioritising compliant sites that uphold policy protections for Darent Valley communities.

If this site is developed, how could the development benefit you?

N/A

Do you support the proposed development brief for the site?

No

Please provide further comments:

SEV24's development brief repeatedly assumes that major harms identified in the Otford Society response above can be "designed away" with aspirational infrastructure and design measures, but its own content shows that these impacts remain unresolved and, in several cases, structurally embedded.

Congestion, traffic and access:

The brief relies on a new bus corridor, upgraded underpasses, a direct eastern entrance to Dunton Green station, and improved crossings on London Road, the A25 and Otford Road to claim a "sustainable and connected movement network". These works are unfunded, dependent on third-party land (e.g. Network Rail for the station access) and tied to wider IDP processes, so they

cannot be guaranteed at plan-making stage, meaning the 1,500-home allocation still conflicts with NPPF and Policy T1 tests on avoiding severe residual highway impacts and car-dependent layouts.

Rye Lane is acknowledged as a narrow rural lane that should retain its character, yet the brief at the same time proposes it as part of the strategic movement framework, with one-way traffic, a local centre frontage and pedestrian/cycle route, which risks funnelling additional movements into a constrained corridor and undermining both safety and rural character. For Otford residents, this reinforces the objection that SEV24 will intensify congestion on already overstretched approaches (Rye Lane, London Road, A25 and Otford Road) rather than relieve it, contrary to the claimed “sustainable movement” objective.

Pressure on local services:

The brief explicitly recognises the need for additional primary school places and “additional capacity for primary and community healthcare” for the wider settlement, including future use of Sevenoaks Hospital, but leaves the scale, timing and funding of this provision to later IDP work. This confirms the Otford Society concern that infrastructure delivery is not secured or phased alongside the development, contrary to Policy IN1 and NPPF requirements that growth be supported by timely provision of schools and health facilities, and that existing service centres like Otford will bear overspill pressure.

Green Belt and settlement separation:

The brief presents the site as a “sensitive transition” between Sevenoaks and the countryside and highlights the opportunity for “a unique series of neighbourhoods in Sevenoaks”, but it does not acknowledge that the land still performs an important Green Belt role in preventing sprawl and maintaining separation between Sevenoaks/Dunton Green and the Darent Valley villages, including Otford. Treating this as an urban extension with higher densities close to stations and a more “urban frontage” on Otford Road undermines Green Belt purposes (b) and (c) by eroding the open gap, exactly as highlighted in the Otford Society objection.

Loss of farmland and “landscape-led” claims:

Although the brief describes a “landscape-led” approach with hamlets, green corridors and a central meadow, it still proposes a net density of 40–60 dph and around 1,500 dwellings across 106.5 ha of currently open, farmed land. This scale of built development is inconsistent with any meaningful retention of the existing agricultural landscape and supports the Society’s position that valuable farmland and rural character would be irreversibly lost, contrary to NPPF emphasis on protecting best and most versatile land.

Air quality and car dependency:

The movement vision assumes that active travel and buses will genuinely dominate everyday travel, yet the brief itself records “poor pedestrian crossings and limited walking/cycling facilities” on London Road, the A25 and Otford Road, and accepts that improvements are only “opportunities” at this stage. Given the existing AQMA along the M26 and known NO2 hotspots on the A25, loading a large new population onto these corridors without secured modal-shift infrastructure reinforces the

Otford Society's objection that the brief fails Policy T1 and national guidance on not worsening air quality in AQMAs.

Flood risk, SSSI and chalk stream:

The brief acknowledges that the River Darent and its floodplain in Zones 2 and 3 "limit development potential" and must be integrated with open space, ecology and drainage, but it still treats the area as a central recreational/meadow spine within a large new settlement. This approach does not resolve the Otford Society concerns about building immediately adjacent to functional floodplain and an SSSI chalk stream, nor does it address the wider catchment-scale risks to groundwater and downstream communities such as Otford identified in the SEV24 objection.

Scale and cumulative impact on local communities:

By confirming a capacity of approximately 1,500 homes, a primary school and local centre over a 1–15 year timeframe, the brief underlines that this is a strategic new settlement, not a modest extension. It explicitly notes that many infrastructure needs stem from "the cumulative impact of development across the District, including all proposed Green Belt sites", yet offers no clear mechanism to ensure that the combined effect on Darent Valley communities—especially Otford as a service centre—is acceptable or mitigated, supporting the Otford Society's conclusion that the scale of SEV24 will harm the local community and renders the allocation unsound.

Site SEV19

Do you agree with the proposed allocation of this site?

Strongly Disagree

Site SEV16

Do you agree with the proposed allocation of this site?

Strongly Disagree

APPENDIX

Summary of Residents Survey

The Otford Society Residents' Survey on Sevenoaks District Council's Emerging Local Plan

Introduction

Otford boasts over 3,000 years of continuous occupation, from Bronze Age settlements and a large Roman villa, to Saxon battles and a grand Tudor palace built by Archbishop William Warham in 1514, later favoured by Henry VIII. Key historic features include the scheduled remains of Otford Palace which is an Ancient Monument of national significance, alongside listed structures like the village pond and the Conservation Area encompassing medieval street patterns, mature trees, hedges, and archaeological sites.

The residents of Otford feel that this rich heritage merits strong protection from inappropriate development, such as large-scale housing on Green Belt land, out-of-scale buildings, or proposals eroding open spaces and character. The Otford Society was formed to represent the views of the residents of Otford with respect to development in and around the village as well as to foster a local sense of community spirit.

Survey Background

On 23rd October 2025 Sevenoaks District Council published an Emerging Local Plan which included substantial developments both within and in close proximity to the village. The Otford Society were keen to understand the views of local residents and conducted an online survey between 23rd October and 7th December 2025. The survey was designed to be unbiased and was seeking views on proposals contained in the Sevenoaks District Council Emerging Local Plan. The Society wanted to give residents the opportunity to agree or disagree with the proposed developments and to highlight any concerns, or equally any advantages of the proposals. There were 416 responses to the survey and the results are summarised in the following sections of this document.

Summary of Results

Do you support the building of 1,500 new houses between Bat & Ball & Dunton Green?

	Answer	Responses	Percent
1	Yes	17	4%
2	No	384	92%
3	I'm Not Sure	15	4%

If 1,500 houses are built between Bat & Ball & Dunton Green would you have any concerns in the following areas: (tick all that apply):

	Concern	Responses	Percent
1	Congestion, local traffic and access issues	401	96%
2	Pressure on local services (e.g. schools & medical services)	394	95%
3	Destruction of Green Belt	372	89%
4	Loss of valuable farmland	307	74%
5	Deterioration in air quality	314	75%
6	Merging between Otford & Sevenoaks & loss of village identity	356	86%
7	Building of houses in areas prone to flooding	306	74%
8	The scale of development will harm our local community	353	85%
9	None of these	11	3%

If 1,500 houses are built between Bat & Ball & Dunton Green do you see any of the following benefits: (tick all that apply):

	Potential Benefit	Responses	Percent
1	The provision of much needed housing in the area	66	16%
2	The potential for local employment opportunities	35	8%
3	Potential for new infrastructure improvements	61	15%
4	The enlargement our local community	12	3%
5	None of these	310	75%

Do you support the building of 150 new houses on land adjacent to Hale Lane?

	Answer	Responses	Percent
1	Yes	30	7%
2	No	336	81%
3	I'm not sure	50	12%

If 150 houses are built on land adjacent to Hale Lane would you have any concerns in the following areas: (tick all that apply):

	Concern	Responses	Percent
1	Congestion, local traffic and access issues	387	93%
2	Pressure on local services (e.g. schools & medical services)	373	90%
3	Destruction of Green Belt	350	84%
4	Loss of valuable farmland	274	66%
5	Air quality	276	66%
6	The scale of development will harm our local community	305	73%
7	None of these	19	5%

If 150 houses are built on land adjacent to Hale Lane do you see any of the following benefits: (tick all that apply):

	Potential Benefit	Responses	Percent
1	The provision of much needed housing in the village	80	19%
2	The potential for local employment opportunities	21	5%
3	Potential for new infrastructure improvements	33	8%
4	The enlargement our local community	18	4%
5	None of these	319	77%

Do you support the building of 7 new houses in Ryecroft Rd?

	Answer	Responses	Percent
1	Yes	114	27%
2	No	187	45%
3	I'm not sure	114	27%

Summary of Additional Comments & Sentiment Analysis

Summary

Respondents were able to enter free text responses at the end of the survey and the key themes mentioned have been extracted using AI tools.

Key Themes

- **Green Belt and Environment:** Frequent objections to reclassifying green belt as "grey belt," citing loss of farmland, wildlife habitats (e.g., pollinators, bats, birds), biodiversity, and floodplains near River Darent. Many argue it contradicts national policy and harms mental health via reduced green spaces.
- **Traffic and Infrastructure:** Roads (e.g., Rye Lane, Telston Lane, Pilgrims Way) described as inadequate for extra vehicles, causing gridlock, safety risks, and pollution. Concerns include frequent closures, narrow lanes, and no viable access for sites like Hale Lane.
- **Public Services:** Overstretched GPs, schools (Otford Primary oversubscribed), hospitals, and utilities (water shortages, hosepipe bans, sewage capacity). Doubts about developer promises for new facilities.
- **Village Identity:** Fear of Otford losing rural charm, becoming a "suburban estate" or merged with Sevenoaks/Dunton Green, eroding heritage and community feel.
- **Water and Flooding:** Repeated mentions of depleted aquifers, ongoing bans, and flood risks on proposed sites, questioning sustainability amid climate change.

Sentiment Analysis

Sentiment is **predominantly negative (90%+ of responses)**, with strong anger, frustration, and despair (e.g., "insanity," "catastrophic," "ruin our village"). Words like "concerned," "oppose," "destroy," and "fight" dominate. Positive/neutral views (minority) accept modest infill housing or new towns elsewhere, conditional on infrastructure upgrades and brownfield prioritisation.

Theme	% Mentions (Est.)	Sentiment Tone
Green Belt Loss	70%	Highly Negative
Traffic Congestion	65%	Negative
Services Strain	50%	Negative
Water/Flooding	40%	Negative
Support Limited Build	10%	Neutral/Conditional

Actions Requested of The Otford Society in Survey Responses

Respondents overwhelmingly urge the Otford Society to actively oppose the proposed housing developments, represent village interests, and fight to preserve green belt land and infrastructure.

Key Requests

- **Oppose and Fight Developments:** Repeated calls to "fight these proposals," "stop these developments," "block this proposal," and "mobilise every resource to stop these plans," targeting sites like the 1500 homes, Hale Lane, and Ryecroft Road.
- **Represent the Village:** Explicit requests to "represent the village against these proposals," "represent our village as the historic heritage community," "represent the interests of the Otford Village Community," and "stand up and fight to preserve Otford as a village."
- **Advocacy and Lobbying:** Write to MPs (e.g., Laura Trott), local representatives, Sevenoaks District Council (SDC), and Kent County Council (KCC); highlight grey belt flaws; demand proof of local housing need.
- **Raise Awareness and Mobilise:** Hold regular meetings, coordinate responses, raise awareness of plans' scale/impacts, partner with groups like Kent Wildlife Trust, and keep residents informed on progress.
- **Promote Alternatives:** Push for brownfield sites first, small-scale infill, infrastructure upgrades (e.g., bypass, GPs, schools) before building, and green initiatives to keep land protected.

Sentiment on Society's Role

Strong support for ongoing efforts ("keep up the good work," "thank you for fighting this," "you're doing a great job"), with praise for awareness-raising but demands for louder, unified action against "destructive" plans.

Action Category	Example Quotes (Paraphrased)	Frequency (Est.)
Oppose Developments	"Fight/stop/block plans"	High (60%+)
Represent Interests	"Represent village/heritage"	Medium (40%)
Lobby Authorities	"Write to MP/SDC"	Medium (30%)
Awareness/Mobilise	"Hold meetings/partners"	Low (20%)
Alternatives	"Brownfield/infrastructure"	Low (15%)

Conclusions & Immediate Actions

It is clear that an overwhelming majority of respondents are against the large proposed developments proposed in SDC's Emerging Local Plan. Opposition to the plans appears to be related to the size and scale of developments with 92% being against the largest development (SEV24) and 81% opposed to the houses adjacent to Hale Lane (OT2). This indicates that residents are certainly not all against development, but that they have strongly held concerns about the likely impact on the village. Whilst a minority of residents mentioned the need for housing in the area, it is notable that a large majority of residents (75% - 77%) saw no benefits at all in the proposed large scale developments. The top concern expressed in the survey (93%) is about congestion, local traffic and access issue. The level of concern about pressure on local services was very high at 90% and residents also feel strongly about destruction of the Green Belt with 84% mentioning this.

Based on strong evidence from the survey that residents feel the need to be represented in this matter, the Otford Society has concluded that it should take the following immediate actions:

1. To set up a separate sub-committee, the "Otford Protection Committee" to formulate plans for objecting to the proposals.
2. To hold a vote of members to authorise the use of the Village Protection Fund to fight the inappropriate developments which currently holds around £50,000.
3. To formulate a robust response for submission to Sevenoaks District Council as part of the Public Consultation.

All three of these actions have been completed and The Otford Protection Committee is already working on other activities such as holding sessions to help residents complete their own consultation responses and the erection of large banners at key locations in the village. The committee is also working on the recruitment of domain experts in preparation for a response at the Regulation 19 stage of the Local Plan and has worked with other local groups to commission expert reports as part of the Regulation 18 submission.

APPENDIX

OtSoc Site OT2 Consultation 18 Response

Site OT2 (HO313) – Land West of Otford

Regulation 18 Local Plan Consultation – Response and evidence submitted by The Otford Society on behalf of the residents of Otford.

Chris Sutton (Co-Chair)

The Otford Society (Representing the residents of Otford)

18 Warham Road, Otford

10/12/2025

Planning Policy Team
Sevenoaks District Council
Argyle Road
Sevenoaks
Kent TN13 1HG

Dear Sevenoaks District Council,

FORMAL OBJECTION TO THE POTENTIAL ALLOCATION OF SITE OT2 (HO313) – LAND WEST OF OTFORD

We submit this comprehensive representation objecting to the allocation of Site OT2 (HO313) in the Sevenoaks Regulation 18 Local Plan. This objection is evidence-led and draws upon:

- The Sevenoaks District Council SHELAA
- The Regulation 18 Site Assessment Documents
- An independent Landscape and Visual Assessment (Appendix 1)
- An independent Highway and Transport Appraisal (Appendix 2)
- Relevant provisions of the National Planning Policy Framework (NPPF 2023/24)
- Local landscape and transport policy, including Kent Downs National Landscape guidance

Taken together, these documents demonstrate conclusively that OT2 is one of the **least suitable, least sustainable, and most constrained** locations for development in the District.

1. GREEN BELT – STRONGLY PERFORMING AND FUNDAMENTAL TO SETTLEMENT SEPARATION

The SHELAA confirms that OT2 lies entirely within **strongly performing Green Belt**, contributing to:

- **Prevention of sprawl** from Otford into the countryside
- **Protection of the gap** between Otford and Dunton Green
- **Safeguarding rural character**
- **Preserving openness and long views** to and from the Kent Downs

Sevenoaks District Council itself concludes:

“The site is constrained by strongly performing Green Belt... therefore the site is not proposed for allocation.”

Under **NPPF §§138–140**, such land should not be released unless exceptional circumstances exist. They do not. The Regulation 18 document identifies several less harmful alternatives around Sevenoaks, Swanley and Edenbridge, which the Council itself directs growth toward.

Allocating OT2 would be a direct breach of national Green Belt policy.

2. LOSS OF BEST & MOST VERSATILE AGRICULTURAL LAND (80% GRADE 2)

The SHELAA confirms:

- **80.39%** of OT2 is classified as **Grade 2 (Best and Most Versatile)**.

Under **NPPF §174**, local planning authorities must protect BMV land unless no other reasonable alternatives exist.

Given the Regulation 18 document identifies:

- Urban brownfield land,
- Lower-quality agricultural land elsewhere,
- Sustainable extensions to Sevenoaks and Swanley,

...there is no justification for destroying one of Otford's largest remaining areas of high-grade farmland.

Allocating OT2 would constitute **avoidable and irreversible loss of nationally valuable agricultural land**.

3. NATIONAL LANDSCAPE (KENT DOWNS) – THE ENTIRE SITE IS WITHIN ITS SETTING

The sheared-down SHELAA “100m buffer” approach significantly underrepresents the impact of development on the Kent Downs National Landscape (formerly AONB).

The **independent landscape assessment** (appendix 1) concludes:

“It is not possible to come to any other conclusion than that the Site, in its entirety, forms part of the setting of the Kent Downs National Landscape.”

Key evidence:

- The site has **strong intervisibility** with designated areas.
- Views from the **North Downs Way** cross directly over OT2 toward the Downs.
- The site shares **the same rural landscape character**, historic field pattern and topography as the designated land.
- Development would introduce major urbanising elements into a sensitive rural valley.

Under **NPPF §176**, *great weight* must be given to conserving landscape and scenic beauty in National Landscapes **and their setting**.

OT2 fails this policy requirement fundamentally.

4. LANDSCAPE SENSITIVITY – MEDIUM–HIGH (NOT LOW–MEDIUM AS SHELAA CLAIMS)

The landscape expert (Appendix 1) finds that the SHELAA landscape sensitivity scoring is **materially incorrect**.

SHELAA rating:

- 70% low–medium
- 30% medium

Expert corrected rating:

- **Medium–High** across the site
- Should be a **RED** constraint, not amber

Reasons/Evidence:

- Undulating topography falling away from Otford, creating high visibility
- Strong perceptual rural qualities and tranquillity
- Absence of development and intact historical field structure
- Functional contribution to the National Landscape setting
- Strong spatial relationship with the Kent Downs and North Downs Way

This means the site's true landscape harm has been **significantly understated** in the Local Plan evidence base.

5. HARM TO THE NORTH DOWNS WAY – A NATIONAL TRAIL

OT2 borders the **North Downs Way (NDW)** along its entire southern boundary.

The landscape expert concludes:

- Development would cause **significant adverse visual effects** on users.
- Views from the NDW toward the Downs would be disrupted by built form.
- Tranquillity, rural character, and dark skies would be lost.
- This harm is **permanent, irreversible, and cannot be mitigated**.

NPPF §180(a) requires planning decisions to protect and enhance National Trails.

OT2 directly conflicts with this requirement.

6. VISUAL IMPACT – URBANISING A SENSITIVE RURAL LANDSCAPE

Key findings from Appendix 1:

- The site is visible **from within the Kent Downs National Landscape**.
- It forms part of the **foreground** of key expansive views.
- Development would introduce:
 - Built form
 - Lighting (affecting dark skies)
 - Vehicle movements
 - Suburban fencing, parking, and infrastructure
- Rural character along Pilgrims Way West and Telston Lane would be *permanently altered*.

The combined impacts constitute major adverse effects on local landscape character.

7. TRANSPORT & HIGHWAY EVIDENCE – FUNDAMENTAL, UNRESOLVABLE CONSTRAINTS

(Based on Appendix 2: Independent Highway Appraisal)

The highways report identifies **serious and insurmountable deficiencies** in the site's accessibility, access strategy, and ability to accommodate additional traffic.

The professional conclusions are unequivocal:

7.1 No safe or policy-compliant vehicular access exists or could exist without a significant overhaul of the landscape and infrastructure

The proposed access from **Pilgrims Way West** is unsafe because:

- It is a **narrow rural lane** with no footways for a significant portion at OT2
- It has **poor visibility** and **limited passing opportunities**
- It cannot safely accommodate increased traffic flows
- Required road widening or engineering would cause severe harm to rural character

These issues breach:

- **NPPF §110(b)** – safe and suitable access for all
- **NPPF §111** – development should be refused on highway safety grounds if unsafe
- **Manual for Streets (MfS)** visibility and width requirements

7.2 Walking and cycling are not viable

The expert report notes that:

- No continuous footways exist to Otford village or rail station
- All approach roads are unlit, narrow, and unsuitable for pedestrians
- Cycling routes are unsafe and fail **LTN 1/20** standards
- Distances to services exceed CIHT preferred walking limits
- Essential facilities are not within an 800m walkable neighbourhood

This directly contradicts:

- **NPPF §§110(a), 112(a), 115(c)** – prioritisation of sustainable transport
- **Active Travel England** guidance

7.3 Public transport is non-existent

The report confirms:

- There are **no scheduled public bus services** serving the western side of Otford beyond basic schools services
- Rail access requires a 2 km walk on unsafe roads or across fields and woods
- The site is therefore **entirely car-dependent**

7.4 Traffic impacts would be severe

Using TRICS-based forecasting, the report finds:

- Significant increases in peak-hour traffic
- Increased conflict on Pilgrims Way West
- Likely gridlock at Otford's key junctions
- Increased rat-running via rural lanes

NPPF §111 requires refusal where there is an **unacceptable impact on highway safety** or the **residual cumulative impacts are severe**.

Both apply here.

8. SUSTAINABILITY – THE SITE IS INHERENTLY UNSUSTAINABLE

OT2 is:

- Too far from local services
- Too far from railway stations (unsafe walking/cycling conditions)
- Unserved by buses
- Lacking safe pedestrian or cycling routes
- Dependent entirely on private vehicle travel

This fundamentally conflicts with:

- **NPPF §§105–112 (Sustainable Transport)**
- **Kent Local Transport Plan**
- **Active Travel England** policy
- **SDC's own sustainability scoring criteria**

OT2 cannot be made sustainable, even with mitigation.

9. SETTLEMENT PATTERN – OT2 IS NOT A LOGICAL EXTENSION

The landscape report confirms:

- OT2 feels visually and perceptually detached from the settlement
- There is minimal intervisibility with the built edge of Oftord
- The site sits as an isolated block of rural land

Allocation would create:

- Urban sprawl
- Settlement coalescence risk
- A disconnected block of development requiring major infrastructure to function

This conflicts with the settlement hierarchy and spatial strategy.

10. REGULATION 18 ALTERNATIVES – OT2 PERFORMS WORST OVERALL

When compared to Regulation 18 proposed sites:

- OT1 lies within the settlement and is already allocated
- Bakers Yard and other brownfield/grey-belt sites have lower landscape and access harm
- Alternative sites perform better on sustainability and transport
- Alternative sites lack BMV land, NDW impact, and National Landscape setting harm

OT2 stands out as **one of the most constrained and least defensible** sites in the entire District.

11. SHELAA ERRORS CORRECTED BY EXPERT EVIDENCE

The two expert reports correct several inaccuracies:

- Understated landscape sensitivity
- Incorrect treatment of National Landscape setting
- Failure to assess NDW impacts

- Oversimplification of access feasibility
- Under-representation of pedestrian/cycle safety issues
- Failure to account for lack of public transport services
- Misclassification of field boundaries
- Omission of severe highway safety concerns

Corrected scoring places OT2 firmly in the “**unsuitable / do not allocate**” category.

12. OVERALL CONCLUSION

Based on the **Council’s own evidence**, combined with **independent expert assessments** of landscape and transport, OT2 (HO313) is one of the **least appropriate development sites** in Sevenoaks District.

OT2:

- Lies entirely in **strongly performing Green Belt**
- Contains **high-value agricultural land (BMV)**
- Sits wholly within the **setting of a National Landscape**
- Has **medium–high landscape sensitivity**
- Causes **harm to the North Downs Way**
- Has **no safe vehicular, pedestrian, or cycling access**
- Is **car-dependent and unsustainable**
- Generates **severe transport impacts**
- Conflicts with the **NPPF and SDC’s spatial strategy**
- Performs **significantly worse** than reasonable alternatives

For all of the above reasons, we submit that the site OT2 (HO313) should be removed from the Local Plan.

Yours faithfully,

Chris Sutton , Co-Chair
For & on behalf of
The Otford Society (Representing the Residents of Otford)

APPENDIX 1 — LANDSCAPE CONSULTANT'S REPORT

Landscape and Visual Constraints Assessment – Land West of Hale Lane, Otford
December 2025 — Ref: 212-NT-01

APPENDIX 2 — TRANSPORT AND HIGHWAYS CONSULTANT REPORT

Highway Appraisal of HO2100271 (OT2)
January 2026 — Ref: R01

APPENDIX

LANDSCAPE CONSULTANT'S REPORT

Land west of Hale Lane, Otford
(Reg 18 ref. OT2; SHELAA ref. HO/21/00271)

Date: Dec 3rd 2025
Ref: 212-NT-01

1. Introduction

1.1. This note identifies landscape and visual constraints on the development of the site referred to as Land west of Hale Lane, Otford in Sevenoaks (the Site) for residential development.

2. Background

2.1. The Site has been included in the list of sites considered for allocation for housing (site ref. HO/21/00271 Land west of Hale Lane, Otford) following Sevenoaks District Council 2025 call for additional sites (SHELAA) to be retested against updated criteria and strategic context. The Site had previously been deemed to be 'unsuitable' for allocation.

3. Executive summary

3.1. Following a site visit and review of relevant guidance etc, it is concluded that the 2025 SHELAA assessment underscores the Site on landscape constraints:

- *National Landscapes*: the SHELAA score for the Site is **amber**, based on 39.08% of it being '*within a 100m buffer of the Kent Downs National Landscape (KDNL)*. The Site is 100% within the setting of the KDNL and a red score for this constraint would be more realistic; and
- *Landscape Sensitivity*: the SHELAA score for the Site is **amber-red**, based on '*29.71% of the Site being medium sensitivity and 70.29% of the Site being low-medium sensitivity*'. The Site's sensitivity is at least medium-high and a red score for this constraint is more appropriate.

3.2. There are additional landscape and visual constraints which are not accounted for in the SHELAA assessment – including but not limited to the adverse effects on the amenity and character of the North Downs Way, which forms the southern boundary of the Site, which would result from development of the Site.

4. The Site

- 4.1. The Site comprises three fields west of Otford (N.B. The SHELAA describes it as comprising two fields). For the most part, it has limited intervisibility with the settlement - due to intervening vegetation and to its topography, which is undulating, with a north-facing slope falling away from the settlement – and the majority of it feels remote from the settlement.
- 4.2. The Site does however have a strong relationship with the KDNL to the north and west (**Figure 1**).
- 4.3. The Site has never been developed and the boundaries remain as shown on 19thC mapping (**Figure 2**), with internal hedgerows aligning with field boundaries.
- 4.4. The trees and vegetation on the boundaries appear generally to be in good health and are positive features.
- 4.5. The Site shares the character and qualities of the undulating farmland to the north and west within the KDNL and has notable perceptual and scenic qualities.
- 4.6. There is an informal footpath around the Site's boundaries, evidence of informal usage by the community.

5. The Site and the Kent Downs National Landscape (KDNL)

- 5.1. The KDNL abuts the Site along the length of its western and northern boundaries, which are defined by Pilgrims Way West to the north and the railway line to the west.
- 5.2. The SHELAA assessment refers to 38.08% of the Site as falling within a 100m buffer of the KDNL, defining the extent of its setting, however it is not clear where this definition of the NL setting derives from, since no reference to any policy documents or guidance is provided.
- 5.3. The Kent Downs AONB Management Plan 2021-2026¹ states (under-lined for emphasis):

'The setting of the Kent Downs AONB is broadly speaking the land outside the designated area which is visible from the AONB and from which the AONB can be seen ... The setting of the Kent Downs is not formally defined or indicated on a map'.
- 5.4. The Kent Downs AONB Setting Position Statement² states:

¹ Kent Downs National Landscape *The Kent Downs AONB Management Plan 2021-2026*

² Kent Downs National Landscape (2018) *The Kent Downs AONB Setting Position Statement*

'The setting of the Kent Downs AONB does not have a geographical border. In most cases, the setting comprises land outside the AONB which is visible from the AONB and from which the AONB can be seen. ... However, the setting area may be substantial for example where there is a contrast in topography between higher and lower ground.'

- 5.5. There is a high level of intervisibility between the Site and the NL. The Site is visible from within the NL (representative viewpoint **Photo A**) and there are open views towards the NL from within the Site (representative viewpoints **Photo B and C**). The landscape areas which fall adjacent to the NL boundary – such as the Site - and those which fall within the NL – such as the fields to the west of the railway and north of Pilgrims Way - share the same qualities and character.
- 5.6. It is not possible to come to any other conclusion than that the Site, in its entirety, forms part of the setting of the KDNL.

6. The Site and the North Downs Way

- 6.1. The North Downs Way passes along Telston Lane to the south, which has an open, generally unvegetated boundary with the Site, allowing attractive views across it towards elevated areas within the NL to the west (**Photo D**).
- 6.2. Looking east towards Otford from the North Downs Way, there are open views of the Site beyond the railway line, a piece of 19th century infrastructure (**Photo A**).
- 6.3. Travelling west, leaving the more built-up area of the settlement, attractive views open out across the Site.
- 6.4. Travelling east, Telston Lane currently represents a gentle approach to Otford, with sporadic, low-density development along the route.

7. Sensitivity of the Site and potential effects of development of the Site

- 7.1. Due to its location within the setting of the KDNL, its contribution to the North Downs Way, its character and qualities, it is considered probable that a detailed assessment of the Site's sensitivity to development applying the guidance and principles of best practice set out in the Guidelines for Landscape and Visual Impact Assessment; Third Edition, 2013 published by the Landscape Institute and IEMA³ would conclude

³ Landscape Institute and IEMA (2013) *Guidelines for Landscape and Visual Impact Assessment; Third Edition, 2013*

that it is of medium-high sensitivity, rather than 29.71% medium and 70.29% low-medium as assessed in the SHELAA. This would result in a red score, rather than an amber score.

- 7.2. Development of the Site would lead to the permanent loss of open fields, resulting in a significant adverse visual impact, harming the rural amenity and landscape quality enjoyed by users of the North Downs Way and by local residents.
- 7.3. There would be resultant harm to the amenity of the North Downs Way and the character of Telston Lane which could not be mitigated.
- 7.4. Specifically in relation to the NL, development in the setting of a protected landscape can result in unacceptable adverse effects on its natural beauty and special qualities, even though such development would avoid direct physical effects on its fabric. Negative impacts can result from factors such as, but not limited to, increased levels of traffic and noise, resulting in a loss of tranquillity, light spill impacting dark skies, and significant adverse effects on views both from and towards the NL.
- 7.5. The change in land use, introduction of built form with associated infrastructure and creation of a proposed vehicle access 400m+ west of the settlement would result in changes to the fabric and appearance of the Site to the detriment of its character, harm to the character of Pilgrims Way West, which, although relatively busy, is that of a country road (**Photo E**), and, most significantly, permanent harm to the KDNL.

PHOTOS



Photo A – Looking east from the North Downs Way, the Site is clearly visible beyond the trees which line the railway line, with the North Downs beyond



Photos B and C - There are open views towards the Kent Downs from within the Site looking north and looking west



Photo D- There are open views from Telston Lane (the North Downs Way) across the Site towards the Kent Downs



Photo D – Pilgrims Way West beside Otford Boarding Kennels has a rural character

FIGURES



Figure 1: The Site (shown with red line) and context

- North Downs Way shown with dotted orange line
- Kent Downs National Landscape boundary shown with green line
-



Figure 2: OS map 1830-1880

APPENDIX
TRANSPORT AND HIGHWAYS
CONSULTANT REPORT

1.0 INTRODUCTION

- 1.1 This note is prepared in relation to land parcel reference HO/21/00271¹ of the Sevenoaks Regulation 18 version Local Plan (LP18).
- 1.2 Land parcel reference HO/21/00271 (hereafter referred to as "the Site") is located on greenfield land beyond the western edge of the settlement of Otford as shown on the figure below.

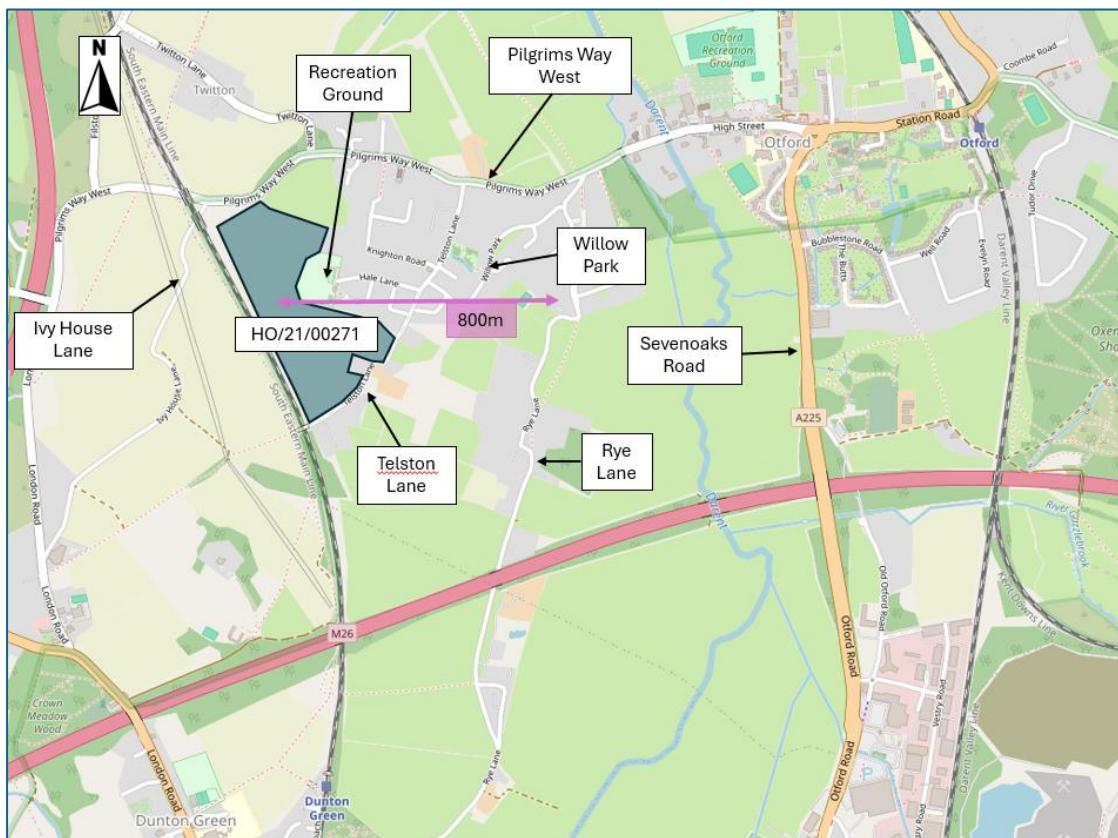


Figure 1: Site Location

- 1.3 Sevenoaks Borough Council ("the Council") is consulting on the suitability of allocating the Site for residential development of up to 150 dwellings. This technical note considers the prospects of a future planning application for the Site being successful having regard to transport sustainability, road safety and highway impact.

Structure

- 1.4 This note is structured as follows:
 - Section 2 sets out the transport policies and guidance of relevance to the Site;

¹ Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025

- Section 3 assesses walking opportunities;
- Section 4 assesses cycling opportunities;
- Section 5 assesses Public Transport opportunities; and
- Section 6 assesses Vehicular Access opportunities.

1.5 For each of the sections, a conclusion is provided regarding its compliance with the policies of the National Planning Policy Framework (NPPF). A summary is provided in the final section together with an overall conclusion which is that there is little or no prospect of the Site obtaining planning permission because:

- It is in an inherently unsustainable location, contrary to NPPF 110 and 115(a).
- Safe and suitable access cannot be achieved for pedestrians, cyclists, or vehicles (NPPF 115(b) and (d)).
- Essential facilities are not within an 800m walkable neighbourhood (NPPF 115(c)).
- Necessary transport improvements would require disproportionate or undeliverable interventions.
- Development would result in unacceptable road safety impacts, contrary to NPPF 116.

1.6 Land parcel HO/21/00271 should therefore be removed from the Regulation 18 Draft Local Plan, because its allocation would be inconsistent with the NPPF.

2.0 POLICY CONTEXT

2.1 The Government's planning policies for England are set out in the National Planning Policy Framework ("the NPPF"), published in December 2024 and updated with minor technical corrections in February 2025. The NPPF highlights the need for close coordination between land-use planning and transport planning to support sustainable development.

2.2 Paragraph 110 of the Framework states the following:

'The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'

2.3 It is noted that paragraph 110 requires that the choice of transport modes should be 'genuine'. The NPPF provides no definition of the term 'genuine' with reference to choice of transport modes. The inclusion of the term 'genuine' however must signal the government's intention that the mere presence of transport modes does not meet the policy requirements. Instead, the choice of transport modes should be sufficiently attractive that people could reasonably be expected to use them. In the alternative, the government could have omitted the word 'genuine' and simply required 'a choice of transport modes'.

2.4 Paragraph 115 of the Framework states the following:

'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) *sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.'*

2.5 Turning to the National Design Guide, this identifies walkable distances as being:

'Walkable: Local facilities are within walking distance, generally considered to be no more than a 10 minute walk (800m radius).'²

2.6 This theme of 800m walkable neighbourhoods is reiterated in mode specific design guidance including 'Planning for Walking' published by the Chartered Institution of Highways and Transportation ("CIHT Walking Guidance"), April 2015.

2.7 Subject to demonstrating that a site is sustainable, Paragraph 116 provides guidance regarding the transport related circumstances in which planning permission can be withheld or refused stating:

'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.'

2.8 Paragraph 116 is very clear that an applicant needs to demonstrate, *inter alia*, that the impacts on the road network arising from a specific development proposal would not be severe when considering it isolation and also cumulatively with all other future developments / transport proposals that are reasonably anticipated.

² Page 20 National Design Guide

Design Guidance

Walking

2.9 The Chartered Institution of Highways and Transportation (CIHT) 'Guidelines for Providing Journeys on Foot' (2000) suggests acceptable, desirable and preferred maximum walking distances ('acceptable' walking distances would vary between individuals). These walking distances are applied consistently when assessing the reasonable walking times whether a development is in a rural or an urban location.

2.10 Table 2.1 summarises the suggested walking distances for pedestrians without mobility impairment for some common trip purposes.

	Town Centres	Commuting/ Schools	Elsewhere
Desirable	200	500	400 (5 minutes' walk)
Acceptable	400 (5 minutes' walk)	1,000 (12.5 minutes' walk)	800 (10 minutes' walk)
Preferred Maximum	800 (10 minutes' walk)	2,000 (25 minutes' walk)	1,200 (15 minutes' walk)

Source: 'Providing for Journeys on Foot', CIHT, 2000

Table 2.1: Reasonable Walking Distances (metres)

2.11 The above guidance, published in 2000, should be read in comparison to the Government's current guidance regarding walkable neighbourhoods in which services and facilities are within an 800m walk. It is noteworthy that the guidance in table 2.1 broadly aligns with this 800m walkable theme, which is the Government's current advice and guidance on distances that it can reasonably be expected that people will walk to reach services and facilities.

Cycling

2.12 The Chartered Institution of Highways and Transportation (CIHT) identifies that the bicycle can reasonably be considered a potential mode of transport for most people for all journeys under five miles (approximately 8 kilometres) (Planning for Cycling, 2015). However, this is subject to suitable infrastructure provision, especially a suitable level of protection afforded to cyclists from traffic. The suitable level of protection needed for cycling to be attractive to most people is set out in the Government's guidance note LTN1/20.

Public Transport

2.13 'Planning for Walking' published by the Chartered Institution of Highways and Transportation ("CIHT Walking Guidance"), April 2015 sets out in section 6.4 advice on walking catchments for public transport as follows:

"The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services."

- 2.14 For comparison, the Transport for London (TfL) Passenger Transport Accessibility Level (PTAL) metric was established to determine an individual's accessibility to public transport using a combination of distance to a public transport node, number of services serving the node and the frequency of each. It uses a walk distance of 640m for accessibility to a bus stop and 960m for accessibility to a railway station.
- 2.15 Considering the above guidance, it is reasonable to assume that a person would walk up to 640m to reach a bus stop and 960m to reach a railway station. This equates to a walk time of 8 and 12 minutes respectively.
- 2.16 Notwithstanding this, guidance also notes that some people will walk further than these distances and the move towards encouraging people to walk further as part of their daily commute for health purposes means that longer walks to and from public transport nodes is becoming more common. In particular the Government has recently indicated that a 15-minute walk can be considered reasonable to reach a railway station. No guidance on what this means in terms of distance is provided and it is noted that the distance that can be walked in 15 minutes is subject to several factors including time spent crossing roads (which can add up to 2 minutes at a traffic signal crossing – even longer on busy roads without active pedestrian crossings), topography, footway width and an individual's fitness level. However, there is no doubt that 15 minutes includes the upper limit of 960m identified by TfL and could reasonably extend to 1.2km in urban areas where an individual is crossing one or two roads.
- 2.17 There is no industry guidance regarding the distances people will cycle to reach a railway station. However, for an average cyclist, a 15-minute travel time, which is the Government's current guidance on a reasonable connecting travel time to a railway station, equates to a travel distances of 3km – 4km subject to the provision of suitable infrastructure to support cyclists including priority measures at junctions.

3.0 WALKING

Design Guidance

- 3.1 When considering genuine sustainable transport accessibility of the Site it is important that this is considered in the context of functional trips i.e. the trips that need to be made at a specific time of day irrespective of weather conditions, for example a journey to school or work. These functional trips would make up the majority of trips generated by the development.
- 3.2 The CIHT Walking Guidance advises:

'Most people will only walk if their destination is less than a mile away. Land use patterns most conducive to walking are thus mixed in use and resemble patchworks of "walkable neighbourhoods," with a typical catchment of around 800 m, or 10 minutes walk.'

3.3 And qualifies the above statement with the following:

'Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres). However, the propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating. Developers should consider the safety of the routes (adequacy of surveillance, sight lines and appropriate lighting) as well as landscaping factors (indigenous planting, habitat creation) in their design.'

3.4 The attractiveness of travelling to and from a site by foot is thus a function of:

- Journey distance; and
- Infrastructure for safe and convenient journeys on foot

3.5 These factors are considered below in relation to the Site.

Distance

3.6 Having regard to the guidance pointed to by NPPF paragraph 115(c) regarding walkable neighbourhoods of 800m which aligns with mode specific design guidance regarding the propensity for people to choose to walk, the following facilities and amenities have been identified in relation to the Site:

- A newsagent.

3.7 Crow fly distance from the centre of the Site to the newsagent is approximately 450m. However, the walking distance for most residents would be 600-800m.

3.8 There are no schools, employment or health facilities or amenities within this walking distance.

3.9 There are continuous, footways on residential streets in the village including on Hale Lane. There are no footways on either Telston Lane or Ivy House Lane which are the two access roads which would serve the Site. There is no footway on Pilgrims Way West. Pedestrians are expected to share the carriageway with general traffic. There is no street lighting in this part of the village.

3.10 Based on the analysis set out above, it is concluded that the Site does not offer genuine opportunities to travel by foot because there are almost no destinations within the distance established by national and mode specific guidance which people are likely to walk and there is no infrastructure for residents to walk safely to and from the Site.

3.11 Therefore, with regards to walking, the Site is not located within a sustainable location within the meaning of paragraphs 110 and 115 of the NPPF.

4.0 JOURNEYS BY CYCLE

Design Guidance

4.1 Local Transport Note 1/20 (LTN 1/20), Department for Transport, 2020 provides guidance on the design of cycle infrastructure LTN1/20 is the government's current guidance on designing infrastructure for cyclists in order to encourage a greater uptake in cycling in accordance with the Government's adopted policy '*Gear Change A bold vision for cycling and walking*' which was issued in July 2020. This was inspired by and endorsed by the then Prime Minister.

4.2 It is clear from the Government's currently adopted cycle policy and design guidance that the outcomes of cycle infrastructure interventions are to:

- Create better streets for cycling and people
- Put cycling and walking at the heart of transport, place-making, and health policy
- Enable people to cycle and protect them when they cycle

4.3 With regards to design principles 'Gear Change A bold vision for cycling and walking' states that:

'In order to see the increases in cycling we want, the quality of cycling infrastructure installed on our roads must dramatically improve.'

and

'Cycling is or will become mass transit and must be treated as such. Routes must be designed for larger numbers of cyclists, for users of all abilities and disabilities.'

4.4 Having regard to how critical the creation of a safe and attractive network of cycle is to Government, it is reasonable to expect that cycle infrastructure meets the minimum requirements of LTN1/20, which in many cases are no more onerous than previous versions of the LTN. The substantive change in LTN1/20 is its reflection of Government policy which is that cycling should be accessible by most people irrespective of ability.

Existing Cycle Infrastructure

4.5 There is currently no cycle infrastructure provided on the network surrounding the Site.

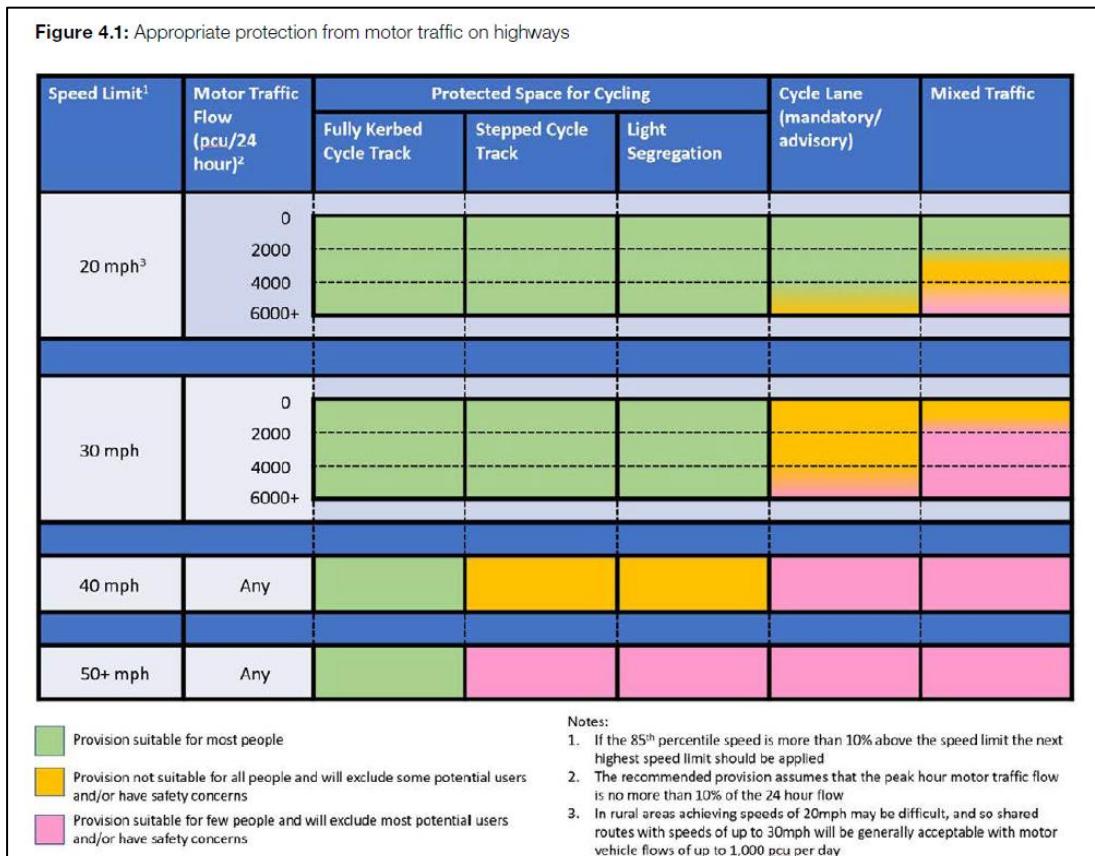
4.6 Traffic survey work commissioned by Otford Parish council³ in relation to traffic management proposals along Pilgrims Way West and High Street established the following:

- average 7-day traffic volumes in 2022 were in the order of 6,610 vehicles per day

³ Part-18-Nov-2022-Phase-Two-Traffic-Surveys

- 85th percentile speeds were around 25mph in both directions

4.7 The table below is taken from LTN1/20⁴, and provides the government's guidance in the appropriate protection for cyclists.



4.8 The figure above shows that in order to meet Government policy on encouraging inclusive cycling and for a route to be attractive to most people, the minimum appropriate protection required for a route such as Pilgrims Way West / High Street (is a segregated space. Segregation could take the form of a cycle lane which is separated from general traffic by, for example, traffic wands, or rubber lane segregators etc.

4.9 Provision of cyclist protection levels below this standard, for example advisory lanes marked on the carriageway, will mean that the route would be suitable only for few people and would exclude most potential users.

4.10 It is noteworthy that the traffic volumes and speeds on this route have been surveyed after traffic management measures have been installed. There is therefore no scenario in which a future traffic management scheme could be installed which would reduce traffic volumes and speeds to levels which make mixed traffic cycling or on carriageway lane markings a safe environment for most cyclists. They traffic speeds and volumes observed represent the very best environment that can be achieved for cyclists without segregation.

⁴ LTN 1/20 Figure 4.1 "Appropriate protection from motor traffic on highways"

4.11 The Pilgrims Way West / High Street route is just one section that cyclists would need to negotiate. There are several, short residential streets within the village which would be suitable for mixed traffic cycling. However due to the remoteness of the Site to key destinations, residents would need to cycle along the Pilgrims Way West / High Street route and then on to roads such as Sevenoaks Road to reach key destinations. Sevenoaks Road accommodates higher traffic volumes travelling at higher speeds than on the Pilgrims Way West / High Street route and yet, as with all other roads and streets within the catchment of the Site, has no protection for cyclists.

Planned Cycle Infrastructure

4.12 The Council's Local Cycle and Walking Investment Plan (LCWIP) identifies two planned cycle routes of interest to the Site which are

- Primary cycle route 1 - which follows Sevenoaks road; and
- Primary cycle route 8 - which follows Rye Lane.

4.13 A review of the infrastructure proposals for these routes identifies the following:

- Neither route complies with the level of protection requirements set out in Figure 4-1 of LTN1/20. This is also the standard which the Council's LCWIP purports to be using as a base.
- Both routes have sections which rely on 3rd parties for delivery.
- There is a discussion regarding lighting the Rye Lane route but no commitment. Failure to light the route will mean that it is unattractive to most people during the hours of darkness, which includes the peak commuting times during the autumn and winter months.

4.14 Whilst the works will inevitably improve conditions for cyclists, as per the Government's guidance, they will not be brought to a standard that would encourage most people to cycle. Moreover, neither would serve the Site and there are no proposals beyond these two schemes in the Otford area that would deliver cycle connections to the Site that are suitable for most people.

4.15 Based on the analysis set out above, it is concluded that the Site currently does not offer genuine opportunities to travel by cycle because the absence of cycle infrastructure excludes most potential users. Cycling will be attractive to only a few people.

4.16 Planned cycle infrastructure schemes are at an early stage with the final form, detail, timing and funding yet to be determined. But these are distant from the Site and there is no strategy to connect west Otford to the Site. In relation to the Site, they could provide some benefit to a few cyclists who would in any event choose to cycle. However they would not provide sufficient benefit such that most people would consider cycling.

4.17 Therefore, with regards to cycling, the Site is not located within a sustainable location within the meaning of paragraphs 110 and 115 of the NPPF and planned infrastructure would deliver de minimis benefits.

5.0 JOURNEYS BY PUBLIC TRANSPORT

Design Guidance

5.1 'Planning for Walking' published by the Chartered Institution of Highways and Transportation ("CIHT Walking Guidance"), April 2015 sets out in section 6.4 advice on walking catchments for public transport as follows:

"The power of a destination determines how far people will walk to get to it. For bus stops in residential areas, 400 metres has traditionally been regarded as a cut-off point and in town centres, 200 metres (DOENI, 2000). People will walk up to 800 metres to get to a railway station, which reflects the greater perceived quality or importance of rail services."

Journeys by Bus

5.2 There are no bus stops within walking distance of the Site that provide a regular bus service.

5.3 The nearest bus stop is located at Willow Park. This would be between 600 and 800m walk distance of the Site, which exceeds the recommended walk distance of 400m. There are limited services operating from this bus stop focussed on school travel.

5.4 As a consequence very few, if any people, would rely on travelling by bus.

5.5 Therefore, with regards to travel by bus based public transport, the Site is not located within a sustainable location within the meaning of paragraphs 110 and 115 of the NPPF.

Journeys by Train

5.6 The nearest railway station is Otford railway station, approximately 2.4km from the Site. This is more than twice the distance considered reasonable for people to walk to reach a railway station. Alternatively, Dunton Green railway station is approximately 3.4km from the Site. This is nearly three times the distance considered reasonable for people to walk to reach a railway station. It is therefore concluded that few people would walk to a railway station.

5.7 There is no guidance regarding the distance that people will cycle to reach a railway station for onward travel by train, but it would be reasonable to conclude that up to 3.4km is a reasonable distance. However, for the reasons set out above, cycling does not represent a genuine travel opportunity for most people.

5.8 There is no bus connecting the Site to either railway station.

5.9 Therefore, with regards to travel by rail based public transport, the Site is not located within a sustainable location within the meaning of paragraphs 110 and 115 of the NPPF

notwithstanding that it is accepted that a material proportion of residents may drive by car to a railway station to make an onward journey by rail.

6.0 VEHICULAR ACCESS

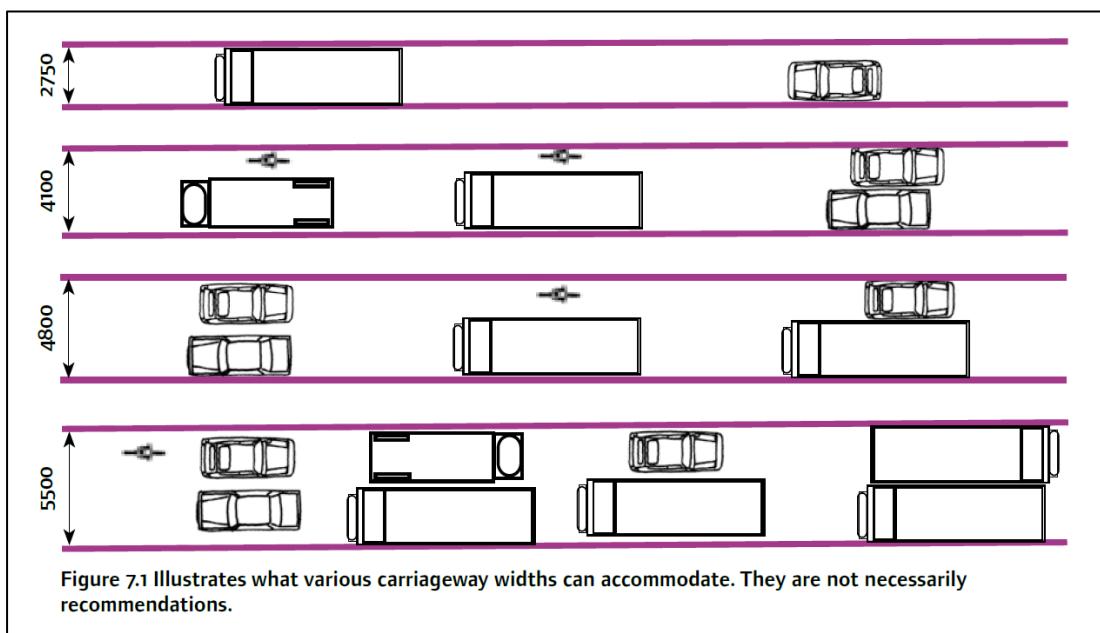
6.1 The Site meets the public highway at Telston Lane and Ivy House Lane at which points vehicular access could be provided. There is a third vehicular access that has been raised previously via Hale Lane notwithstanding that the Site does not border Hale Lane and so access over third-party land would be required. These three options are discussed below.

Telston Lane

6.2 Telston Lane between Pilgrims Way West and Hale Lane is a residential street. It is approximately 5m wide with footways on each side. There is no street lighting.

6.3 South of its junction with Hale Lane, the footways stop and Telston Lane narrows to around 4m. There are fenced frontages to the edge of the carriageway preventing any widening without acquiring 3rd party land.

6.4 Manual for Streets (MfS) sets out the Government's guidance on designing roads and streets in residential areas. Figure 7.1 of MfS provides guidance in the widths of streets and is reproduced below.



6.5 The figure above shows that for two-way roads, a minimum carriageway width of 4.8m is required in order to enable a vehicle like a home delivery van to pass a car. For two delivery vehicles to pass, a width of 5.5m is required. Typically, 5.5m is the minimum width required by a highway authority to adopt the road to be maintained at the public expense.

- 6.6 There is no prospect of the section of Telston Lane south of its junction with Hale Lane, being widened to the minimum width required for two-way traffic (4.8m) and certainly not the 5.5m required for the road to be adopted. This will mean that when two vehicles meet on this section of Telston Lane will need to undertake excessive and dangerous reversing manoeuvres to facilitate the two vehicles to pass.
- 6.7 Furthermore, there would be no space for the provision of a footway, causing pedestrians to share the carriageway with motor traffic which would be contrary to the safe passage of pedestrians as well as discourage people from walking to and from the Site.

Ivy House Lane

- 6.8 Ivy House Lane is a single-track rural lane. It has no street lighting and no provision for pedestrians or cyclists. There is no opportunity to improve Ivy House Lane to meet the minimum requirements for an access road to the Site. Minor modifications could be made to the lane however to provide an emergency access to the Site to compliment a main vehicular access elsewhere.

Hale Lane

- 6.9 Hale Lane is a residential street. The carriageway is approximately 5.5m wide and it has footways on each side. The road is unlit and has on-street parking on both sides.
- 6.10 Hale Lane is a cul-de-sac running east-west. At its eastern end Hale Lane meets Telston Lane. At its western end, Hale Lane stops at a small parking area that serves a children's playground and wider recreation area.
- 6.11 As stated above, the Site does not border Hale Lane. In order to achieve a vehicular access via Hale Lane, 3rd party land would need to be acquired. Even if this were possible, the provision of a vehicular access would result in:
 - The removal of the children's playground; and
 - Substantial loss of land which is currently dedicated as recreation land.
- 6.12 For context the road would require an approximately 9-10m wide corridor to provide the carriageway and footways (including construction space). To minimise loss of the land, after entering the recreation land, the vehicular access route would immediately need to bend to the south. Nonetheless approximately 20-25% of the recreation space would be lost. This loss of space combined with the need to relocate the children's playground would mean that there were insufficient space remaining to mark out a full-size team sports pitch. This would render the land worthless as a recreation ground.

Vehicular Access Summary

- 6.13 The analysis set out above demonstrates that the Site is effectively a land locked island with no means of safe and suitable vehicular access.

6.14 Therefore, with regards to vehicular access, the Site does not meet the requirements of paragraphs 115(b) and 116 of the NPPF.

7.0 SUMMARY AND CONCLUSION

7.1 This Technical Note has been prepared in relation to land parcel HO/21/00271 ("the Site"), identified in the Sevenoaks Regulation 18 Draft Local Plan (LP18) for potential residential development of up to 150 dwellings. The Site lies on greenfield land west of Otford, beyond the existing settlement boundary.

7.2 The purpose of the assessment is to consider the prospects of a future planning application being successful in transport terms, with specific regard to sustainable transport accessibility, walking and cycling opportunities, public transport connectivity, and the ability to provide safe and suitable vehicular access.

Policy Context

7.3 The analysis is undertaken within the framework of the National Planning Policy Framework (NPPF, December 2024, updated February 2025), alongside national design guidance including the National Design Guide, National Model Design Code, Manual for Streets, LTN 1/20, and CIHT guidance on walking and cycling. Key policy requirements (NPPF paragraphs 110, 115, and 116) emphasise:

- Focusing significant development only in locations that are or can be made genuinely sustainable.
- Ensuring safe and suitable access for all users.
- Prioritising sustainable transport modes.
- Ensuring development does not create unacceptable safety impacts or severe residual cumulative impacts on the transport network.

Key Findings

Walking

7.4 National guidance identifies 800m as the reasonable extent of a walkable neighbourhood.

7.5 Only a newsagent lies within this range (600-800m walk). No schools, healthcare, employment areas, or other key facilities fall within a reasonable walking distance.

7.6 There are no footways on Telston Lane, Ivy House Lane, or Pilgrims Way West, and no street lighting, requiring pedestrians to share the carriageway with traffic.

7.7 For the reasons set out above, the Site does not provide genuine walking access to facilities as required by NPPF 110 and 115.

Cycling

7.8 No existing cycle infrastructure serves the Site.

- 7.9 Traffic volumes and speeds on key routes (e.g., Pilgrims Way West/High Street) exceed the thresholds at which mixed-traffic cycling could be considered safe under LTN 1/20.
- 7.10 Planned LCWIP schemes on Sevenoaks Road and Rye Lane are distant from the Site and do not meet minimum LTN 1/20 protection guidance, nor do they provide a linkage to west Otford.
- 7.11 For the reasons set out above, cycling opportunities are insufficient for most users and hence the Site does not provide genuine cycling access to facilities as required by NPPF 110 and 115.

Public Transport

- 7.12 Nearest stop (Willow Park) lies 600-800m away which is further than the 400m walking threshold. It offers only very limited school-focused services.
- 7.13 Otford Station lies 2.4 km away; Dunton Green 3.4 km away. These are both significantly beyond recognised walking thresholds (0.8-1.2km). These distances are potentially suitable for cycling however the routes between the Site and the railways stations are neither attractive nor safe for most users due to a lack of cycling infrastructure. There are no bus service links between the Site and either Otford or Dunton Green railway stations.
- 7.14 For the reasons set out above, it is clear that the Site has very poor public transport accessibility and so does not provide genuine public transport accessibility as required by NPPF 110 and 115.

Vehicular Access

- 7.15 Three possible access points have been considered as follows
 - Telston Lane - Sections narrow to 4m with no footways and no scope for widening due to third-party boundaries. This falls below the 4.8m minimum for two-way traffic per Manual for Streets, creating unsafe reversing and conflict risks.
 - Ivy House Lane - A single-track rural lane with no footways or lighting and no realistic prospect of improvement. Possible use as emergency access only.
 - Hale Lane - which does not border the Site and hence would require third-party land acquisition, which would result in the loss of a children's playground and 20-25% of a recreation ground, rendering it unusable for team sports.
- 7.16 The Site is effectively landlocked and no safe, suitable or policy-compliant vehicle access can be achieved. This directly conflicts with NPPF paragraphs 115(b) and 116.

Overall Conclusion

- 7.17 The assessment set out above demonstrates that there is little or no prospect of the Site securing planning permission for residential development. The Site fails to meet NPPF policy tests because:

- It is in an inherently unsustainable location, contrary to NPPF 110 and 115(a).
- Safe and suitable access cannot be achieved for pedestrians, cyclists, or vehicles (NPPF 115(b) and (d)).
- Essential facilities are not within an 800m walkable neighbourhood (NPPF 115(c)).
- Necessary transport improvements would require disproportionate or undeliverable interventions.
- Development would result in unacceptable road safety impacts, contrary to NPPF 116.

7.18 It is therefore concluded that Land parcel HO/21/00271 should be removed from the Regulation 18 Draft Local Plan, because its allocation would be inconsistent with the NPPF.