



Allocations and Development Management Plan

Sustainability Appraisal (SA) Report

January 2013

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Introduction

Background

A Sustainability Appraisal (SA) has been undertaken to support the emerging Sevenoaks District LDF Allocations and Development Management Plan. The SA considers the impacts of the emerging plan in terms of the key sustainability issues. The outcome of the SA should aid the preparation of the plan and avoid and mitigate any adverse impacts whilst maximising any positive impacts.

An SA of Local Planning Documents is a legal requirement and must be undertaken in-line with the procedures prescribed by the EU Strategic Environmental Assessment (SEA) Directive.

This SA Report must be published alongside the Allocations and Development Management Plan Draft for Submission. The aim of this SA Report is to:

- Present the appraisal of the Council's Allocations and Development Management Plan Draft for Submission
- Present reasoned justification as to why the preferred approach has been selected.

This Report should aid stakeholders in the consultation of the Allocations and Development Management Plan Draft for Submission.

Structure of Report

Annex 1 of the EU Directive prescribes the information that must be contained within this SA Report. The report has been structured to provide this information by answering a logical sequence of nine 'appraisal questions' - see Table 1.

Table 1: Appraisal Questions which and corresponding requirement of the SEA Directive

Appraisal Question	Corresponding requirement of the SEA Directive (the report must contain....)
What is the Plan seeking to achieve?	“ an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes” (Annex I(a))
What’s the sustainability ‘context’?	an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes ” (Annex I(a)) “ the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))
What’s the situation now?	“ the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan” (Annex I(b)) “ the environmental characteristics of areas likely to be significantly affected ” (Annex I(c))
What would the situation be without the Plan?	“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan ” (Annex I(b))
What are the key issues that should be a particular focus of the appraisal?	“ any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance , such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I(d))
What has the Plan-making process involved up to this point?	“ an outline of the reasons for selecting the alternatives dealt with , and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (Annex I(h)) “the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation ” (Annex I(e))
How has the appraisal at this current stage been undertaken?	“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information” (Annex I(h))

<p>What are the appraisal findings and recommendations at this current stage?</p>	<p>“the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors” (Annex I(f))</p> <p>“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan” (Annex I(g))</p>
<p>What are the next steps (including monitoring)?</p>	<p>“a description of the measures envisaged concerning monitoring...” (Annex I(i))</p>

1. What is the Plan Seeking to Achieve?

“an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes” (Annex I(a))

What is the Allocations and Development Management Plan and how does it fit into the LDF?

The Allocations and Development Management Plan (ADMP) forms part of a set of documents that comprises the Local Development Framework for Sevenoaks District.

The ADMP includes:

- New Development Management Policies that will replace all of the remaining ‘saved’ policies contained in the Sevenoaks Local Plan 2000;
- Site Specific Residential, Employment and Mixed use Allocations that will contribute towards meeting Sevenoaks’ future development and community needs; and
- Open Space allocations for protection.

The detailed development management policies and site allocations that form the basis of the Plan will, in combination with Core Strategy policies, provide the framework within which future development proposals will be assessed and determined.

The Council will also produce a Community Infrastructure Levy Charging Schedule and the Gypsy and Traveller Plan.

What are the main objectives of the ADMP?

The purpose and objective of the document is to act as an implementation tool and build upon the overarching policy framework set out in the Sevenoaks Core Strategy. To carry out this role effectively the ADMP will identify where and how future development requirements for the town will be delivered as well as include generic policies that govern how planning applications will be determined up to 2026.

What does the plan not do?

The Allocations and Development Plan does not allocate land for Gypsy and Traveller sites. These sites will be identified through the Gypsy and Traveller Plan.

The Plan also does not repeat any national policies or those already adopted as part of the Core Strategy.

2. What's the Sustainability 'Context'?

“an outline of the contents, main objectives of the plan and **relationship with other relevant plans and programmes**” (Annex I(a))

“**the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan** and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I(e))

Sustainability

This part of the process involves establishing an understanding of the sustainability context in which the ADMP is being prepared, i.e. the implications of key policies, plans, programmes, strategies and initiatives that are relevant to the ADMP, with a focus on the opportunities and challenges they present. Establishing the sustainability context helps to identify key sustainability issues.

Previous Sustainability Appraisal Scoping Reports

Scoping Report (2005 with 2008 and 2011 Updates)

The Scoping Report identified the key sustainability issues within the District. This list of messages is not necessarily exhaustive and no priority should be inferred from the ordering.

Key messages – the LDF should seek to:

- Where possible, promote ‘win-win-win solutions’ that advance economic, social and environmental concerns. In some instances trade-offs between competing objectives may be necessary;
- Respect environmental limits;
- Conserve and enhance biodiversity through an integrated focus on both designated sites and the provision of new habitats;
- Respect the Green Belt and restrict inappropriate development within it;
- Create mixed communities;
- Reduce car dependence by facilitating more walking and cycling and improving public transport linkages;
- Promote good design in new developments;
- ‘Green’ residential developments and ensure sufficient open space provision;
- Adopt a sustainable approach to identifying housing sites for allocation;
- Increase the density of development, avoiding developments with less than 30 dwellings per hectare net;
- Incorporate waste strategies into new developments and encourage further re-use, recycling and recovery of waste;

- Locate major generators of travel demand in towns and District centres;
- Ensure that jobs, shopping, leisure facilities and services are accessible by public transport;
- Protect the historic environment and sites of archaeological interest;
- Protect and provide open space and sports and recreational facilities of high quality / value to the local community;
- Separate noise generating from noise sensitive land uses;
- Reduce flood risk associated with new development including through the use of SUDS;
- Ensure that local communities have access to a range of shopping, leisure and local services;
- Regenerate deprived areas;
- Prioritise the development of previously developed (brownfield) sites
- Re-use existing buildings
- Conserve the natural beauty of Areas of Outstanding Natural Beauty (AONBs)
- Support development proposals that will aid farmers including rural diversification
- Develop renewable energy sources and incorporate renewable energy projects in new developments.
- Contribute to Kent-wide targets for renewable energy
- Support a more local, small scale and dispersed pattern of energy generation where appropriate
- High standards of energy and water efficiency in new developments
- Where appropriate, invoke the 'precautionary principle' in relation to potentially polluting development
- Encourage high value added activities and promote cluster activities
- Upgrade tourism facilities, promote diversity and reduce seasonality
- To improve the match between housing needs and provision
- Deliver affordable housing where there is a need, which contributes to the creation and maintenance of
- sustainable communities, including in market towns and villages
- Endeavour to reduce greenhouse gas emissions and adapt to climate changes already underway
- Incorporate disabled access into development
- Include policies to promote better public health (e.g. through walking and cycling initiatives)
- Encourage developments that 'design out' crime and reduce fear of crime
- Consider the impact of growth in Ashford and the Thames Gateway
- Consider the implications of an ageing population
- Allow for strong and sustainable gypsies and traveller communities whilst also considering the needs of the settled community
- Protect and encourage the provision of suitable employment sites.

3. What's the Situation Now?

“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan” (Annex I(b))

“the environmental characteristics of areas likely to be significantly affected” (Annex I(c))

Overview of the District

Sevenoaks District is covered by 93% green belt and as such has limited development potential. 60% of the District also lies in the Kent Downs and High Weald Areas of Outstanding Natural Beauty and much of the landscape is covered by other natural environment designations such as Historic Parks and Gardens, Sites of Special Scientific Interest and Ancient Woodland.

The District, although generally affluent, has areas of deprivation particularly within the Urban Area of Swanley. The Strategic Housing Market Assessment stated that there is a need for a high level of affordable housing within the District.

The Core Strategy identified the following key issues which needed to be tackled by the LDF. These are derived from understanding the nature of the District; the direction of other strategies and plans, including the Community Strategy; future trends revealed through research and local concerns expressed through engagement with stakeholders.

1. Meeting future development requirements within an area constrained by the Green Belt

The District has to provide for new development. It has in the past been able to meet development requirements without the loss of Green Belt and the background studies show future requirements can be met while continuing to maintain the Green Belt.

2. Making the best use of previously developed land in urban areas

Locating development in existing urban areas puts the focus on making efficient use of existing urban land to ensure that it contributes fully to providing for new development.

3. Conserving and enhancing the high quality of the natural and built environment.

Sevenoaks has a legacy of high quality landscapes and historic features, which need to be protected and appropriately managed for future generations.

4. Providing for future development in Sevenoaks Urban Area

In an area lacking large towns Sevenoaks is the District's largest settlement with the greatest range of services. The strategy sets out the future role of the town and establishes the scope for future development, while protecting its environmental quality.

5. Improving Swanley

Swanley is the District's second largest town. It is well-located close to M25 but there are issues of deprivation in some areas and the town centre needs improvement. Consequently a greater emphasis is placed on regeneration

6. The future for the rural areas

Over 90% of the District is rural. The high quality of the rural environment needs to be conserved and enhanced while at the same time ensuring that the needs of rural communities are met and the rural economy can continue to develop in a sustainable way.

7. Improving the provision of affordable housing

Housing is expensive in the District and studies show a high level of need from local people who cannot afford to buy on the open market. Ways of increasing provision of housing that is affordable to local people are examined.

Baseline Information and Evidence Base

Baseline information helps to identify key sustainability issues, and can also be used at the assessment stage as a basis for predicting and evaluating effects. Reviewing baseline information is important for identifying appropriate monitoring indicators. The collection of baseline information is a key component of the SA process and a legal requirement under the SEA Directive. Baseline information helps to provide a basis for predicting and monitoring effects and assembling baseline data helps to identify sustainability problems.

The purpose of the ADMP is to deliver the sites and policies required to implement the vision and policies of the adopted Core Strategy. In this respect the baseline review indicated that the following trends would be likely to continue without the ADMP and the Core Strategy:

- Increasing shortage of affordable housing both in actual numbers and in the range of types available, linked to continuing high house prices relative to other parts of the South East
- Increase in domestic CO₂ emissions
- Increased use of energy i.e. the domestic consumption of gas and electricity
- Increased use of water per capita
- Loss of local employment opportunities
- Loss of employment land for new business development

Presented below is a list of recent evidence-base studies that have been published since the publication of the Scoping Report which highlight the following baseline conditions.

- ELR Revised Forecasts;
- Gypsy and Traveller Needs Survey;
- GlaxoSmithKline Powder Mills site;

- Graham Chase Swanley Town Centre Report;
- ELR in relation to 4 sites.

4. What Would the Situation be Without the Plan?

“the relevant aspects of the current state of the environment and **the likely evolution thereof without implementation of the plan**” (Annex I(b))

The Allocations and Development Management Plan contains land allocations and development management policies which will guide development up to 2026. The plan replaces all remaining policies within the 2000 Local Plan and is in accordance with current European and National policy and current evidence. The absence of the Allocations and Development Management Plan is likely to have negative impacts on sustainability.

Social/Community Issues

Without the plan the District is likely to experience continued pressure on land availability to meet the high demand for housing. Housing that was brought forward would most likely fail to meet high design standards until required to by national legislation. Additionally, it is not clear whether the demands of demographic shift expected for the District would be met and there would most likely be an overprovision of large dwellings. Greater levels of affordable housing need would also be experienced without the plan.

In terms of socio-economic conditions the District is likely to continue to demonstrate high levels of affluence although disparities between the relatively deprived areas could be expected to continue. Importantly, without the Allocations and Development Management Plan the need for regeneration in specific parts of the District, such as Swanley, may not be realised.

Environmental Issues

The plan seeks to ensure that the District’s natural environment is conserved and enhanced. It identifies the Green Infrastructure Network and future opportunities for enhancement. The development management policies will ensure that existing and new green infrastructure will be incorporated into the design of new development and without the plan developments are likely to include significantly less onsite green infrastructure. It is also likely that the biodiversity and geodiversity of the development sites and therefore the District as a whole will be reduced.

The Allocations and Development Management Plan also allocates open spaces outside of the Green Belt for protection, without the plan these spaces may be vulnerable to redevelopment and result in the loss of many areas of land valuable to the local community.

In terms of transport, high levels of private car use (with associated greenhouse gas emissions and air pollution) would be expected to continue although the separate Transport Strategy and Local Transport Plan would help encourage a modal shift towards more sustainable transport patterns. Proximity to London means that a large number of highly skilled residents will continue to commute to the capital for work. The plan seeks

to ensure that new residential development is focussed in the most sustainable locations within the District by allocating sites. Without the plan new residential development may be built in less sustainable locations and therefore lead to an increase in car use.

Economic Issues

The Allocations and Development Management Plan will ensure that the overall employment stock within the District will be maintained. The Core Strategy required the Allocations and Development Management Plan to identify the District's employment sites for protection under Policy SP8. Without this plan these employment sites may be vulnerable for redevelopment and most likely for residential development. The plan also identifies land for future employment provision, without the plan it is likely that this site will be redeveloped for a different use.

The plan also seeks to protect and control the development of the unallocated employment sites. Policy SP8 in the Core Strategy protects the District's employment sites identified within the Allocations and Development Management Plan. These sites are all 0.2ha or above and as such there is currently a policy vacuum which, over time, could result in the loss of smaller (less than 0.2ha) employment sites which play a valuable role in the District's economy. This would be a particular issue within the rural areas of the District where smaller employment units are more common and play a vital role in the sustainability of the area.

The Allocations and Development Management Plan will also ensure the viability and sustainability of the town and local centres within the District. The town and local centre policies within the Allocations and Development Management Plan will also ensure the viability and sustainability of the town and local centres within the District. Without the plan, the development of these will be uncontrolled and may lead to an unbalanced spread of use classes and therefore have a negative impact on the District's economy.

5. What are the Key Issues that should be a Particular Focus of the Appraisal?

“any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I(d))

What key issues were identified in the Scoping Report?

The key issues identified in the Scoping Report were refined into a list of 13 sustainability objectives which are used to assess the allocations and policies within the Allocations and Development Management Plan in order to identify the environmental, economic and social/community impacts and therefore appraise the overall sustainability. These objectives are a key outcome of the scoping and provided a methodological framework for the appraisal. Table 2 outlines which objective assesses which impact.

Table 2: The Sevenoaks Sustainability Appraisal Objectives

	Objective	Impact
1	To help ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	Economic, Social/Community
2	To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	Environmental, Social/Community
3	To improve the health and well-being of the population and reduce inequalities in health	Environmental, Social/Community
4	To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	Social/Community
5	To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	Economic, Environmental, Social/Community
6	To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	Environmental
7	To conserve and enhance biodiversity and geodiversity	Environmental
8	To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	Environmental
9	To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	Economic, Environmental
10	To create a high quality built environment	Social/Community
11	To promote sustainable forms of development and sustainable use of natural resources	Environmental
12	To encourage high and stable levels of employment and sustain economic competitiveness	Economic
13	To improve the development and retention of skills	Economy, Social/Community

6. What has the Plan-Making Process Involved up to this Point?

“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”
(Annex I(h))

“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”
(Annex I(e))

Overview of how the plan has developed?

The plan was initially two separate documents which have now been integrated.

Consultations have taken place in various stages of the production of the ADMP including:

- Site Allocations Issues and Options: Undertaken between 11 February and 1 April 2010
- DM Policies Issues and Options: Undertaken between 26 May and 4 August 2011
- Open Space Allocations: Undertaken between 22 September and 3 November 2011
- Supplementary Site Allocations Consultation: Undertaken between 29 March and 10 May 2012

The identification of the **site allocations** within the Plan started in 2008. The Council undertook a Strategic Housing Land Availability Assessment (SHLAA) in 2008 to identify areas of land which may be suitable for development. This included a public “call for sites” and an analysis of land available across the District. Submitted sites were categorised according to their sustainability using criteria including landscape or policy constraints such as the site lying within the Green Belt or within Flood Plains. The Council then updated the SHLAA in 2009 following and further analysis of land available across the District. The most sustainable housing and employment sites identified in the SHLAA update 2009 were then carried forward into the Site Allocations Options document and consulted upon and subject to SA in 2010.

These sites have since undergone further analysis and additional sites have been submitted and included if they meet the sustainability criteria set out in the SHLAA update 2009. Any sites which were added since 2010 or where the proposed allocation had significantly changed were subject to a Supplementary Site Allocation consultation in March 2012. These sites were also subject to an SA in March 2012. Site options that have been found to perform well subsequent to SA and following the responses to the consultation are now identified within the Allocations and Development Management Plan as suitable for residential, employment or mixed use during the plan period (up to

2026).

The **development management policies** were developed subsequent to careful analysis of the existing saved local plan policies and the identification of local policy gaps. The initial draft policies and SA were subject to public consultation in 2011. These policies were reviewed following the responses to the public consultation, further evidence and for conformity following the publication of the National Planning Policy Framework in March 2012. Preferred development management policies are now included in the Allocation and Development Management Plan Draft for Submission.

The **open space allocations** were identified through the Open Space, Sport and Recreation Study 2009. The sites which lie outside of the Green Belt and are 0.2ha or above (unless previously identified in the Local Plan) were included in the document and identified on accompanying maps. The sites were subject to SA and public consultation in September 2011. Following the consultation the sites were updated and reassessed for inclusion in the Allocation and Development Management Plan Draft for Submission.

Figure 1: Development of the Allocations and Development Management Plan and Sustainability Appraisal



Past appraisal that has informed development of the plan

As detailed in Figure 1, above, Interim SA Reports were published alongside the plan consultation documents at each stage. The appraisal findings and recommendations set out within these Interim SA Reports have been taken into account by the Council when preparing the draft for submission version of the plan.

Site Allocations

Site Allocation Options (2010)

The Council undertook SA of the options for the Sevenoaks Allocations in February 2010. The first stage of the assessment tested housing, employment, opportunity area and major developed sites against criteria derived from the objectives of the Core Strategy. These being:

- *To focus the majority of new housing, employment and retail development in the towns of Sevenoaks and Swanley and, to a lesser extent, in Edenbridge with smaller scale development in the larger villages which have a more limited range of local facilities.*
- *To safeguard the countryside around the District's towns and villages and promote change within them by making the best use of previously developed land.*
- *To safeguard and maintain the openness of the Green Belt and the distinctive character and biodiversity of the district's landscapes, particularly the Kent Downs and High Weald Areas of Outstanding Natural Beauty.*

The second stage of the assessment tested the sites against criteria derived from the 13 SA Objectives (as identified through scoping). These criteria were as follows:

- *Links to Public Transport (derived from objectives 5 and 9)*
- *Impacts on Ecology and Biodiversity (derived from objective 7)*
- *Impacts on Listed Buildings (derived from objectives 8 and 10)*
- *Impacts on Conservation Area (derived from objectives 8 and 10)*
- *Impacts on Archaeology (derived from objective 8)*
- *Impacts of Flooding (derived from objective 2)*
- *Impacts on Air Quality (derived from objective 6)*
- *Impacts on Noise and Pollution (derived from objective 6)*
- *Impacts on Economic Development (derived from objectives 12 and 13)*
- *Potential to contribute to affordable housing provision (derived from objective 1)*

The Council published the result of these assessments alongside the consultation document. This Report, while not a statutory requirement, provided information to stakeholders with a view to informing their responses. Appraisal findings were also of use to the Council when determining how to progress the plan subsequent to consultation.

Interim 'Options and Alternatives' Report (2012)

Allocations

In March 2012 the Council published an interim SA report detailing issues that had arisen through previous rounds of consultation. The purpose of the report was to identify the areas where reasonable alternatives exist that have not previously been tested against sustainability objectives and assess the likely environmental, economic and social impacts, both positive and negative, of the alternative policy approaches. Some of the sites appraised within the interim SA report were also subject to the Supplementary Site Allocation Consultation.

Sites were considered to have reasonable alternatives if:

- It was promoted for a change from an existing and potential continuing use (e.g. Warren Court Farm) and it had not been allocated in the previous Local Plan or it had not had a previous planning application for the proposed use; or
- It had alternative development proposals for the same use (e.g. Swanley Town Centre); or
- circumstances had changed and the site was no longer suitable for the current use (e.g. GSK); or
- new evidence had been gathered since the initial site assessments which did not support the proposed allocation (e.g. Land Rear of Moat Cottage).

Reasonable alternatives were considered in relation to the following sites;

- *Land Rear of Déjà Vu, Swanley – employment or residential*
- *The Swanley Centre, Swanley – redevelopment within existing boundary, redevelopment including recreation ground*
- *Land at Cedar Drive, Edenbridge- residential or open space*
- *Land Rear of Moat Cottage, Otford – residential or non-allocation on heritage grounds*
- *Currant Hill Allotments, Westerham – residential and replacement allotments or retain allotments*
- *Sheft's Croft (Leigh's Builders Yard), Edenbridge – employment or residential*
- *GlaxoSmithKline (GSK) Site, Powder Mills, Leigh – employment, residential or mixed use*

- *Warren Court, Halstead – employment, residential or mixed use*
- *Land Adjacent to Employment Allocation, Broom Hill, Swanley – residential or open space*
- *Land at Bligh’s Meadow, Sevenoaks – retail only development or mixed retail, business and housing development*
- *Station Approach, Edenbridge – employment or mixed use*

Other sites have since been appraised for reasonable alternatives including:

- *United House, Swanley – employment, residential or mixed use*
- *Bovis Manor House Site, New Ash Green – employment, residential, non-allocation*
- *West Kingsdown Industrial Estate, West Kingsdown – Employment or residential*

The appraisals for these sites can be found in the Technical Appendix.

Allocations which have been removed or altered

Some allocation sites have been removed or altered since previous drafts of the plan. The previous sustainability appraisals of some of the allocations has directly altered the allocation of the sites. This was primarily following the Interim Options and Alternatives stage. Table 3 outlines which sites have been altered as a result of the appraisal of reasonable alternatives. The full appraisal for all sites remaining within the Allocations and Development Management Plan including the reasonable options can be found in the Technical Appendix.

These are outlined in table 3 below:

Table 3: Site Allocations which have been removed or altered including as a result of SA

Site	Previous Allocation	Final Allocation	Reason for change
West Kent Cold Store, Dunton Green, Sevenoaks	Residential	None	Planning Application Granted and development underway
Police Station, Morewood Close, Sevenoaks	Residential	None	Planning Application Granted
Land West of Bligh’s Meadow, Sevenoaks	Mixed use	None	Planning Application Granted

Corner of Birchwood Park Avenue, Swanley	Residential	None	No longer promoted by owner
Former De ja vu site and land to rear	Residential	None	Planning Application Granted for the former de ja vu site. Land to rear in primarily retail use. No allocation.
St. Bartholomew's Hospital, Swanley	Residential	None	Planning Application Granted and development complete
31-37 Park Lane, Kemsing	Residential	None	No longer promoted by owner
West Kingsdown Industrial Estate	Residential	Employment	Appraisal concluded that employment was the most sustainable use of this site. Therefore reallocated for retained employment (see technical appendix for appraisal)
United House, Swanley	Mixed Use without open space then allocated for Residential	Mixed – Employment, Residential and open space	Appraisal concluded that mixed use including open space was most sustainable use of this site. Therefore reallocated..
Warren Court Farm, Halstead	Employment	Residential	Appraisal concluded that residential use was most sustainable use of this site. Therefore reallocated for residential.
Land adjacent to Broom Hill employment allocation, Swanley	Residential	Open Space	Appraisal concluded that open space was the most sustainable use of this site. Therefore reallocated for protected open space.

Land at Cedar Drive, Edenbridge	Residential	Open Space	Appraisal concluded that open space was the most sustainable use of this site. Therefore reallocated for protected open space
Land Rear of Moat Cottage, Otford	Residential	None	Appraisal concluded that this site was not suitable for residential development. Therefore unallocated
Land Rear of Garden Cottages, Leigh	Residential	None	Planning Application Granted
Shefts Croft (Leigh builders yard) Edenbridge	Employment	None	Planning Application Granted
Bovis Manor House Site, New Ash Green	Residential	None	On the recommendation of the LDF Advisory Group, the site is left as non-allocated land which will allow consideration through a Neighbourhood Plan or through planning applications for the site which would be considered on their merits.

Other sites which were identified by the Strategic Housing Land Availability Assessment were not included in the proposed allocations as they did not meet the required sustainability and planning requirements.

Open Space Allocations

Open Space Options (2011)

The Council undertook SA of the options for open spaces to be protected in September 2011. The Council considered and appraised the merit of protecting the following types of open space against the 13 Sustainability Objectives.

- *Allotments and Community Gardens*
- *Amenity green spaces*
- *Cemeteries and churchyards*

- *Green corridors*
- *Natural and semi-natural urban green spaces*
- *Outdoor sports facilities*
- *Parks and Gardens*
- *Young People and Children's playspace*

The Council published the result of these assessments alongside the consultation document. This Report, while not a statutory requirement, provided information to stakeholders with a view to informing their responses. Appraisal findings were also of use to the Council when determining how to progress the plan subsequent to consultation.

Findings of Open Space Allocation appraisal which have altered the Plan

The appraisal found that the current allocations were the most sustainable options for the open space allocations and therefore no changes were required to be made.

Development Management Policies

Development Management Policy Options (2011)

The Council undertook SA of the options for the development management policies in May 2011. In developing policy options the Council identified options under the following chapter areas:

- *Sustainable Communities and Development Principles*
- *Environment and Climate Change*
- *Heritage Assets*
- *The Green Belt*
- *Housing and Residential Development*
- *Travel and Transport*
- *Green Infrastructure and Open Spaces*
- *The Economy and Employment*
- *Town Centres and Shopping*
- *Leisure and Tourism*

The Council carried out a qualitative appraisal of policy options against the 13 Sustainability Objectives derived from the scoping process. The Council published the result of these assessments alongside the consultation document. This Report, while not a statutory requirement, provided information to stakeholders with a view to informing

their responses. Appraisal findings were also of use to the Council when determining how to progress the plan subsequent to consultation.

Interim 'Options and Alternatives' Report (2012)

Reasonable alternatives for some of the development management policies were appraised.

Policies were considered to have reasonable alternatives if:

- they were promoted through public consultations by Statutory Consultees and the Council agreed that there was a potential policy gap that was worth testing (e.g. Crime and Disorder), or
- addressed a potential policy gap which is not covered by national or local policy (e.g. Non-allocated Employment Sites), or
- were potentially particularly restrictive (e.g. Re-use of Redundant School Buildings).

Alternatives were appraised in relation to the following policy areas:

- *Re-use of Redundant School Buildings*
- *Re-use of Redundant School Playing Fields*
- *Non Allocated Employment Sites*
- *Town Centre Strategy*
- *Crime and Disorder*
- *Residential Institutions*

The results of these appraisals can be found in the Technical Appendix.

The outcomes of this process have helped inform the final version of the ADMP, which has been submitted for public examination. However, it should be noted that where external material considerations are overriding the options receiving the most favourable SA scores have not always been included within the final plan.

Development Management Policies which have been removed or combined

Some policies have been combined or removed since the public consultation.

Table 4: Development Management policies which have been removed or combined

Policy	Reason for change
Crime and disorder	Appraisal concluded policy should be included and now incorporated into policy EN1 – Design Principles
New residential institutions	Not compliant with NPPF
Re-use of redundant school playing fields	Appraisal concluded policy should be included and now incorporated into policy GI2 – Loss of Open Space
Village Centres	Incorporated into policy LC4 – Neighbourhood and Village Centres

There are also a number of policy areas within the Saved Local Plan policies which have not been carried into the plan. It was concluded that the policy area was adequately covered by the Core Strategy or National Policy.

Findings of Development Management appraisals which have altered the Plan

Some policies have been altered due to the appraisal findings. The Interim Options and Alternatives Report identified policies which had reasonable alternatives and appraised the options. The findings of these appraisals led to the retention of policies such as the Town and Neighbourhood Centres and the Non-allocated employment sites and the combination of policies which seek the same aim such as GI2 Loss of Open Space and the Re-use of redundant school playing fields.

7. How has the Appraisal at this Current Stage been Undertaken?

“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”
(Annex I(h))

Appraisal Methodology for the Allocations and Development Management Plan Draft for Submission

The appraisal of the ADMP involved:

- Appraising the sites to be allocated for development or protection;
- Appraising the proposals for open spaces;
- Appraising the Development Management policies.

The appraisal was carried out using the SA Framework that was developed and documented in the Scoping Report. The SA Framework consists of 13 objectives against which the ADM Plan allocations, open space allocations and policies were appraised. The appraisal was a qualitative exercise based on the professional judgement of the Council.

Difficulties Encountered

There were minor difficulties in undertaking the SA of the Allocations and Development Management Plan. However, these were minimised as the evidence base which has informed the document is robust and has been strengthened through additional site specific studies where this was deemed necessary.

During the development of the Plan circumstances beyond the control of the Council necessitated changes in the potential allocations and emerging policies. This slowed the development of the plan and resulted in additional evidence base evidence and sustainability appraisals.

Also some allocations and policies were more challenging to appraise than others. This was due to the level of uncertainty over the exact way in which they will be delivered. An example of this is the policy on Fort Halstead which makes provision for possible future redevelopment. However, it is not yet clear exactly what form this development will take and as such it was difficult to appraise the final impact.

8. What are the Appraisal Findings and Recommendations at this Current Stage?

“the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors” (Annex I(f))

“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan” (Annex I(g))

This section sets out the summary findings from the appraisal the ADMP Pre Submission Version. This consists of separate appraisals of the:

- Site Allocations;
- Open Space Allocations;
- Development Management policies.

The full appraisal can be found in the Technical Appendix to this report.

The findings within the Technical Appendix also include mitigation measures identified during the appraisal.

Many of the measures proposed are in the form of general recommendations or points for consideration, rather than measures designed to counter specific impacts.

Summary and Recommendations

The appraisals of the allocations and policies within the Allocations and Development Management Plan have identified that the plan will have an overall positive impact of sustainability.

The development built as a result of the allocations and policies within the plan will directly have positive long term effects on the sustainability of the District. These include the conservation and enhancement of the natural environment, retention of economic competitiveness on employment sites and within Town and Local centres and meeting the housing requirement, including affordable housing.

There are very few significant effects or areas of concern with respect to the performance of the ADMP against the SA Framework. The few areas of concern are shown in Table 5.

The Council should take on board the recommendations set out to mitigate and monitor these significant effects. In the case of monitoring recommendations it is important to note that these are initial and in some cases aspirational ideas. It will be up to the Council to consider the practicalities of monitoring and what might be achievable.

Table 5: Key Negative Impacts and Mitigation

Significant Effect	Mitigation	Monitoring	Council's Comments
Small scale development of open green sites that will result in the loss of permeable land and therefore has the potential to reduce flood mitigation.	Development should include mitigation measures such as SUDs, if appropriate and required at the detailed design stage.	Monitor the number of planning permissions granted contrary to Environment Agency advice on flooding.	Whilst built development would have a lesser impact in respect of drainage and flood mitigation the allocation of sites is predominantly focussed on previously developed land and as such it is unlikely that any of the proposed allocations would have a demonstrable impact upon flood risk within the District.
The DPD is focussed on new development allocations. Development will have a knock on impact in relation to increased CO2 emissions and associated pollution from vehicle movements.	<p>Core Strategy Policy SP2 requires Code for Sustainable Home construction requirements, which seek to mitigate and reduce the level of greenhouse gas emission.</p> <p>Measures could be introduced with regard to the residential development restricted to minimum levels or no car parking for the site in order to promote the use of public transport and local services.</p> <p>Consideration to be given as to the suitability of the site for electric vehicle charging provision in an attempt to reduce traffic pollution.</p>	<p>Monitor Code for Sustainable Homes achievements.</p> <p>Monitor delivery of provision for electrical vehicle charging points.</p>	The level of development being allocated for development is consistent with the Council's Core Strategy, which was subject to comprehensive Sustainability Appraisal. Therefore the significant effects of the proposed level of development have already been considered and approved.
There is little within the ADMP that will lead to positive impacts on skills development within the District	<p>To strengthen the effects of the ADMP against the relevant SA Objectives opportunities may be provided for businesses that provide opportunities for the promotion of apprenticeships or skills development.</p> <p>These could be explored and developed through the Local Strategic Partnership.</p>	Participation of 16-18 year-olds in education or training	<p>Policy SP8 of the Core Strategy already commits the Council to work with partners to develop initiatives to improve skills in the workforce.</p> <p>The policy also supports the development of start up units for small businesses in suitable locations.</p>

The appraisal found that the ADMP may have a detrimental impact on localised flooding due to small scale development of greenfield sites. This impact would be relatively minor due to the small percentage of allocated greenfield sites and can be further mitigated by Policy GI1 which ensures that all new development incorporates green infrastructure which will help to mitigate surface water run off and reduce localised flooding. Further text on Sustainable Drainage Systems (SuDs) will be added to the supporting text of the Green Infrastructure and Design Principles policies.

9. What are the Next Steps (including monitoring)?

“a description of the measures envisaged concerning monitoring...” (Annex I(i))

Monitoring measures

The Allocations and Development Management Plan will be monitored through a set of performance indicators which will be reported in the Annual Monitoring Report. These indicators will monitor the success of the policies and the overall economic, environmental and social sustainability of the plan and have been produced following the outcome of the appraisals for the sites and policies and through consideration of the feasibility of the monitoring. Any policies where the council is significantly and consistently underachieving will be reviewed and the sustainability appraisal for that policy reassessed.

Next steps

The Allocations and Development Management Plan will be published for comments prior to submission to the Secretary of State. Any significant changes to the plan prior to submission and adoption will require an update to this report.

A Sustainability Statement will be published at the time of the adoption of the Allocations and Development Management Plan. This statement will outline how environmental, and in this case broader sustainability considerations and consultation responses were reflected in the plan or programme and how its implementation will be monitored in the future.