

Appendix 2



Local Development Framework

Allocations and Development Management DPD

Assessment of Options & Alternatives
Interim Sustainability Appraisal

February 2012

Should you wish to comment on this SA Report, please do so in writing no later than Monday 9 April 2012.

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**Local Development Framework
Allocations and Development Management DPD**

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Interim Sustainability Appraisal**

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1 INTRODUCTION

1.1 The Allocations and Development Management (A&DM) Development Plan Document (DPD) will form part of a set of documents that comprises the Local Development Framework for Sevenoaks. The purpose of the document is to build upon the overarching policy framework set out in the Sevenoaks Core Strategy (adopted in February 2011), by identifying where and how future development requirements for the District will be delivered. It will include:-

- New Development Management Policies that will replace all of the remaining 'saved' policies contained in the Sevenoaks Local Plan (Adopted March 2001);
- Site Specific Allocations that will contribute towards meeting Sevenoaks' future development needs; and
- Area specific policies and designations.

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

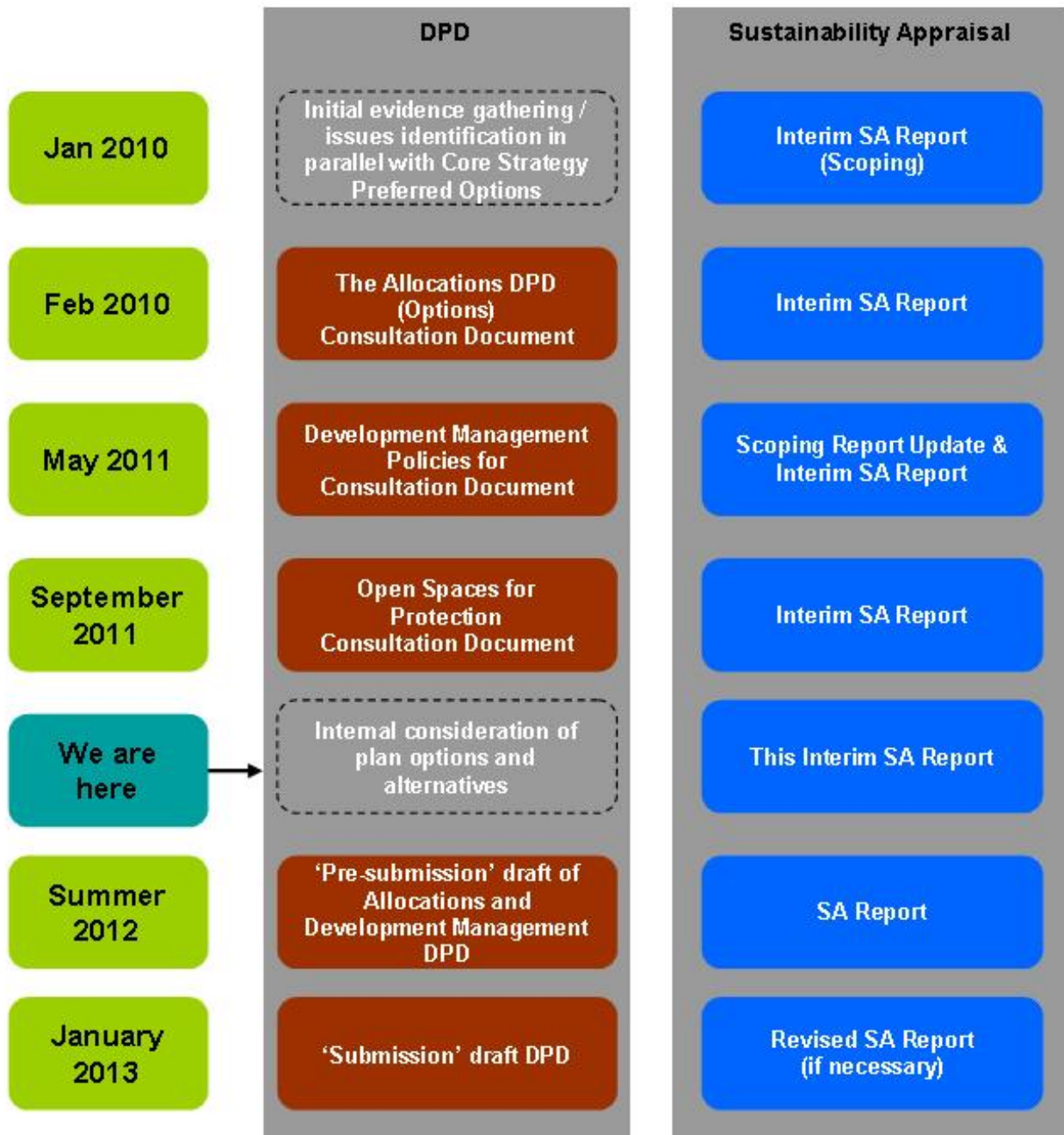
Production of the Allocations and Development Management DPD

1.3 Consultations have taken place in various stages of the production of the A&DM Policies DPD as detailed in diagram 1 overleaf.

1.4 Interim SA Reports were published alongside plan consultation documents at each of the above stages. The appraisal findings and recommendations set out within these Interim SA Reports will be taken into account by the Council when preparing the draft ('Pre-submission') version of the plan.

1.5 The purpose of this document is to appraise a number of alternative approaches to Site Allocations and Development Management Policies that have emerged (subsequent to previous iterations of consultation / SA). The appraisal findings from this current plan-making / SA step will inform the preparation of the Pre-submission Plan.

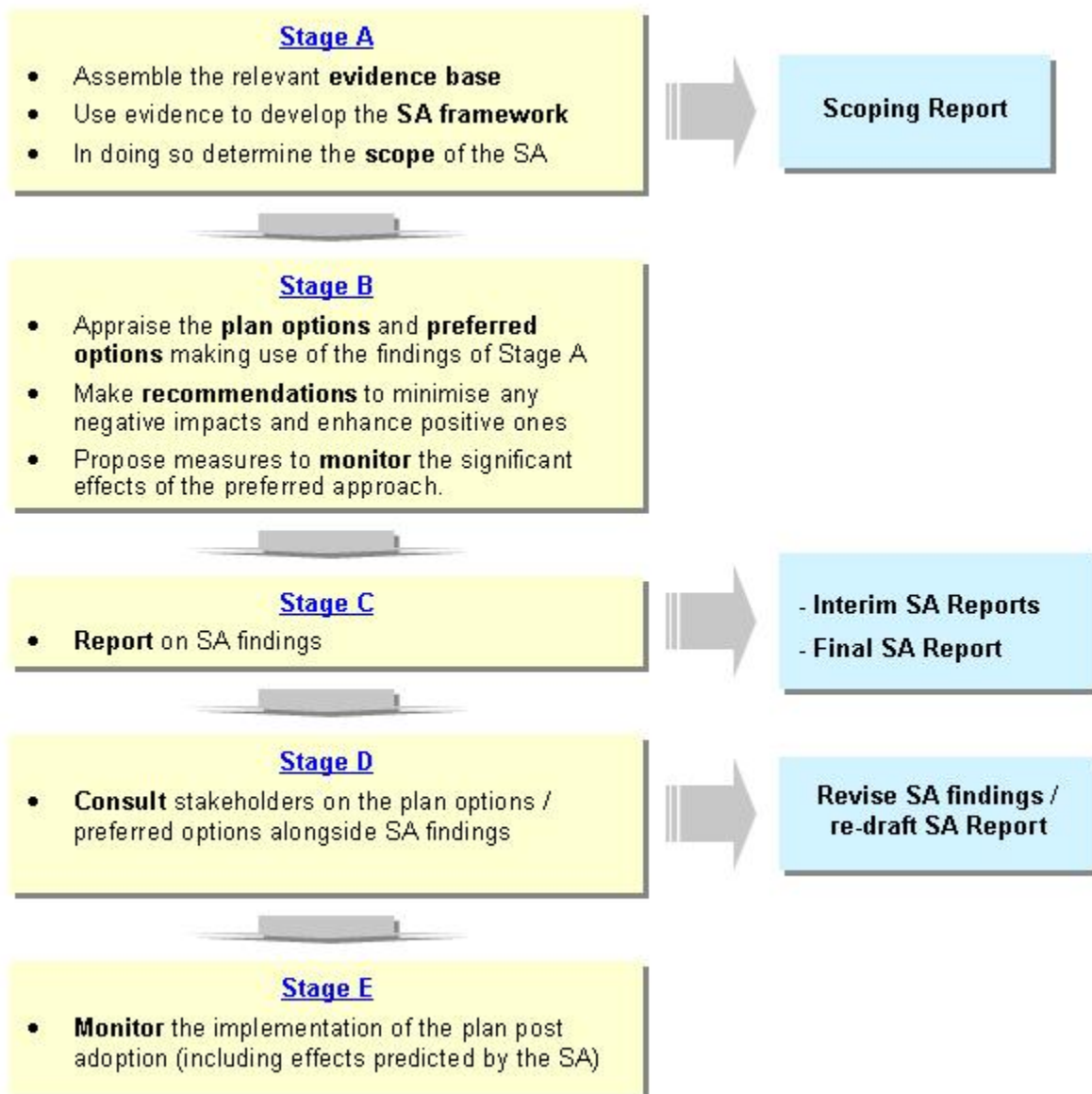
Diagram 1: Production and SA to date.



2 SUSTAINABILITY APPRAISAL AND THE STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) DIRECTIVE

- 2.1 The purpose of the SA is to undertake an appraisal of the ‘social, environmental and economic effects of plans, strategies and policies’ from the outset of the LDF process, so that decisions can be made that accord with the objectives of sustainable development.
- 2.2 The Government’s objectives for sustainable development are set out in the revised strategy document entitled ‘Securing the Future – UK Government Sustainable Development Strategy’ (Defra, 2005).
- 2.3 The five guiding principles of the strategy are identified as:-
- Living Within Environmental Limits;
 - Ensuring a Strong, Healthy and Just Society;
 - Achieving a Sustainable Economy;
 - Promoting Good Governance; and
 - Using Sound Science Responsibly.
- 2.4 Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, commonly referred to as the Strategic Environmental Assessment (SEA) Directive, came into effect in the UK in July 2004. SEA is the assessment of the likely environmental impacts of plans and programmes at a strategic level, whereas SA has a broader responsibility to consider environmental social and economic issues.
- 2.5 However, common techniques are employed in undertaking SEA and SA assessments, and Government guidance recommends a process which meets their combined requirements.
- 2.6 The Government’s approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social as well as environmental effects. To this end, the Department for Communities and Local Government (CLG) Plan Making Manuel provides detailed guidance as to the approach to be taken to SA and SEA. The combined SEA / SA process is referred to in this document as SA.

2.7 The Guidance advocates a five-stage approach to undertaking SA.



2.8 Stages A and B are key stages of the SA process. The purpose of Stage A – the scoping stage - is to gather evidence and set the scope for the forthcoming assessment stage (Stage B). The Council originally undertook a scoping report of the Sevenoaks Local Development Framework in 2005, followed by an update in 2007. This scoping report set the baseline data and key framework for the Core Strategy DPD.

2.9 Following the adoption of the Core Strategy the Council produced a Scoping report Update in May 2011 in order to ensure that the scope of the ongoing SA reflects the most up-to-date baseline data.

- 2.10 Stages B and C are iterative. This SA Report presents the findings of the most recent iterative step. In particular, this SA Report presents an appraisal of a range of alternative approaches (options) that have emerged. This report will play an important role in informing the pre-submission plan document.
- 2.11 In the future, the Council will produce an SA Report for consultation alongside the pre-submission version of the DPD. The SA Report will provide all of the information required of the 'Environmental Report' by the SEA Directive (Annex 1). The Council may also wish to alter the A&DM DPD further, to reflect the consultation on the Pre-submission Plan as well as the recommendations of the SA. If the changes made are likely to have significant sustainability implications then they will be subject to further SA (Stage B) and a further SA Report will be produced (Stage C).

3 OPTIONS AND ALTERNATIVES METHODOLOGY

- 3.1 Scoping is the first stage of SA that is completed before production of the plan document starts.
- 3.2 This scoping process has evolved and been subject to a number of reviews, most recently in May 2011. Through the scoping review process a set of 13 key sustainability objectives were derived by which the Council will consider all of its LDF documents. This is the same approach used and accepted throughout the Core Strategy production.
- 3.3 The basis for producing these objectives come from the SEA Directive, which states the SA process should assess 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.

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

- 3.4 The first round of ‘option’ consultations on the Councils site allocations and development management policies were assessed against these objectives prior to the

first round of public consultation. This Interim SA Report follows the same approach and tests the potential options and alternative approaches that have been proposed by stakeholders during the first round of consultations.

- 3.5 The results of the ‘options’ and ‘alternative’ appraisals will assist the Council when determining which policies and allocations will be included within the pre-submission.

Traffic Light Assessment

- 3.6 This SA uses the process of appraising differing ‘options’ against the LDF sustainability objectives and utilises a traffic light assessment method to measure and summarise the impacts of policy proposals.

- 3.7 The purpose of the traffic light assessment is to establish the positive and negative aspects of sustainability against the objectives of the LDF.

- 3.8 The traffic light system was preferred for assessing policies rather than risk false precision by giving a numerical sustainability rating. For example if the policies were assessed on a numerical basis rather than the traffic light system, the comparison between a score of 10 and 5 would imply that the former is twice as good as the latter, which is unlikely to be the case.

- 3.9 Scores were assigned drawing on the evidence-base and professional judgement and also taking into account the criteria for determining the likely significance of effects listed in Annex II of the Directive. A guide to the traffic light approach is included below.

Guide to Traffic Light Policy Assessment

++	<i>A very positive assessment is judged to be where the policy/allocation explicitly promotes opportunities or criteria to deliver the key outcome of the sustainability objective.</i>
+	<i>A positive assessment is where the policy/allocation would positively contribute to achieving the delivery of the sustainability objectives.</i>
0	<i>A neutral assessment is where the policy is either irrelevant to the sustainability objective or where the positives are equally outweighed by the negatives creating a neutral.</i>
-	<i>A negative assessment is where the policy/allocations is inconsistent with the strategic sustainability objective.</i>
--	<i>A very negative assessment applies where the policy/allocation is explicitly in conflict with the sustainability objective.</i>

- 3.10 The final decision of policies to be included within the DPD will be a balancing exercise, where the Council will weigh the positives/negatives and any implications for the inclusion or exclusion of a policy.
- 3.11 Upon identification of final draft policies, the SA will be taken forward to a more advanced Pre-submission stage at which time more detailed assessment of the final policies will be carried out. This will include the evaluation of likely significant effects of the policies including probability of impacts, duration, frequency, cumulative nature and magnitude in accordance with Annex II of the SEA Directive.

4 SITE ALLOCATION ALTERNATIVE OPTION APPRAISALS

- 4.1 A long list of site options has already been subject to appraisal, and findings will be taken into account when selecting the preferred approach. It has now emerged that, for some sites, there is a need to give more explicit consideration to alternative uses. As such, this Chapter considers 11 sites in turn, giving consideration to the merits of alternative uses for each.
- 4.2 This need to give consideration to options for some sites has arisen due to alternative uses being promoted through consultation and/or the emergence of evidence from other sources in recent months
- 4.3 Options that are not consistent with the Core Strategy are not considered to be reasonable, and hence have are not considered.

The detailed appraisals of the site options are included overleaf. The sustainability objectives to which the assessments relate are;

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

LAND REAR OF DÉJÀ VU, SWANLEY

Déjà vu was a former nightclub within Swanley, which had become a derelict site during the previous 10 years. The Council’s evidence base (Strategic Housing Land Availability Assessment – SHLAA) identified it as a site that may be suitable for housing over the plan period. In assessing the suitability for housing the Council identified that the land immediately to the rear of the site, in a non allocated employment use, may also be better suited to residential development as part of a wider scheme due to the potential inappropriate relationship that may result between new residential on the Déjà vu site and existing employment uses to the rear. The Council considered the two adjoining sites for housing through the first round of ‘options’ public consultation.

However following the consultation, the Déjà vu site was granted permission for a hotel and restaurant, which has since been implemented and completed. The introduction of new commercial development and that fact that the land is fully occupied in employment use means that the adjacent land rear of Déjà vu may be more suitably kept for protected employment use rather than residential as originally identified.

Option A therefore tests the option of allocating the rear site for protected employment use, whilst Option B tests a residential option.

Option A	Option B
Retention and protection of land in its current employment/commercial use.	Allocate the land for housing development as initially identified in the Allocation ‘Options’ consultation.

Option A Appraisal

Option A, to retain the site in its current employment/commercial use, scores positively against the sustainable development objectives that seek to maintain access to services, facilities and employment (Objective 5), as it is a site that allows for small and local businesses to operate within Swanley.

It also scores positively when assessed against objective 9, which seeks to reduce the need to travel, as it maintains local jobs and services that if lost would result in current occupiers having to travel to alternative employment sites.

Objective 12 seeks to encourage high and stable levels of employment and economic competitiveness. The retention of the site in employment use provides very positive impacts in relation to this objective by providing small scale local employment opportunities for local businesses.

Objective 13 seeks to retain and develop skills. The existing units provide facilities for local businesses, in particularly for skilled trades, which would otherwise be lost if the employment site was redeveloped.

The only negative impact of option A is judged against objective 1, which seeks to provide housing. The protection of the site in employment use would mean that this site, previously identified to provide housing, no longer yields any residential units.

Option B Appraisal
<p>The allocation of the site for housing development would have a very positive impact in relation to objective 1, which seeks to provide opportunities for all residents to live in a sustainable, decent and affordable home. The allocation would include new housing and would include an element of affordable housing.</p>
<p>The site is located within Swanley, which is one of the District’s most sustainable locations. As such new housing in the area would have good links to public transport and would result in housing that has lesser need for private vehicle than in other areas. This is therefore considered to be a positive in relation to new housing along with object 11, which promotes the prudent use of natural resources as the land is previously developed.</p>
<p>There is a very negative assessments against objective 12. The redevelopment for housing would result in the loss of access to employment and services, and the physical loss of employment land that contributes to the local economy.</p>
<p>The redevelopment for housing would also have a negative impact upon access to employment opportunities (objective 5) and the retention of skills (objective 13), through the loss of premises for skilled works and potentially apprenticeships.</p>

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	0	0	+	0	0	0	+	0	0	++	+
Option B	++	0	0	0	-	0	0	0	+	0	+	--	-

Conclusion

Taking into consideration the above assessments, the option to retain the site in employment use scores most positively against the Sevenoaks LDF Sustainability Objectives.

In determining the most sustainable option the key ‘trade off’ is between the objective of providing sustainable and affordable housing and that of maintaining employment, economic development and the retention of skills. The SA Scoping Report Update (May 2011) shows a number of baseline indicators in relation to both issues. Whilst the development of housing would impact positively in relation to the housing objectives such as contributing to affordable housing, the retention in employment would score well against combating unemployment and reducing job centre allowance.

The potential loss of employment land is likely to have more significant impacts upon the baseline employment conditions, whilst the housing provision could likely be met without the inclusion of the site.

THE SWANLEY CENTRE, SWANLEY	
<p>The Swanley Centre is the main shopping area within the town centre of Swanley. In recent years the Centre has declined significantly and has become a poor quality and under performing centre in need of significant regeneration. The Core Strategy identified that the Council would support regeneration in this area.</p> <p>During the Core Strategy process the land owners submitted representations suggesting that a viable regeneration scheme could not be implemented without a greater quantity of land and that the adjoining recreation ground would need to be redeveloped to provide the critical mass of space to accommodate a new and improved town centre proposal. The Council commissioned independent retail consultants to review this submission who confirmed that additional land is required to support a viable regeneration scheme in the town centre.</p> <p>Option A tests the allocation of the recreation ground for redevelopment as part of the wider regeneration proposal, based on the assumption that sports and recreation facilities lost would be replaced at an alternative location in Swanley to equal or greater value, which would be insisted upon by the Council in considering a formal allocation. It is also assumed that the regeneration proposal would provide a number of residential units and improved GP and community facilities as promoted by the land owner.</p> <p>Option B tests the option of allocating only the existing town centre for redevelopment and protecting the recreation ground as open space. Based on the evidence submitted by the land owners this option assumes that in the short to medium term a viable town centre regeneration scheme would not be possible and that the Swanley Centre will not be regenerated in the plan period.</p>	
Option A	Option B
<p>Allocation of the centre and the adjoining recreation ground for the comprehensive regeneration and mixed use redevelopment of Swanley Town Centre. Includes replacement recreational facilities, residential, community and GP facilities.</p>	<p>Retain the existing town centre boundary and maintain the recreation ground on the assumption that a regeneration scheme will not come forward and that the centre will not significantly improve without intervention.</p>
Option A Appraisal	
<p>The most significant positive in relation to option A is that the regenerated town centre would have a major benefit in terms of the levels and stability of employment and the local economy within Swanley (objective 12). Other significant positive impacts that option A would have would be against objectives 1 (housing), 9 (reducing travel needs through improved services and facilities within the centre), 10 (creating a high quality environment as the existing centre is in a poor and unattractive state) and 13 (providing scope for skills retention and development, through business and GP facilities).</p> <p>It is accepted that in principle the regeneration of the town centre would be entirely positive, however the negative aspects of this approach relates to the use of the Swanley recreation ground to provide the critical mass of land to drive a viable regeneration scheme. The proposal therefore scores a series of negative ratings against the following objectives; 2</p>	

(managing flood risk- as a result of loss of open permeable land), 3 (Health and well being – through loss of centrally located sports and recreation facilities albeit alternative facilities will be replaced), 6 (Impact on air pollution- through loss of open space and increased traffic) and 7 (loss of Biodiversity/Green Infrastructure).

Objective 4 seeks to reduce poverty and social exclusion. This was given a neutral impact as both the retention of sports and recreation facilities or an enhanced town centre with new community and GP facilities would both provide positives in relation to this goal.

On balance it is considered that there is a neutral impact in relation to objective 5. Option A would see the sports pitches replaced, albeit they are likely to be less accessible than the existing provision. However there is likely to be improved facilities and services in a regenerated town centre and as such the positive and negatives in both respects cancel each other out and result in a neutral score.

Objective 11 has also been given a neutral score as the development would be deemed to be sustainable, which is a positive, but this is offset by the loss of greenfield undeveloped land.

Option B Appraisal

An independent assessment carried out by retail consultants has shown that in all likelihood without the use of at least part of the recreation ground a viable regeneration scheme will not be achievable. Option B is therefore the ‘do nothing scenario’ which is likely to result in no significant improvement for the site during the plan period up to 2026.

This option would have positive impacts in terms of objectives; 2 (preventing flood risk through keeping land open), 3 and 5 (preserving the sports and recreational facilities), 6 (improving air quality as a result of much reduced need to travel as a result of a regenerated town centre) and 7 (preservation of biodiversity opportunities at the site).

The negative impacts would be against objectives; 9 (reducing the need to travel - as inadequate town centre and shopping facilities necessitate the need to travel), 10 (the quality of the environment- which is currently in decline), 11 (sustainable development – through the need to travel to access services and facilities), and 12 and 13 (the decline in employment which impacts upon job opportunities, skills development/retention and the local economy).

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	+	-	-	0	0	-	-	0	+	+	0	++	+
Option B	0	+	+	0	+	+	+	0	-	-	-	-	-

Conclusion

Taking into consideration the above assessments, the option to regenerate the town centre, (including the replacement of lost open space and recreation facilities) scores slightly more positive assessments against the Sevenoaks LDF Sustainability Objectives than promoting regeneration within the existing centre boundary.

The key issues for consideration are the extent to which the loss of accessible and centrally located public open space should be assessed against the creation of a regenerated and more viable town centre for the residents of Swanley.

Baseline indicators such as the proportion of people in working age and people claiming unemployment are likely to see a significant improvement as a result of the regeneration proposal, whilst access to sports facilities and local green space are also identified as key baseline data that will be impacted upon should the recreation ground be redeveloped as part of a regeneration package.

LAND AT CEDAR DRIVE, EDENBRIDGE

Land at Cedar Drive Edenbridge is a small piece of protected open land within the urban area of Edenbridge. The Council’s evidence base (Strategic Housing Land Availability Assessment (SHLAA)) identified it as a site that may be suitable for housing over the plan period if the open space designation was no longer deemed to be relevant.

Adjacent to the site is a relatively newly constructed residential development, to which the redevelopment of the site would reasonably relate.

Option A appraises the impact of removing the open space designation and allocating for housing development.

Option B appraises the re-allocation of the land as protected open space.

Option A	Option B
Remove open space designation and allocate for housing development.	Re-allocate as protected open space.

Option A Appraisal

The allocation of the site would have a very positive impact on objective 1, which seeks to provide decent and affordable housing.

However a housing allocation would have a very negative impact against objective 7 which seeks to protect and enhance biodiversity and geodiversity through the loss of open space. There would also be further negative impacts when assessed against objective 2 (managing flood risk- as a result of loss of open permeable land), 5 (loss of recreational opportunities), and 6 (Impact on air pollution- through loss of open space and increased traffic).

Option B Appraisal

Protecting the open space use would have a very positive impact against objective 7, which seeks to protect biodiversity and geodiversity.

It would also have positive impacts against objectives; 2 (preventing flood risk through keeping land open) and 5 (preserving recreational opportunities).

It is considered that maintaining the open space designation would have a negative impact on the objective which seeks to provide housing, as the site was previously identified as a site that could be suitable for housing through the Council’s evidence base documents.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	++	-	0	0	-	-	--	0	0	0	0	0	0
Option B	-	+	0	0	+	0	++	0	0	0	0	0	0

Conclusion

Taking into consideration the above assessments, the option to retain the site as protected open space scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The key issues for consideration are the extent to which the loss of public amenity open space should be assessed against the creation of a small scale housing development.

Baseline indicator levels of affordable housing levels will not be significantly improved as a result of a very small scale development, which may only include a financial contribution or single affordable unit. In contrast access to local green space is an identified as key baseline indicator that will be impacted upon should the site be lost to a housing scheme.

LAND REAR OF MOAT COTTAGE, OTFORD

Land rear of Moat Cottage is a small piece of open land within the residential curtilage of Moat Cottage in Otford. The Council’s evidence base (Strategic Housing Land Availability Assessment (SHLAA)) identified it as a site that may be suitable for housing over the plan period.

The site is in a location of high archaeological importance and a conservation area. There is also a protected Ancient Monument, which is long linear pond that would need to be crossed to access the area of the site whereby housing would be developed.

Option A tests the impacts of allocating the site for housing.

Option B appraises the option of excluding the site from allocation on heritage and archaeological grounds.

Option A	Option B
Allocate for housing development.	Reject housing on heritage grounds.

Option A Appraisal

The allocation for housing would have a very positive aspect against the housing objective (1) through the creating a number of new units.

However it is considered that such allocation would have a very negative assessment against objectives 2 (managing flood risk- as a result of new units in close proximity to a number of local ponds, with increased risk of flooding), 7 (the loss of biodiversity opportunities) and 8 (impact on a scheduled ancient monument, which is a key aspect of the local historic environment).

The impact against Objective 11 was a considered to be neutral as the site is sustainably located, but would not constitute prudent use of natural resources.

Option B Appraisal

Rejecting the site as an allocation and maintaining it in its current form would have a very positive impact on objective 8, which seeks to protect the historic environment.

There would also be positive impacts against objective 2 (protection against flooding), 6 (air quality), 7 (protection of biodiversity) and 10 (protecting the high quality built environment).

This option would have a negative impact on the objective which seeks to provide housing, as the site was previously identified as a site that could be suitable for housing through the Council’s evidence base documents. It is not considered to be a very negative impact as the site would only have a small housing capacity.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	++	--	0	0	0	-	--	--	0	0	0	0	0
Option B	-	+	0	0	0	+	+	++	0	+	0	0	0

Conclusion

Taking into consideration the above assessments, the option to reject a housing allocation on heritage grounds scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The key issues for consideration are the importance of protecting heritage assets and whether the housing benefit of a small scale residential scheme would warrant the potential loss or harm of these units.

CURRENT HILL ALLOTMENTS, WESTERHAM

Current Hill Allotments are part of a wider area of land in Westerham that was previously safeguarded for long term development needs through the Sevenoaks District Local Plan. The Core Strategy reviewed the need to safeguard land for long term needs and instead allocated a reserve site in Edenbridge. The land was removed from the Green Belt many years ago.

Representations were received during the initial consultations promoting a small level of housing on the lower southern section of the site, with equal or greater replacement allotment provision to be provided as an extension at the northern side of the site.

Option A therefore tests the allocation of a portion of the site for housing with replacement allotments on the northern section of the site.

Option B protects the existing allotments in the entirety as community open space.

Option A	Option B
Allocate a portion of the existing allotments for housing, with equal sized replacement allotments provided as an extension at the northern end of the site.	Retain and protect existing allotments in their current form.

Option A Appraisal

Option A results in a very positive impact when assessed against objective 1, which seeks to provide housing.

However there are negative aspects against the following objectives; 2 (impact on flooding through loss of permeable land, 6 (increased air pollution as a result of new development) and 7 (potential loss of biodiversity on both the site of the housing and the area where the replacement allotments will be provided).

The potentially significant negative impacts are neutralised as a result of the replacement of the existing allotment provision with equal or greater new provision. In relation to objective 8 open countryside is considered to be land outside the existing settlement confines of villages (i.e. within the Green Belt). This site is within the existing confines of Westerham and as such this objective is not considered to be relevant in this instance.

Option B Appraisal

In direct contrast to Option A protecting the site in its current form would have positive impacts upon objectives 2 (reducing flood risk by keeping land open and permeable), 6 (protecting against air pollution from new development) and 7 (preserving biodiversity across the two sites).

The negative reading would be against objective 1 by prohibiting a small scale housing development.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	++	-	0	0	0	-	-	0	0	0	0	0	0
Option B	-	+	0	0	0	+	+	0	0	0	0	0	0

Conclusion

Taking into consideration the above assessments, the option to retain the site in its current form scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

However the key issues to be considered are the impact of providing replacement allotment provision and its impact on accessibility to open space against the objective of providing new housing within the settlement of Westerham.

The option that secures housing and replacement allotments is likely to have significant benefits in relation to housing objectives, such as providing affordable units, and in relation to improving health and well being as replacement allotment provision will be included as part of the housing proposal.

SHEFT’S CROFT (LEIGH’S BUILDERS YARD), EDENBRIDGE

Leigh’s Builders Yard (Including the listed property Sheft’s Croft) is a redundant builders yard site located within Edenbridge.

The site was identified in the Council’s Employment Land Review, along with an adjoining site, as a site that should be protected in employment use for the long term.

Representations were submitted throughout the Core Strategy and initial Allocations and Development Management DPD consultation suggesting there was no reasonable prospect of the site being taken up for employment use in the long term, and that the site was better suited for housing development.

Option A appraises the principle of maintaining the site in employment use.

Option B tests the impact of reallocating the site for housing development.

Option A	Option B
Retain in protected employment use.	Re- allocated for housing.

Option A Appraisal

The retention of the site in employment use scores very positively against the objective that seeks to encourage high levels of economic growth and sustain economic competitiveness (Objective 12).

It also scores positive impacts against objectives 5 (providing access to employment opportunities), 9 (reducing the need to travel by providing alternative employment provision), 11 (promoting the sustainable re-use of a previously developed site) and 13 (providing opportunities for employment that would retain and develop skills).

The only negative impact is that protecting it in employment use would have a negative impact on the housing objective (1) which seeks to promote sustainable and affordable housing.

Option B Appraisal

Allocating the site for housing would have a very positive impact upon objective 1, which promotes housing.

It would also have positive impacts in relation to objectives 5 (providing housing in a location with good access to services, facilities and recreation opportunities), 9 (reducing the need to travel as a result of good links to shops, employment and services), 10 (the enhancement of the built environment) and 11 (promoting the re-use of a previously developed site that is sustainably located).

The negative impacts would be in relation to objectives 12 and 13 which seek to retain employment, economic competitiveness and skills. Allocation for housing would have a very

negative impact in relation to objective 12 and negative impact in relation to objective 13.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	0	0	+	0	0	0	+	0	+	++	+
Option B	++	0	0	0	+	0	0	0	+	+	+	--	-

Conclusion

Taking into consideration the above assessments, the two option score similar ratings against the Sevenoaks LDF Sustainability Objectives. Based on a single very negative reading against objective 12, Option A (to retain the site in employment use) scores slightly better when considered against these objectives.

The key issues for consideration is the potential trade between economic stability and the provision of high quality and sustainable housing. Whilst retaining the site in employment scores well there is limited demand for retention and as such the site has been redundant for a number of years. In contrast the housing option would provide for new dwellings in an accessible location and would result in more scope for development to occur and for baseline conditions to improve.

GLAXOSMITHKLINE (GSK) SITE, POWDER MILLS, LEIGH

The GSK pharmaceutical site at Leigh is an established ‘Major Developed Site’ in the Green Belt that pre-dates planning regulations. However in February 2011 the site closed and operations ceased.

The Council commissioned consultants to undertake an independent report into the potential to re-use the site in employment use. The Report undertaken by URS Scott Wilson (September 2011) considered a number of potential options for the re-use of the site in various different uses.

The key constraint of the site is that it is poorly located with limited access to public transport and local services.

Option A tests the option of maintaining the entire site in an employment use.

Option B tests the option of allocating the site for entirely residential redevelopment.

Option C tests the option of allocating the site for predominantly residential development but with the retention of a the most modern business building (as recommended as the preferred option of the URS Scott Wilson report)

Option A	Option B	Option C
Protect site for employment use.	Allocate for housing.	Allocate for mixed use.

Option A Appraisal

The very positive assessments of maintaining the site in employment use is against objectives 12 (protecting employment and the economy). Positive impacts are judged against objective 5, which seeks to provide access to services, facilities, recreational opportunities and employment, as the site is of a size and scope that provides a significant contribution to local employment and objective 13 (retaining skills).

The very negative impacts of retained employment is judged against objective 9 as the site is so remote there is a significant need to travel by private vehicle to access the site.

There are also negative impacts in relation to objectives 1 (loss of scope for new housing), 6 (Air quality as a result of traffic/the need to travel) 8 (no access to historic element of site) and 11 (promotion of development in a wholly unsustainable location).

Option B Appraisal

An entirely residential development would have a very positive impact against objective 1 (housing). There is also positive assessments against objectives 7 (conserving biodiversity as a result of measures that could be incorporated into a new scheme), 8 (opportunities to integrate access to the historic element of the site) and 10 (the creation of a higher quality built environment).

However very negative impacts would be drawn against objectives 2 (access to the site is covered by flood zone 3), 5 (poor accessibility to services), 6 (Increased air pollution as a

result of need to travel out of the site), 9 (Need to travel to access services and facilities), 12 (loss of employment provision) and 13 (loss opportunity for skills retention).

There would also be a negative impact upon sustainable development as a whole as the site is in a wholly unsustainable location, albeit it would constitute a prudent use of natural resources as the site is previously developed (objective 11).

Option C Appraisal

An entirely residential development would have a very positive impact against objective 1 (housing). There are also positive assessments against objectives 7 (conserving biodiversity as a result of measures that could be incorporated into a new scheme), 8 (opportunities to integrate access to the historic element of the site) and 10 (the creation of a higher quality built environment).

However very negative impacts would be drawn against objectives 2 (access to the site is covered by flood zone); 5 (poor accessibility to services) and 6 (Increased air pollution as a result of need to travel out of the site),

Negative impacts would be drawn against objectives; 9 (Increased need to travel to access services and facilities), 11 (Unsustainable location) 12 (net loss of employment provision) and 13 (net loss opportunity for skills retention).

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	0	0	+	-	0	-	--	0	-	++	+
Option B	++	--	0	0	--	--	+	+	--	+	-	--	--
Option C	++	--	0	0	--	--	+	+	-	+	-	-	-

Conclusion

Taking into consideration the above assessments, the three options all score relatively poorly against the Sevenoaks LDF Sustainability Objectives, primarily as a result of the unsustainable location of the site. Option A to retain the site in employment use has the least amount of negative ratings, whilst option C to promote a mixed use development has the most positive ratings but with at least three very negative assessments.

The key issues for the future of this site is that the existing occupier has vacated the site and that an independent assessment has shown that there is limited prospect of it being taken up in employment use. As such in order to positively plan for the future the issue of delivery must be addressed. Whilst residential redelivery scores the least positive score and would be judged to be negative against flood risk baseline objectives, it may be the most likely and suitable option overall as it would result in a development that would see demonstrable improvements against other baseline data contained in the scoping report, such as providing towards affordable housing provision.

WARREN COURT, HALSTEAD

Warren Court is an existing protected employment site in Green Belt, which has an outstanding allocation for increased commercial/employment development. In recent years the site has fallen into disrepair and is no longer fully occupied.

A number of potential options were promoted by the land owner as to how to improve the environment of the site.

Option A tests the option of maintaining the entire site in an employment use.

Option B tests the option of allocating the site for entirely residential redevelopment.

Option C tests the option of allocating the site for mixed use development.

Option A	Option B	Option C
Retain as protected employment.	Reallocate for housing.	Reallocate for mixed use development.

Option A Appraisal

The very positive elements of retaining the site in employment use is considered to be against objective 12 which seeks to retain employment and maintain economic competitiveness.

Other positives include assessments against objectives; 5 (maintaining accessibility to employment), 9 (reduction in the need to travel through providing employment opportunities locally), 11 (providing localised employment and the prudent use of natural resources) and 13 (opportunities for the retention of skills).

The negative assessments are against objective 1, which seeks to provide housing and objective 10 that seeks to create a high quality built environment, which at present is very poor.

Option B Appraisal

The very positive impact of Option B relates to objective 1 which promotes the development of high quality, sustainable and affordable housing. The assessment against objective 10 (to create a high quality built environment) is also a positive as the current environment is very poor and any redevelopment would likely result in significant improvement.

The loss of employment provision would have very negative impacts upon objectives 12 and 13 which seek to retain employment, promote economic competitiveness and retain and develop skills.

Another negative result of the loss of employment for housing would be against objective 9, which seeks to reduce the need to travel. This is considered to be negative as a result of the loss of employment within the settlement of Halstead and the resulting need to travel out of the village to access replacement job opportunities.

Option C Appraisal

The very positive impact of Option C relates to objective 1 which promotes the development of high quality and affordable housing. The assessment against objective 10 (to create a high quality built environment) is also a positive as the current environment is very poor.

The loss of part of the existing employment provision would have a negative impacts upon objectives 12 and 13 which seek to retain employment, promote economic competitiveness and retain and develop skills. Whilst there would be some employment provision as part of a mixed use scheme the Green Belt restriction of buildings allowed would mean that overall there is a net loss of potential employment space.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	0	0	+	0	0	0	+	-	+	++	+
Option B	++	0	0	0	0	0	0	0	-	+	0	--	--
Option C	++	0	0	0	0	0	0	0	0	+	0	-	-

Conclusion

Taking into consideration the above assessments, the option to retain the site in its current employment use scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The key issues for consideration is the viability of maintaining the site in employment use, which is currently performing poorly and whether an alternative approach that scores less positively against the SA objectives would have a more positive impacts that can be delivered. The development for housing would likely have a positive impact in relation to reducing homelessness, and providing affordable housing, whilst the retention in employment is unlikely to see positive impacts in relation to employment objectives unless it is substantially redeveloped, which is likely to be unviable.

LAND ADJ TO EMPLOYMENT ALLOCATION, BROOM HILL, SWANLEY

The Broom Hill development site, adjacent to the M25 in Swanley, is a longstanding employment land allocation that was contained in the Sevenoaks District Local Plan. The Core Strategy proposes that only 4.1 ha of it should be carried forward for employment purposes in the Allocations and Development Management DPD.

Proposals have been put forward, for the area not required for employment use, for housing development that would incorporate improved access to the open countryside located to the north, but would see additional loss of identified acidic grassland.

Option A considers allocating part of the site for housing.

Option B considers protecting the land in its current open form.

Option A	Option B
Allocate a portion of land for housing.	Retain land in its current open form.

Option A Appraisal

Option A would result in new housing, which would score very positively in relation to Objective 1 (Housing).

The negative impacts on the proposal relate to objectives 2 (flooding) as a result of the loss of permeable open land, 5 as a result of the loss of open recreational land, 6 through increased air pollution/greenhouse gases from new dwellings, 7 through loss of biodiversity opportunities, particularly as a result of the loss of acidic grassland and 11 as a result of the loss of natural undeveloped land, which is not a prudent use of natural resources.

The very negative impact on this option would be against objective 3, which seeks to improve health and well being, as the redevelopment of the site would result in the decline in character and amenity of a piece of open recreational space.

Option B Appraisal

The impacts of retaining the space as it exists is predominantly positive.

Option B would have very positive impacts in relation to objective 7 which protects biodiversity and geodiversity, which particularly relates to the acidic grassland identified as being a natural asset.

Other positive impacts relate to objectives 2 (maintaining open permeable land to avoid flood risk), 3 (maintaining natural conditions for walking to the benefit of health and well being), 5 (maintaining recreational opportunities) and 6 (reducing the impact of air pollution).

The negative impact of this proposal is that it would result in no housing being provided in this location, which would be contrary to objective 1.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	++	-	--	0	-	-	-	0	0	0	-	0	0
Option B	-	+	+	0	+	+	++	0	0	0	0	0	0

Conclusion

Taking into consideration the above assessments, the option to retain the site in its current open form scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The issues for consideration are the merits of retaining non accessible open space against the delivery of housing at the site. Whilst the retention of open space is positive for aesthetical reasons the private nature of the land will mean that baseline indicators that seek improved access to sports and recreation opportunities or access to local green space will not benefit as a result of the retention approach. In contrast the delivery of affordable housing as part of a redevelopment would likely have a positive impacts against the housing baseline indicators.

LAND AT BLIGH’S MEADOW, SEVENOAKS	
<p>Bligh’s Meadow is the development within the heart of Sevenoaks town centre. The phase 2 element of the site is outstanding and would involve the redevelopment of the area fronting London Road.</p> <p>Option A tests the sustainability of an entirely retail led development at phase 2 of Bligh’s.</p> <p>Option B tests a mixed use approach with retail, employment and residential elements.</p>	
Option A	Option B
Retail (A1-A5) only redevelopment.	Mixed use development incorporating retail, business and residential uses.
Option A Appraisal	
<p>An entirely retail led redevelopment would have a very positive impact in relation to objective 12, which seeks to encourage high and stable employment levels and economic growth.</p> <p>Other positives are considered against objectives 5 (providing improved accessibility to more shops and employment), 9 (reducing the need to travel through greater shopping provision and employment), 10 (enhancing the quality of the built environment), 11 (re-using PDL in a sustainable town centre location) and 13 (creating opportunities to development and retain skills).</p> <p>By focussing redevelopment solely for retail use there would be a very negative impact on objective 1, which seeks to promote housing in sustainable locations.</p> <p>Objective 6 seeks to reduce air pollution. The redevelopment of the site for retail development may have a greater or lesser impact on air quality as a result of new buildings and traffic generation. However it could be argued that in this respect providing enhanced shopping facilities may reduce the need for shoppers to travel to alternative locations. Taking this into consideration a neutral impact has been given.</p>	
Option B Appraisal	
<p>A mixed use development that incorporates retail, employment and residential uses would have very positive impacts in relation to objective 5, which seeks to provide increased accessibility to a range of services and facilities.</p> <p>There would also be positive assessments in relation to objectives 1 (providing housing), 9 (reducing the need to travel), 10 creating a high quality built environment, 11(re-using PDL in a sustainable town centre location), 12 (by encouraging high levels of employment and economic stability) and 13 (creating opportunities to development and retention of skills).</p> <p>The site is located in an Air Quality Management Area (AQMA). As a mixed use scheme would involve placing new residents with an AQMA a negative rating is scored against the objective of promoting health and well being (Objective 3). Objective 6 seeks to reduce air pollution. The redevelopment of the site for mixed use development may have a greater or lesser impact on air quality as a result of new buildings and traffic generation. However it could be argued that in this respect providing a mix of facilities it may reduce the need for visitors to</p>	

travel to alternative locations. Taking this into consideration a neutral impact has been given.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	--	0	0	0	+	0	0	0	+	+	+	++	+
Option B	+	0	-	0	++	0	0	0	+	+	+	+	+

Conclusion

Taking into consideration the above assessments, the option to promote a mixed use development at the site scores most positively against the Sevenoaks LDF Sustainability Objectives.

However, there are merits and likely positive implications against housing and economic indicators as a result of either of the options.

STATION APPROACH, EDENBRIDGE

Station Approach Edenbridge is a protected employment site close to the centre of the town. The existing site is occupied by a Jewsons Builders Merchants with a significant area of under utilized employment land.

The land owner has promoted the site through the Allocations and Development Management process for a mixed use development scheme, which would incorporate an equal level of employment floorspace to that which currently exists, with the remainder of the land developed for housing.

Option A tests the retention in its current protected employment allocation.

Option B appraises the promoted mixed use business and residential allocation.

Option A	Option B
Retain site in protected employment use.	Allocate for mixed use business and residential development (based on no net loss of employment floor space).

Option A Appraisal

The very positive aspect of retaining the site in its current protected employment use is in relation to objective 12, which seeks to encourage high and stable levels of employment.

Other positive impacts are considered against objectives; 5 (providing access to employment), 9 (reducing the need to travel by providing employment opportunities in a sustainably located site), 11 (promoting sustainable forms of development on a PDL site) and 13 (providing employment opportunity to develop skills).

The only negative aspect of retain the site in employment rather than allocating for mixed use would be that the proposal would not result in the development of housing to the detriment of objective 1.

Option B Appraisal

A mixed use scheme under option B would have very positive scores against objectives 1 (providing housing), 5 (improving access to services, facilities and employment) and 11 (sustainable development in an accessible location on PDL).

Other positive scores are against objectives 6 (to reduce air pollution as a result of higher quality energy efficient buildings and the reduced need to travel), 10 (creating a higher quality built environment), 12 (promoting economic competitiveness and encouraging high levels of employment) and 13 (opportunities to develop or retain skills).

There are no identified conflicts with the sustainability objectives.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	0	0	+	0	0	0	+	0	+	++	+
Option B	++	0	0	0	++	+	0	0	+	+	++	+	+

Conclusion

Taking into consideration the above assessments, the option to promote mixed use development scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The key issues relate to balancing the option of maintaining the whole site in employment use, which is based on the hope that the vacant land is redeveloped for intensified employment use, or accepting a loss of employment land with a regeneration of existing provision and the construction of some housing development. The mixed use option is most likely to see direct positive impacts against baseline indicators set out in the scoping report as there would be viability questions over whether replacement employment will be provided when the site has been subject to an employment allocation for a number of years.

5 DEVELOPMENT MANAGEMENT ALTERNATIVE OPTIONS

- 5.1 A long list of policy options has already been subject to appraisal, and findings will be taken into account when selecting the preferred approach. It has now emerged that, for some policies, there is a need to give more explicit consideration to alternative uses. As such, this Chapter considers 6 policies in turn, giving consideration to the merits of alternative approaches for each.
- 5.2 This need to give consideration to options for some policies has arisen due to alternative approaches being promoted through consultation and/or the emergence of evidence from other sources in recent months
- 5.3 Options that are not consistent with the Core Strategy are not considered to be reasonable, and hence have are not considered.

The detailed appraisals of the site options are included overleaf. The sustainability objectives to which the assessments relate are;

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

RE-USE OF REDUNDANT SCHOOL BUILDINGS

There are a number of primary and secondary schools within the Sevenoaks District, some of which may become vacant during the plan period. Without a specific policy with regards to the re-use of redundant school buildings, the sites will usually be most valuable for housing development whether it be within established confines, or part of a Green Belt footprint replacement as has occurred at both Eden Valley and Halstead Place School in recent years

Without intervention providers of community uses are unable to compete with the land values that residential development can offer.

Option A tests a policy that seeks to retain or replace redundant school buildings with a community use such as a village hall, library or youth club unless it is identified that there is no such need for that type of use.

Option B is the ‘do nothing’ scenario that allows the market to drive development accepting that the majority of sites will result in housing developments.

Option A	Option B
Prioritise the reuse of redundant school buildings in community use in first instance.	No specific policy- let the market drive the type of redevelopment.*

Option A Appraisal

The re-use of redundant school buildings in community use would have very positive scores when considered against objectives 4 (seeking to reduce poverty and social exclusion through the provision of community facilities), 5 (creating recreational opportunities) and 11 (promoting sustainable development and the reuse of a PDL site).

Other positive scores include objective 3 (improving health and well being through increase opportunity for social interaction), 9 (reducing the need to travel by having community facilities more accessible) and 13 (developing skills often provided and learnt through community facilities).

The negative assessment of prioritising redundant school buildings for community use is that there is a lost opportunity for new housing on a PDL site.

Option B Appraisal

The very positive aspects of option B is related to the provision of new housing. There are also positives against objective 10 (to create a high quality built environment – assuming that most redundant schools are usual of poor build and design quality) and 11 (to promote sustainable development and make efficient use of natural resources).

Objectives 5 (improving accessibility to services and facilities) will result in a very negative rating as the ‘do nothing’ scenario assumes that community and service uses would not be able to compete with the land values demanded by housing redevelopment.

There would also be negatives in relation to objectives 3 (health and wellbeing) and 4(reducing poverty and social exclusion) as a result of the mixed opportunity to provide new facilities.

*Due to the high house prices in Sevenoaks unallocated buildings not in the Green Belt are usually developed for residential development therefore the presumption is that without a specific designation the land will be developed for housing.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	+	++	++	0	0	0	+	0	++	0	+
Option B	++	0	-	-	--	0	0	0	0	+	+	0	0

Conclusion

Taking into consideration the above assessments, the option to protect redundant school buildings in a community use scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The key issues to be balanced are the opportunities to promote housing development on brownfield and sustainable sites, compared with the option of utilising opportunities to promote essential facilities that meet community needs and combat poverty and social exclusion, particularly as opportunities to provide community facilities don't arise regularly in an area covered by constraints such as Green Belt and high residential housing values.

RE-USE OF REDUNDANT SCHOOL PLAYING FIELDS

There are a number of primary and secondary schools within the Sevenoaks District, some of which may become vacant during the plan period. Without a specific policy with regards to the re-use of redundant school land, the land will often be most valuable as housing due to high land values in Sevenoaks. Without intervention, providers of community uses will be unable to compete with the land values that residential development can offer.

Option A tests a policy that seeks to retain school playing fields in a public community use such as sports playing fields, a public park, or a children’s play area unless it is identified that there is no such need for that type of use.

Option B accepts that most redundant school sites will most likely be redeveloped for housing or mixed use development, but seeks to maintain the majority of open space as amenity land to serve the associated development.

Option C is the ‘do nothing’ scenario that allows the market to drive development accepting that this is likely to result in housing development*.

Option A	Option B	Option C
Prioritise for community open space use in the first instance (i.e. sports pitches or open recreation ground for public use).	Protect as amenity open space for the occupants of a wider school complex redevelopment (most likely housing)	Allow market driven development (most likely housing).

Option A Appraisal

Prioritising for community open space use would have very positive marks against objectives 3 and 5 which seek to promote health and well being and provide access to recreation respectively. Other positive impacts are in relation to objectives; 2 (preventing flood risk), 4 (helping combat social exclusion by providing opportunities to interact), 6 (preventing air pollution), 7 (preserving biodiversity), 9 (reducing the need to travel for community facilities) and 11 (promoting facilities locally and protecting natural resources to the benefit of sustainable development).

The negative drawn against option A is that housing development would be resisted as a result of proposals to prioritise community uses (conflicting with objective 1).

Option B Appraisal

Prioritising for residential amenity land would have very positive impacts against objectives 7 to enhance biodiversity as gardens and amenity land is likely to be of higher ecological value than community sports grounds or facilities.

A positive impact would be in relation to objective 5 which seek to provide access to recreation opportunities which may be carried out as part of such use. Other positive impacts are in relation to objectives; 2 (preventing flood risk by keeping land permanently open and permeable), 3 (improving health and well being by providing exercise opportunities), 6 (preventing air pollution), 10 (creating a higher quality built environment) and 11 (promoting facilities locally and protecting natural resources to the benefit of

sustainable development).

The negatives drawn against option A is that housing development would be resisted as a result of proposals to prioritise community uses (conflicting with objective 1).

Option C Appraisal

The only very positive impact of the loss of school playing fields for housing would be against objective 1, which seeks to provide high quality and sustainable housing.

The very negative assessments would be against objective 5, which seeks to improve access to recreation opportunities, and 11 that seeks sustainable use of natural resources (due to the loss of undeveloped land).

Other negatives are drawn against objectives 3 (to improve health and well being), 4 (reduce social exclusion), 6 (preserving air quality), and 7 (Conserving biodiversity opportunities).

*Due to the high house prices in Sevenoaks unallocated land not located in the Green Belt is usually developed for residential development therefore the presumption is that without a specific designation the land will be developed for housing.

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	+	++	+	++	+	+	0	+	0	+	0	0
Option B	-	+	+	0	+	+	++	0	0	+	+	0	0
Option C	++	0	-	-	--	-	-	0	0	0	--	0	0

Conclusion

Taking into consideration the above assessments, the option to protect redundant school playing fields in a community use scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

The key issues to be balanced are the good opportunities to promote housing development on urban and sustainably located sites, compared with the option of utilising opportunities to promote essential sports and recreational facilities that meet community needs and that help promote health and wellbeing and combat poverty and social exclusion.

The need to promote health and wellbeing has a number key baseline indicators, such as accessing the accessibility to sports facilities and green open space. Increasing the accessibilities and meeting baseline objectives is harder to address than some of the housing indicators because of land ownerships and constraints that exist within the District.

NON ALLOCATED EMPLOYMENT SITES	
Core Strategy Policy SP8 protects the District’s identified core employment stock.	
Option A appraises a policy that protects non allocated employment sites by insisting that they should be re-used in employment use in the first instance. However the policy would apply a more relaxed approach to the process of marketing that applicant would need to go through to demonstrate that the site is no longer required in employment use compared to that of SP8 of the Core Strategy.	
Option B is to not provide any protection to non allocated employment sites and allow them to be redeveloped for residential and other uses.	
Option A	Option B
Protect non allocated employment site in business use where viable.	No protection, which in a Sevenoaks context is likely to result in sites being redeveloped primarily residential use.
Option A Appraisal	
The very positive assessment of retaining non allocated employment is in relation to objective 12, which seeks to encourage employment and economic stability.	
There would also be beneficial impacts in relation to objectives 5 (protecting access to employment and services), 9 (reducing the need to travel), 11 (Promoting sustainable forms of development) and 13 (providing opportunities to develop skills).	
Protecting non allocated employment sites would have a negative impact on providing new housing (objective 1) as it acts as a potential constraint to developing PDL sites.	
Option B Appraisal	
Option B would have very positive impacts in relation to objective 1 (providing housing).	
It would also have positive impacts in relation to objectives 10, which seeks to create a high quality built environment and 11, to promote sustainable forms of development and prudent use of natural resources.	
There would be very negative impacts in relation to objective 12 which seeks to encourage high and stable levels of employment.	
Other negative impacts include the impact on accessibility to employment (objective 5), the increased need to travel (objective 9) and opportunities to develop or retain skills (objective 13).	

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	-	0	0	0	+	0	0	0	+	0	+	++	+
Option B	++	0	0	0	-	0	0	0	-	+	+	--	-

Conclusion

Taking into consideration the above assessments, the option to protect non allocated employment sites scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives.

In determining the most suitable option for this policy approach the sustainability issues to balance are the impacts upon economic competitiveness compared to the merits of improving housing and other development requirements.

TOWN CENTRE STRATEGY	
<p>The town centre chapter of the Allocations and Development Management DPD will set out the approach that is taken to ensuring viable and well performing centers.</p> <p>There are two potential options are either to seek to try and create a balance of retail uses underpinned by a core element of A1 (shop) units, or to allow a market driven approach of allowing an unrestricted balance of units provided they are established town centre uses.</p> <p>Option A assesses the impacts of a balanced approach to be underpinned by a minimum level of A1 shop units.</p> <p>Option B appraises a market driven approach that allows any proportion of uses provided they are defined town centre uses.</p>	
Option A	Option B
Protect an appropriate balance of A1 units within town and local centres.	Do not protect an appropriate balance of A1 units and instead allow appropriate town centre uses to be driven by market demand.
Option A Appraisal	
<p>The Option A approach to keeping a shop led town centre approach is intended to maintain balanced town centres that do not result in an over provision of a particular use. It is therefore considered that Option A would have very positive impact in relation to objective 5 which seeks to improve accessibility to services, facilities, recreational opportunities and employment and to option 12, which seeks to encourage employment and economic stability</p> <p>Other positive assessments are in respect to reducing the need to travel (objective 9) as a result of a good mix of uses and the opportunity to develop and retain skilled workers (Objective 13).</p>	
Option B Appraisal	
<p>Allowing a market driven approach to the provision of town centre units would have positive impacts in relation to improving accessibility to services (objective 5), high levels of employment (objective 12) and the retention of skills (13).</p> <p>Within a Sevenoaks District context it is difficult to predict whether the market driven approach would result in a proliferation of certain uses. A proliferation of predominantly A1 uses would have a more desirable impact that a proliferation of restaurants, take-aways or uses such as betting shops. As it is impossible to predict the most likely impact of a market driven policy, it is not considered that the market driven approach would have an adverse impact in relation to any of the sustainability objectives.</p>	

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	0	0	0	0	++	0	0	0	+	0	0	++	+
Option B	0	0	0	0	+	0	0	0	0	0	0	+	+

Conclusion

Taking into consideration the above assessments, the option to promote a balance of A1 (shop) units within the main town centres scores the most positive assessments against the Sevenoaks LDF Sustainability Objectives. Both options seek to ensure the maximum amount

of floor space in town centre uses, which is a specific baseline indicator related to objective 5 as defined in the Scoping Report Update (May 2011)

CRIME & DISORDER	
<p>This section considers a specific need to include a crime and disorder policy.</p> <p>Option A promotes a specific policy that allows a resistance of development (including change of use) that may result in increased crime, disorder and anti social behavior.</p> <p>Option B appraises the choice not to include a specific policy and rely on other generic policies such as the draft design and amenity policies.</p>	
Option A	Option B
<p>Include a generic policy to prohibit proposals that will or could result in an increase in crime, disorder and anti-social behaviour.</p>	<p>Do not include policy and rely on criteria in the design and amenity policies that seeks to ensure development is safely designed and does not impact on surrounding neighbours.</p>
Option A Appraisal	
<p>Option A would see a policy that allows development uses to be controlled or resisted if they may result in an increase or potential to increase crime, disorder or anti social behaviour. This would therefore have significant benefits in relation to maintaining the well being and health of residents (objective 3) and potentially helping reduce social exclusion by prohibiting inappropriate developments in deprived areas (objective 4).</p> <p>In addition there would be positive assessments against objective 10 by creating a safer and therefore high quality built environment and against objective 12 because safer places would be more appealing to visitors, and businesses, which would impact upon the economic success of an area.</p>	
Option B Appraisal	
<p>Option B would be to not include a specific policy and to rely on design criteria included in the main design policy. Whilst this option would not result in any significant negative effects, neither is it expected to result in any significant positives.</p>	

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	0	0	+	+	0	0	0	0	0	+	0	+	0
Option B	0	0	0	0	0	0	0	0	0	0	0	0	0

Conclusion

Taking into consideration the above assessments, the option to include a crime and disorder policy scores very positively against the Sevenoaks LDF Sustainability Objectives.

RESIDENTIAL INSTITUTIONS	
<p>This section determines the need for a specific policy that relates to residential institutions in Class C2 of the Use Classes Order.</p> <p>Option A is to include a specific criteria based policy for new proposals for new residential institutions.</p> <p>Option B relates to not including such policy and judging policies against generic design and amenity policies in the same way that use class C3 residential development would be treated.</p>	
Option A	Option B
<p>Include specific policy with criteria by which a C2 class residential institution use would be considered.</p>	<p>No not include such a policy.</p>
Option A Appraisal	
<p>Option A would not include the formal allocation of sites for C2 residential institutional use, but would set specific criteria by which they will be considered.</p> <p>The specific criteria would support the Core Strategy objective of ensuring the delivery of housing that is designed to meet the needs of all residents and that residential institutions meet specific guidance, including being located in areas that are sustainable and are well served with services and facilities and have suitable opportunities that meet the needs of residents.</p> <p>A specific policy would therefore be considered to have positive impacts upon objectives 1, 3 and 5.</p>	
Option B Appraisal	
<p>Not including a policy to control residential institutions would not result in any negative assessments, but there would be no identified positives.</p>	

Summary

SAObjective	1	2	3	4	5	6	7	8	9	10	11	12	13
Option A	+	0	+	0	+	0	0	0	0	0	0	0	0
Option B	0	0	0	0	0	0	0	0	0	0	0	0	0

Conclusion

Taking into consideration the above assessments, the option to include a residential institutions policy scores very positively against the Sevenoaks LDF Sustainability Objectives.

6 SUMMARY & CONCLUSIONS

- 6.1 The purpose of this document is to appraise reasonable ‘options’ and ‘alternative’ approaches for sites and policies that are to be considered for inclusion in the Pre-submission version of the Council’s Allocations and Development Management DPD in line with the SEA Directive. The appraisals follow the established approach by which sites and policies have been considered against the 13 objectives derived through the Sustainability Appraisal scoping process.
- 6.2 The appraisals, along with all other planning considerations, will help inform the final decision of what policies and sites are included in the Pre-submission version.
- 6.3 The Council has not included a review of proposed options that are inconsistent with the adopted Core Strategy or National Planning Guidance as the policies and sites included within the Allocations and Development Management DPD should be in conformity with the higher level plans.

Should you wish to comment on this SA Report, please do so in writing no later than Monday 9 April 2012.

Write to:

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