



**New Edenbridge District Residents' Association
Response to the Sevenoaks Local Plan 2024**

**EVIDENCE
BASE**

Contact: info@nedra.org.uk



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Executive Summary

This executive summary introduces our comments on the Evidence Base for the Sevenoaks Local Plan 2042 as it affects Edenbridge. Our Evidence Base responses sit alongside our separate Policies and Site responses.

What the evidence says about Edenbridge

Taken together, the Council's own evidence paints a consistent picture:

- Edenbridge is a **historic market town in a constrained river valley**, with a high-value Green Belt setting and medium to high landscape sensitivity around the town. Much of the surrounding land performs strongly in safeguarding the countryside and the historic settlement, rather than being low-value “spare” land.
- The **flood risk evidence shows real existing problems**, with areas of deep and fast flooding, long flood histories, and limited scope for simple strategic fixes. Several allocations sit in locations where the evidence already identifies significant hazard.
- The transport modelling and baseline work identify **congestion and safety pressures on the B2026 and town-centre junctions**, with conditions approaching or exceeding comfortable capacity by 2042 even before the full Local Plan growth is added.
- The housing and local needs evidence suggests **modest, specific local housing needs for Edenbridge itself**, particularly for affordable housing and older households, tens of homes, not thousands, alongside a Settlement Capacity Study that finds limited additional capacity within the existing town.
- Open space, sport, leisure, and health evidence points to **existing deficits and an ageing leisure offer**, with shortfalls in accessible green space and play, already stretched sports facilities, and a leisure centre treated as a strategic hub but in need of renewal.
- The heritage work underlines Edenbridge's **high-value historic core**, with a dense concentration of listed buildings and clear sensitivities to traffic, inappropriate infill, and poor public realm.
- The Gypsy and Traveller studies show **significant existing provision and intensification pressure around Edenbridge**, while the IDP highlights the need for new school(s) capacity, water and wastewater upgrades, and better access and improvements to the two stations if large scale growth is to be accommodated.

In simple terms, the evidence base itself shows Edenbridge as a historic, environmentally sensitive rural service centre, already under pressure from flooding, traffic, and infrastructure, with limited headroom for major additional growth.

Where the evidence and its use are problematic

Across topics, we identify recurring problems in how the evidence is framed and used for Edenbridge:

- Several key studies are **time limited or prepared for shorter plan periods** and have not been fully refreshed to support a Local Plan extending to 2042, or to reflect the full scale of new allocations now proposed.
- Edenbridge is too often **submerged into wider geographic labels** (“Edenbridge and the South,” “the rural south”) so that settlement-level needs, deficits, and capacities are blurred, even though the Plan then concentrates large housing and pitch numbers on Edenbridge itself.
- The housing and employment evidence is used **selectively and without clear reconciliation**: modest local needs and limited identified capacity within the town sit uneasily alongside very high numbers actually directed to Edenbridge, with no transparent explanation of why this is the most appropriate outcome.
- The transport and active-travel work **identifies problems more clearly than it secures solutions**. The modelling recognises congestion and safety issues, but there is no equivalent depth of committed, costed, and phased mitigation for Edenbridge to match the level of growth proposed, nor an Edenbridge LCWIP comparable to those for Sevenoaks and Swanley. Indeed, we did not even have one to comment on for Regulation 18.
- On flood risk, the Local Plan **relies too heavily on future site-specific FRAs** instead of using the strategic evidence to shape or limit allocations at the plan-making stage, particularly where deep and fast flooding and functional floodplain are already identified.
- Green Belt, landscape, heritage, equalities, and infrastructure findings are **not consistently carried through into the spatial strategy**, so that the most constrained and sensitive settlement is still asked to accommodate a very large share of the district’s growth.

How this affects soundness

In our detailed topic responses, we assess the Edenbridge element of the Plan against the Regulation 19 soundness tests:

- **Positively prepared** – whether growth at Edenbridge reflects a realistic understanding of local needs, environmental limits, and infrastructure requirements.

- **Justified** – whether directing such high numbers to a constrained town is clearly shown, in the evidence, to be the most appropriate strategy compared with less constrained alternatives.
- **Effective** – whether there is a deliverable, funded and phased package of transport, flood, education, health, green infrastructure, and utilities solutions for Edenbridge, rather than aspirational wording.
- **Consistent with national policy** – particularly in relation to flood risk, Green Belt, heritage, and avoiding severe residual cumulative impacts on the transport network.

Our overall message

Our comments do **not** ask the Council to discard its evidence base. On the contrary, they ask that the Local Plan for Edenbridge is brought back into line with what that evidence genuinely shows: a historic, flood-constrained market town with modest local housing need, existing Gypsy and Traveller provision, and significant environmental and infrastructure sensitivities. We propose targeted changes to the way the evidence is explained and used, so that the scale, location, and timing of growth at Edenbridge are fair, proportionate and sound.



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Evidence Base Response

SHELAA Methodology and Appendices A-C / Methodology, Suitable Sites, ADMP Allocations

The Strategic Housing and Economic Land Availability Assessment (SHELAA) 2025 sets out how the Council has identified and assessed land for housing, employment and Gypsy & Traveller uses across the District, including around Edenbridge. It explains the methodology, the Stage 1, and Stage 2 tests of suitability / availability / achievability and provides settlement totals for “deliverable” (1–5 years) and “developable” (later) sites.

Appendix B lists the existing Allocations and Development Management Plan (ADMP) housing allocations that are being carried forward into the new plan – none of which are in Edenbridge.

Appendix C sets out the detailed pro-formas for all sites judged “suitable,”. These assessments repeatedly rely on Edenbridge’s “Town” status in the Settlement Hierarchy 2025 and on “grey belt” conclusions from the Green Belt Assessment.

Our separate representations on the Settlement Hierarchy and the Green Belt Assessment show that the underlying assumptions about Edenbridge’s role, transport, and countryside are contested and, in key respects, inconsistent and weak.

Taken together, these documents form the main evidence that the Council is using to justify a very large expansion of Edenbridge into the surrounding Green Belt.

What’s good

- The SHELAA is clearly described as a **technical assessment**, not a decision in itself on allocations or planning applications. That is an important starting point, especially where the evidence is still incomplete.
- The methodology follows the National Planning Policy Framework (NPPF) and Planning Practice Guidance structure by testing sites for suitability, availability, and achievability, and by classifying them as “deliverable” or “developable” with a published method.
- The density typologies recognise that the upper ends of the ranges will not always be achieved, and that detailed design will be needed, which is important for a smaller, historic, and flood-affected town centre like Edenbridge.
- Appendix B is transparent that **no ADMP allocations are being carried forward in Edenbridge**, which underlines that the very large new allocations now proposed are a significant policy change rather than a continuation of the existing plan.

- The Edenbridge site entries at least flag some key constraints (flood zones, landscape sensitivity, presence of listed buildings, odour and contamination, limited transport capacity), even if the conclusions then underplay these.

What's vague or risky

1. Edenbridge's role is overstated through the Settlement Hierarchy

Across Appendix C, Edenbridge sites (EDEN1–EDEN17) are repeatedly said to be “in a sustainable location” simply because Edenbridge is classified as a Town and “top-tier settlement” in the Settlement Hierarchy 2025, with references to “two train stations” and “key services and facilities” used to justify everything from very small brownfield plots to large greenfield Green Belt sites.

Our Settlement Hierarchy representation demonstrates that for Edenbridge this approach:

- counts services and rail lines but does not test whether they actually work for the town's population and rural catchment (for example, Uckfield line capacity and reliability, GP / dentist access, secondary school deficits); and
- treats Edenbridge as functionally similar to Swanley despite very different strategic employment, rail, and road links.

The SHELAA then carries this “top tier” label straight into site suitability conclusions without any settlement-specific capacity or performance testing. That is a weak basis for directing very substantial Green Belt growth to Edenbridge.

2. Provisional “grey belt” is treated as if it were settled policy

Appendix C shows that most large Edenbridge sites – including EDEN7 (Gabriels Farm), EDEN11 (Skinners Farm), EDEN13 (Lingfield Road), EDEN14 (Breezehurst / Crouch House Road), and other EDEN sites in the same Green Belt parcels – are all described as:

- fully or largely within the Green Belt,
- “grey belt under national policy” or “Green Belt Stage 3 grey belt”, and
- having “no other constraints which would make the site unsuitable,” leading to conclusions that they are “relatively unconstrained” and “suitable for development.”

Our Green Belt Assessment representation makes clear that:

- every Edenbridge sub-area has been labelled “provisional grey belt” at Stage 2, even where the land is strongly or largely rural, with very little built development and high scores for safeguarding countryside.
- Stage 1 finds that land south of Edenbridge (Parcel 25) is strongly rural countryside and important to the setting and special character of the historic town, with the highest scores for purposes (c) and (d); and
- the “grey belt” concept is expressly provisional, has no policy status at Regulation 18, and does not alter Green Belt boundaries.

Despite this, the SHELAA uses grey-belt status as a **positive reason** to allocate large tracts of open countryside around Edenbridge, effectively treating “provisional grey belt” as if it were already agreed weaker Green Belt.

3. Strong countryside and historic-setting roles are not reflected in SHELAA conclusions

The Green Belt Assessment evidence acknowledges that:

- much of Edenbridge’s edge is real countryside, with many sub-areas described as strongly or largely rural, with very low built form and high purpose-(c) scores; and
- Edenbridge is a historic town and land south of the town in particular (Parcel 25) is important to its setting and special character.

However, the Edenbridge entries in Appendix C:

- make no distinction between these high-performing countryside areas and genuinely more compromised or previously developed land; and
- still conclude that grey-belt Green Belt sites have “no other constraints which would make the site unsuitable,” even where the Green Belt Assessment clearly shows strong countryside performance.

This disconnect undermines the claim that site conclusions are genuinely grounded in the Green Belt evidence.

4. Flood risk is acknowledged but downplayed for key Edenbridge sites

For several Edenbridge sites, the SHELAA identifies Flood Zone 2 and 3 coverage, but then still concludes there are “no other constraints which would make the site unsuitable”:

- EDEN7 (Gabriels Farm) – 21.7% in Flood Zone 2.
- EDEN14 (Breezehurst / Crouch House Road) – Flood Zones 2 and 3 through the centre of the site, plus medium–high landscape sensitivity and difficult access.
- Skinners Farm (HO/21/00232, associated with EDEN11) – 38.5% in Flood Zone 2 and 0.52% in Flood Zone 3, with “no capacity on transport network” and mineral safeguarding issues.

The text often defers flood-risk issues to the updated Strategic Flood Risk Assessment for Regulation 19, while still treating capacity figures and suitability as if they are firm now. For a town already known locally for flood risk, this is not a cautious or proportionate approach.

5. Transport capacity is handled with formula wording, not cumulative testing

Many Edenbridge Green Belt sites (including a number of EDEN1–EDEN17 allocations around the western and northern edges of the town) use standard phrases such as:

- “limited capacity on transport network and requires improvements,” or
- “capacity on transport network (contributions towards improvements may still be sought),”

and then conclude the site is suitable and “relatively unconstrained.”

There is no settlement-wide cumulative assessment within the SHELAA of:

- the combined impact of all Edenbridge allocations on the constrained local road network (Mill Hill, Lingfield Road, Crouch House Road, the High Street, bridges, and level crossings); or
- the realistic scope for improvements, given existing pinch-points, and the absence of strategic road upgrades for the town.

In practice, the SHELAA reads as if any network issues can simply be “fixed” by contributions, which is not evidenced for the scale of growth envisaged.

6. ADMP context – an unexplained “step change” in growth for Edenbridge

Appendix B shows that no ADMP allocations are carried forward in Edenbridge, while several are in Sevenoaks, Swanley, Westerham and other settlements.

There is no clear explanation in this evidence base for why Edenbridge must now take such a sharp increase in growth, relative to its transport links, employment base and service capacity, compared with the Principal Town (Sevenoaks) and Swanley.

7. Promoter-led capacities and thin achievability evidence

The SHELAA acknowledges that, for Regulation 18, site capacities are “generally” based on promoter submissions, with further capacity work and viability testing to follow before Regulation 19.

In Appendix C, some of the largest and most sensitive Edenbridge sites (including EDEN13, EDEN14, Skinners Farm / EDEN11, Mead Road and other EDEN allocations) are treated as “Developable (6–10 years)” with:

- very limited evidence of firm developer interest.
- significant unresolved issues (flood zones, no transport capacity, difficult access, noise and odour, mineral safeguarding); and
- no clear link yet to the high-level viability work.

This is not strong enough to underpin the scale and timing of growth proposed for Edenbridge.

8. Town-centre parking and vitality at EDEN6

For EDEN6 (High Street / Leathermarket), the SHELAA recognises that the site includes a town-centre car park but still concludes that there are “no other constraints which would make this site unsuitable” and that it is simply “highly sustainable”.

There is no assessment here of:

- the importance of that car park to Edenbridge town centre’s vitality and viability, particularly for the rural hinterland; or
- whether redevelopment would maintain, reduce or intensify public parking provision.

What to change

1. Clarify how Edenbridge’s “sustainable location” is assessed

In the SHELAA methodology, wherever suitability is linked directly to the Settlement Hierarchy 2025, the text should be amended to make clear that for Edenbridge:

“The classification of Edenbridge as a Town in the Settlement Hierarchy 2025 indicates that it provides a range of services and facilities, but it does not in itself determine the appropriate scale of development. For Edenbridge, assessments of ‘sustainable location’ will consider real-world transport performance, service and infrastructure capacity, and the town’s wider rural catchment, not simply proximity to the urban confines.”

2. Make explicit that “provisional grey belt” has no policy weight at this stage

In the main SHELAA and in Appendix C’s introduction, a short explanatory paragraph should be inserted, consistent with the Green Belt evidence, stating:

“References to land as ‘grey belt’ are based on provisional technical judgements in the Green Belt Assessment. They do not alter the adopted Green Belt boundaries, do not create any presumption in favour of development, and will only carry weight if and when confirmed through adoption of the Local Plan after independent examination.”

For Edenbridge sites (EDEN1–EDEN17) this should be accompanied by the removal or softening of phrases such as “unconstrained nature” and “no other constraints” where the only substantive justification is grey-belt status.

3. Require strong countryside and historic-setting scores to count against release

In the SHELAA methodology and in the Edenbridge settlement text, we consider the following wording necessary:

“Where Green Belt parcels or sub-areas around Edenbridge are assessed as strongly or largely rural and given high scores for safeguarding countryside (purpose (c)) and/or preserving the setting and special character of the historic town (purpose (d)), this will be treated as a significant constraint on release. Such land will not normally be identified as suitable or developable, even if provisionally classified as grey belt.”

4. Align EDEN5 and other sites with the Green Belt Assessment

For any Edenbridge site where the Green Belt Assessment says, “not recommended for release”, Appendix C should be updated to:

“Restrict the developable area to previously developed land within the urban confines. The Green Belt portion identified as not recommended for release is excluded from the SHELAA capacity and boundary.”

5. Strengthen flood-risk wording and make capacities clearly indicative

For Edenbridge sites with Flood Zone 2 or 3, the phrase “there are no other constraints which would make the site unsuitable” should be replaced with:

“The site is subject to fluvial flood risk. Its potential capacity and layout are indicative only and will be reassessed following the updated Strategic Flood Risk Assessment and the application of sequential and, where necessary, exception tests in accordance with the NPPF. Any

allocation will need to demonstrate that development can be steered to the lowest-risk parts of the site and will not increase flood risk elsewhere.”

6. Add a cumulative transport test for Edenbridge

In Section 4 of the Methodology, after Tables 3 and 4, the following wording should be added:

“Where a settlement such as Edenbridge is shown to have a significant concentration of developable Green Belt sites (including EDEN1–EDEN17), the cumulative impacts of those sites on the local and strategic transport network will be tested through settlement-wide modelling and junction capacity assessment. Individual site conclusions in Appendix C will not be treated as confirmation that the network can accommodate the combined scale of growth.”

7. Address town-centre parking and vitality at EDEN6

For EDEN6, the conclusions in Appendix C should be amended to include:

“Any allocation or planning permission will require a town-centre parking and access strategy to demonstrate that the redevelopment will not undermine the vitality and viability of Edenbridge High Street, taking into account the role of the existing public car park for local residents, rural visitors and businesses.”

8. Clarify that promoter-supplied capacities and achievability will be recalibrated before Regulation 19

In the Methodology section on capacity and achievability, we consider the following addition necessary:

“For this Regulation 18 iteration, site capacities and achievability judgements are based in part on promoter submissions. Ahead of Regulation 19, all Edenbridge capacities and trajectories (including EDEN1–EDEN17) will be reviewed in light of the completed high-level viability work, the updated Strategic Flood Risk Assessment, the Green Belt Assessment, and settlement-specific infrastructure evidence. Where appropriate, capacities and phasing will be reduced or sites removed to ensure that growth at Edenbridge is realistic and deliverable.”

Our request

- We ask that the Council amends the SHELAA methodology and explanatory text so that Edenbridge’s classification as a Town does not automatically render edge-of-settlement and Green Belt sites “sustainable,” but is instead tempered by real-world evidence on transport, services, flood risk, and its wider rural catchment.
- We ask that the Council explicitly states in the SHELAA that “provisional grey belt” has no policy status at Regulation 18, removes “unconstrained” language from Edenbridge grey-belt sites, and re-weights strong countryside and historic-setting scores so that genuinely rural Green Belt around Edenbridge is normally ruled out from release.
- We ask that the Council revises the Edenbridge site assessments in Appendix C to align with Green Belt and flood-risk evidence, and to show clearly that capacities are indicative pending Regulation 19 work on viability, transport, and the Strategic Flood Risk Assessment.

- We ask that the Council undertakes and publishes a cumulative transport and infrastructure assessment for all Edenbridge allocations combined and, if this shows that the current unit count total is not realistically deliverable, **reduces the Edenbridge total and redistributes growth in a more justified way between the District’s main settlements.**

Regulation 19 soundness & legal points

- The evidence is not sound because the SHELAA treats all Edenbridge sites within 400m of the urban confines as automatically “sustainable” based mainly on a contested Settlement Hierarchy score, without robust testing of real-world transport, service, and infrastructure capacity. This fails the **justified** test (not proportionate, locally specific evidence) and raises issues of **positive preparation**, as it allocates growth where infrastructure is weakest.
- The evidence is not sound because Edenbridge’s Green Belt sites (including EDEN1–EDEN17 where they fall in Green Belt parcels) are treated as “relatively unconstrained” and “suitable” largely on the basis of a “provisional grey belt” label, despite Green Belt evidence showing strongly rural character and important historic-setting roles south of the town. This is not **justified** and is not **consistent with national policy** on Green Belt, which requires exceptional circumstances and a brownfield-first approach.
- The evidence is not sound because there is an unexplained step change from the adopted ADMP (no carried-forward allocations in Edenbridge), without a transparent comparison of reasonable alternatives in more accessible or less constrained locations. This fails the **justified** and **effective** tests and risks placing a disproportionate share of development onto Edenbridge.
- The evidence is not sound because flood risk and transport capacity for key Edenbridge sites are acknowledged but then downplayed with generic wording that there are “no other constraints” and that contributions can address network limitations. This is not a proportionate or precautionary approach and undermines both the **effectiveness** of the plan and its **consistency with national policy** on directing development away from areas at highest risk of flooding and ensuring safe, suitable access.
- The evidence is not sound because capacities and achievability for major Edenbridge sites are still heavily promoter-led and pre-date the high-level viability work, so the plan cannot yet demonstrate that the scale and timing of development at Edenbridge is realistically **deliverable over the plan period**, failing the **effective** test.

Edenbridge Impact

As drafted, the SHELAA and its appendices use disputed hierarchy scores and provisional grey-belt labels to push a disproportionate amount of Green Belt and flood-affected growth onto Edenbridge, on an evidence base that does not yet reflect the town’s real capacity or constraints compared with other main settlements.



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Evidence Base Response

SHELAA Methodology and Appendices E-G / Discounted Sites

1. What this document does (in plain English)

Appendix E is the detailed Strategic Housing and Economic Land Availability Assessment (SHELAA) schedule of sites the Council has decided are “unsuitable” for allocation. For each site it lists constraints (Green Belt, landscape, access, flood risk, heritage, ecology, etc.) and then reaches a simple conclusion.

In most cases the detailed tables accept that these sites are:

- Adjacent to Edenbridge’s urban confines
- In Green Belt identified in the Green Belt Assessment as “provisional grey belt” rather than strongly performing Green Belt, or at least as relatively weak against some Green Belt purposes
- In sustainable locations, often within 2km of the town centre and the two stations

But they are still concluded to be “unsuitable,” largely on landscape / “form” grounds “unnatural extension,” “gap” in the Green Belt) rather than any hard showstopper.

2. What’s good for Edenbridge

The Appendix does at least work through a full technical checklist for the Edenbridge sites: Green Belt, flood risk, ecology, heritage, access, network capacity, distances to services, and so on.

For several Edenbridge sites the Council’s own assessments explicitly accept that:

- Edenbridge is a “town” in the Settlement Hierarchy and is in principle a sustainable location for growth.
- The sites are close to, or well-related to, a town centre and two rail stations.
- A number of sites are in weaker Green Belt / provisional grey-belt areas or are partly brownfield (for example the Crouch House Road cluster, golf driving range, derelict tennis courts, and The Laurels).

The Eden Valley Woodland Burial Ground site is recognised as genuinely constrained, with its existing open space/burial use and flood risk providing clear planning reasons against development.

Taken together, Appendix E, the Settlement Hierarchy and the Green Belt Assessment actually support a core point for Edenbridge:

- There is a mix of genuinely strong “pure” Green Belt countryside that should be protected; and
- There are some weaker, more enclosed, or partially brownfield “grey belt” locations where, if the Council really wants to release Green Belt, it ought logically to look first.

3. What’s vague or risky

(a) Over-reliance on “unnatural extension” with no definition

Across many Edenbridge entries, the decisive reason for calling a site “unsuitable” is simply that it would be an “unnatural extension” to the urban confines or create/leave a “gap” in the Green Belt.

There is:

- No definition anywhere in the SHELAA or wider evidence of what “unnatural extension” actually means.
- No settlement edge analysis to show why these extensions at Edenbridge are supposedly worse than comparable edges elsewhere.

This makes the term subjective and, in practice, a catch-all label to keep these options off the table.

(b) Internal contradictions: “sustainable, grey belt... but unsuitable”

Several Edenbridge sites are described as:

- Adjacent to a Town with a wide range of services and facilities.
- In or adjoining Green Belt which the Green Belt Assessment itself classes as “provisional grey belt,” or where the sub-areas are recorded as having lower performance on some Green Belt purposes.
- Within walking or cycling reach of the town centre and rail stations.

...and yet they are rejected as “unsuitable” with no hard showstopper.

At the same time, the Stage 2 Green Belt Assessment acknowledges that much of the countryside around Edenbridge – particularly south of the town (Stage 1 Parcel 25 and multiple ED sub-areas) – is strongly rural, plays an important role in the setting of the historic town and scores highly for countryside protection (purpose (c)), i.e. genuine “pure” Green Belt.

What is striking is that:

- Some Edenbridge sites in weaker, more enclosed, or partially brownfield Green Belt (the sort of land the Council calls “grey belt” in principle) are being rejected outright as “unsuitable.”
- Meanwhile, larger, and more open “pure” Green Belt parcels around other settlements are being presented as grey-belt release opportunities.

That points to an internal inconsistency: Edenbridge is being denied development on land that, under the Council's own methodology, looks much closer to grey belt than some of the land they are actually promoting elsewhere.

(c) Brownfield and town-centre edges treated like open countryside

The approach to Edenbridge sites does not reflect the National Planning Policy Framework (NPPF) emphasis on making effective use of brownfield and settlement-edge land:

- HO/21/00106 (The Laurels) is part within the existing town/local centre confines and part brownfield, yet it is rejected using the same “unnatural extension” language as wholly greenfield sites.
- HO/25/00080 (derelict land and tennis courts) is clearly partially brownfield and physically connected to the built-up area but is dismissed in the same way.

The Council has not tested smaller, more design-led options or mixed-use forms, even though these sites sit exactly where the NPPF would normally expect authorities to start.

(d) Disconnection from the Settlement Hierarchy's real picture of Edenbridge

The SHELAA relies implicitly on the Settlement Hierarchy's conclusion that Edenbridge is a “Town” and therefore, in the Council's view, a sustainable place for further growth.

However, your Settlement Hierarchy work shows that:

- The hierarchy mainly counts facilities and rail lines rather than asking whether they actually work in practice for Edenbridge residents and its rural catchment.
- Edenbridge's lack of a secondary school is barely reflected in the scoring.
- Edenbridge's real rail position is overstated: two lines on a map translate in reality into one line (Uckfield–London Bridge) with reliability and capacity problems, and another (Tonbridge–Redhill) which has limited peak services compared with Swanley's high-frequency metro-style offer.

So, the combination is particularly risky:

- The Settlement Hierarchy oversells Edenbridge's sustainability.
- Appendix E then rejects many of Edenbridge's more realistic grey-belt and brownfield options.
- Yet the Local Plan still leans on the same hierarchy and Green Belt work to justify directing growth and Green Belt loss to and around Edenbridge.

This is not a sound or joined-up basis to decide which Edenbridge sites should be “unsuitable” versus which are supposedly “available” or “grey belt.”

(e) Green Belt evidence used selectively around Edenbridge

The four Green Belt documents treat every sub-area around Edenbridge as “provisional grey belt”, even where the sub-area clearly has a strongly rural character and scores highly for countryside protection.

In practice that means:

- The Council’s Green Belt evidence makes almost all land around Edenbridge look “in play.”
- Appendix E then appears to use that flexibility to rule out some of the weaker, more developable parts on landscape / “form” grounds, while leaving it open for the Local Plan to target more sensitive “pure” countryside elsewhere around the town under the grey-belt label.

The net result is that:

- Some Edenbridge sites that are arguably closer to genuine grey belt are being written off as “unsuitable.”
- At the same time, other areas of strong, open countryside around the town – which Stage 1 and Stage 2 show are integral to its historic setting – are being left exposed to future Green Belt release.

This is the wrong way round and a clear equity issue for Edenbridge.

4. What to change (wording suggestions)

We consider that the Edenbridge entries in Appendix E need clearer, evidence-based wording.

We propose that the Council:

- **Defines “unnatural extension” and “gap in the Green Belt”** in the SHELAA methodology and applies those definitions consistently between Edenbridge and other main settlements, with simple diagrams or town-edge analyses to justify the conclusions.
- **Cross-references the Green Belt Assessment** for each Edenbridge site, explicitly stating whether the land is genuinely weaker Green Belt / provisional grey belt or part of the stronger countryside that Stage 1 and Stage 2 identify as important to the historic town and its setting.
- **Acknowledges the limits of the Settlement Hierarchy** in the SHELAA, by stating that site suitability around Edenbridge must also take account of real infrastructure constraints, particularly rail reliability and the lack of a secondary school, rather than assuming the Town score shows the town can simply “absorb” more growth.

For Edenbridge sites that are currently rejected as “unsuitable” **only** on “unnatural extension” or “gap” grounds, with no critical technical constraint, the SHELAA should be amended to say:

“This site lies adjacent to Edenbridge, a Town in the Settlement Hierarchy with a broad service role and two rail lines, but also with acknowledged infrastructure constraints including rail reliability and the absence of a secondary school. The land falls within Green Belt which the Stage 2 Green Belt Assessment identifies as provisional grey belt / weaker performing against some purposes. Taking these factors together, the site remains a reasonable alternative whose suitability should be tested further through the Local Plan spatial strategy, design-led options, and comparison with other grey-belt opportunities across the district, rather than being ruled out outright at the SHELAA stage.”

5. Our requests – Appendix E

- We ask that the Council defines and transparently applies the concept of “unnatural extension” and “gap in the Green Belt” to Edenbridge in the same way as for other settlements, including supporting plans and settlement-edge analysis.
- We ask that the Council revisits Edenbridge sites which are in provisional grey-belt or partly brownfield land and currently rejected only on “unnatural extension” grounds, and reclassifies them as reasonable alternatives where appropriate, so they can be compared fairly with other grey-belt sites across the district.
- We ask that the Council joins up the SHELAA with the Settlement Hierarchy by acknowledging Edenbridge’s real-world infrastructure limits – especially rail reliability and the lack of a secondary school – before using the Town score to justify either discounting or loading development onto Edenbridge sites.

6. Soundness and legal points – Appendix E

- **Not justified / not positively prepared** – The evidence is not sound because several Edenbridge sites in weaker Green Belt or partially brownfield land are dismissed as “unsuitable” using vague “unnatural extension” language, without a clear methodology, while the Green Belt Assessment itself treats almost all land around Edenbridge as provisional grey belt. At the same time, the Settlement Hierarchy overstates Edenbridge’s sustainability by counting facilities and rail lines without properly reflecting capacity or reliability. Together, this does not provide a robust, proportionate basis for deciding that these sites should be ruled out as options for a town of Edenbridge’s size and role.
- **Not effective / not consistent with national policy** – The evidence is not sound because national policy expects brownfield land, weaker Green Belt, and sustainable locations to be used efficiently, but Appendix E rejects a number of such Edenbridge sites without testing design-led or smaller-scale options, and without a clear comparison with other grey-belt sites in the district. This undermines the effectiveness of the site-selection process and is inconsistent with the National Planning Policy Framework’s requirements on making effective use of land and taking local circumstances properly into account.
- **Fairness and consistency between settlements** – The evidence is not sound because the combination of a generous Town score for Edenbridge (based on headline counts) and the blanket grey-belt classification of its surrounding Green Belt is used in a way that appears to remove realistic grey-belt choices at Edenbridge while exposing more sensitive countryside to future release. At the same time, settlements with National Landscape protection benefit from additional safeguards. This raises a clear fairness issue between Edenbridge and more protected locations and fails the tests of being justified and effective.

7. Edenbridge impact – Appendix E (one line)

As things stand, Appendix E uses vague “unnatural extension” language and selectively applied Green Belt and hierarchy evidence to rule out some of Edenbridge’s more realistic grey-belt and brownfield options, while leaving its more sensitive countryside around the historic town exposed to pressure.

Appendix F – “Sites Contrary to Strategy”

1. What this document does

Appendix F lists sites that have been removed from the SHELAA at an early stage as “Contrary to Strategy.” For Edenbridge’s wider area this includes several sites with Edenbridge postal addresses in the Cowden & Hever area (Four Elms, Hever, Stick Hill, etc.), all simply marked as “Contrary to Strategy” with no explanation of which part of the development strategy they are said to conflict with.

Effectively, it is an early filter that stops these sites being considered even as “unsuitable” reasonable alternatives.

2. What’s good

The appendix is at least open about which sites have been dropped at this early stage, and it confirms that the Council is aware of a range of possible sites in the wider Edenbridge area.

3. What’s vague or risky

There is no explanation of:

- Which strategy policy or criterion each site fails.
- Whether the decision flows from the Settlement Hierarchy (for example, distance from a higher-tier settlement) or the Green Belt Assessment.
- Whether other similar rural sites around other main settlements have been treated in the same way.

Given that:

- Edenbridge is recognised in the Settlement Hierarchy as a Town and service centre for a wide rural hinterland.
- All Green Belt around Edenbridge is treated as provisional grey belt in the Green Belt Assessment.

simply removing nearby rural sites as “Contrary to Strategy” without reasons makes it impossible to see whether Edenbridge’s surrounding area has been treated more harshly than the rural hinterlands of Sevenoaks, Swanley or Westerham.

4. What to change (wording suggestions)

We consider that Appendix F must, at a minimum, provide reasons for each entry. For example:

“For each site listed as ‘Contrary to Strategy’, the Council will identify: (a) the relevant element of the spatial strategy or Settlement Hierarchy that the site is considered to conflict with; (b) whether Green Belt / grey-belt considerations have influenced the decision; and (c) a short explanation of why, with reference to the site’s role in the rural catchment of any Town such as Edenbridge.”

5. Our requests – Appendix F

- We ask that the Council adds a clear reason column to Appendix F, identifying for every site – including those in the wider Edenbridge area – which specific part of the strategy it conflicts with and why.
- We ask that the Council demonstrates, in a short note, that “Contrary to Strategy” decisions around Edenbridge’s rural hinterland have been taken on the same basis as for the rural areas of other main settlements and that they are not being used to suppress reasonable alternatives close to Edenbridge.

6. Soundness and legal points – Appendix F

- **Not justified** – The evidence is not sound because Appendix F removes sites as “Contrary to Strategy” with no explanation of the policy basis for the decision or how the Settlement Hierarchy and Green Belt Assessment have been applied. This is not proportionate or transparent evidence for discounting reasonable alternatives around a main town like Edenbridge.
- **Not consistent with national policy** – National policy expects local plans to be based on proportionate evidence and to consider reasonable alternatives in an open way. A bare “Contrary to Strategy” label offers no real evidence and does not allow residents to understand or test whether choices around Edenbridge’s hinterland are fair.

7. Edenbridge impact – Appendix F (one line)

By stripping out rural sites near Edenbridge as “Contrary to Strategy” without reasons, the Council has removed possible alternatives around Edenbridge from consideration in a way that cannot presently be checked against how other main settlements’ hinterlands are treated.

Appendix G – “Discounted Sites”

1. What this document does

Appendix G is a list of sites “discounted from the SHELAA process.” For each it gives only the ward, reference, address, area, and the word “Discounted” – with no reason.

For Edenbridge North & East and Edenbridge South & West, this includes many strategic-scale and smaller sites (for example land north of Swan Lane and east of Fairmead, land south of Skinners Lane, land west of Ashcombe and Hilders Lane, land east of Mead Road, further land at Crouch House Road and the Kent & Surrey Golf Course).

2. What’s good

The Appendix at least lists all the sites that were discounted at an early stage, so they are visible rather than simply disappearing.

It confirms the Council is aware of substantial land around Edenbridge in all directions, not just the specific SHELAA sites.

3. What’s vague or risky

For Edenbridge, Appendix G appears to remove a wide range of potential options – including some which, under the Green Belt Assessment, look closer to genuine grey belt – without any explanation, at the same time as:

- The Settlement Hierarchy is being used to position Edenbridge as a Town expected to accommodate growth.
- The Green Belt Assessment is labelling all of Edenbridge’s Green Belt as provisional grey belt and explicitly flagging some areas south of the town as important to the historic setting and strongly rural.

Because no reasons are given, we cannot tell:

- Whether these discounted Edenbridge sites were removed for genuine, specific constraints (for example, flood risk) or just because they were awkward in terms of the emerging strategy.
- Whether they are on weak or strong Green Belt, and how that compares to areas being promoted elsewhere.
- Whether, taken together, discounting so many options around Edenbridge has skewed the reasonable alternatives assessment for the whole Plan.

Given that parts of the land around Edenbridge are clearly “pure” high-performing Green Belt, while other parts are more enclosed or affected by existing development, it is particularly concerning that Appendix G treats them all the same, simply as “Discounted.”

4. What to change (wording suggestions)

We consider that Appendix G must be turned into real evidence, not just a list. For example:

“For each discounted site, Appendix G will provide a short ‘Reason discounted’ explaining the main constraint or policy reason (e.g. duplication with another site, major show-stopper constraint, conflict with Green Belt purpose (c) in strongly rural ‘pure’ Green Belt, or conflict

with the spatial strategy). Where a site overlaps with or adjoins land assessed in the Green Belt Assessment (for example ED-sub-areas) or another SHELAA site, this cross-reference will be made clear.”

For Edenbridge, it is particularly important that Appendix G makes clear:

- Which discounted sites lie in weaker, grey-belt type land; and
- Which fall in the high-performing countryside and historic setting areas identified in the Green Belt Assessment.

5. Our requests – Appendix G

- We ask that the Council provides, for each Edenbridge site listed in Appendix G, a brief reason for discounting and a cross-reference to the relevant Green Belt sub-area(s) and any overlapping SHELAA entries, so that residents can see whether weaker, grey-belt sites have been quietly removed while more sensitive countryside is left exposed.
- We ask that the Council publishes a short note demonstrating that early “discounted” decisions have not removed a disproportionate share of Edenbridge’s reasonable alternatives compared with other Towns, in the light of the Settlement Hierarchy and Green Belt evidence.

6. Soundness and legal points – Appendix G

- **Not justified** – The evidence is not sound because Appendix G removes many significant Edenbridge sites – including strategic land around the town – from the SHELAA with no reasons. This prevents a proper comparison between weaker “grey belt” land and stronger “pure” Green Belt around Edenbridge and other settlements and undermines the reasonable alternatives exercise required for the Local Plan.
- **Not consistent with national policy / not effective** – The National Planning Policy Framework expects choices on Green Belt and development distribution to be based on transparent evidence and a fair comparison of options. Without reasons for discounting, we cannot see whether the combination of the Settlement Hierarchy and Green Belt Assessment has been applied fairly to Edenbridge. This risks an unbalanced outcome where Edenbridge’s more defensible countryside is left to take pressure while more suitable grey-belt land has been taken off the table without proper scrutiny.

7. Edenbridge impact – Appendix G (one line)

By discounting a wide range of Edenbridge sites without reasons, the Council has removed many of the town’s potential grey-belt and settlement-edge options from consideration, while leaving its more sensitive “pure” Green Belt countryside vulnerable to future release in a way that cannot currently be justified or compared with other settlements.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Economy and Viability – Town Centre Health Check Baseline Report and Needs Assessment March 2022

1. What the document does

This retail and town centre evidence is being used to justify the Local Plan's approach to Edenbridge town centre. It explains how Edenbridge is performing as a town centre, based on the mix of shops and services, vacancy levels and how people travel to and use the High Street. It sets out Edenbridge's role in the District, highlights that Edenbridge has the highest vacancy rate among the town centres, recognises the impact of the out of centre retail park including Lidl, and calculates how much extra convenience food and comparison non-food floorspace might be supportable up to 2040. Those Edenbridge findings are then carried through into the Town Centres Strategy and sit alongside district wide policies such as EMP1, EMP2, EMP3 and TLC1 in the Local Plan, and the Edenbridge vision in EDN1.

2. What is good for Edenbridge

a. Edenbridge is treated as a main town centre

The evidence recognises Edenbridge as one of the four main town centres in the District and gives it a full, centre specific assessment. It describes Edenbridge as an historic town with an attractive core, serving a population of around 9,000 plus a wide rural catchment and playing a genuine role as a service centre.

b. Clear Edenbridge health check

For Edenbridge the study

- Maps the town centre and primary shopping area and notes that much of the core lies within a Conservation Area.
- Provides land use breakdowns for 2013, 2019 to 2020 and 2021, using both unit numbers and floorspace and comparing them with national averages.
- Shows that Edenbridge has a broad service role with a mix of retail, leisure, and financial services.
- Records that convenience units as a proportion of units are around the national average but convenience floorspace is below the national average, so Edenbridge relies on smaller food stores rather than large ones in the High Street.

- Confirms that Edenbridge has the highest proportion of vacant units of all the town centres and that vacancy levels in both units and floorspace are above national averages.

This gives a clear factual basis for saying that Edenbridge town centre is fragile and needs careful handling.

c. Strong Edenbridge specific retail capacity figures

For convenience goods the study shows that

- Edenbridge attracts a significant amount of convenience spending from the wider area.
- There is a clear surplus of convenience expenditure compared with the benchmark turnover of existing convenience floorspace.
- That surplus grows towards 2040 and is presented as an indicative capacity of around 1,300 to 1,600 square metres net of additional convenience floorspace.

For comparison goods the study shows that

- Edenbridge's comparison goods market share is low.
- Under the more cautious "equilibrium" scenario, Edenbridge has little or no new comparison floorspace capacity, with very small figures up to 2040.

The Edenbridge numbers are transparent, which helps us challenge any proposals that try to stretch them beyond what the evidence actually says.

d. Honest about Lidl and the fragility of the High Street

The evidence openly recognises that

- The town centre Waitrose and the out of centre Lidl are the main contributors to Edenbridge's convenience surplus.
- Other Edenbridge town centre convenience stores are expected to trade below benchmark.

It also warns that, when considering whether to plan for more convenience floorspace, the Council needs to think about protecting the health of Edenbridge town centre. This is an important hook for resisting further harmful out of centre retail serving Edenbridge.

3. What is vague or risky for Edenbridge

a. The "surplus capacity" headline invites out of centre schemes

The evidence highlights a large convenience "surplus" in Edenbridge and turns it into a floorspace figure, but it does not spell out that this capacity should be treated with caution in a fragile centre and should not automatically support more edge of centre or out of centre floorspace.

At the same time the study accepts that Waitrose and Lidl largely drive the surplus while other High Street stores are under performing, in a town centre that already has the highest vacancy rate. Without clearer interpretation, developers can easily use the headline surplus to promote more out of centre retail aimed at Edenbridge, with obvious risks for the High Street.

b. Tension between Edenbridge numbers and the simple “no overriding need” line

The Local Plan text on town centres says there is “no overriding need” for extra convenience or comparison floorspace across the District.

That is not fully reconciled with the Edenbridge numbers, which show a sizeable convenience surplus and some potential comparison capacity under certain scenarios. Because the Plan does not clearly explain how that Edenbridge surplus is expected to be managed within the district wide framework, there is a risk that the Edenbridge figures are used selectively to argue for more development, rather than being seen as something that has to be managed in a way that supports the High Street.

c. No specific testing of further out of centre growth in Edenbridge

The evidence recognises that

- Edenbridge has an existing out of centre retail park including Lidl and Home Bargains.
- Car use for trips to Edenbridge is high and increasing.
- Edenbridge has high vacancy levels and relatively short dwell times.

Yet it does not test what would happen to the High Street if larger format out of centre retail serving Edenbridge were approved. There is no scenario modelling of the likely effect on High Street vacancies, turnover or linked trips, and no Edenbridge focused guidance on risk thresholds. For a centre already flagged as the most fragile, this is a gap.

d. Qualitative need is not turned into clear Edenbridge conclusions

The study describes qualitative need in general terms, such as gaps in provision, over trading and quality of offer, but it does not turn this into firm statements for Edenbridge. For example, it does not clearly say that the real qualitative need is to reduce vacancies, refresh the High Street, and diversify the leisure and evening offer, rather than to add more large format food stores away from the High Street.

That lack of clear qualitative conclusions for Edenbridge makes it easier for applicants to claim that almost any proposal meets some sort of “qualitative” need, even when it does nothing for the town centre.

e. The evidence is already ageing for a vulnerable centre

The Edenbridge health check and capacity figures use 2019 to 2020 GOAD data and 2021 survey work and forecasts. They therefore do not reflect more recent changes in the economy, the cost of living pressures, any closures or openings after that date, or new mixed use employment allocations for Edenbridge such as EDEN14 and EDEN16 that sit in the Local Plan’s economic strategy.

For a Plan running to 2042, this is already becoming out of date, which is particularly concerning for a town centre that the evidence itself describes as fragile.

4. What to change

We recognise that Local Plan policies are written district wide. Our concern is how this Edenbridge evidence is interpreted and applied within that framework.

a. Clarify how the Edenbridge “surplus” should be interpreted

We want the Council, when it uses this evidence, to treat the Edenbridge convenience “surplus” as a cautious upper limit in a fragile centre, not as a target to be met. The supporting material to the Plan and the way decisions are explained should make it clear that:

- Waitrose and Lidl mainly generate the surplus, while other High Street stores are weaker and vacancy is high.
- Any additional convenience floorspace serving Edenbridge should first support the town centre and reduce vacancies, rather than extending the pull of the out of centre retail park.
- Proposals that use the Edenbridge figures must show clearly how they will avoid harm to the High Street, vacancy levels and linked trips.

This does not require Edenbridge only policies. It does require the Council to show, in its evidence and decision making, that it understands the Edenbridge risks in how the district wide policies are applied.

b. Reconcile the “no overriding need” line with Edenbridge evidence

The Plan’s statement that there is no overriding district wide need for extra retail floorspace needs to be clearly reconciled with the Edenbridge findings. We want the Council to explain, in its evidence and supporting text, that:

- There is no case for significant net growth in total retail floorspace across the District.
- Where the figures show localised surpluses, as in Edenbridge for convenience goods, these will be managed in a way that supports existing town centres and will not be used as a simple justification for more out of centre provision.

That explanation can be written once at District level, but it needs to be explicit that the Edenbridge numbers are not a green light for more retail park style development.

c. Strengthen how out of centre proposals are judged for Edenbridge

Within the existing sequential and impact tests in national policy and Policy TLC1, we want the Council to make clear, in practice and in guidance, that Edenbridge’s higher vacancy rates and existing out of centre floorspace will be important material considerations.

That means impact assessments for out of centre schemes that draw trade from Edenbridge should be expected to look carefully at vacancy, turnover of High Street units and linked trips in Edenbridge, not just at District wide totals. This can be done through the way the Council scopes and assesses applications, rather than through separate Edenbridge only policy wording.

d. Commit to updating the Edenbridge evidence

Given Edenbridge’s fragility, the Council should commit to updating the Edenbridge town centre health check and retail capacity work within the Plan period and before any major decisions that rely heavily on the current figures. This can be framed as part of the Plan’s monitoring and review arrangements and does not have to single out Edenbridge in policy text, but it should recognise that some centres need closer watching, and Edenbridge is one of them.

5. Requested Changes

- We ask that the Council explains, in its evidence and supporting text, that the Edenbridge convenience “surplus” is a cautious upper limit in a fragile town centre and is to be used to support the High Street and reduce vacancies, not as a simple target for more edge of centre or out of centre retail floorspace.
- We ask that the Council clearly reconciles the District wide “no overriding need” statement with the Edenbridge figures by confirming that localised surpluses, such as Edenbridge’s convenience surplus, will be managed to reinforce existing town centres rather than justify additional retail park style growth serving Edenbridge.
- We ask that the Council strengthens how it applies the existing sequential and impact tests to proposals that could draw trade from Edenbridge, expecting Edenbridge specific analysis of vacancy, High Street turnover and linked trips, and that it commits to updating the Edenbridge town centre health check and capacity work within the Plan period.

6. Regulation 19 soundness and legal points

Not positively prepared and not fully effective for Edenbridge

The evidence is not sound because it does not clearly show how the identified Edenbridge convenience surplus will be managed to support the vitality and viability of Edenbridge town centre, even though Edenbridge has the highest vacancy rate and has already seen significant out of centre retail. This weakens the Plan’s ability to provide a positive, effective strategy for Edenbridge town centre, as expected by the National Planning Policy Framework in relation to town centres and local economies.

Not fully justified for Edenbridge

The evidence is not sound because the Local Plan statement that there is no overriding need for additional retail floorspace across the District is not fully justified in the specific case of Edenbridge, where the evidence shows a sizeable convenience surplus and some potential comparison capacity under certain scenarios. The way that surplus will be handled for Edenbridge is not clearly set out, and reasonable alternatives for managing it, such as focusing on High Street renewal rather than further out of centre growth, are not transparently tested or explained.

Not fully consistent with national policy on town centres and up to date evidence

The Edenbridge evidence relies on data that is already several years old for a town centre that is identified as fragile. This falls short of the National Planning Policy Framework expectation that retail and town centre needs should be kept up to date and monitored, especially for places undergoing rapid change.

The evidence also does not provide a clear Edenbridge specific basis for applying the town centre first and impact tests to new or expanded out of centre food stores that serve Edenbridge, despite acknowledging the importance of Lidl and the existing retail park. Without a clearer interpretation of the Edenbridge figures, the Plan’s district wide policies, including TLC1 and EDN1, are not as robust as they should be when it comes to resisting harmful proposals affecting Edenbridge.

Potential Equity issues Edenbridge

The evidence is not sound because it does not consider how further out of centre growth serving Edenbridge, in a context of high car use and short dwell times, might particularly disadvantage residents who rely on the High Street, such as those without access to a car, compared with other residents. This raises concerns about equal access to services within Edenbridge if more trade is drawn away from the town centre.

Edenbridge Impact

If left as it is, this evidence can still be used to promote more out of centre retail serving Edenbridge on the back of a headline convenience “surplus,” while giving too little practical protection and priority to fixing High Street vacancies and footfall in Edenbridge town centre.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Economy and Viability – Economic Needs

1. What this document does

This is the Council's 2025 Economic Needs Study update, which refreshes the 2022 employment evidence and estimates how much and what type of employment land and floorspace is needed in the District up to 2042.

It assesses existing employment areas, records recent gains and losses of floorspace, and then recommends where new employment land and industrial floorspace should go, with the result that Edenbridge is recorded as having a net loss of employment space while most new industrial floorspace is focused at Swanley and at the Vestry Trading Estate in Sevenoaks.

2. What is positive for Edenbridge

Clear recognition of Edenbridge's importance

The Study recognises Edenbridge's industrial estate around Station Road, Enterprise Way, Commercial Way, Fircroft Way and London Road as a large, functioning, and diverse employment area with very low vacancy and generally good quality premises.

It records that Edenbridge holds about 8.6 percent of all jobs in the District, comparable with Swanley and higher than Westerham. We welcome this clear confirmation that Edenbridge is one of the four main employment centres in the District and not a minor rural settlement.

The Study accepts that Edenbridge's stock of affordable industrial space is fairly rare around the M25. That is important and supports the case for long term protection of this land and careful treatment of any redevelopment proposals.

Evidence of net loss supports a no further loss position

The Study shows that, taking recent consents together, Edenbridge has a net loss of 1,801 square metres of employment floorspace, while the rest of the District, and Swanley in particular, record large net gains.

This is a key figure for Edenbridge. It demonstrates that the town is already going backwards in terms of total employment floorspace over the period looked at, despite its recognised role in the District's economy.

We consider this strong evidence that there should be a clear expectation of no further net loss of employment floorspace in Edenbridge and that the Local Plan should at least replace this 1,801 square metre deficit in the town.

Explicit recommendation to safeguard Edenbridge

The 2025 update endorses the 2022 recommendation to protect major industrial concentrations and safeguard space in Edenbridge and Westerham. It repeats the recommendation to resist conversion to other uses in key employment areas.

The Study also refers to the need for start-up and grow on space and affordable workspace, identifying Sevenoaks and Swanley and suggesting that this should perhaps include Edenbridge. We consider that the description of Edenbridge's role fully justifies specific provision for new workspace and start up space in the town centre and on the industrial estate.

Consistency with parts of the Local Plan

Parts of the draft Local Plan's employment policies are consistent with the Study and can be used to support Edenbridge. The Plan talks about protecting existing employment land, resisting changes of use without strong evidence and the possible use of Article 4 Directions to prevent further losses.

Read together with the Study, this gives a basis for a clear and strong approach to safeguarding Edenbridge's main industrial area and providing new employment floorspace that matches local needs.

3. What is vague or risky for Edenbridge

a) Edenbridge's net loss is underplayed

Although the Study clearly records a net loss of 1,801 square metres of employment floorspace in Edenbridge, it quickly moves back to a District wide picture of net gain and does not analyse whether this loss is acceptable in a rural service town with a recognised employment role.

There is no settlement level reconciliation between this loss and the Local Plan allocations at EDEN14 and EDEN16. It is not clear whether the proposed allocations genuinely replace this loss in terms of quantity, type, and affordability of units for Edenbridge.

b) Distribution of new land between settlements is not evidenced

The updated forecasts produce a single District figure of 2.6 hectares of office land and 3.7 hectares of industrial land. The Study does not break this requirement down between Sevenoaks, Swanley, Edenbridge and Westerham.

The Local Plan then uses this evidence to direct most new industrial floorspace to Swanley and the Vestry Trading Estate, while Edenbridge receives only 1,400 square metres at EDEN14 plus an undefined mixed use allocation at EDEN16 with employment floorspace to be confirmed.

We cannot see from the evidence why a town which is already shown to have a net loss of floorspace and is recognised as a main employment centre receives only modest and partly undefined new allocations, while Swanley receives a large share of the new B2 and B8 land.

c) Optional wording on workspace weakens Edenbridge

The recommendation on start-up and grow on space says this should be provided in Sevenoaks and Swanley, and perhaps Edenbridge. The word perhaps makes Edenbridge optional, even though the Study describes it as an important employment location with a rare stock of affordable industrial units.

This soft wording creates a clear risk that the Council will claim to have followed the Study by focusing on Sevenoaks and Swanley alone, without delivering any dedicated start up or maker space for Edenbridge businesses.

d) London Road firm line not translated into policy

The Study is clear that the London Road and wider Edenbridge industrial area has experienced eating away at the edges and that a firm line against further erosion is needed. It links this to the fact that these premises provide rare affordable industrial floorspace around the M25.

The Local Plan, however, only refers in general terms to retaining and optimising employment land and to possible Article 4 Directions. It does not clearly single out the Edenbridge industrial estate or London Road in the way the evidence suggests is required.

The Plan also refers to opportunities for intensification on existing industrial land in Edenbridge without any guarantee that this intensification will be employment led or will result in a net increase of employment floorspace rather than housing led mixed use schemes.

This mismatch between the clear recommendation in the evidence and the vague policy wording exposes Edenbridge to continued incremental losses, including through prior approvals and ad hoc changes of use, even though the Study warns directly against this pattern.

e) Prior approvals and rural losses not broken down by place

The Study records that prior approvals have produced a net loss of 3,800 square metres of employment floorspace, equal to 34 small units, with many of these losses in rural locations. However, it does not break down these losses by town or hinterland.

Without a clear figure for Edenbridge and its rural catchment, there is no way to see whether this area is being hit harder than others or whether it has particular exposure to this form of loss. The Local Plan then relies on generic policy tools, which may not be sufficient for a town that the same evidence already shows to be in net loss overall.

f) Site picture may become out of date over the plan period

The Study is presented as an update to 2022 and acknowledges rapid economic and property market change. For Edenbridge, much of the description appears to be based on the earlier work, with limited fresh, site specific analysis of recent changes and losses.

For a Local Plan that is intended to run to 2042, there is a risk that the Edenbridge specific part of this evidence will be stale by the time of examination, unless it is refreshed or supplemented for the main industrial estate and the town's employment allocations.

4. What to change

a) How the evidence should be completed and used

We request that the Council prepares an addendum to the 2025 Economic Needs Study that:

Identifies gains and losses of employment floorspace since 2022 for the main employment towns and rural service centres, including Sevenoaks, Swanley, Edenbridge and Westerham, and sets these out by use class E g, B2 and B8.

Identifies, for each of these settlements, the number and type of small units, for example under 250 square metres, that have been lost and gained, including those lost through prior approvals.

Shows clearly where there are net deficits of employment floorspace, particularly in locations with a recognised employment role and rare affordable space such as the Edenbridge industrial estate around Station Road, London Road, Enterprise Way, Commercial Way, and Fircroft Way.

Confirms how far proposed allocations in each of the main employment settlements, including EDEN14 and EDEN16 in Edenbridge, will replace any identified net losses in terms of overall amount, mix of unit sizes and affordability for local businesses.

This would provide a settlement level evidence base that can support district wide decisions on the distribution of new employment land and the protection of existing industrial estates, while making sure that the situation in Edenbridge is properly understood and addressed.

b) Changes needed in the Local Plan using this evidence

1. Supporting text in the Employment and Economy chapter

We request that the supporting text on industrial and business floorspace is amended so that it:

Describes the District's main industrial estates in a way that reflects the Study, recognising their role in providing scarce, affordable industrial and distribution space close to the M25. This should include Swanley, the Vestry Trading Estate in Sevenoaks and the Edenbridge industrial estate around Station Road and London Road.

States that the evidence recommends a firm line against further erosion of these established industrial areas and that the Plan therefore seeks to safeguard and, where appropriate, intensify them primarily for employment uses rather than mixed use redevelopment that would reduce overall employment floorspace.

This would apply district wide, while giving a clear context for decisions affecting Edenbridge.

2. Strategic Policy EMP1

We request that Strategic Policy EMP1 is strengthened so that it clearly commits to safeguarding the District's main established industrial estates. For example, by adding wording that:

Prioritises the protection and renewal of major industrial estates and trading areas where they provide significant concentrations of affordable industrial and distribution premises serving the wider District, including those at Swanley, the Vestry Trading Estate in Sevenoaks and the Edenbridge industrial estate.

This would operate district wide but would give particular weight to the kind of estate described in the evidence at Edenbridge.

3. Strategic Policy EMP3 on existing employment land

We request that Strategic Policy EMP3 is amended so that:

The policies map will identify the full extent of the main industrial estates and trading estates in the District.

Within these identified employment areas, further eating away at the edges will not be permitted and proposals will be expected to maintain or increase the overall amount of employment floorspace.

This approach is explicitly justified by the evidence that these areas, including the Edenbridge industrial estate, provide rare and important stocks of affordable industrial floorspace and are operating with low vacancy.

This would convert the Study's firm line recommendation into a clear, district wide policy that also protects Edenbridge.

4. EMP2 and replacement of net losses

We request that the EMP2 allocation table and supporting text are amended so that:

Where the evidence shows a recent net loss of employment floorspace in a main employment settlement, the Local Plan allocations in that settlement should, as a minimum, aim to replace that loss in appropriate B2, B8 and E g uses.

There is a particular emphasis on small and grow on units where this reflects local needs that are identified in the evidence.

The role of individual allocations, including EDEN14 and EDEN16 in Edenbridge, is explained in this context so that it is clear how they contribute to replacing recorded losses and meeting local demand for affordable workspace.

This would set a general principle across the District, while directly addressing the recorded net loss of 1,801 square metres in Edenbridge.

5. Edenbridge town centre vision text

As Policy EDN1 is settlement specific, we consider that it is appropriate for it to respond directly to the Edenbridge evidence. We therefore request that the Edenbridge Town Centre Vision and policy include a new project bullet that:

Commits to delivering new and improved workspace in and around Edenbridge town centre, including affordable start up and grow on space and flexible co working facilities.

States that this reflects the Economic Needs Study recommendation that such provision should extend beyond Sevenoaks and Swanley and recognises Edenbridge's role as a main employment centre.

This would give a clear route for implementing the Study's workspace recommendations in Edenbridge within the district wide approach.

5. Requested Changes

We ask that the Council prepares an addendum to the 2025 Economic Needs Study that provides settlement level analysis of employment floorspace gains and losses, small unit changes and prior approvals for the main employment towns, including Edenbridge, and shows clearly where net deficits exist that need to be addressed through allocations and policy.

We ask that the Council amends the Employment and Economy chapter so that the main industrial estates and trading estates across the District, including the Edenbridge industrial estate, are explicitly recognised as strategic employment locations that provide rare affordable industrial space, and that Strategic Policies EMP1 and EMP3 are strengthened to safeguard these areas, prevent further erosion of their boundaries and require no net loss of employment floorspace within them.

We ask that the Council amends EMP2 and its supporting text so that, where the evidence shows a recent net loss of employment floorspace in a main employment settlement, the Plan's allocations in that settlement, including EDEN14 and EDEN16 in Edenbridge, are required to at least replace that loss in suitable B2, B8 and E g space with a focus on small and grow on units, and that the Edenbridge town centre vision is updated to include delivery of new affordable workspace and co working facilities in line with the Economic Needs Study.

6. Regulation 19 soundness and legal points

Justified and positively prepared distribution between settlements

The evidence is not sound because it provides only District wide employment land requirements and does not assess how these needs should be shared between Sevenoaks, Swanley, Edenbridge and Westerham, even though these are the main employment centres. The Local Plan then heavily favours Swanley for new industrial land while Edenbridge, which the Study identifies as a key employment centre and records as having a net loss of 1,801 square metres, receives only modest and partly undefined allocations.

This undermines the justified test, which requires a clear explanation of the chosen spatial approach and consideration of reasonable alternatives, for example directing more of the 6.3 hectares to intensification or expansion at Edenbridge. It also weakens the positively prepared test because the evidence does not show that economic needs are being met in a balanced way across the main settlements.

Justified and effective failure to secure a firm line for Edenbridge

The evidence is not sound because it explicitly identifies the London Road and Edenbridge industrial area as a rare and strategic concentration of affordable industrial floorspace around the M25 and calls for a firm line against further erosion. The Local Plan only offers generic wording on employment land and open ended references to intensification and possible Article 4 Directions, without specific protection for Edenbridge's industrial estate.

This means the Plan is not clearly effective in safeguarding what its own evidence describes as critical to the District's economic base and does not fully support the National Planning Policy Framework objective of building a strong, competitive economy by ensuring that sufficient land of the right type is available in the right places.

Justified and effective prior approvals and small units

The evidence is not sound because it notes a net loss of 3,800 square metres and 34 small units through prior approvals, many in rural locations, but does not analyse how this affects particular settlements such as Edenbridge, which is identified as an important cluster of small industrial and distribution units and is already in net loss overall.

Without settlement level analysis, the Plan cannot show that its approach to Article 4 Directions, change of use criteria and new allocations is effective in managing these losses in Edenbridge. This weakens both the justified and effective tests because the chosen policies are not clearly supported by detailed evidence on where losses are concentrated.

Positively prepared and consistent with national policy rural service centres

The evidence is not sound because it does not explicitly assess the employment land needs of Edenbridge as a rural service centre in the context of higher housing numbers and the National

Planning Policy Framework emphasis on supporting thriving rural communities and a strong rural economy. The Local Plan then under allocates clearly defined employment land in Edenbridge compared with Swanley, despite the town's recognised employment role and recorded losses.

This raises issues under the positively prepared test and consistency with national policy, as there is a risk that too much of the new employment growth is concentrated in the north of the District, while a key rural centre experiences erosion of affordable local jobs and workspace.

Effective and monitoring over the plan period

The evidence is not sound because, although it acknowledges rapid economic change and recommends close monitoring of employment floorspace gains and losses, there is no clear link from that recommendation to a Local Plan monitoring framework which would trigger review or additional allocations if Edenbridge continues to lose industrial units.

This weakens the effective test, because the Plan is not clearly adaptable over the full period to 2042 in response to continued losses in a key employment location such as Edenbridge.

On legal compliance and equalities, the Study itself does not obviously create direct issues, but a spatial approach that concentrates new employment in Swanley and allows continued losses in Edenbridge could lead to more unsustainable commuting and weaker local job access for Edenbridge residents. This may have indirect equality impacts which should be examined carefully in the Sustainability Appraisal and Equalities Assessment.

Edenbridge Impact

In its current form the evidence accepts an ongoing net loss of employment floorspace in Edenbridge while most new industrial provision is directed elsewhere, which risks undermining Edenbridge's role as a main provider of affordable local jobs and workspace compared with other settlements.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Economy and Viability – Settlement Hierarchy

This Settlement Hierarchy is a technical paper that scores and ranks all settlements in Sevenoaks District by services and transport, and the Council says it will use it to help decide the pattern of development in the new Local Plan, so the way Edenbridge is treated in it really matters.

1. What the document does

The Sevenoaks District Settlement Hierarchy 2025:

- It classifies settlements from Principal Town down to Cluster.
- It gives each place a numerical score based on population, whether it has an urban confines boundary, the range of services and facilities within the settlement or 1.2 kilometres, and public transport access, particularly rail and bus.

For Edenbridge, including Marlpit Hill, it:

- Labels Edenbridge as a Town alongside Swanley and Westerham.
- Records a population of 9,214 and a total score of 176.
- Describes Edenbridge as having a good range of services and facilities and two stations providing links to Central London and Gatwick Airport.

The Council says that this hierarchy will help determine the general distribution of development in the emerging Local Plan and identify which settlements are most suitable to accommodate additional growth. In other words, the higher a place scores for apparent sustainability, the more it is likely to be seen as a focus for new development.

2. What is good for Edenbridge

The hierarchy recognises Edenbridge as a main settlement

The hierarchy does at least acknowledge that Edenbridge is one of three Towns and the third largest settlement in the District. Table 2 shows that Edenbridge's score of 176 is close to Swanley's 182 and clearly above Primary and Secondary Service Settlements.

This reflects the reality that Edenbridge is already functioning as a main service centre rather than as just another large village, even though, as set out below, the way that role is measured is very limited.

The Edenbridge proforma records the breadth of services

Appendix A's proforma for Edenbridge gathers together a useful list of what is currently present. It gives points for:

- Two rail stations on two different lines.
- Six bus routes.
- EV charging and public cycle storage.
- A primary school and three nurseries or childcare settings.
- A GP surgery, three dentists, three other medical facilities and an older persons care facility.
- A post office and nine convenience, pharmacy, or newsagent outlets.
- A community hall, recreation ground and a range of other community uses.

This helps show that Edenbridge is already providing day to day services for people living in the town and in the surrounding rural area.

The methodology is explained openly

The hierarchy explains what counts as a key service and that these attract higher scores. It explains that facilities within a 1.2 kilometre walking distance are counted, referencing the idea of a fifteen minute settlement, and it sets out how rail stations are scored for frequency, additional lines, fast London services, footfall and walking or cycling distance.

That transparency makes it easier to identify where the method is too crude, where it does not reflect how services actually operate, and where it can distort decisions that affect Edenbridge.

3. What is vague or risky for Edenbridge

It mostly counts facilities, not whether they actually work for people

For Edenbridge, around 95 per cent of the total score comes from counted facilities and transport. Only 9 points come from population.

Under this approach, more GPs, more dentists, or more small convenience shops all add points. The proforma does not ask:

- Whether there are enough GP or dentist appointments for the current population and wider rural catchment.
- Whether the convenience stores and pharmacies are the right size, quality, and price range to meet every day needs.
- Whether opening hours and accessibility match how residents actually live and work.

The absence of a secondary school in Edenbridge appears as a single zero in one cell of the proforma and is not given any extra weight, even though Swanley is praised in the text for having both primary and secondary provision and gains additional points for this.

For Edenbridge, the effect is that a cluster of small shops and several health premises can offset a major strategic gap in secondary education and any existing pressures on services. A long list of facilities on paper is then treated as a sign of sustainability, without testing whether those facilities are coping in reality.

Population and rural catchment are underplayed

Population is scored at one point per 1,000 residents. Sevenoaks Urban Area gets 29 points, Swanley 17 and Edenbridge 9, but these figures are small compared with the many service and transport points.

The Council accepts that this is a largely rural district and that many smaller settlements rely on larger ones for services, yet the scoring:

- Gives no explicit recognition to the fact that Edenbridge is the main service hub for a swathe of hamlets and villages in the south, such as Hever, Cowden, Marsh Green, Four Elms, and Chiddingstone Causeway.
- Scores those smaller settlements sparsely in their own right and then does not reflect their demand back into the assessment of Edenbridge.

Meanwhile, Westerham scores only 126, which would place it in the Primary Service Settlement band but is kept in the Town category by exception because it has historically been treated as a town and has a Town Council.

So, for Westerham, historic status is allowed to override the scoring. For Edenbridge, there is no similar uplift to reflect its wider rural catchment. That combination of choices does not read as a neutral or balanced treatment of different settlements.

Rail scoring ignores reliability and capacity, despite clear evidence

The hierarchy gives considerable weight to rail access and describes the District as having strong rail connections. It lists four lines, including both the Tonbridge to Redhill line via Edenbridge Town and the Uckfield to London line serving Edenbridge. It notes that Edenbridge has two stations, one with a service to one London Terminal and one with links to Gatwick. These factors all generate a strong rail score for Edenbridge.

However, in the methodology change table the Council acknowledges that it is aware of periodic reliability issues with rail and bus services, then states that there is no clear way to accurately measure reliability and therefore declines to include it in the scoring, saying it will be addressed case by case at planning application stage.

Your Train Station Presentation uses RealTimeTrains, OnTimeTrains, operator data and Network Rail's Framework Capacity Statement 2024 to show that:

- The Uckfield to London Bridge line has had persistent reliability and cancellation issues over a six month period.
- Network Rail itself states that the line has very little spare capacity.
- Other authorities along the Uckfield corridor are planning significant new housing that will draw on the same limited rail capacity.

With existing development and Local Plan growth, Edenbridge's population will be moving towards 15,000 and above, yet there is no evidence in this hierarchy of how rail services will be improved to match that role.

Reliability and capacity are clearly measurable, and public data exists. The decision not to include them means the hierarchy presents Edenbridge as more accessible and sustainable by rail than the evidence supports.

Employment role is treated inconsistently with other Local Plan evidence

The Edenbridge proforma shows zero points for Designated Business Area, because it only counts the employment areas designated in the previous Allocations and Development Management Plan.

At the same time, other parts of the emerging Local Plan and its economic evidence make clear that Edenbridge has established industrial and commercial clusters, and that the Plan relies on some of these for intensification and mixed use.

We are not arguing that Edenbridge should receive a higher score here, because a higher score would be used as a further indicator of apparent sustainability. The issue is that the Settlement Hierarchy and the economic evidence are not describing the town's employment role in a consistent way. One part of the evidence base behaves as if Edenbridge has no significant employment areas. Another part depends on the existence of those areas. That inconsistency raises questions about how safely the hierarchy can be used to inform development decisions.

A single snapshot is being used for decisions up to 2042

The Council acknowledges that the hierarchy is a technical document auditing services and facilities at a specific point in time and that changes will need to be picked up in future iterations.

At the same time, it states that this hierarchy will help identify which places are most suitable to accommodate additional growth and will inform the distribution of development in the Local Plan up to 2042.

For Edenbridge, this is problematic because:

- Rail performance, bus routes, GP and dentist capacity, shop openings and closures, and community facilities can all change significantly in a few years.
- Rail research already shows that the present position on reliability and capacity is more constrained than the hierarchy suggests.

If the hierarchy is selective or overly optimistic today about something as fundamental as train services, that casts doubt on its use as a long term anchor for deciding where further development and investment should be focused over the next fifteen years.

4. What to change

These changes are drafted for use across the District, but they are grounded in the Edenbridge evidence.

Spell out that the hierarchy is only one piece of evidence

In the executive summary and introduction, add wording such as:

“This Settlement Hierarchy provides an indicative assessment of relative accessibility to services and facilities at a point in time. It is only one part of the evidence base for the Local Plan and does not in itself determine how much development any settlement should

accommodate. The spatial strategy will also need to reflect service and infrastructure capacity, real world public transport performance, and the wider role of each settlement in serving surrounding communities.”

This would make clear that a high score for Edenbridge is not, on its own, sufficient justification for directing further growth here.

Take account of capacity, quality, and rural catchment, not only counts

In the methodology section on services and facilities, add:

“When interpreting the facilities score for a settlement, the Council will take account of evidence on the capacity and quality of key services, and any significant deficiencies, for example where a settlement lacks a secondary school or where health, education or childcare services are operating at or near capacity. For larger settlements which act as service centres for surrounding rural communities, the assessment will recognise their wider catchment and the additional demand this generates.”

In the Edenbridge description within the Towns section, add:

“Edenbridge also functions as a service centre for a wide rural hinterland in the south of the District and beyond, and this wider catchment generates additional demand on its schools, health services, retail and community facilities.”

This would ensure that the interpretation of Edenbridge’s score reflects its real pressures and responsibilities.

Include rail reliability and capacity in the transport approach

Replace the statement that there is no clear way to measure reliability with wording along these lines:

“In addition to the number of lines and scheduled services, the Council will consider publicly available information on rail and bus performance and network capacity, including train operator data and Network Rail capacity statements. Where these sources identify persistent reliability issues or very limited spare capacity on a route, this will be treated as a constraint when assessing the relative sustainability of settlements and their ability to accommodate further development reliant on these services.”

In the Edenbridge profile, add:

“Although Edenbridge benefits from two rail stations, publicly available performance and capacity data indicate that services on the Uckfield to London Bridge line are subject to reliability issues and have very limited spare capacity. This constraint will need to be addressed through engagement with Network Rail and the train operator if further significant growth is to be supported on the basis of rail accessibility.”

This would bring the transport assessment closer to the reality already evidenced by the Residents’ Association.

Align references to employment with the wider evidence

In the facility scoring table, adjust the employment entry to say:

“Employment: one point for each designated or allocated employment area, including significant existing industrial and commercial clusters identified in up to date Local Plan and Economic Needs evidence. This element of the score does not in itself justify directing additional growth to that settlement.”

Update the Edenbridge text so that it acknowledges the presence of established employment areas in a way that is consistent with the economic and employment evidence, without treating that as a reason to encourage further development pressure.

Explain how the hierarchy will be used alongside other evidence

In the conclusion, add:

“The Settlement Hierarchy will be used alongside, rather than instead of, other evidence on infrastructure capacity, service performance, and environmental constraints. Where the hierarchy indicates that a settlement appears relatively sustainable but other evidence identifies significant constraints, for example in rail capacity or education and health provision, the amount and type of development directed to that settlement will be limited accordingly and may require prior or parallel investment in infrastructure.”

This would help to prevent a simple numerical score being treated as the deciding factor when considering further development in Edenbridge.

5. Requested Changes

We ask that the Council amends the Settlement Hierarchy so that it moves beyond simple counts of facilities in Edenbridge and explicitly reflects service capacity, the absence of a secondary school and the additional demand from the town’s rural catchment.

We ask that the Council revises the transport methodology and the Edenbridge profile to incorporate publicly available evidence on rail reliability and capacity, including the constraints identified on the Uckfield to London Bridge line, rather than treating the presence of two lines as sufficient evidence of high sustainability.

We ask that the Council aligns the Settlement Hierarchy with the wider Local Plan evidence on employment and clarifies that the hierarchy is only one input into growth distribution, not a standalone justification for directing significant additional development to Edenbridge.

6. Regulation 19 soundness and legal points

Justified

The evidence is not sound because the Settlement Hierarchy relies on a simple count of services and facilities, with minimal weighting for population, no explicit recognition of Edenbridge’s rural catchment and only a single zero entry for the absence of a secondary school. This is not a proportionate or realistic basis for deciding which settlements should accommodate substantial further development.

The evidence is not sound because the hierarchy gives Edenbridge a strong rail score while explicitly choosing not to consider reliability or capacity, despite the availability of public data and clear evidence of constraints on the Uckfield line. This is a methodological choice rather than a data limitation and it undermines the credibility of using the hierarchy to justify development patterns.

Positively prepared

The evidence is not sound because it presents Edenbridge as a highly sustainable location for additional growth without engaging properly with the capacity of its rail services, education and health infrastructure or the demands of its rural hinterland. National planning policy expects plans to be positively prepared to meet needs in ways that are deliverable; an approach that assumes Edenbridge can accommodate more simply because it scores well on paper does not satisfy that expectation.

Effective

The evidence is not sound because it provides a snapshot of facilities and connections at a single point in time, yet it is intended to underpin a spatial strategy to 2042. In a context where rail performance, bus services and local facilities can change rapidly, and where the methodology does not incorporate reliability and capacity, there is a real risk that policies based on this hierarchy will not remain effective over the plan period for Edenbridge.

Consistent with national policy

The evidence is not sound because the National Planning Policy Framework expects spatial strategies to guide development towards sustainable solutions while taking local circumstances, including infrastructure capacity and service roles, into account. By overstating Edenbridge's apparent accessibility and underplaying its constraints and wider service function, the Settlement Hierarchy risks supporting a distribution of growth between settlements that does not fully reflect those local circumstances.

Edenbridge Impact

Taken together with your rail evidence, this Settlement Hierarchy tends to overstate how sustainable Edenbridge is and understate both its service pressures and infrastructure constraints, making it easier for the emerging Local Plan to direct proportionately more growth to Edenbridge than its current rail, education, health, and other services can realistically support compared with other settlements.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Economy and Viability – CIL Viability

This is the Council's Stage 1 Local Plan Viability and Community Infrastructure Levy (CIL) assessment. It uses broad, district wide assumptions to judge overall viability and leaves all settlement and site specific testing to a later Stage 2.

1. What this document does

It uses standard mixes of houses and flats and standard build costs to test a range of "typical" development types, including 500 home and 2,500 home greenfield schemes.

It divides the district into six "placemaking" value areas and nine value levels. Edenbridge falls in the lower value "South" area, using value levels VL3 to VL7.

It incorporates the headline policy costs for 20 to 50 per cent affordable housing, Nationally Described Space Standards, water efficiency, electric vehicle charging, ten per cent Biodiversity Net Gain, M4(2) and M4(3) accessibility, the Future Homes Standard uplift, and the Building Safety Levy.

It treats CIL at the current indexed rates as a fixed cost plus a flat three thousand pounds per dwelling section 106 allowance for all typologies.

It concludes that small and medium greenfield sites are generally viable at around 40 per cent affordable housing, while brownfield and all flatted schemes face more significant viability pressure. For large strategic sites, it suggests that around 30 to 40 per cent affordable housing might be achievable but confirms that these require detailed Stage 2 testing once infrastructure requirements and costs are clearer.

It states that this is interim Stage 1 work. Stage 2 is expected after Regulation 18, with settlement specific modelling and appraisal of strategic allocations once infrastructure needs and costs are defined.

2. What is helpful for Edenbridge

It clearly identifies Edenbridge as a lower value location within the "South" value area and recognises that development values here are lower than in Sevenoaks and central rural areas. This acknowledges that Edenbridge has less viability headroom.

It recognises that large strategic sites require substantial infrastructure such as schools, significant junction works and local centres and confirms that detailed, bespoke viability testing is required before any firm conclusions can be drawn.

It confirms that Stage 1 findings are provisional and subject to ongoing review, with full viability and CIL review to follow Regulation 18. This acknowledges that the evidence base for the level of growth planned in Edenbridge is not yet complete.

It sets out clearly that new homes must meet the cumulative policy requirements for Biodiversity Net Gain, accessibility, energy standards, and EV charging, rather than assuming these can be absorbed within generic build cost assumptions.

3. What is vague or risky for Edenbridge

a) CIL and section 106 are used as broad proxies without reference to actual Edenbridge infrastructure needs

The report applies current CIL rates and a flat three thousand pounds per dwelling section 106 allowance as a stand in for infrastructure costs. This approach does not reflect the specific list of infrastructure identified for Edenbridge in the emerging Local Plan, which includes a secondary school, enhanced stations access, education and youth facilities, junction improvements, walking and cycling links and town centre reinvestment.

For 2,801 homes, the actual scale of required infrastructure in Edenbridge is far greater than the broad proxy used in this assessment. Affordable housing is also largely exempt from CIL, reducing the real level of available funding. None of this is tested at settlement level.

b) No settlement specific viability or infrastructure testing for Edenbridge

The assessment uses district wide typologies and generic values. There is no Edenbridge specific appraisal using:

Edenbridge “South” area values, the Edenbridge CIL charging zone, and a costed Edenbridge infrastructure package reflecting the Local Plan.

Lower development values and lower CIL receipts in Edenbridge are not modelled against the substantial infrastructure burden placed on the town. The absence of this assessment leaves a critical gap in understanding whether the growth strategy is deliverable in Edenbridge.

c) Strategic typologies do not reflect the Edenbridge infrastructure burden

The 500 and 2,500 home typologies show apparently strong residual values, but they rely on the same generic CIL and section 106 proxies used for small sites. The report itself accepts that strategic sites normally require new schools, major junction upgrades, and new local centres and that more specific testing is needed.

For Edenbridge, once a secondary school, strategic highway works, station access, walking and cycling schemes and town centre improvements are factored in, viability may be significantly reduced. This scenario is not tested.

d) Distribution of impacts between settlements is not assessed

The study does not consider the balance between where development happens and where infrastructure funding is available. Higher value settlements can generate substantially higher land values and CIL receipts. Edenbridge, a lower value settlement, is expected to accommodate a significant proportion of growth without a clear demonstration that the resulting funding will be sufficient to meet the town’s infrastructure needs.

e) Stage 1 findings are treated as sufficient support for the Local Plan despite being incomplete

The report states that Stage 1 is high level, uses generic typologies and does not provide formal valuation advice. Despite this, it is still used to suggest that the Local Plan's policy suite is broadly viable.

Given the scale of development planned for Edenbridge, this is not supported by the evidence available. The essential settlement specific testing has not yet been carried out.

f) CIL and section 106 are not realistic funding routes for Edenbridge's strategic transport needs

The document gives no account of rail or bus capacity in Edenbridge or of the transport impacts of 2,801 homes. Strategic transport interventions for Edenbridge, particularly rail, fall outside the scope of CIL funding and depend on bodies such as Network Rail, train operators, and Kent County Council. The evidence does not identify a credible route for securing these improvements.

g) Edenbridge is placed in a broad value category without settlement level evidence

Edenbridge is grouped into a wide "South" area. No settlement specific price evidence or sensitivity testing is supplied, despite the heavy reliance on Edenbridge in the growth strategy. The value classification has significant consequences for assessing viability but the underlying data for Edenbridge is not presented.

4. What to change

a) Required changes to the Viability Assessment at Stage 2

Stage 2 should:

Provide clear settlement specific Infrastructure and Viability statements for all major growth locations, including Edenbridge, setting out:

the full list of infrastructure required to support the scale of growth proposed, cost estimates and timing, and expected funding sources including CIL, section 106, and external funding partners.

Model Edenbridge specific viability using:

- the Edenbridge "South" value levels for relevant typologies,
- the correct Edenbridge CIL rates, and
- a detailed and realistic Edenbridge infrastructure cost breakdown, rather than a flat section 106 proxy.

Set out transparently whether Edenbridge's strategic sites remain viable once **real** infrastructure obligations and policy requirements are included.

b) District wide Local Plan wording responding to the Edenbridge evidence

Suggested text:

"Where the Local Plan proposes significant growth in lower value locations, the Council will prepare settlement specific infrastructure and viability statements. These will identify the full

infrastructure package required, the anticipated funding from Community Infrastructure Levy and section 106, and any funding gap. Strategic allocations will only be progressed where settlement specific testing demonstrates that the required infrastructure and policy requirements can be delivered.”

“Where Community Infrastructure Levy receipts from lower value locations contribute to district wide infrastructure, this will not compromise the delivery of the infrastructure necessary to support the communities accommodating growth.”

“For locations where the Local Plan proposes significant growth and where public transport is already constrained, the Council will prepare settlement specific transport strategies. These will identify current capacity and performance, model the impact of planned growth, and set out the necessary interventions, distinguishing between those fundable through development contributions and those requiring action by external transport bodies.”

These additions retain district wide applicability while addressing evidence gaps relevant to settlements such as Edenbridge.

5. Requested Changes

We ask that the Council publishes a settlement specific Infrastructure and Viability Statement for Edenbridge before submitting the Regulation 19 Local Plan, setting out the full infrastructure required for 2,801 homes and the expected funding sources.

We ask that Stage 2 of the Viability Assessment includes Edenbridge specific modelling using local development values, CIL rates, and a detailed breakdown of Edenbridge infrastructure costs.

We ask that the Local Plan is updated so that strategic growth in lower value locations is supported by settlement level viability testing demonstrating deliverability of infrastructure and policy requirements.

We ask that the Council prepares a settlement specific Transport and Access Strategy for Edenbridge, identifying required rail, bus, walking and cycling improvements and setting out realistic funding routes.

We ask that the scale and phasing of growth in Edenbridge is reviewed if the required infrastructure cannot be shown to be fully funded and deliverable.

6. Regulation 19 soundness and legal points

Positively prepared and consistent with national policy on infrastructure and viability

The evidence is not sound because the plan allocates 2,801 homes to Edenbridge without identifying, costing, or funding the full infrastructure needed. The National Planning Policy Framework requires a clear understanding of infrastructure needs and deliverability over the plan period. This has not been demonstrated for Edenbridge.

Justified and evidence based

The evidence is not sound because the Stage 1 findings are explicitly provisional and rely on generic typologies, yet the Local Plan uses them to support a major concentration of growth in a lower value settlement. Reasonable alternatives have not been assessed against a complete or comparable evidence base.

Effective and deliverable

The evidence is not sound because there is no settlement specific assessment of whether CIL and section 106 from 2,801 homes in Edenbridge can fund a secondary school, town centre improvements, major transport upgrades, and other required infrastructure. Without this, the growth strategy cannot be shown to be deliverable.

Consistent with national policy on cumulative policy impacts

The evidence is not sound because the cumulative impact of Local Plan policies has not been tested for Edenbridge. The strategic sites have not been appraised with realistic local infrastructure costs alongside affordable housing, higher building standards, and other policy burdens.

Consistent with national policy on sustainable transport

The evidence is not sound because national policy expects plans to identify the infrastructure required to support sustainable travel. The CIL and viability assessment does not test the transport infrastructure needed for 2,801 additional homes in Edenbridge or assess whether the assumed CIL and section 106 contributions are capable of funding the necessary improvements. Without identifying these requirements or their cost, the evidence cannot demonstrate that the Local Plan's transport aims can be delivered in Edenbridge.

Equity between settlements

The evidence is not sound because it concentrates a large proportion of development in a lower value settlement without demonstrating that the necessary infrastructure will be secured. This raises concerns about equitable access to facilities, services, and transport.

Edenbridge Impact

The current evidence treats Edenbridge as a generic test case and does not show that CIL and section 106 from 2,801 homes in a lower value settlement will cover the schools, transport and town centre improvements required, leaving Edenbridge at clear risk of receiving insufficient infrastructure for the scale of growth proposed.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Greenbelt & Environment – Green Belt Assessment

1. The Four Green Belt Documents

These four Green Belt reports set out how the Council proposes to judge Green Belt across the District and apply that method to land around Edenbridge. They currently label every Edenbridge sub-area as **“provisional grey belt,”** but at Regulation 18 this is **only an officer technical view** and has **no formal status** until a Local Plan is adopted.

- **Stages 1 & 2 Green Belt Assessment Methodology** – explains the criteria for assessing Green Belt and the approach to identifying “provisional grey belt”. Grey belt is defined as land that does *not* strongly meet Green Belt purposes (a), (b) or (d) and is *not* covered by National Planning Policy Framework (NPPF) “footnote 7” constraints such as National Landscape, Sites of Special Scientific Interest (SSSI) or functional floodplain.
- **Stage 1 Green Belt Assessment** – assesses large parcels. For Edenbridge this includes **Parcel 25 to the south**, which is described as strongly rural countryside, important to the setting and special character of the historic town and given the top scores for protecting countryside (purpose (c)) and the historic town (purpose (d)).
- **Stage 2 Green Belt Assessment – Main Report (October 2025)** – sub-divides the Green Belt into smaller sub-areas, including **ED-01 to ED-53** around Edenbridge. Each sub-area is scored against the five Green Belt purposes, and certain areas are flagged as “provisional grey belt.” All Edenbridge sub-areas are placed in this provisional grey belt category. Every sub-area district-wide is automatically given a score of 1 for purpose (e) (assisting urban regeneration).
- **Stage 2 Green Belt Assessment – Annex (Edenbridge)** – contains the detailed proformas for ED-01–ED-53: descriptions, scoring, comments under “wider considerations”, and observations on whether releasing a sub-area would create “holes” or “islands” of Green Belt. It also confirms for each Edenbridge sub-area that there is **no National Landscape designation**.

In summary, the documents recognise Edenbridge as a historic town in a rural valley but still treat **all of the assessed Green Belt around Edenbridge as “provisional grey belt,”** even though that label is not yet agreed and carries no statutory weight at Regulation 18.

2. What's good for Edenbridge

Clear evidence that countryside south of Edenbridge is important

- Parcel 25, south of Edenbridge, is described as strongly rural countryside with farmland, tree belts, the River Eden, and long views across the valley.
- The assessment states that this land is important to the setting and special character of the historic town, including views along Mill Hill towards the historic core.
- Parcel 25 receives the highest scores (5) for purpose (c) (safeguarding the countryside from encroachment) and purpose (d) (preserving the setting and special character of the historic town).

This is strong, specific evidence that the landscape south of Edenbridge is not spare or residual land, but integral to the town's character and setting.

Recognition that much of Edenbridge's edge is real countryside

The Edenbridge Annex shows that many sub-areas (including ED-01, ED-03, ED-05, ED-06, ED-42, ED-49, and ED-52):

- contain very little or no built development (often less than 1–2% built form),
- are mainly grassland or agricultural fields,
- are described as having a “strongly rural” or “largely rural” character, and
- receive high scores (often 4 or 5) for purpose (c), safeguarding countryside from encroachment.

The Council's own evidence therefore confirms that much of the Green Belt around Edenbridge is functioning effectively as open countryside.

Acknowledgement that Edenbridge is a historic town

- The Methodology lists Edenbridge as a historic town for the purposes of assessing purpose (d).
- Sub-area ED-30 is explicitly noted as adjoining and overlapping the historic core and helping to maintain the town's setting and special character.

This establishes, in the Council's own evidence, that Green Belt around Edenbridge has a specific historic role as well as a countryside role.

Reference to testing against very large Green Belt losses

The Stage 2 Main Report refers to the need to consider whether any Green Belt release would “fundamentally undermine” the purposes of the remaining Green Belt, using Stage 1 “fundamentally important areas” as a benchmark. This is directly relevant to high-scoring, strongly rural parcels around Edenbridge.

3. What's vague or risky for Edenbridge

The “provisional grey belt” label risks being treated as if it is already agreed

- The documents repeatedly use the term “provisional grey belt” and colour almost all Edenbridge sub-areas in grey on the maps.
- Table 5 and Figure 8 in the Stage 2 Main Report show that 205 of 214 sub-areas across the District are treated as provisional grey belt, including **all** ED-01–ED-53 around Edenbridge.

At Regulation 18, these are only preliminary technical judgements. They do **not** change the adopted Green Belt boundaries, do **not** create any current planning presumption in favour of development, and cannot be treated as agreed positions until and unless the Local Plan is adopted. There is a serious risk that this provisional labelling will be misunderstood and used to argue that land around Edenbridge is already accepted as “less Green Belt” than other areas, when this is not the case in policy or law.

Strong countryside performance is not treated as a real constraint on release

For many Edenbridge sub-areas, the Annex records:

- strongly or largely rural character,
- very low levels of built development,
- high scores for purpose (c), and
- statements that they “meet the Green Belt purposes strongly overall.”

Despite this, these same sub-areas are still classified as provisional grey belt solely because they do not strongly meet purposes (a), (b) or (d). The evidence does not state that strong performance against purpose (c), especially on the settlement edge, should normally rule out release. This weakens the protection of genuinely rural Green Belt around Edenbridge and places excessive weight on the absence of some other purpose scores.

Edenbridge is more exposed because it has no National Landscape status

- National Landscapes are treated in the Methodology as a key NPPF footnote 7 constraint that can prevent land being treated as grey belt.
- The Edenbridge Annex confirms that every Edenbridge sub-area is outside a National Landscape.

The effect is that settlements within National Landscapes elsewhere in the District benefit from extra protection, while non-designated Edenbridge is heavily exposed to provisional grey-belt classification. This creates an imbalance between settlements and increases the risk that Edenbridge carries an unsustainable share of Green Belt release.

Historic setting is treated inconsistently between Stage 1 and Stage 2

- Stage 1 finds that Parcel 25 plays an important role in maintaining the setting and special character of the historic town (score 5 for purpose (d)).
- In Stage 2, several sub-areas that abut the historic town (including ED-01, ED-03, ED-05, ED-25, ED-26, ED-27, ED-42, ED-49 and ED-52) repeatedly state that they “do not play a

role” in maintaining the historic setting or special character of the town and are scored 0 for purpose (d).

The evidence does not explain how land which clearly contributes to the historic setting at Stage 1 is then treated as making no contribution at Stage 2 once divided into smaller parcels. This inconsistency reduces the reliability of the Stage 2 scoring for Edenbridge and understates the role of land that obviously forms part of the town’s historic landscape context.

Heavy reliance on aerial photography and template wording at Edenbridge

The Annex acknowledges that a number of Edenbridge sub-areas (for example ED-01, ED-03, ED-06, ED-22–27 and ED-42) were assessed largely from aerial photography because of limited access or views. Even so, the pro-formas use confident and often identical statements about views, experiential qualities, and relationships to the historic core.

For permanent decisions on Green Belt boundaries around a historic town, this level of desk-based and formulaic assessment is weak. It does not provide robust, locally specific evidence on how land around Edenbridge actually functions on the ground.

“Hole” and “island” reasoning encourages larger Green Belt releases

In several Edenbridge sub-areas (including ED-01, ED-12, ED-22, ED-25, ED-27, ED-42, ED-49 and ED-52), the Annex suggests that releasing the land would create a “hole” or “island” of Green Belt and that the Council should consider releasing more land to create a “tidier” or more “coherent” boundary.

This goes beyond neutral description and actively steers the Council towards wider Green Belt loss around Edenbridge once any sub-area is under consideration. It risks turning a limited release into a much larger one, driven by aesthetic concerns about boundary shape rather than the purposes of the Green Belt.

Purpose (e) is pre-judged in a way that normalises Green Belt development

The Methodology and Stage 1 treat the entire Sevenoaks Green Belt as playing only a limited role in assisting urban regeneration. This judgement is then simply carried forward into Stage 2 so that all 214 sub-areas, including all Edenbridge ED-areas, automatically receive a score of 1 for purpose (e). There is no meaningful exploration of how the new Local Plan could shift more development onto brownfield or non-Green Belt land, including in accessible locations.

This approach reinforces past patterns of development in the Green Belt instead of seeking improvement, and it weakens the case for protecting high-performing Green Belt around Edenbridge.

Previously developed land alternatives have not been properly used or explained

It is also notable that several parcels of **previously developed land (PDL)** or part-PDL offered to the Council have not been taken forward in this assessment, while “pure” open Green Belt around Edenbridge is swept into the provisional grey-belt category. Some of those omitted PDL sites may in reality be more “grey” in planning terms than the open countryside now identified as provisional grey belt, yet the evidence does not transparently explain why PDL options have been excluded or rejected before placing heavy pressure on undeveloped fields around Edenbridge.

At Regulation 18, this selective use of the grey-belt label risks misleading the public and decision-makers about where the truly least harmful options lie.

4. What to change

(All suggested changes are district-wide but are clearly justified by the Edenbridge evidence.)

A. Clarify that “provisional grey belt” has no status before adoption

In the Methodology and Stage 2 Main Report, immediately after the explanation of “provisional grey belt”, add wording along the following lines:

“The identification of any land as ‘provisional grey belt’ at Regulation 18 is an officer technical judgement only. It does not alter the adopted Green Belt boundaries, does not create any presumption in favour of development, and will only carry weight if and when confirmed through adoption of the Local Plan following independent examination.”

At the start of each settlement Annex, including Edenbridge, add:

“The findings in this Annex are provisional and relate only to Green Belt purposes (a)–(e). They do not consider detailed housing needs, brownfield capacity, flood risk, biodiversity, or infrastructure capacity. No assumption should be made that land identified as provisional grey belt is suitable for development or release from the Green Belt.”

B. Ensure equity between designated and non-designated settlements

In the grey-belt section of the Methodology, following the grey-belt definition, include:

“When applying grey belt and NPPF footnote 7 judgements, the Council will ensure that settlements without environmental designations such as National Landscapes, including but not limited to Edenbridge, are not expected to accommodate a disproportionate share of Green Belt release compared with more constrained settlements, and that reasonable alternatives are considered across the District.”

C. Lock in Stage 1 historic-setting conclusions at Stage 2

In the Stage 1 report, under the discussion of purpose (d), add:

“Where Stage 1 parcels are found to play an important role in maintaining the setting and special character of a historic town (score 5 for purpose (d)), subsequent Stage 2 subdivision will maintain that conclusion for the relevant sub-areas unless clear, locally specific evidence is provided to justify a different score.”

And add:

“The Council will identify on settlement-based maps the ‘fundamentally important areas’ of Green Belt around each historic town, including land where Stage 1 assessment finds an important role in maintaining the town’s setting and special character, and will not propose these areas for release.”

D. Treat strong countryside performance as a constraint in its own right

In the Stage 2 Main Report, within the explanation of grey belt, insert:

“Across all settlements, strong performance against Green Belt purpose (c) (safeguarding the countryside from encroachment), particularly where land is described as ‘strongly rural’ or

‘largely rural’ and lies close to the settlement edge, will normally be treated as a strong reason not to release a sub-area, even where it is provisionally identified as grey belt.”

E. Fix purpose (e) and require a brownfield-first approach

Replace the current blanket approach to purpose (e) with:

“Past delivery indicates that a relatively high proportion of recent development has taken place in the Green Belt. The emerging Local Plan should therefore seek to improve performance against purpose (e) by optimising brownfield and non-Green Belt opportunities, including in accessible settlements, before Green Belt release is considered.”

And add:

“When considering locations for any Green Belt release, the Council will first identify and assess previously developed land and part-previously-developed land in and around all higher-tier settlements and will explain clearly where such options have been rejected and why they are considered less suitable than any proposed release of open, undeveloped Green Belt.”

F. Remove “hole / island” pressure to widen releases

In all pro-formas where “wider considerations” currently suggest further land should be released to avoid “holes” or “islands,” replace that wording with:

“If this sub-area were released from the Green Belt, some adjoining Green Belt might remain as a ‘hole’ or ‘island.’ Any further changes to the Green Belt boundary would require separate, transparent justification through comparison of options across the District and should not be assumed from this assessment.”

G. Use neutral wording on historic setting at Stage 2

For Edenbridge sub-areas that currently state that they “do not play a role” in the historic setting, substitute:

“Although the sub-area abuts the historic town, this assessment has not identified specific designated heritage assets whose setting depends primarily on this land. A more detailed heritage and townscape study will be required at plan-making or application stage to confirm the sub-area’s contribution, if any, to the setting and special character of the town.”

5. We ask the Council

We ask the Council to:

- Make it explicit and prominent in the Green Belt Assessment that all grey-belt identifications at Regulation 18 are provisional technical judgements, have no policy status, and cannot be treated as agreed until the Local Plan is adopted after independent examination.
- Amend the Methodology and Stage 2 reports so that non-designated settlements such as Edenbridge are not treated as an “easy option” for Green Belt loss simply because other settlements sit within National Landscapes or other designations, and so that strongly rural, high-performing countryside (high purpose-(c) scores) is normally ruled out from release even if currently labelled provisional grey belt.

- Align the Stage 2 Edenbridge sub-area scoring on historic setting with the Stage 1 finding that land south of the town is important to the historic town's character and publish maps of "fundamentally important" Green Belt areas around Edenbridge which are expressly ruled out from release.
- Review the treatment of previously developed land and part-PDL sites so that genuinely more "grey" locations are fully assessed and, where suitable, preferred to the release of open, undeveloped Green Belt around Edenbridge.
- Remove or rewrite the "hole / island" wording in the Edenbridge Annex that encourages a widening of Green Belt loss once any sub-area is considered, and instead state that any wider release would require a fresh, district-wide comparison of options.

6. Regulation 19 soundness & legal points

Not justified – "provisional grey belt" treated as if it were agreed around Edenbridge

The evidence is not sound because it presents all 53 Edenbridge sub-areas as provisional grey belt at Regulation 18 without clearly stating that this label has no policy status until adoption, and without properly reflecting the strong countryside and historic-setting scores recorded in the same documents. This risks giving a misleading impression that Green Belt around Edenbridge is already accepted as weaker and more suitable for development, contrary to the "justified" soundness test.

Not justified – all Edenbridge land treated as grey belt despite strong countryside role

The evidence is not sound because every Edenbridge sub-area is provisionally identified as grey belt even where the pro-formas show very low levels of built development, a strongly rural character, and high scores for purpose (c), and where Stage 1 identifies land south of the town as important to the historic setting. The assessment does not distinguish truly weaker Green Belt from high-performing countryside and does not provide a robust, justified basis for Green Belt release at Edenbridge.

Not justified / not consistent with national policy – inconsistent treatment of historic setting

The evidence is not sound because Stage 1 recognises Parcel 25 as playing an important role in the setting and special character of the historic town of Edenbridge (score 5 for purpose (d)), while multiple Stage 2 sub-areas that abut the town are given a score of 0 for purpose (d) using standardised text that they "do not play a role", without clear, local evidence. This inconsistency undermines the assessment of purpose (d) and is not consistent with national policy expectations to give appropriate weight to the setting of historic towns, failing the "justified" and "consistent with national policy" tests.

Not justified – over-use of aerial photography and template text

The evidence is not sound because the Annex acknowledges that several Edenbridge sub-areas were assessed largely from aerial photography due to limited access or views, yet it still reaches firm conclusions about views, experiential qualities and relationships to the historic core using repeated standard wording. This is not proportionate or robust evidence for permanent Green Belt boundary changes around a historic town and fails the "justified" test.

Not positively prepared / not effective – non-designated Edenbridge exposed by the grey-belt approach

The evidence is not sound because the grey-belt methodology relies heavily on NPPF footnote 7 designations such as National Landscapes to rule land out of grey-belt status, while all Edenbridge sub-areas are recorded as having no such designation. In practice this shields settlements within National Landscapes from release but exposes non-designated Edenbridge to extensive provisional grey-belt identification without a transparent comparison of reasonable alternatives across the District, undermining the “positively prepared” and “effective” tests and creating a clear equity issue between settlements.

Not justified – purpose (e) pre-judged and brownfield alternatives not properly explored

The evidence is not sound because the Methodology and Stage 1 conclude that the whole Green Belt has only a limited role in assisting urban regeneration, and Stage 2 simply applies this conclusion to every sub-area, including all Edenbridge sites, with a uniform score of 1 for purpose (e), without proper examination of brownfield and PDL options in and around higher-tier settlements. This is not a robust or “justified” basis for significant Green Belt loss and risks conflict with national policy expectations to make as much use as possible of suitable brownfield land.

Not justified – previously developed land not transparently considered

The evidence is not sound because some parcels of previously developed land or part-PDL that were offered have not been taken forward, while “pure” open Green Belt around Edenbridge has been placed in the provisional grey-belt category. The documents do not transparently explain why PDL options, which may be genuinely more “grey,” have been rejected in favour of exerting pressure on open countryside, which undermines the justification for the pattern of proposed Green Belt changes.

7. Edenbridge Impact

By labelling almost all of Edenbridge’s countryside as “provisional grey belt” while not clearly preferring previously developed land elsewhere, this Green Belt evidence leaves Edenbridge at serious risk of taking a large share of Green Belt loss compared with more protected or better-tested locations in the District.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Greenbelt & Environment – Landscape and Visual Evidence

This landscape and visual evidence by Arup compares three large growth options **within the Kent Downs National Landscape**. It is part of the justification for putting a great deal of growth in a very sensitive area. That matters for Edenbridge because if this Kent Downs-led strategy has to change at Regulation 19 or examination stage, the Council will be looking for other places to move numbers to, including Edenbridge.

The document

- The report tests three options, all **inside the Kent Downs National Landscape**:
 - nine sites around Sevenoaks / Westerham / West Kingsdown,
 - a large new settlement at Pedham Place (MX15), and
 - a mixed option using both.
- It uses a common method to score landscape and visual effects, with and without assumed mitigation (planting, green infrastructure, “landscape-led” design).
- It concludes that, on this basis, **Pedham Place** performs better than the nine-site option, though all options still cause significant harm.
- It is framed around a **Local Plan 2040** and the **December 2023 National Planning Policy Framework (NPPF)**, not the 2042 plan period and current NPPF.

What's good

- The report is honest that **all three options** would lead to **significant adverse effects** on the Kent Downs National Landscape, even after mitigation. This confirms that the chosen strategy is pushing large amounts of growth into one of the most constrained parts of the district, which is inherently risky.
- The study recognises that to reduce harm on some sites you have to **scale back** development (for example, developing only part of some sites). That is a clear admission that capacity needs to follow landscape limits, not the other way round. The same principle must apply if the Council later looks again at how much growth it puts in other settlements, including Edenbridge.
- The document clearly describes the **assumptions** behind the “with mitigation” scores – especially long-term planting and master planning. This makes it easier to see where the

strategy depends on optimistic delivery assumptions that may or may not be realised in practice.

What's vague or risky

- The strategy shown here is **highly committed to the Kent Downs**. The report does not spell out what will happen if:
 - mitigation at Pedham Place or other Kent Downs sites cannot be delivered as assumed, or
 - the Inspector reduces the scale of major development in the National Landscape.

In that situation, there is a clear risk that the Council will try to redistribute numbers quickly to other settlements, including Edenbridge, without revisiting the overall strategy in a measured way.

- The report is tied to a **2040** plan period and **2023 NPPF** wording but is now being used to support a **2042** plan under an updated NPPF. If that mismatch is challenged at examination, there is a real prospect that the Kent Downs element will be trimmed or re-shaped. Edenbridge would then be exposed to late changes in distribution that this document does nothing to plan for.
- The “with mitigation” scores depend on **long-term woodland and landscape change**. Trees and structural planting take decades to have full effect. If development comes forward early in the plan period but mitigation lags, the actual landscape harm will be closer to the “without mitigation” position. If that undermines confidence in the Kent Downs strategy, the Council will again be looking around for other locations, putting Edenbridge at risk of additional pressure.
- The document does not include any simple commitment that, if the Council changes the scale or mix of the Kent Downs options, it will **re-run its spatial choices across the district**, rather than just pushing extra development onto whichever settlements look least protected. That is the direct risk for Edenbridge.

What to change

We are not asking the Council to re-do the Kent Downs analysis. We are asking for safeguards so that, if this evidence-led strategy has to change, Edenbridge is not treated as a convenient dumping ground.

1. Add a clear “if the strategy changes” safeguard

In the **conclusions** section, after the comparison of the three options, insert wording along the lines of:

“If, through the Local Plan process, the scale or mix of development within the Kent Downs National Landscape differs materially from the options assessed in this report, the Council will need to review the spatial strategy on a district-wide basis rather than reallocating development on an ad hoc basis to individual settlements.”

This makes it clear that any change triggers a proper, district-wide re-look, not a quick shift to places like Edenbridge.

2. Recognise the delivery risk around long-term mitigation

In the text explaining “with mitigation” scores, add a short sentence such as:

“These ‘with mitigation’ judgements depend on long-term delivery of planting and other landscape measures; if these are delayed or under-delivered, effects are likely to be closer to the ‘without mitigation’ position, and this would have implications for the scale of development that can be accommodated.”

This acknowledges that if mitigation does not work as assumed, the Kent Downs capacity claims fall away and the strategy needs to be reconsidered, not simply moved elsewhere.

3. Align the evidence with the 2042 plan period and current NPPF

Add a short update or note to:

- confirm that the analysis has been checked against the **2042** plan horizon, and
- confirm that it has been reviewed for consistency with the **current NPPF**, not only the December 2023 version.

Without this, there is an obvious hook for cutting back the Kent Downs element at examination, with knock-on risks for Edenbridge.

We ask the Council

- **We ask the Council** to add clear wording in the conclusions that any material change in the scale or mix of Kent Downs development will trigger a **district-wide review of the spatial strategy**, not a simple reallocation of numbers to individual settlements such as Edenbridge.
- **We ask the Council** to acknowledge explicitly that the “with mitigation” scores depend on long-term delivery of planting and landscape works, and that if these are not delivered as assumed, the scale of development in the Kent Downs will need to be reviewed rather than shifted elsewhere.
- **We ask the Council** to update or supplement this document so that it clearly relates to a **Local Plan 2042** under the current NPPF, reducing the risk that the Kent Downs-led strategy is cut back late in the process with consequential pressure on other settlements.

Regulation 19 soundness & legal points

- **The evidence is not sound because** it commits a large part of the strategy to a very constrained area (the Kent Downs National Landscape) without setting out what will happen if that level of development proves undeliverable, leaving other settlements – including Edenbridge – exposed to late, unplanned re-distribution of growth.
 - *Soundness tests:* Positively prepared; Effective; Justified.

- **The evidence is not sound because** the “with mitigation” conclusions depend on long-term mitigation being delivered exactly as assumed, with no clear route for reviewing the overall strategy if those assumptions fail, again creating a risk that numbers will simply be moved to other settlements at a late stage.
 - *Soundness tests:* Effective; Justified.
- **The evidence is not sound because** it is framed around a Local Plan 2040 and an earlier NPPF, with no transparent update to demonstrate that using it for a Local Plan 2042 under the current NPPF remains robust; this increases the likelihood that the Kent Downs element will be reduced at examination, with knock-on impacts for other settlements.
 - *Soundness tests:* Justified; Effective; Consistent with national policy.

Edenbridge Impact

This document locks a large part of the strategy into the Kent Downs on optimistic assumptions but does not say what happens if that strategy has to change, leaving Edenbridge at risk of taking extra unplanned growth if the Kent Downs element is later cut back.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Greenbelt & Environment – Landscape Sensitivity and Character Assessment

1. What this evidence document does (and why it matters to Edenbridge)

This is the Sevenoaks District Landscape Sensitivity Assessment – Main Report (May 2017). It looks at how sensitive the countryside around each main settlement is to housing and commercial development, on a scale from Low to High.

For Edenbridge it defines two areas:

- **E1 – Edenbridge north** (Marlpit Hill / Low Weald)
- **E2 – Edenbridge south** (Eden Valley / River Eden floodplain)

For each, it:

- Describes the landscape and its key characteristics
- Identifies “absolute constraints” such as Flood Zone 3, Scheduled Monuments and Ancient Woodland
- Gives an overall sensitivity rating for housing and commercial development
- Provides guidance on how any development should be designed

The Council will rely on this as core evidence when deciding how much growth Edenbridge should take and where, so the way Edenbridge is scored and described here directly affects the town.

2. What's good for Edenbridge

a) It recognises Edenbridge's historic and flood-affected setting

The document notes that Edenbridge is a historic town which grew at the River Eden crossing, with later growth northwards, and that the River Eden floodplain is a major constraint. For E2 it classifies both the Flood Zone 3 land and the medieval moated site at Devil's Den as “absolute constraints” to development.

That supports the position that building in the Eden floodplain, or close to this heritage asset, is not acceptable.

b) It gives relatively protective sensitivity ratings around Edenbridge

The summary table shows:

- **E1 – Edenbridge north:** *Medium–High* sensitivity (housing and commercial)
- **E2 – Edenbridge south:** *Medium* sensitivity (housing and commercial)

Some edges of other settlements in the District are only assessed as *Low–Medium* for at least some development types. This matters because it shows the land around Edenbridge is not low sensitivity “easy land” for large-scale growth.

c) It reflects what residents recognise as Edenbridge’s rural character

For **E1 (north)** the document highlights:

- Thick hedgerows, shaws and small woodlands typical of the Low Weald
- A highly rural character with dark skies beyond the town edge
- Historic field patterns and scattered historic rural buildings
- Narrow rural lanes and historic routeways

For **E2 (south)** it highlights:

- The River Eden, ditches, wetland habitats, lowland meadows, and fen
- Historic small pastoral fields with thick hedgerows and mature trees
- Public access and views across the river valley
- Dark skies and rural lanes away from the town edge

This is a good technical description of what people in Edenbridge actually value about the countryside to the north and south of the town.

d) It supports climate and nature protection without spelling it out

The emphasis on floodplain, wetlands, hedgerows, woodland, trees, field patterns, dark skies, and tranquillity all fits well with current thinking on blue-green infrastructure, biodiversity net gain, and climate resilience.

Taken together, the document gives solid technical backing for:

- Keeping the Eden Valley floodplain open and undeveloped
- Protecting the rural Low Weald setting north of the town

3. What’s vague or risky for Edenbridge

a) Old evidence for a plan running to 2042

The Sensitivity Assessment is dated **May 2017**.

The new Local Plan runs to 2042 and is framed against a later National Planning Policy Framework (NPPF), with new concepts such as grey belt and updated climate and biodiversity expectations. The 2017 study cannot have taken these into account.

For a long-term plan, relying on un-updated 2017 settlement-edge evidence around Edenbridge risks failing the test of being up-to-date and proportionate.

b) Edenbridge is relatively sensitive but could still be treated as the “pressure valve”

Table 3.1 shows:

- E1 (north Edenbridge) – *Medium–High* sensitivity
- E2 (south Edenbridge) – *Medium* sensitivity

while some edges of other settlements are only *Low–Medium*. The document does **not** explain how these ratings should be used to decide between settlements.

Without clear rules, there is a real risk that Edenbridge is still used to absorb growth which could be placed in less sensitive locations elsewhere in the District, which would be contrary to the pattern implied by the ratings.

c) “Few absolute constraints” north of the town invites over-development

For **E1 (north)** the report stresses that there are “few absolute constraints” around the settlement (only some Flood Zone 3 and small patches of Ancient Woodland).

At the same time, it:

- Rates the area *Medium–High* sensitivity overall; and
- Describes it as a highly rural, dark-sky landscape with historic field patterns and valued hedgerows and shaws.

That combination is risky. The phrase “few absolute constraints” can easily be cherry-picked to argue that E1 is a suitable growth area, glossing over both the high sensitivity rating and the descriptive text pointing to a sensitive rural landscape.

d) “Opportunity to improve harsh edges” is open-ended

The guidance for E1 talks about new development improving unattractive or “harsh” settlement edges and then lists design principles.

However, it does **not**:

- Put any explicit limit on the *scale* or *depth* of such development; or
- Say that only small-scale “edge tidying” is envisaged.

Without tighter wording, this could be used to justify a major urban extension north of Edenbridge, even though the area is assessed as *Medium–High* sensitivity.

e) Floodplain and climate risk south of Edenbridge not clearly tied to tight limits on development

For **E2 (south)** the report correctly treats:

- The River Eden floodplain (Flood Zone 3), and

- The Devil’s Den Scheduled Monument

as “absolute constraints” and recognises the importance of the floodplain landscape to the town’s setting and public access.

But it then describes the rest of E2 simply as “Medium sensitivity”, which can be read as having general capacity, instead of stressing that scope for change is very limited even outside the floodplain.

That vagueness could allow allocations that, in practice, nibble away at the valley floor and its setting.

f) Weak clarity on National Landscapes versus Edenbridge countryside

The Eden Valley character area (12a) covers Edenbridge, Hever and Penshurst and is partly within the High Weald National Landscape at the eastern end. The Local Plan text (as summarised here) says National Landscapes have the highest status of protection and that major development there should be refused other than in exceptional circumstances and where in the public interest.

The Sensitivity Assessment does not clearly distinguish between:

- Land within the High Weald National Landscape; and
- The non-designated edges around Edenbridge, such as E1 and much of E2.

This lack of clarity increases the risk that Edenbridge’s non-designated countryside is treated as the place to take growth in order to “save” National Landscapes elsewhere, without that trade-off being made explicit.

g) No clear link between sensitivity ratings and actual capacity

The method defines how sensitivity is judged and gives a High–Low definition table, but it does not spell out what Medium–High or Medium actually mean in terms of:

- Whether major allocations are appropriate
- How much development could be absorbed
- How choices between settlements should be made

Without this “capacity bridge,” the Council can claim to have “regard to” the Sensitivity Assessment while still adopting allocations around Edenbridge that appear inconsistent with its findings.

4. What to change

Below we set out one clear set of changes we want to see, framed district-wide but justified by Edenbridge.

4.1 Method – link sensitivity ratings to capacity

Add after the sensitivity rating definitions in Table 2.2 / paragraph 2.7:

“For the purposes of plan-making, areas rated medium-high sensitivity should not be considered for large-scale urban extensions unless there is a clear, publicly justified reason, and any such proposals must be of a scale and form that can be demonstrated to conserve the key landscape characteristics identified in this report; areas rated medium sensitivity have limited capacity for change, restricted to small-scale, edge-of-settlement infill or rounding-off that respects these identified sensitivities.”

This makes it much harder to treat a Medium–High rating as a green light.

4.2 E1 – Edenbridge north: emphasise limited capacity

Replace the final evaluation sentence for E1 with:

“Overall, the area is judged to have medium-high sensitivity, indicating that only small-scale, carefully designed extensions immediately adjoining the existing settlement edge are likely to be acceptable, and that the wider area should be retained as open countryside to maintain the rural setting and dark skies of Edenbridge.”

4.3 E1 – Edenbridge north: fix the “harsh edges” wording

Replace the opening sentences of the E1 guidance (up to “for the reasons set out above”) with:

“Although there are relatively few ‘absolute constraints’ to development in the area, the landscape has medium-high sensitivity to built development for the reasons set out above. Any new built development should be limited in scale and focused on improving the quality of the existing settlement edge rather than extending the town significantly into the surrounding countryside.”

4.4 E2 – Edenbridge south: make clear that sensitivity applies across the area

Replace the first “However...” sentence in the E2 guidance with:

“The floodplain (marked by Flood Zone 3) and the medieval moated site at Devil’s Den form ‘absolute constraints’ to development, and together with the surrounding historic field pattern and wetland habitats mean that the area overall has medium sensitivity to built development, with the floodplain and intact rural landscapes away from the settlement edge exhibiting higher sensitivity.”

Add a bullet to the E2 guidance list:

“limit new development to locations that avoid encroachment into the River Eden floodplain and maintain a clear, open valley floor between Edenbridge and the wider countryside.”

4.5 Edenbridge introduction – link clearly to the wider Eden Valley and National Landscape

After the paragraph introducing E1 and E2, add:

“Development around Edenbridge should also be considered in the context of the Eden Valley landscape character area (LCA 12a), including those parts of the valley which lie within the High Weald National Landscape, to ensure that proposals conserve and enhance the wider valley landscape and do not displace development pressure from designated areas onto sensitive but undesignated countryside around the town.”

4.6 Local Plan – Natural Environment text (NE1) – explicitly reference sensitivity around Edenbridge

Where the Local Plan’s supporting text currently only cites the Sevenoaks Landscape Character Assessment 2017, insert explicit reference to this Sensitivity Assessment and the Edenbridge ratings, along the lines of:

“Alongside this, the Sevenoaks Landscape Sensitivity Assessment 2017 provides settlement-edge sensitivity analysis, including identifying the land north of Edenbridge (E1) as medium-high sensitivity and the land south (E2) as medium sensitivity to both housing and commercial development, which should be treated as a constraint when selecting sites and determining the scale of growth around the town.”

5. We ask the Council

- **We ask the Council** to update the landscape sensitivity evidence for Edenbridge (E1 and E2) so that it reflects current national policy and the 2042 plan period, and to do this before finalising the scale and location of growth around the town.
- **We ask the Council** to amend the Edenbridge (E1 and E2) sections of the Sevenoaks Landscape Sensitivity Assessment so it is explicit that Medium–High and Medium sensitivity support only small-scale edge-of-settlement improvements, not large urban extensions, particularly where development would affect the Eden Valley floodplain.
- **We ask the Council** to apply the strengthened sensitivity-to-capacity framework consistently across all settlements, so that higher sensitivity around Edenbridge is treated as a real constraint and not ignored in favour of convenience elsewhere in the District.

6. Regulation 19 soundness & legal points

a) Not justified – outdated and incomplete evidence for Edenbridge

The evidence is not sound because the 2017 Landscape Sensitivity Assessment for Edenbridge predates the current NPPF and the 2042 plan period and has not been updated to reflect newer national policy on brownfield priority, grey belt, climate change, and biodiversity. The Plan is therefore not “justified,” as it is not based on up-to-date and proportionate evidence about landscape capacity around Edenbridge.

b) Not justified / not effective – no clear link from sensitivity ratings to the scale and distribution of growth

The evidence is not sound because although the Assessment rates land north of Edenbridge (E1) as Medium–High and south (E2) as Medium sensitivity, it does not explain how these ratings have been used to limit the scale of allocations around Edenbridge compared with lower-sensitivity edges at other settlements. Without a transparent framework linking sensitivity to capacity across the District, the Plan is not justified in its distribution of growth and is not

effective in showing that the chosen strategy is the most appropriate when compared with reasonable alternatives.

c) Not consistent with national policy – protection of valued landscapes and flood risk

The evidence is not sound because the Assessment acknowledges the Eden Valley floodplain, wetland habitats, and historic field pattern south of Edenbridge as key landscape sensitivities and “absolute constraints” yet does not clearly rule out large-scale development affecting this floodplain. If the Plan allocates substantial growth at Edenbridge that conflicts with this, without updating or re-interpreting the evidence, it would not be consistent with national policy on directing development away from areas at highest risk of flooding and on protecting valued landscapes as part of climate change adaptation.

d) Not positively prepared – potential burden on Edenbridge

The evidence is not sound because the lack of explicit criteria on how sensitivity ratings guide allocation choices allows Edenbridge – with Medium–High and Medium sensitivity edges – to be treated as a “pressure release” location to protect National Landscapes and more constrained areas elsewhere, without a proper exploration of lower-sensitivity alternatives and without recognising the cumulative risks around Edenbridge. This undermines the “positively prepared” test because the strategy does not clearly show that development needs are being met in a way that is equitable between settlements and respects environmental constraints.

e) Legal / duty to have regard to National Landscapes – unclear treatment of Eden Valley

The evidence is not sound because it does not clearly distinguish parts of the Eden Valley that lie within the High Weald National Landscape from the non-designated countryside immediately around Edenbridge, even though the Plan relies on a strengthened statutory duty to further the conservation and enhancement of National Landscapes. This lack of clarity risks displacing development pressure from designated land further east into sensitive but undesignated Edenbridge countryside by default, which is inconsistent with that duty and with the Plan’s own landscape aims.

7. Edenbridge Impact

If this evidence is left as it is, it makes it too easy for the Council to push disproportionate growth onto Edenbridge’s sensitive rural edges and floodplain instead of giving proper weight to less sensitive options elsewhere in the District.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Greenbelt & Environment – Flood Risk

This flood risk evidence package is the technical backbone the Council is using to justify putting significant new development in and around Edenbridge despite known and complex flood risks.

It includes:

- **Level 1 Strategic Flood Risk Assessment (SFRA, 2024)** – sets the district-wide picture for all sources of flooding, including the River Eden, Eden Brook, and Medway catchment, explains climate change allowances and how the Sequential and Exception Tests should be applied.
- **Level 2 SFRA and appendices** – zooms in on specific “candidate” development sites, including four Edenbridge sites:
 - 78–80 and 82–84 High Street and 1–2 Leathermarket (MX/21/00014) – town-centre riverside site.
 - Land at Breezehurst Farm, Crouch House Road (MX/21/00009) – large mixed-use site between the railways.
 - Open Space / Community Hall / Shop at Farmstead Drive (MX/21/00038).
 - Land at Crouch House Road (HO/21/00228/B) – smaller greenfield housing site.
- **Medway Catchment Study / hydraulic modelling (2015)** – provides the modelled flows, depths and hazard ratings used to map flood risk in Edenbridge and underpin both SFRA, including reference to the 2013 flood event.

The Council is relying on these documents to claim that Edenbridge allocations can pass the Sequential and Exception Tests and be made “safe for their lifetime” under the National Planning Policy Framework (NPPF), and to support policies W1 (Flood Risk) and W2 (Surface Water Management).

What’s good (for Edenbridge)

Up-to-date strategic approach – on paper

- The Level 1 SFRA is dated 2024 and uses UKCP18 climate projections and the latest Environment Agency guidance for the Medway catchment, including the higher climate change allowances for development lasting beyond 2061 – which applies to all 2042 allocations.
- This should stop any attempt to rely on out-of-date climate allowances for Edenbridge.

Clear link to the NPPF and the tests

- Both SFRA sets out the NPPF risk-based approach and explain when the Sequential and Exception Tests must be applied to “more vulnerable” development in Flood Zones 2 and 3 or where surface water and other risks are significant.
- This reinforces that Edenbridge allocations in Flood Zones 2/3 or with serious surface water risk must pass the Exception Test – they cannot simply be assumed acceptable.

Honest about defended risk in Edenbridge

- The Medway modelling and Level 1 SFRA acknowledge that in Edenbridge, larger events overtop or bypass defences, with floodwater spreading through the town centre, including the High Street, and building quickly.
- This accepts that residual risk remains for town-centre allocations, despite the presence of defences.

Strong, detailed evidence for key Edenbridge sites

For the four Edenbridge sites, the Level 2 SFRA provides:

- How much of each site is in Flood Zones 1, 2 and 3.
- How much of each site floods from surface water for 3.3%, 1% and 0.1% annual exceedance probability (AEP) events.
- Maximum and mean depths, flow velocities, and hazard categories (“danger to some” / “danger to most”), including climate-change scenarios.

For example, at High Street/Leathermarket:

- 23% of the site floods in the 1% AEP fluvial event and 100% in the 0.1% AEP event.
- In the 0.1% AEP event, mean hazard is 1.66 (“danger to most”); under climate change (1% +37% flow), up to 81% of the site is affected with hazard up to 1.73 (“danger to most”).

This gives residents hard numbers that show how serious the risk really is.

Recognition of flood history and fragile infrastructure

- The evidence records historic flooding affecting Edenbridge (including 1960, 1968, 2013 and 1958 events) and multiple local incidents recorded by Kent County Council, often linked to blocked drains and gullies.
- It also notes where sites lack formal defences (Breezehurst/Farmstead) and where town-centre sites depend on a single downstream wall.
- This undermines any suggestion that Edenbridge sites are “problem-free” and confirms that local infrastructure is already under strain.

What's vague or risky (for Edenbridge and equity between settlements)

3.1 General issues

Old hydraulic modelling for a long-term plan

- The Edenbridge hazard and depth mapping still relies on the 2015 Medway Catchment Study, even though climate allowances and national policy have moved on.
- The Level 1 SFRA notes that future Environment Agency modelling could update this, but the Local Plan is being pushed forward now on the 2015 baseline.
- By 2042, this may under-estimate real flood risk in Edenbridge, especially given rising climate allowances.

Cumulative impacts on Edenbridge are largely ignored

- The Level 1 SFRA refers to cumulative impacts, but the detailed Level 2 work treats each Edenbridge site largely in isolation.
- There is no worked-through assessment of what happens if Breezehurst, Crouch House Road, Farmstead Drive and high-density town-centre infill all go ahead together, or whether the River Eden/Eden Brook system can cope with that combined runoff.
- This leaves Edenbridge exposed to the combined effects of growth without them being properly tested or mitigated.

Site codes do not match the Local Plan allocations

- The Level 2 SFRA uses legacy “MX/21” and “HO/21” codes and descriptive names rather than the EDEN-coded allocation references in the draft Local Plan.
- This makes it hard for residents to see which flood evidence applies to which EDEN allocation and opens the door to quiet changes in allocation boundaries without clear re-testing.

Confusion over which NPPF version applies

- The Level 1 SFRA refers to the NPPF as a 2023 document; the Level 2 SFRA refers to the December 2024 revision.
- At Regulation 19, it is not clear which exact national policy text the evidence is aligned with, despite the NPPF requirement for plans to be based on up-to-date policy.

Too much reliance on “the FRA will sort it out”

- There is a repeated pattern that complex risk is left to site-specific Flood Risk Assessments, Emergency Plans and SuDS design at planning application stage.
- This side-steps the NPPF requirement to show at plan-making stage that allocations themselves are safe and deliverable, not just theoretically “mitigatable.”

Equity between settlements

- The Level 2 summary shows that some large sites at Swanley, Dunton Green and Westerham face mainly surface water risk and no fluvial or reservoir risk.

- By contrast, Edenbridge allocations include:
 - High Street/Leathermarket: fluvial, surface water, historic flooding, and reservoir residual risk.
 - Breezehurst Farm: Flood Zones 2 and 3 through the site, high-velocity surface water flowpaths, historic flooding and no formal defences.
 - Farmstead Drive: majority in Flood Zone 2, with 79% of the site flooded by surface water in the 0.1% AEP event.
- Edenbridge is therefore being asked to carry a disproportionately high share of “difficult” sites without a clear strategic justification.

No realistic scope for further strategic flood mitigation in Edenbridge

- The evidence implies that Edenbridge has very limited options for meaningful new flood-risk infrastructure.
- The modelling shows that the River Eden and Eden Brook already overtop defences in larger events.
- The town centre is tightly enclosed by built development, the railways, and roads, leaving no obvious land for new upstream storage, diversion channels, or major embankments.
- Several Level 2 site summaries state that any benefits from mitigation works would be minimal because of the site’s location in the floodplain or because defences already operate at their functional limit.
- The SFRAs repeatedly fall back on site-by-site SuDS and floor-raising, effectively acknowledging that strategic-scale interventions are not available in the Edenbridge area.
- This means the Local Plan is banking on allocations in Edenbridge while admitting—implicitly—that the town cannot be protected by new strategic schemes. That is a major risk and should be stated plainly.

3.2 High Street & Leathermarket (MX/21/00014)

Very serious fluvial hazard understated in the conclusions

- The Level 2 evidence shows:
 - 23% of the site floods in the 1% AEP event and 100% in the 0.1% AEP event.
 - At 0.1% AEP, mean depth is ~0.88m and mean hazard 1.66 (“danger to most”).
 - Under climate change (1% +37% flow), 81% of the site is affected, with hazard up to 1.73 (“danger to most”).
 - There is a recorded history of fluvial flooding (1960, 1968, 2013) plus 49 local incidents.

- Despite this, the Level 2 text still suggests access/egress is acceptable via High Street/Church Street in the 1% + climate change surface-water event, because depths are said to be under 0.3m.
- This looks over-optimistic given that the same evidence accepts that Edenbridge’s defences can be overtopped and that the town core shows high hazard in larger events.

Groundwater, sewer, and reservoir risk under-played

- Groundwater is mapped as very near the surface (0.025–0.5m), implying limited ability to infiltrate water. Southern Water shows a moderate risk of internal sewer flooding.
- The southern half of the site is also within “wet day” reservoir risk from several upstream reservoirs.
- Taken together with fluvial and surface water risk, the site is a marginal location for more-vulnerable town-centre housing, yet the narrative does not reflect this.

3.3 Breezehurst Farm, Crouch House Road (MX/21/00009)

Large site with Flood Zone 2/3 and high surface-water hazard, but generic wording

- The Level 2 tables show:
 - The site is mostly Flood Zone 1 but with Flood Zones 2 and 3 running through the centre next to the watercourse.
 - Surface water flooding affects 3% (3.3% AEP), 7% (1% AEP) and 23% (0.1% AEP) with velocities up to 3.39 m/s and hazard up to 2.83 (“danger to most”) along the main flowpath.
 - Under climate change, 14% of the site still floods in the “design” 1% AEP +45% rainfall scenario.
- Yet the conclusions rely on generic phrases about addressing climate change and “designing to be safe” and suggest infiltration might be viable.
- There is no clear recognition that some parts of the allocation may simply be unsuitable for more-vulnerable uses, or that nominal capacity may need to be cut significantly.

No defences and known flood history on the flowpath

- The site has no formal defences, sits across a key surface water and ordinary watercourse route, and shares a flood history linked to the tributary running through town (including 1958).
- A major mixed-use allocation here could worsen risk for existing residents downstream in Edenbridge as well as for new occupiers, but this cumulative implication is not spelled out.

3.4 Farmstead Drive (MX/21/00038)

Change from low-vulnerability community use to more-vulnerable housing in the floodplain

- Most of the site is in Flood Zone 2 with a strip of Flood Zone 3 near the watercourse.

- Surface water flooding affects 36% (3.3% AEP), 43% (1% AEP) and 79% (0.1% AEP), with mean depth around 0.4m and hazard around 1.2 (“danger to some”).
- The proposal is effectively to replace open space/community hall/shop with more-vulnerable residential use in this flood-affected area.
- This is directly at odds with the “make space for water” principle promoted in the Level 1 SFRA and the NPPF.

Climate change makes much of the estate wet

- With climate uplift, 54% (3.3% AEP +35%) and 59% (1% AEP +45%) of the site flood, with depths up to 0.83m.
- The conclusion that access via Fircroft Way/B2027 remains under 0.23m deep sidesteps the fact that large parts of the estate around residents would be under water.

3.5 Land at Crouch House Road (HO/21/00228/B)

Runoff and downstream impacts not properly quantified

- The site lies outside fluvial flood zones but has surface-water flowpaths, ponds and drainage ditches, draining towards Kent Brook and then the River Eden.
- The Level 1 SFRA stresses increased storm intensity and the importance of managing cross-boundary and downstream impacts in the Medway catchment.
- However, the evidence does not quantify how much extra runoff this site and Breezehurst together could send into Edenbridge in a major storm, or what standard of onsite mitigation is needed to avoid harm.

What to change (proposed wording / additions)

These are proposed district-wide changes that are justified by the Edenbridge evidence but would sensibly apply to all similar sites.

4.1 How the SFRA is used in the Local Plan

a) Clear mapping between allocations and SFRA evidence

Add supporting text to the climate/flood chapter (alongside Policies W1 and W2) along the lines of:

“The Council will publish and maintain a schedule linking each site allocation in the Local Plan to the relevant Strategic Flood Risk Assessment references, including any Level 2 site-specific tables and catchment modelling where available. This will include, for example, cross-references between allocations in Edenbridge, the Medway catchment modelling outputs and Level 2 SFRA site codes MX/21/00009, MX/21/00014, MX/21/00038, and HO/21/00228/B.”

This makes the relationship between evidence and allocations transparent across the district, with Edenbridge as a clear example.

b) Updated modelling for defended or high-hazard locations

Strengthen the supporting text for Policy W1 (Flood Risk) so that it reads:

“For major development in defended locations or areas mapped as ‘danger to most’ or ‘danger to some’ in the Strategic Flood Risk Assessment, planning permission will only be granted where a site-specific Flood Risk Assessment uses up-to-date hydraulic modelling and current Environment Agency climate-change allowances for the relevant catchment, and demonstrates that the development will be safe for its lifetime and will not increase flood risk elsewhere. This requirement will apply in particular to town-centre riverside sites and strategic growth locations in Edenbridge and other settlements where residual risk is significant.”

This sets a consistent district approach but directly tackles the Edenbridge case.

4.2 Wording for high-risk allocations (district-wide principles)

a) Town-centre riverside sites (including High Street/Leathermarket)

Amend the Level 2 SFRA conclusions and/or allocation text for any town-centre riverside site with “danger to most” hazard (not just in Edenbridge) to say:

“Where Strategic Flood Risk Assessment mapping shows that significant parts of an allocation are subject to ‘danger to most’ or similar high hazard in the 0.1% AEP event and under relevant climate-change scenarios, more-vulnerable residential development will be strictly limited to those parts of the site that can be demonstrated to remain in Flood Zone 1 and at low hazard for the lifetime of the development. Development must not rely on emergency evacuation, or on the future improvement of existing flood defences, to achieve an acceptable standard of safety. Where this cannot be achieved, the scale or nature of the allocation will be reduced, or the allocation will not be taken forward.”

Applied to Edenbridge, this would significantly constrain residential use at High Street/Leathermarket rather than assuming the whole site is comfortably developable.

b) Local centres and community sites in Flood Zones 2/3 (including Farmstead Drive)

For any allocation that proposes to replace less-vulnerable community/open-space uses in Flood Zones 2/3 with more-vulnerable housing, add:

“Where existing land uses in Flood Zones 2 or 3, or in areas of extensive surface water flooding, are currently less vulnerable than the proposed use (for example open space, community or employment uses), more-vulnerable residential development will be restricted to parts of sites that remain in Flood Zone 1 in the 1% AEP plus climate-change scenario and lie outside areas mapped as ‘danger to some’ or higher. Where this cannot be demonstrated, the preferred approach will be to retain and enhance the site’s role in flood storage, open space, and community resilience.”

This would directly address the issues at Farmstead Drive while setting a consistent rule for similar locations elsewhere.

c) Strategic edge-of-settlement sites on key flowpaths (including Breezehurst Farm and Crouch House Road)

For large mixed-use or residential allocations that straddle ordinary watercourses or mapped surface-water flowpaths, add to the Local Plan and/or Level 2 SFRA conclusions:

“Development proposals on allocations that cross main overland flowpaths or ordinary watercourses must deliver measurable betterment in downstream flood risk, demonstrated through hydraulic or runoff modelling for all relevant storm events, including climate-change

allowances. Post-development peak flows and volumes must be no greater than, and where practicable less than, the existing baseline. Where this cannot be achieved across the whole allocation, the developable area and capacity will be reduced to keep built development out of high-hazard areas and avoid increasing risk downstream.”

This would force a proper re-think of the Breezehurst / Crouch House Road strategy and prevent Edenbridge bearing cumulative downstream impacts without benefit.

4.3 Clarify which NPPF version the SFRA uses

Ask for the SFRA front-matter and summary to be updated as follows:

“References to the National Planning Policy Framework in this SFRA are to the December 2024 version, and the Sequential and Exception Test guidance applied in this document has been checked against that version.”

This is a straightforward fix but essential for soundness.

We Ask the Council

- We ask that the Council publishes and keeps up to date a clear schedule linking every Edenbridge EDEN allocation to the relevant Level 1 and Level 2 SFRA references and Medway catchment modelling, so residents can see exactly which evidence underpins which site.
- We ask that the Council updates or supplements the Edenbridge flood modelling before confirming any allocations in defended or high-hazard areas, using current climate-change allowances, and testing the combined impact of all proposed Edenbridge sites on the River Eden and Eden Brook system.
- We ask that the Council tightens the Level 2 SFRA and Local Plan wording so that more-vulnerable housing is kept out of Flood Zone 3 and mapped high-hazard areas across the district, and so that major allocations – including High Street/Leathermarket, Breezehurst Farm and Farmstead Drive – are only taken forward where they can demonstrably reduce, not increase, flood risk in Edenbridge.
- We ask that the Council reconsiders the proposed change of use at Farmstead Drive, recognising that replacing less-vulnerable open space/community facilities with more-vulnerable housing in Flood Zones 2/3 conflicts with both its own SFRA and the NPPF’s “make space for water” approach.
- We ask that the Council openly acknowledges, in the Local Plan and SFRA, that there is no realistic opportunity for further strategic flood-mitigation schemes in Edenbridge, and that this must materially limit the scale and type of development directed to the town.

Regulation 19 soundness & legal points

These are framed for written representations.

Not positively prepared

- The evidence is not sound because it is **not positively prepared**. It does not show how the Local Plan will *reduce* overall flood risk in Edenbridge over the plan period. Instead,

it is mainly used to justify allocating high-risk sites (including defended and high-hazard land) and then defers real solutions to individual Flood Risk Assessments. This is contrary to the NPPF requirement for plans to proactively manage and reduce flood risk, make space for water, and avoid reliance on emergency response.

- The evidence is not sound because it fails to acknowledge that Edenbridge has no credible scope for further strategic flood-mitigation works. Without strategic interventions, placing multiple high-risk allocations in the town is neither positively prepared nor effective, and contradicts the NPPF requirement to steer development to locations where risks can be managed through achievable, sustainable solutions.

Not justified (evidence-based and considering reasonable alternatives)

- The evidence is not sound because it is **not justified**. The Medway hydraulic modelling for Edenbridge dates from 2015 and has not been transparently updated to reflect current climate projections or the cumulative impact of multiple new sites around the town. Level 2 work assesses sites separately, without proper combined impact testing. Lower-risk sites in other settlements appear to be favoured, while more complex high-hazard sites are kept in Edenbridge. Reasonable alternatives – such as shifting some growth away from the highest-risk parts of Edenbridge – have not been properly explored in the flood evidence, contrary to the NPPF emphasis on steering development away from areas at highest risk.

Not effective (deliverable over the plan period)

- The evidence is not sound because it is **not effective**. High Street/Leathermarket, Farmstead Drive and parts of Breezehurst Farm are shown to experience “danger to most” or “danger to some” hazard, with significant depths and velocities now and under climate change. Yet the Plan assumes that standard mitigation, SuDS, and emergency planning will make more-vulnerable housing “safe for its lifetime,” without any convincing worked-through examples or costed infrastructure. This heavy reliance on future FRAs rather than a realistic assessment of what can actually be built and safely occupied undermines deliverability.

Not consistent with national policy

- The evidence is not sound because it is **not consistent with national policy**. The NPPF requires the Sequential and Exception Tests to be applied rigorously, plans to be based on up-to-date evidence, and development to be directed away from areas at highest risk wherever possible. In Edenbridge, older modelling is still being used for core decisions, there is confusion over which NPPF version the SFRA is aligned to, and the high-hazard nature of several proposed allocations is under-played in the conclusions. The approach is closer to “development first, mitigation later” than to the precautionary, sequential approach required by the NPPF.

Legal compliance / equalities

- Concentrating complex and residual flood risk in Edenbridge, which already has a recorded flood history and a different demographic profile from some better-protected settlements, raises potential issues under the Public Sector Equality Duty. The Council needs to show that it has considered who will be exposed to increased residual risk and

why, and that it has not loaded higher flood risk onto particular communities without robust justification.

Edenbridge impact (one line)

Overall, this flood evidence tends to justify loading more high-risk, climate-sensitive development onto Edenbridge than onto other settlements, without convincingly proving that people and property here can be kept safe for the full lifetime of the Local Plan.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Sustainability Appraisal

1. What this document is and why it matters for Edenbridge

We understand that the Sevenoaks Local Plan Sustainability Appraisal (SA) – Initial Note is an early, high-level paper prepared by AECOM. It:

- Explores district-wide “reasonable alternatives” for housing numbers and distribution (below / at / above Local Housing Need (LHN) of 714 dwellings per annum at that time).
- Looks at key constraints such as flood risk, biodiversity, and Green Belt, including the Edenbridge / River Eden corridor.

It is not settlement-specific and predates:

- The current plan period (now 2027–2042 rather than 2022–2040).
- The new LHN of 1,145 dwellings per annum used for the emerging Local Plan.
- The December 2024 National Planning Policy Framework (NPPF), with mandatory housing targets and the grey-belt concept.

Even though it is dated, the Initial Note still sets out important principles on reasonable alternatives and flood-risk-led spatial planning which the Council must continue to follow when making decisions that affect Edenbridge.

2. What’s good for Edenbridge

a) Clear statement that reasonable alternatives are legally required

We welcome that the Initial Note and early Interim SA clearly state that the Council must test reasonable alternatives, including different overall housing numbers and different distributions of growth.

For Edenbridge, this confirms that:

- A single “take-it-or-leave-it” package of growth is not what SA is meant to deliver; and
- The later step-change to **2,136 homes on 17 allocation sites at Edenbridge** (2,801 in total including extant permissions, windfall, and infill), with no lower-growth scenario left on the table, is not properly justified as the outcome of a reasonable alternatives exercise.

b) Strong support for maximising urban capacity and higher densities

The Initial Note stresses that:

- There is a strong argument for maximising supply and density in urban areas (for example Sevenoaks town and Swanley) to reduce pressure on Green Belt and greenfield locations.
- Urban densities and brownfield re-use should be pushed as far as possible before looking to more sensitive land.

For Edenbridge, this supports the argument that, before loading a very large quantum of growth onto a flood-constrained town, the Council should be making full, appropriate use of capacity in larger, better-connected settlements, always within the wider Green Belt and environmental constraints across the district.

c) Early recognition that Edenbridge / River Eden is a flood-risk hotspot

The Initial Note and SA Scoping Report make it clear that:

- The southern rail corridor and River Eden are subject to much more significant fluvial flood risk than most of the district.
- In Edenbridge, some options lie in the fluvial flood zone, currently used as car park and open space, and historically undeveloped flood-risk land should be avoided wherever possible.
- Surface-water flooding is a known problem, with Hartfield Road highlighted as a location where highways drainage is overwhelmed.

This shows the Council knew early on that Edenbridge is a major focus of both fluvial and surface-water flood risk, yet the plan now proposes a very high level of growth in this location relative to its size and constraints.

3. What's vague or risky (especially for Edenbridge)

a) Out-of-date overall context and housing numbers

The Initial Note is based on an earlier context (LHN 714, plan period 2022–2040, less prescriptive national policy). The submission Plan instead uses:

- LHN 1,145 dwellings per annum.
- Plan period 2027–2042; and
- A new NPPF with mandatory targets and an expectation that LHN will be met in full, especially in the Southeast.

The Sustainability Assessment documentation does not clearly explain how the Council moved from testing “below LHN with unmet need exported” to a position where the higher LHN is now to be met wholly within Sevenoaks, and why that leads to the very large uplift at Edenbridge. We are unclear on the duty to cooperate and how any options there seem to have evaporated. There does not seem to be any clear understanding in the evidence base documents on what has been attempted here and why it has failed, again.

For Edenbridge, the absence of this “storybook” means the increase in district numbers appears simply translated into a much bigger allocation for our flood-constrained town.

b) Reasonable alternatives not carried through to Edenbridge

Although the Initial Note talks extensively about reasonable alternatives, later SA work effectively collapses this into a single fixed scenario for Edenbridge:

- The 2023 Interim SA identified only one “reasonable” growth scenario – 982 homes on SHELAA “suitable” sites.
- The 2025 Interim SA now presents **17 SHELAA-supported allocation sites totalling 2,136 homes** in Edenbridge, explicitly calling this a “high growth strategy” and saying lower growth is “difficult to envisage”, while the total for the town rises to 2,801 once extant, windfall and infill sites are included.

In practice, Edenbridge is not being offered:

- Low / medium / high growth options.
- Different directions of expansion; or
- Alternative combinations of sites.

The Edenbridge settlement is effectively locked into a single, pre-determined high-growth package.

c) Confused treatment of “above LHN” and what drives higher numbers

The Initial Note and 2022 Interim SA treat “above LHN” as an option mainly to improve affordable housing delivery and respond to unmet need in the wider area.

Since then:

- The December 2024 NPPF and new standard method have introduced mandatory housing targets.
- Meeting LHN in full has become the baseline, not an “above LHN” scenario; and
- The 2025 Interim SA focuses on the risks of under-delivery (for example, presumption in favour and “planning by appeal”).

Against that backdrop, the SA does not transparently explain why Edenbridge specifically must rise from 982 to 2,136 allocation homes to play its part, or whether less constrained settlements could reasonably take more. This raises questions of justification and equity between settlements.

d) Incomplete use of flood-risk evidence for Edenbridge (including Hartfield Road)

Across the Initial Note, Scoping Report and Interim SAs, the evidence shows that:

- Edenbridge and the River Eden corridor are one of the main fluvial flood-risk areas in the district.
- Surface-water flooding is a particular problem on Hartfield Road, with high water levels in local watercourses affecting drainage.

- Some urban sites in Edenbridge lie in fluvial flood zones, currently used as car park or open space, and one is proposed for higher-density development.
- The 2023 Interim SA already described Edenbridge at 982 homes as a “fairly high growth strategy” and treated flood-risk sites as marginal.
- The 2025 Interim SA nevertheless accepts a much higher growth strategy and discusses the possible southward extension of EDEN15 (Land between Hartfield Road and Hever Road), describing it as “sequentially least preferable” with concerns about sprawl and historic environment impacts.

Despite this, there is no clear SA narrative showing:

- Why it is appropriate to move from 982 to 2,136 allocation homes (2,801 total) in a town with known fluvial and surface-water problems, including on a key route such as Hartfield Road; or
- How lower-growth or alternative-direction options that would reduce exposure to the floodplain have been properly assessed and discounted.

This sits uneasily with the risk-aware tone of the Initial Note and with national flood-risk policy.

e) Equity between settlements

The evidence base recognises that:

- Sevenoaks is strongly constrained by National Landscape (formerly Area of Outstanding Natural Beauty) and Green Belt but has major services and rail links.
- Swanley and the northern corridor have very good connectivity and town-centre regeneration needs.
- Edenbridge has reasonable rail access but relatively poor road links and sits in a low-lying vale with extensive flood risk.

Yet:

- Edenbridge is asked to accommodate **2,136 allocation homes on 17 sites (2,801 total)**.
- Sevenoaks and Swanley also take large numbers but benefit from stronger transport networks and wider service bases; and
- Some constrained settlements (for example Westerham) are subject to much lower growth.

There is no clear SA explanation of how this distribution is equitable and proportionate when Edenbridge’s environmental and access constraints are considered.

4. What we say should change – wording and approach

(We propose the following as alternative supporting text / policy amendments for the Council to adopt.)

a) Clarify the status of the Initial Note

“The SA Initial Note (AECOM, 2022) is an early, high-level document based on a previous Local Housing Need figure of 714 dwellings per annum and an assumed plan period 2022–2040. It has been overtaken by later SA work and by national policy changes, including the December 2024 National Planning Policy Framework. The Initial Note should therefore be treated as historic context only, and not as justification for the Local Plan 2042 spatial strategy or settlement-level growth choices.”

b) Insert explicit text on reasonable alternatives at settlement level, including Edenbridge

“In line with the legal requirements for Sustainability Appraisal and the Town and Country Planning (Local Planning) Regulations 2012, reasonable alternatives must be defined and appraised not only at the district-wide level (for example, below / at / above Local Housing Need) but also at the settlement level. For each main settlement, including Edenbridge, the SA will set out and compare at least one lower-growth and one higher-growth alternative, and different combinations and directions of growth, taking full account of flood risk, transport, and the settlement hierarchy. Where only a single growth scenario is taken forward at a settlement, the SA will provide clear justification for ruling out other options.”

c) Tie the new LHN and NPPF 2024 explicitly to a re-run of choices, not simple uplifts

“The increase in Local Housing Need to 1,145 dwellings per annum, and the December 2024 National Planning Policy Framework changes including mandatory targets and grey-belt policy, require the Council to revisit the distribution of growth across the District. The SA will therefore re-test district-wide and settlement-level alternatives in the light of updated national policy and evidence, rather than relying on proportionate uplifts to previously identified settlement capacities.”

d) Strengthen and localise the flood-risk wording for Edenbridge, including Hartfield Road

“The SA recognises Edenbridge and the River Eden corridor as one of the main concentrations of fluvial flood risk in Sevenoaks District, with additional surface-water flooding issues on Hartfield Road and other local highways. Development options at Edenbridge, including town-centre and Green Belt sites, will only be taken forward where it can be demonstrated through the SA and Strategic Flood Risk Assessment that:

- development complies with the NPPF flood-risk Sequential and Exception Tests;
- higher-risk locations currently used as car parks or open space in the functional floodplain are avoided wherever possible;
- proposals do not exacerbate surface-water flooding issues on key routes such as Hartfield Road; and
- alternative growth options at less flood-prone settlements have been robustly considered and reasonably ruled out.”

e) Require a specific Edenbridge alternatives paper

“A separate Edenbridge Growth Options Paper will be prepared as part of the SA process, setting out and appraising alternative quantum and spatial options for the town (including options below 2,136 homes), and explicitly addressing the combined effects of fluvial and surface-water flood risk, transport constraints and social infrastructure.”

5. We ask the council to
 - Treat the SA Initial Note as historic context only and make clear in the Regulation 19 SA Report and Local Plan that it does not justify the current Edenbridge growth strategy.
 - Produce and publish a dedicated Edenbridge Growth Options Paper with genuine lower-growth and alternative-direction scenarios, appraised against up-to-date evidence on flood risk (including Hartfield Road), transport, and infrastructure.
 - Re-run the distributional choices across the district in light of the December 2024 NPPF and the new LHN of 1,145 dwellings per annum and clearly explain how equity between settlements (including Sevenoaks, Swanley and Edenbridge) has been assessed in the SA.
6. Regulation 19 soundness and legal points

We set out below short arguments that we would consider in our Regulation 19 representations.

Reasonable alternatives – settlement level (Justified / legal SA duty)

“The evidence is not sound because the SA Initial Note recognises a legal requirement to define and appraise ‘reasonable alternatives,’ but this has not been carried through to Edenbridge. Later SA reports present only a single high-growth scenario at Edenbridge (2,136 allocation homes on 17 sites, 2,801 in total) with no genuine lower-growth or alternative spatial options. This conflicts with the Sustainability Appraisal Regulations and fails the ‘justified’ test, because reasonable alternatives for Edenbridge have not been identified or appraised in a transparent way.”

Out-of-date context and policy shift (Justified / Consistent with national policy)

“The evidence is not sound because the SA Initial Note and early Interim SA are based on an out-of-date Local Housing Need figure and an earlier plan period, whereas the Regulation 19 Plan uses a much higher LHN (1,145 dwellings per annum) and a 2027–2042 period under the December 2024 National Planning Policy Framework. The SA does not provide a clear audit trail explaining how these changes have been reflected in the choice of spatial strategy and the very high growth now proposed at Edenbridge. This fails the ‘justified’ and ‘consistent with national policy’ tests, because updated national policy and evidence have not been transparently integrated into the SA choices.”

Flood-risk obligations at Edenbridge (Positively prepared / Justified / Consistent with NPPF)

“The evidence is not sound because the SA documents identify Edenbridge and the River Eden corridor as one of the main fluvial flood-risk hotspots in the district, with additional surface-water problems on Hartfield Road, yet the spatial strategy proposes a very high level of growth at Edenbridge without presenting a robust comparison with lower-growth or alternative options in less flood-prone locations. This appears inconsistent with the NPPF Sequential Test and the requirement to avoid increasing flood risk to people and property. The Plan is therefore not ‘positively prepared,’ ‘justified’ or ‘consistent with national policy’ in relation to flood risk and climate change adaptation.”

Equity between settlements and effective delivery (Positively prepared / Effective / Justified)

“The evidence is not sound because the Initial Note supports maximising urban density and brownfield use in the larger, better-connected settlements, whereas the current strategy places a very large quantum of growth on a smaller, flood-constrained town with relatively poor road connectivity (Edenbridge), while giving lower growth to some other constrained settlements and not clearly maximising capacity in better-connected locations. There is no clear SA explanation of why this is the most appropriate strategy, or how infrastructure and flood-risk constraints at Edenbridge will be overcome in practice. This undermines the Plan’s ‘positively prepared,’ ‘effective’ and ‘justified’ status.”

7. Edenbridge Impact

Overall, the evidence shows that Edenbridge has been placed into a single, very high-growth scenario in a known flood-risk corridor, with **2,136 allocation homes on 17 sites (2,801 in total)**, without the robust reasonable alternatives, equity testing and updated SA work that should underpin such a decision.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Health, Leisure, Open Space

1. Big picture

Across the three key evidence documents and the emerging Local Plan policies, the Council is essentially doing the following:

- **2018 Open Space Study** – This audits parks, amenity green space, children’s play, natural green space, allotments, and cemeteries. It uses Fields in Trust standards for quantity and walking distance, identifies shortfalls (including in north Edenbridge), and proposes using Community Infrastructure Levy (CIL) and on-site provision to improve things.
- **2024 Playing Pitch & Outdoor Sport Strategy (PPOSS)** – This looks at pitches and outdoor sport (football, rugby, cricket, hockey, tennis, netball, bowls, athletics). It treats “Edenbridge and the South” as one analysis area, quantifies spare capacity or shortfall in “match sessions,” and gives a site-by-site action plan for Edenbridge facilities (Lingfield Road Recreation Ground, Blossoms Park, Mowhurst, Spitals Cross MUGA, Edenbridge Leisure Centre artificial grass pitch (AGP)). There is also a short Addendum correcting mistakes, mainly around cricket Section 106 money in Sevenoaks parish.
- **2024 Sports Facility Strategy & Needs Assessment** – This focuses on built sports facilities: leisure centres, pools, gyms, sports halls, and studios. It identifies Edenbridge Leisure Centre as one of three main public leisure centres, notes its age and condition, and calls for an options appraisal to decide whether to refurbish or replace it, and how to expand gym capacity by 2040.
- **Local Plan Health & Wellbeing / Green Space policies** – These talk in general terms about promoting healthy lifestyles, access to open space, protecting sports facilities and reducing health inequalities, but do not yet hard-wire most of the Edenbridge-specific deficits and actions identified in the evidence documents into binding policy.

In short, the Council’s own evidence base recognises that Edenbridge has gaps in provision and ageing facilities. The emerging Local Plan text does not yet guarantee that those gaps will be filled over the extended plan period to 2042, particularly given the uncertainty and political debate around Edenbridge Leisure Centre and the all-weather pitch.

2. What is positive for Edenbridge in the evidence

Open space and play

We welcome the following points in the 2018 Open Space Study:

- It explicitly recognises that parts of **north Edenbridge are undersupplied with amenity green space**, even though many areas of the district are described as “reasonably well supplied.”
- It clearly sets out national **quantity and walking distance standards** (Fields in Trust) for parks, amenity green space and children’s play, and states that the Council should use these standards in Local Plan policies and CIL decisions.
- It identifies a **serious shortfall in equipped children’s and young people’s play** across the district and proposes using poor-quality amenity spaces to create new play areas, with clear triggers for on-site LAPs, LEAPs, and NEAPs in new housing.
- Its long-term action plan says the Council should “try to meet quantitative shortfall of appropriately sized open space,” including **parks and amenity green space in north Edenbridge**, and improve quality using CIL and on-site provision.

Playing pitches and outdoor sport

We also recognise important positives within the PPOSS:

- It treats “**Edenbridge and the South**” as a **distinct analysis area**, rather than subsuming Edenbridge into a wider district-wide picture, and it gives **named actions for specific Edenbridge sites**.
- It is candid about current shortfalls and exported demand:
 - Rugby at **Lingfield Road Recreation Ground** is overplayed and sits on fragile, short-term tenure.
 - Cricket shows substantial Saturday and Sunday shortfalls in the area, with **Edenbridge Cricket Club** an important contributor to that picture.
 - Athletics, bowls, and netball have **no provision in Edenbridge**, with demand exported to Sevenoaks and elsewhere.
- The site-specific actions for Edenbridge are **concrete and practical**: improving Blossoms Park square and nets, formalising and improving Lingfield Road Rec (including potential floodlighting), encouraging use of spare capacity at Mowhurst, resurfacing the poor-quality Spitals Cross MUGA, and deciding the future of the Edenbridge Leisure Centre AGP.

Built sports facilities and leisure centres

Within the Sports Facility Strategy & Needs Assessment, we particularly note that:

- It **recognises Edenbridge Leisure Centre as one of the district’s three strategic public leisure centres**, serving a wide rural catchment in the south.
- It frankly acknowledges the **age and condition of Edenbridge’s pool and building**, and the need for investment rather than endless patching.

- It commits on paper to a **formal options appraisal**, backed by Sport England modelling, before major decisions are taken on Edenbridge and Sevenoaks leisure centres.
- It recognises that **Edenbridge and White Oak serve more deprived communities** and stresses the need to keep prices affordable and maintain health and exercise programmes there – directly reflecting the Health & Wellbeing focus that the Local Plan claims to promote.

Common positives

Across all of the evidence, we welcome that:

- There is clear technical work: counts, audits, quality scores, “match-equivalent sessions,” and straightforward standards that can be translated into policy tests.
- The documents explicitly state that they **support the Local Plan and decisions on Section 106 and CIL. If this is the Council’s evidence, then Local Plan policies must follow it through for Edenbridge.**

3. What is vague or risky – and how this affects Edenbridge

3.1 Plan period mismatch and out-of-date baselines

- The **Open Space Study (2018)** was written for a Local Plan running to 2035. It does not reflect newer growth scenarios or changing patterns of use post-Covid.
- The **Playing Pitch Strategy and Sports Facility Strategy (2024)** are calibrated to a Local Plan and demand forecast to **2040**, not 2042.

Why this matters for Edenbridge

If Edenbridge is to take significant housing growth up to 2042:

- Open space calculations based on **2018 data and a 2035 horizon** will understate the scale and urgency of new parks, play areas and amenity spaces needed in the town.
- Pitch and facility modelling that stops at **2040** will under-estimate future pressure on Edenbridge’s pitches and leisure centre (particularly cricket and rugby) and ignore two years of additional demand.

3.2 Edenbridge blurred into “Edenbridge and the South”

- The PPOSS combines **Edenbridge with an arc of rural parishes** in a single analysis area.
- Spare capacity in small rural clubs is then used to offset shortfalls identified within that area.
- There is **no clear step** that asks: “What does the town of Edenbridge itself need, given its role as the main growth point in the south?”

Risk

- Because the evidence groups us into a wide area called “Edenbridge and the South,” the Council could argue that developer contributions from new housing in Edenbridge are

fixing shortfalls across that whole area, even if the actual projects funded are in nearby rural villages or in Sevenoaks. This creates a loophole where Edenbridge takes the housing growth and generates the money, but the improvements to pitches, play areas and leisure facilities do not have to be delivered in, or directly for, Edenbridge itself, leaving our town's facilities under continued pressure despite being the source of much of the new demand.

3.3 Big deficits, small fixes

- **Cricket:** A large shortfall in weekend match capacity is acknowledged, but the proposed solutions largely focus on improving quality at existing squares, using spare capacity in Cowden and Stonewall Park, and drawing on cricket funding that is in fact tied to Sevenoaks parish.
- **Rugby:** Lingfield Road Recreation Ground is overplayed and on fragile tenure, yet the proposed remedies are mainly better maintenance, some floodlighting, and improvements to ancillary facilities such as the boiler.
- There is **no settlement-level capacity plan** that sets out what Edenbridge itself must have by 2040/42 in terms of number of cricket squares, rugby pitches, training facilities, or indoor spaces.

Risk

- Edenbridge accepts the development, but the “solutions” to sports shortfalls are **largely off-site**, spread across the wider analysis area or centred on Sevenoaks town, rather than ensuring robust provision in Edenbridge itself.

3.4 Leisure centre and all-weather pitch – a policy vacuum

- The Sports Facility Strategy's key message for Edenbridge is that the Council should “determine the long-term future” of the leisure centre, whether by refurbishing or replacing it. There are **no clear criteria**, no “no net loss” test, no explicit guarantee that it remains in Edenbridge, and no requirement that any replacement must open before any closure.
- The disused **AGP at Edenbridge Leisure Centre** is acknowledged but treated as an unresolved question. There is no explicit statement that it is protected sports land, and **no firm requirement** that any redevelopment must re-provide equivalent or better AGP / 3G capacity in Edenbridge.
- In practice, the Council has **stopped leasing the AGP and allowed it to deteriorate**, while now exploring ideas that would move the leisure centre onto part of that area, funded by housing. This appears to amount to managed decline rather than a transparent decision that the facility is genuinely surplus to requirements.

Risk

- The AGP and potentially part of the leisure centre site risk becoming a **land bank for housing** rather than being treated as strategic sports infrastructure for the south of the district.

- Edenbridge residents lose out twice: first during the period of decay and non-use, and then again if the land is used to justify housing without guaranteed, equivalent replacement provision in the town.

3.5 Local Plan does not pull the evidence through for Edenbridge

Across the Health & Wellbeing and green space policies, the Local Plan currently:

- Talks in general terms about:
 - Protecting open space and sports facilities.
 - Promoting healthy lifestyles; and
 - Reducing health inequalities.
- But **does not provide specific policy hooks** which:
 - Require development in Edenbridge to address the **amenity green space and children’s play shortfalls in north Edenbridge** identified in the Open Space Study.
 - Require major sites in Edenbridge to **meet or exceed Fields in Trust standards** for the quantity and accessibility of parks, amenity green space, and play.
 - **Embed the PPOSS actions for Edenbridge pitches** into policy, including rugby, cricket, the MUGA and the AGP.
 - Commit to **no net loss of leisure centre capacity in Edenbridge**, or to re-provision in Edenbridge if anything is relocated or rebuilt.

As a result, the evidence base is strong on **diagnosis**, but the connection into binding Local Plan policy is weak, particularly for Edenbridge.

3.6 Equity between settlements

We are particularly concerned about equity between settlements:

- **White Oak in Swanley** now has a brand-new centre and a long-term contract.
- **Sevenoaks** benefits from multiple modernised facilities and a significant share of Section 106 money for sport anchored to its parish.
- **Edenbridge**, by contrast, has:
 - An ageing leisure centre and pool.
 - A disused AGP that has been allowed to decline.
 - Exported athletics, bowls, and netball demand; and
 - Shortfalls in amenity green space and children’s play in the north of the town.

Yet neither the evidence nor the Plan clearly commits to levelling this up. Nor is there a clear equalities assessment of what happens to **lower-income residents or residents without cars** if Edenbridge’s facilities are run down, moved, or replaced with “drive-to” options elsewhere.

4. What needs to change – in the evidence and in the Local Plan

We set out below a single, coherent set of changes that we consider necessary.

4.1 Update and sharpen the evidence

Refresh the 2018 Open Space Study to 2042

- Extend the quantity and accessibility analysis to cover the full **2042 plan period**.
- Use updated population and housing figures, including **all Edenbridge allocations**.
- Provide clear figures for how much extra **amenity green space and play provision Edenbridge needs**, expressed in hectares and in numbers/size of play areas, with a particular focus on **north Edenbridge**.

Add settlement-specific analysis for Edenbridge in the PPOSS and Sports Facility Strategy

- Within “Edenbridge and the South,” state clearly that **Edenbridge town is the principal focus** for meeting the area’s needs.
- For **cricket, rugby and AGP/hockey**, spell out clearly what Edenbridge needs in its own right by 2040/42.
- For the leisure centre, include a simple **options matrix** (for example, refurbish, rebuild on site, town-centre move, etc.) tested against **health, equalities, access, and carbon**, not just cost.

Explicitly treat the Edenbridge AGP as protected sports land

- Acknowledge the history of under-use and the current condition.
- Make clear that its decline reflects **management decisions**, not a proven lack of community need.
- Set a clear expectation that any redevelopment of that area must secure **equivalent or better AGP / 3G provision in Edenbridge**.

4.2 Lock the evidence into Local Plan policy for Edenbridge

Strategic green space / open space policy

We ask that the Local Plan:

- **Adopts Fields in Trust standards** on quantity and accessibility as the baseline for all new housing.
- Requires an **Open Space Statement** for major schemes, showing how they meet or exceed those standards.
- **Prioritises new and improved open space and children’s play in identified deficit areas**, specifically including north Edenbridge.

Edenbridge-specific policy (EDN1 or equivalent)

We ask that the Edenbridge place-based policy is strengthened so that:

- Major development in Edenbridge (including town centre schemes and housing allocations) must:
 - Address the **identified shortfalls in amenity green space and equipped children's and young people's play**.
 - Provide at least one new **multi-functional neighbourhood park with play** in or near north Edenbridge, within walking distance standards.
 - Upgrade poor or average amenity spaces (such as The Platt and other scored sites) so they function as **safe, attractive local green spaces** for informal recreation and play.
- Development in Edenbridge must **prioritise local re-provision of pitches and built sports facilities** where there is any impact on existing provision.

Playing pitch and outdoor sport policy hook

We ask for a district-wide policy, with a **specific Edenbridge clause**, that:

- Applies the **PPOSS recommendations** as a material planning consideration.
- States that **contributions from development in Edenbridge will be spent first on facilities in or immediately adjoining Edenbridge** (Lingfield Road Rec, Blossoms Park, Mowhurst, Spitals Cross, the AGP area and related provision), before being directed elsewhere.
- Requires any proposal impacting Lingfield Road Recreation Ground or Edenbridge Cricket Club to demonstrate **no net loss of capacity or quality for Edenbridge teams**.

Leisure centre and AGP safeguard

In the Health & Wellbeing chapter and the Edenbridge place-based policy, we ask that the Plan:

- Commits the Council to maintaining a **full-service public leisure centre in Edenbridge** over the plan period.
- States that any redevelopment, relocation or replacement of Edenbridge Leisure Centre or its associated outdoor sports land (including the AGP) will only be supported where:
 - There is **no net loss of water space, sports hall space, gym capacity, squash, and studio provision** for Edenbridge residents.
 - Replacement facilities of at least **equivalent quality, accessibility and affordability** are provided **in or immediately adjoining Edenbridge**.
 - Replacement facilities are **operational before any closure** of existing provision.
 - A **Health Impact Assessment and Equalities Impact Assessment** demonstrate that changes will not worsen health inequalities or access for residents without cars.

5. Requests to the Council

We set out the following specific requests to the Council:

- **We ask that the Council updates and extends** the 2018 Open Space Study and the 2024 Playing Pitch and Sports Facility Strategies so that they explicitly cover the Local Plan period to 2042, with settlement-level analysis for Edenbridge itself, not just “Edenbridge and the South”.
- **We ask that the Council writes the identified Edenbridge deficits** – in amenity green space, children’s and young people’s play, cricket, and rugby capacity, and built leisure and AGP provision – directly into the Local Plan policies, with clear requirements on new development in Edenbridge to address them using Fields in Trust and Sport England standards.
- **We ask that the Council commits in policy to no net loss of sports and leisure provision in Edenbridge**, including Edenbridge Leisure Centre and its all-weather pitch area, and to replacing any lost facilities with at least equivalent provision in Edenbridge itself, brought into use before any existing facilities are closed.
- **We ask that the Council makes clear in both evidence and policy that developer contributions generated in Edenbridge will be prioritised for Edenbridge facilities**, and that Section 106 monies ring-fenced to Sevenoaks parish or other locations cannot be treated as “solving” sports shortfalls in Edenbridge.
- **We ask that the Council undertakes and publishes robust Health Impact and Equalities Impact Assessments** of options for Edenbridge’s leisure and sports facilities, so that residents in the south of the district are not left worse off while newer facilities and funding are concentrated in Sevenoaks and Swanley.

6. Regulation 19 soundness & legal points – for use in written representations

We set out below arguments we consider relevant to the Regulation 19 soundness tests and basic legal compliance.

Plan period mismatch – Positively prepared / Justified / Consistent with national policy

- The evidence is not sound because the open space, playing pitch and sports facility work either predates the current Local Plan or is explicitly based on a plan horizon to **2040**, whereas the emerging Local Plan runs to **2042** and relies on later population figures and an updated National Planning Policy Framework (NPPF). The Council has not shown how it has tested health, open space, and leisure needs in Edenbridge over the full period to 2042. The plan is therefore **not positively prepared, not justified** by proportionate, up-to-date evidence, and not fully **consistent with national policy** on robust assessment of infrastructure needs.

Edenbridge vs “Edenbridge and the South” – Justified / Effective

- The evidence is not sound because by treating Edenbridge and surrounding rural parishes as a single analysis area, it **masks the specific needs of Edenbridge** as the main growth point in the south of the district. Spare capacity in small rural clubs is used to offset shortfalls, instead of properly testing whether new or expanded facilities are

needed in the town itself. This is not a **justified** basis for planning provision and undermines the **effectiveness** of the Plan in delivering sport and leisure where growth is actually happening.

Disconnect between evidence and policy – Justified / Effective

- The evidence is not sound because, while it clearly identifies deficits in amenity green space and children’s play in north Edenbridge, overplay in rugby, cricket shortfalls, the disused AGP and the ageing Edenbridge Leisure Centre, the draft Local Plan policies do **not secure the delivery of the new and improved facilities** required to address those deficits. The plan therefore fails the “**justified**” test, as policies are not aligned with the evidence, and the “**effective**” test, as there is no clear mechanism to meet these needs over the plan period.

Leisure centre and AGP – managed decline – Consistent with national policy / Effective

- The evidence is not sound because it assumes the Edenbridge all-weather pitch and leisure centre are part of the town’s sports offer while, in practice, the Council has stopped leasing the AGP and allowed it to fall into disrepair and is now considering housing-led redevelopment options that are not transparently tested in the evidence base. This amounts to **managed decline rather than a demonstration that the facility is surplus**, and conflicts with national policy on protecting sports land. Without a clear “**no net loss**” policy and a commitment to local re-provision in Edenbridge, the Plan is not **effective** or **consistent with the NPPF**.

Use of developer contributions and Section 106 – Justified / Effective

- The evidence is not sound because it **over-states the role of existing Section 106 monies**, particularly in Sevenoaks parish, in addressing district-wide sports shortfalls, while failing to demonstrate that new development in Edenbridge will fund and deliver facilities that are genuinely accessible to Edenbridge residents. Contributions ring-fenced to other parishes cannot reasonably be treated as solving shortfalls in Edenbridge. This weakens both the **justification** and **effectiveness** of the Plan in planning for sport and leisure infrastructure.

Equity between settlements and equalities – Positively prepared / Consistent with national policy

- The evidence is not sound because it does not adequately address the **relative position of Edenbridge compared with Sevenoaks and Swanley**, nor does it robustly assess the equalities and health impacts of allowing Edenbridge’s facilities to age, decline or be relocated. White Oak in Swanley benefits from a new facility and long-term security, while Edenbridge’s future is left to a later options appraisal with no explicit guarantee of equivalent provision in the town. This is not a **positively prepared** plan for all parts of the district and does not sit comfortably with national policy on **reducing health inequalities** and providing accessible opportunities for sport and physical activity.

Edenbridge Impact

As currently presented, the Council's health, leisure and open space evidence would allow Sevenoaks and Swanley to consolidate and upgrade modern facilities while leaving Edenbridge with ageing buildings, a deteriorating all-weather pitch, and only vague future commitments, despite Edenbridge accommodating a significant share of the growth to 2042.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Historic and Built Environment

This is the Sevenoaks District Historic Environment Review (December 2017). It is a district-wide evidence report on heritage: listed buildings, conservation areas, market towns, farmsteads, parks and gardens, and related historic assets.

For Edenbridge, the Review:

- Treats the town as one of the three market towns in the District, alongside Sevenoaks and Westerham.
- Describes Edenbridge's historic development (the Wealden iron industry, the Roman road, later railway-led growth) and its role as a small country town and service centre.
- Records that the Edenbridge Conservation Area contains around 50 listed buildings.
- Identifies clear vulnerabilities, including inappropriate infill development, poor-quality replacement materials, intrusive road markings and signage, unsympathetic shopfronts, and the impact of heavy traffic on historic town centres.
- Notes heritage associated with Edenbridge's railway infrastructure (stations, cottages, bridges, and associated structures).

Within the draft Local Plan, the Review is mainly signposted in:

- The Historic Environment chapter, which explains that the Council commissioned the 2017 Review to understand the District's historic environment and local distinctiveness.
- The Historic Environment Chapter
- (Policy HEN1), where the Sevenoaks District Historic Environment Review is listed as one of the documents that applicants should use to reflect "local character and distinctiveness".

For Edenbridge, this document therefore acts as the Council's own statement that the town centre and Conservation Area are highly significant, sensitive, and under pressure from traffic and poorly designed change. It underpins, but does not itself constitute, Local Plan policy for heritage and design.

What's good for Edenbridge

Clear statement of Edenbridge's importance as a market town.

The Review recognises Edenbridge explicitly as one of the District's "distinguished" market towns and describes:

- Its medieval and post-medieval growth.
- Its role in the Wealden iron industry.
- Its subsequent railway-driven expansion.
- Its current function as a shopping and commercial centre for surrounding villages.

This supports our position that Edenbridge should not be treated simply as a dormitory town. It demonstrates that Edenbridge has a strong, independent, and historically rooted identity and role within the District.

Recognition of the quality and concentration of heritage in Edenbridge

The Review confirms that the Edenbridge Conservation Area contains around 50 listed buildings and that the market towns are of "high historic and architectural significance" because of the quality of their buildings and spaces.

This provides a clear evidence base for robust heritage protection in the Local Plan and for any Edenbridge-specific policies. It helps justify a strong focus on conservation and enhancement in Edenbridge's historic core.

The Review sets out specific threats to the market towns, which are plainly relevant to Edenbridge:

- Infill development that does not respect traditional forms and plot sizes.
- Loss of traditional details (such as timber windows and doors) and their replacement with cheap, low-quality modern materials.
- Over-dominant road markings and poor-quality signage.
- Inappropriate replacement shopfronts.
- Loss of historic paving and kerbs.

It also highlights **traffic noise, pollution and vibration**, and the effect of traffic on the enjoyment, occupation, and reuse of buildings on busy roads.

This gives strong and detailed evidence that any substantial change to Edenbridge High Street and the wider town centre should be heritage-led and accompanied by effective traffic and public realm management.

The Review records the importance of Edenbridge and Edenbridge Town stations, railway cottages, bridges, and associated infrastructure, and explains how the railways have shaped settlement patterns and the landscape.

This is valuable evidence to support our view that development around the stations must respect the established railway character and should not treat these areas as generic "brownfield opportunity" locations with no heritage context.

Cross-reference in Local Plan chapters

- The Historic Environment chapter explicitly identifies the 2017 Review as a key research document on local distinctiveness and heritage character.
- The Design chapter requires development to reflect “local character and distinctiveness” with reference to the Sevenoaks District Historic Environment Review, alongside the District Character Study and other guidance (Policy DE3).

These cross-references, lead us to insist that Council officers and applicants use the Edenbridge sections of the Review in preparing and determining planning applications.

What’s vague or risky

Document age for a Local Plan to 2042

The Review dates from 2017, it predates:

- The more recent Sevenoaks District Character Study (2022), which is heavily relied upon in the Design chapter.
- Recent changes in retail activity, town centre uses and traffic patterns, including those following the COVID-19 pandemic.
- Any newer development strategy which may increase housing and employment pressures on Edenbridge beyond those envisaged in 2017.

For a Local Plan running to 2042, depending on a 2017 evidence base without an update or addendum for the market towns, especially where major change is proposed, risks challenge that the evidence is insufficiently up-to-date or proportionate.

The Review groups Sevenoaks, Westerham and Edenbridge together and presents a single combined list of threats and opportunities. There is little differentiation of:

- Edenbridge’s specific issues (for example the A25/A22 traffic mix, its relatively fragile retail offer, and local economic context).
- The relative scale of post-war and later 20th-century expansion and recent development around Edenbridge compared with Sevenoaks and Westerham.

This makes it harder to derive from the Review, on its own, a clear case that Edenbridge needs a different level of protection or a distinct approach to growth from the other market towns. It weakens the argument for a tailored Edenbridge strategy unless supplemented with more detailed, settlement-specific evidence.

The Review identifies very specific threats to historic town centres, including:

- Traffic impacts.
- Insensitive infill development.
- Poor-quality shopfronts.
- Loss of historic paving and kerbs.

However, the Historic Environment chapter then presents only general policies, applying District-wide, and does not:

- Highlight market towns, or Edenbridge specifically, as places where these threats need proactive and targeted management.
- Commit to specific tools (such as public realm strategies, detailed shopfront guidance, or traffic management measures) tailored to Edenbridge.

Policies HEN1 and HEN2 address heritage assets in broad, non-place-specific terms. This creates a mismatch between the detailed, place-specific concerns in the evidence and the generic wording of the policies, which may raise soundness concerns.

The Design chapter is clear that developers should use the Character Study and the Historic Environment Review to respond to local character (Policy DE3). However, there is no explicit requirement that:

- Edenbridge site allocations (for example any EDN policies) must demonstrate how they have used the Edenbridge sections of the Review and the Edenbridge Conservation Area Appraisal.
- Edenbridge town centre policies must directly address the specific threats identified in the Review (traffic, shopfront quality, public realm).

This creates a risk that, if Edenbridge is expected to accommodate significant growth, the absence of clear heritage-led requirements will lead to over-intensification and gradual erosion of character. By contrast, Sevenoaks and Westerham may benefit more from existing Conservation Area guidance and stronger place-branding.

The Design chapter leans heavily on the 2022 Character Study and refers to future “Design in Sevenoaks” guidance. By contrast, the main heritage evidence remains the 2017 Review, and there is no indication that the Edenbridge Conservation Area Appraisal (2012) will be updated.

This imbalance risks leaving heritage considerations, particularly in Edenbridge, lagging behind newer design and growth tools. For Edenbridge’s historic core, which could mean weaker protection relative to the ambitions for new development.

What to change

We set out below our proposed changes, which are intended to be constructive and to align evidence, policy, and implementation for Edenbridge.

a) Update or supplement the Historic Environment Review for Edenbridge

We ask the Council to produce a short addendum to the 2017 Review to bring Edenbridge’s evidence up to date, including:

- Post-2017 changes in the town centre and Conservation Area.
- An updated assessment of traffic impacts on the historic core.
- A clearer statement of Edenbridge’s role, vulnerabilities and opportunities compared with Sevenoaks and Westerham.

Suggested new paragraph in the Historic Environment chapter, after 7.8:

“For the market towns of Sevenoaks, Edenbridge and Westerham, the Council will prepare updated settlement-specific heritage statements as an addendum to the Sevenoaks District Historic Environment Review (2017). These will identify the particular heritage significance, vulnerabilities, and opportunities in each town, and will inform future development management decisions, design codes, and public realm improvements.”

b) Tie the evidence explicitly to Edenbridge policies and applications

We propose adding to Policy HEN1 (after the list of sources in (d)):

“For proposals within or affecting the market towns of Sevenoaks, Edenbridge and Westerham, applicants must have regard to the relevant sections of the Sevenoaks District Historic Environment Review (2017) and any subsequent settlement-specific heritage statements and demonstrate in Heritage Statements how the identified vulnerabilities and opportunities have informed the design and layout of development.”

We also propose adding to Policy DE3 or its supporting text (after the list of documents in paragraph 5.14):

“For development in Edenbridge, Sevenoaks and Westerham, Design and Access Statements will explicitly explain how the scheme responds to the specific historic character, townscape and vulnerabilities identified for the relevant settlement in the Sevenoaks District Historic Environment Review and Conservation Area Appraisals.”

c) Strengthen shopfront and public realm protection for Edenbridge

We recommend a settlement-specific sentence within the supporting text for Policy HEN6 on shopfronts, as follows:

“Where the Historic Environment Review identifies particular vulnerabilities from inappropriate infill and replacement shopfronts, development proposals and public realm schemes will be expected to retain and repair historic paving, kerbs and street furniture, avoid over-dominant road markings and signage, and use materials and detailing that reflect the traditional character of the Conservation Area.”

d) Require Edenbridge allocations to use this evidence

Within the Edenbridge allocation policies (for example EDN1 and any other Edenbridge-specific allocations), we propose a standard criterion along the following lines:

“Proposals must be accompanied by a Heritage Statement proportionate to the scale and location of development, demonstrating how the scheme will conserve and enhance the historic character of areas as identified in the Sevenoaks District Historic Environment Review (2017), the Edenbridge Conservation Area Appraisal and any subsequent settlement-specific heritage statements.”

We ask that the Council:

- Updates or supplements the 2017 Sevenoaks District Historic Environment Review with settlement-specific heritage statements for Edenbridge, Sevenoaks and Westerham, so that the evidence base is suitable for a Local Plan running to 2042.

- Amends the Historic Environment and Design chapters so that proposals in Edenbridge must explicitly refer to, and respond to, the Edenbridge sections of the Historic Environment Review and the Edenbridge Conservation Area Appraisal.
- Strengthens the wording on shopfronts and public realm in Edenbridge town centre to address the specific vulnerabilities identified in the evidence (inappropriate infill, poor-quality replacement materials, intrusive signage and road markings, and loss of historic paving and kerbs).

Regulation 19 soundness & legal points

Positively prepared / Justified – up-to-date, proportionate evidence

The evidence is not sound because the Historic Environment Review is from 2017 and has not been updated or supplemented to support a Local Plan to 2042, notwithstanding significant changes in policy context, town centre uses and potential growth pressures in Edenbridge. This undermines the “positively prepared” and “justified” tests, since national policy expects local plans to be underpinned by adequate, proportionate, and up-to-date evidence, and to demonstrate that reasonable alternatives and settlement choices have been considered on the basis of robust baseline information.

Justified – settlement equity and reasonable alternatives

The evidence is not sound because the Review groups Sevenoaks, Westerham and Edenbridge together as generic “market towns” and does not clearly distinguish the differing roles, capacities, and vulnerabilities of each settlement. If the Local Plan requires Edenbridge to accommodate significant growth without a stronger Edenbridge-specific heritage and character analysis, the strategy risks not being justified compared with reasonable alternatives (for example, different distributions of growth or stronger mitigation measures in Edenbridge).

Effective – deliverable conservation outcomes

The evidence is not sound because, although it identifies very specific threats to Edenbridge’s historic town centre—including inappropriate infill development, cheap replacement materials, harmful shopfronts, intrusive signage, and traffic impacts—these are not clearly converted into precise Local Plan policy requirements for Edenbridge. A generic, District-wide evidence document with no defined mechanism for settlement-specific action is unlikely to be effective in delivering conservation and enhancement across the plan period.

Consistent with national policy – positive strategy for the historic environment

The evidence is not sound because it is not currently being used to support a clear “positive strategy” for conserving and enhancing the historic environment in Edenbridge, as required by the National Planning Policy Framework (NPPF). The Council’s own evidence identifies Edenbridge’s Conservation Area and market town character as both highly significant and vulnerable, but the Local Plan does not yet set out a correspondingly robust, Edenbridge-specific package of policies and tools (for example heritage-led design codes, public realm strategies, and settlement-specific guidance).

Consistency across the Plan and legal robustness

The evidence is not sound because there is a marked imbalance between relatively recent design and character evidence (for example the 2022 Character Study and forthcoming “Design in Sevenoaks” guidance) and older heritage evidence (the 2017 Review and the 2012 Edenbridge Conservation Area Appraisal). This inconsistency makes it harder to demonstrate, both at examination and in development management, that design, heritage, and growth policies are

aligned for Edenbridge. It risks weakening the Plan's legal robustness where heritage harm is alleged.

Edenbridge Impact

In practice, relying on an older, generic heritage review without a clear Edenbridge-specific policy response risks leaving Edenbridge's historic town centre more exposed to harm from new development than other settlements in the District.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Housing – Sevenoaks District Targeted Review of Local Housing Need (October 2025)

1. What this document does (in plain English)

This Targeted Review of Local Housing Need (TRLHN) is the Council's main housing needs evidence for the new Local Plan prepared under the December 2024 National Planning Policy Framework (NPPF). It:

- Calculates overall housing need using the Government's standard method – 1,145 homes per year.
- Identifies a net need for 353 affordable homes per year and recommends an 80% social rent / 20% shared ownership affordable tenure split.
- Sets out detailed dwelling mix by size and type, and splits this down by Place-making Areas, including the South area that covers Edenbridge.
- Quantifies specialist needs: extra housing for older people, wheelchair-accessible homes (5% to M4(3) wheelchair standard; all others to M4(2) accessible standard), and self/custom build (4% of all dwellings; at least 5% on sites of 10+).
- Looks at Build to Rent (BtR) and Affordable Private Rent, including whether 80% of market rent is actually affordable and what policy wording the Council should put in place.

The Local Plan housing chapter then quotes and relies on this document – for example on the 1,145 homes per year, the affordable need, the 80/20 split, older persons figures, accessibility standards, and self-build assumptions.

For Edenbridge, the TRLHN is indirectly relevant because Edenbridge sits in the South Place-making Area. The study gives net affordable need of 37 homes per year in the South, out of 353 district-wide (around 10.5% of the total), and sets out the mix of houses, flats and level-access homes needed there.

2. What's good for Edenbridge and equity between places

Up-to-date and NPPF-aligned

The TRLHN is recent (August 2025) and explicitly framed as evidence for the December 2024 NPPF and Planning Practice Guidance (PPG).

It provides a clear, transparent statement of local housing need and the key policy messages the Plan should respond to (for example on social rent, accessibility, and self-build).

The study is honest about the scale of affordable need (353 homes per year) and the severity of affordability pressures in the district.

It firmly supports social rent as the main tenure, recommending 80% social rent and 20% shared ownership, which the Local Plan then picks up in Policy H2.

From an Edenbridge perspective, that is helpful, because a large quantum of new housing is now proposed in the town and residents are already under price pressure.

The TRLHN sets out a district-wide dwelling mix by type and size and then refines this by Place-making Area, including the South/Edenbridge.

It quantifies the need for 568 C3 older persons dwellings, 84 extra-care units and 308 residential care units, and states that 5% of all new dwellings should be wheelchair-accessible (M4(3)) and all others should meet the M4(2) standard.

Policy H1 in the Local Plan picks this up directly by requiring all new homes to meet M4(2) and at least 5% of homes on schemes of 20+ units to be M4(3)b wheelchair units as social rent.

For Edenbridge, as a town absorbing a high volume of new development, this should, in principle, generate a good number of accessible and older persons' homes.

The TRLHN recommends 4% of new dwellings district-wide to be self/custom build, and 5% of dwellings on sites of 10+ units.

Policy H8 picks this up by requiring at least 5% of plots on sites of 10+ homes to be made available and supporting self-build in neighbourhood plans and rural exception sites.

This gives us a clear policy hook to say that Edenbridge's large sites should, as a minimum, deliver the full 5% self-build, not less.

The TRLHN is realistic about Build to Rent. It highlights that the discounts needed to make BtR genuinely affordable for Local Housing Allowance-dependent households are higher than the standard 20%, and it explicitly says decisions on discounts must be affordable to local incomes.

This provides an evidence base for tightening Policy H5, so Edenbridge is not used for "premium" BtR product that does not address local need.

Recognition of major Edenbridge schemes

The TRLHN's stakeholder appendix lists Four Elms Road, Edenbridge (340 homes permitted at 40% affordable, plus a further 450 homes pending decision) as a significant strategic scheme.

That acknowledges the scale of change already committed or on the way in Edenbridge, which is important context when the Council is considering further allocations and cumulative impacts.

3. What's vague or risky for Edenbridge

a) No settlement-level needs vs very high Edenbridge numbers

The TRLHN breaks affordable need down only to Place-making Areas, not to individual settlements. Edenbridge is submerged within the South area.

The South area's net affordable need is 37 homes per year, about 10.5% of the district total (37/353).

By contrast, the Local Plan and extant permissions already load a very large number of homes onto Edenbridge. The study itself highlights 790 homes at Four Elms Road (340 permitted + 450 pending), and we understand that Edenbridge is planned for around 2,136 Local Plan homes plus additional existing consents taking it to 2,801 over the period.

The evidence base does not:

- Compare the South/Edenbridge share of planned homes with its share of assessed need; or
- Test whether this level of growth in Edenbridge is the most justified option compared with higher-tier settlements such as Sevenoaks, Swanley or the Northeast and Northwest areas, which have much higher net affordable needs (for example 115 per year in the Northeast and 68 per year in Sevenoaks & Surrounds).

This presents an equity risk for Edenbridge. The TRLHN provides numbers, but it does not justify why Edenbridge should take a disproportionate share of growth relative to its share of need and infrastructure capacity.

b) Dwelling mix for the South area is not tied clearly to Edenbridge allocations

The TRLHN gives a detailed dwelling mix for each Place-making Area, including the South, covering the proportions of 1/2-bed houses, 3-bed houses, 4+-bed houses, flats, and level-access/bungalows needed in the affordable sector.

Policy H1 says schemes should be “informed by the dwelling mix profiles set out in the latest housing needs evidence”, but:

- The actual percentages for the South are not reproduced in the Plan.
- There is no clear link between that South mix and what the Edenbridge site allocations (for example Four Elms Road and other ST2 sites) are expected to deliver in terms of size and type.

This is a gap. Without that link, there is a real risk that Edenbridge will receive a familiar pattern of 3–4 bed family houses, rather than the mix the TRLHN says is needed (including a significant share of smaller units and level-access homes).

c) Specialist and accessible housing – not targeted on growth settlements

The TRLHN highlights a significant gap in specialist housing and wheelchair-accessible homes and quantifies the extra need over the plan period.

The Local Plan does pick this up in H1 and H4, but:

- There is no indication of how much of the older persons and wheelchair housing should be directed to Edenbridge, despite the large growth planned there.
- The evidence remains “district-wide” and “place-based,” with no clear statement that growth settlements like Edenbridge must host an equitable share of the specialist provision.

This weakens the case that the Edenbridge allocations will create a balanced, inclusive housing offer rather than simply adding volume.

d) Build to Rent – evidence warns on affordability, but policy doesn't

The TRLHN is clear that standard 20% discounts on Build to Rent may not make the product affordable for households reliant on Local Housing Allowance, and that much deeper discounts may be needed in some locations.

Yet Policy H5 simply repeats the national “headline”: 20% on-site Affordable Private Rent at 80% of open market rent, with no embedded test that this is genuinely affordable in the local place-based context.

Given Edenbridge is specifically named as a suitable location for BtR schemes, this mismatch is risky. It leaves scope for high-rent BtR in Edenbridge that technically meets the 80% rule but is still out of reach for local workers and lower-income residents.

e) Self-build distribution – risk of pushing plots to cheaper, more stressed places

The TRLHN suggests 4% of dwellings should be self/custom build and at least 5% of homes on sites of 10+ dwellings. It notes strong register demand around Sevenoaks Urban Area and surrounds.

Policy H8 applies the 5% requirement across the district, without any expectation that the geographical distribution of plots should reflect the location of demand on the register.

That opens up a risk that developers “solve” their self-build obligations by pushing plots into lower-value, heavily allocated locations like Edenbridge, rather than where the evidence shows demand is strongest.

4. What to change

Below we set out the wording changes that we, as the Edenbridge Residents' Association, would ask the Council to consider in the Local Plan and supporting evidence.

a) Link the TRLHN dwelling mix directly to the South/Edenbridge allocations

Add to the supporting text after Policy H1 (Housing Mix):

“For each Place-making Area, and particularly in the South Place-making Area which includes Edenbridge, the Council will expect proposals to reflect the indicative dwelling mix set out in the Targeted Review of Local Housing Need (2025). For the South Area this includes a strong emphasis on smaller houses and level-access homes, including bungalows, across both market and affordable tenures. Planning applications for major housing sites in Edenbridge must demonstrate how the proposed mix has been shaped by that evidence.”

b) Require BtR in Edenbridge to prove local affordability, not just hit 80% of market rent

Replace Policy H5(1)(c) with:

“Provide at least 20% on-site affordable housing in the form of one and two bedroom Affordable Private Rented homes. Rent levels, including service charges, must be set so that the housing is genuinely affordable to households in housing need in the relevant Place-making Area, having regard to up-to-date local income evidence and Local Housing Allowance levels, and must be secured through a legal agreement for the lifetime of the development, with full nomination

rights to the Council. Where this cannot be demonstrated, the Council will require deeper rental discounts and/or alternative affordable tenures to deliver at least the same overall value as the headline affordable housing contribution required by Policy H2.”

c) Make self-build distribution follow the register and the TRLHN, not just land availability

Add a new clause to Policy H8:

“The mix and distribution of self-build and custom housebuilding plots across the district will be guided by the Council’s Self and Custom Build Register and the Targeted Review of Local Housing Need (2025), so that the proportion of plots in each Place-making Area, including the South Area which contains Edenbridge, is broadly in line with identified demand and does not fall disproportionately on any one settlement.”

d) Commission and publish an Edenbridge-focused addendum to the TRLHN

We ask that the Council commissions a short addendum to the TRLHN which:

“Sets out, for each Place-making Area and for key growth settlements including Edenbridge, a comparison between net annual affordable housing need and the Local Plan’s proposed housing and affordable housing supply, including extant permissions, together with a short commentary on whether the distribution of growth is proportionate to the level of need and infrastructure capacity.”

5. We request

We ask that the Council commissions an addendum to the Targeted Review of Local Housing Need to present settlement-level commentary for Edenbridge and a simple comparison between need and planned supply in each Place-making Area, including existing permissions.

We ask that the Council amends the supporting text to Policy H1 so that the South Place-making Area (including Edenbridge) is explicitly required to follow the TRLHN dwelling mix, with particular emphasis on smaller homes and level-access housing.

We ask that the Council strengthens Policy H5 so that Build to Rent schemes in Edenbridge must demonstrate that Affordable Private Rent levels are genuinely affordable to local incomes in the South Place-making Area, not just capped at 80% of market rent.

We ask that the Council amends Policy H8 so the number and location of self-build plots in Edenbridge is governed by the Self-build Register and TRLHN evidence and is proportionate to actual demand rather than the easiest land to develop.

6. Soundness and legal points (Regulation 19 arguments)

a) Justified – distribution and equity between settlements

We consider the evidence not sound because the TRLHN only presents needs at district and Place-making Area level and does not justify the very high concentration of growth in Edenbridge compared with its share of affordable need in the South Area (37 net affordable homes per year – about 10.5% of the district total).

This goes to the “justified” test, because the Plan’s spatial strategy and Edenbridge allocations are not clearly shown to be the most appropriate strategy when considered against reasonable alternatives, as required by the NPPF.

Edenbridge is being asked to take far more growth than the evidence shows it “needs,” without a clear explanation.

b) Justified and effective – mix and specialist housing

We consider the evidence not sound because the TRLHN provides detailed mix by Place-making Area and strong recommendations on specialist and accessible housing, but the Local Plan does not clearly translate this into expectations for the Edenbridge allocations, particularly in relation to the proportion of smaller homes, bungalows, and older persons housing in the South Area.

This undermines both “justified” (because the housing mix on Edenbridge sites is not tied back to evidence) and “effective” (because there is no clear mechanism to deliver the identified mix where most growth is going).

c) Consistent with national policy – Build to Rent

We consider the evidence not sound because the TRLHN shows that standard 20% discounts on Build to Rent may not be affordable to lower-income households and stresses the need to relate discounts to local incomes, but Policy H5 does not build that safeguard in for Edenbridge or anywhere else, simply repeating the 80% market rent rule.

This conflicts with the NPPF requirement to address the needs of those who require affordable housing and to ensure policies are based on up-to-date evidence. It weakens “consistent with national policy” and “effective” (because BtR may come forward but fail to meet the needs identified).

d) Positively prepared – not clearly balancing need and constraints between places

We consider the evidence not sound because it does not show how the Council has balanced meeting housing and affordable housing needs across the district with the very different constraints and capacities of individual settlements, especially Edenbridge, which already has significant commitments identified in the TRLHN itself.

Without a clear, evidenced comparison of need vs supply by area, it is difficult to show that the Plan is positively prepared in the NPPF sense – planning to meet as much of the identified need as reasonably possible in an equitable and sustainable way.

e) Legal/compliance – equalities and consistency

We consider the evidence not sound because the TRLHN highlights major shortfalls in specialist and accessible housing for older people and disabled people, but the Local Plan does not yet demonstrate that the large Edenbridge allocations will secure an equitable share of that specialist provision where major growth is happening.

This raises a potential equalities concern and touches on legal compliance, given the need to consider the Public Sector Equality Duty and to ensure that new development does not disadvantage older and disabled residents in particular locations.

7. Edenbridge impact

Overall, we consider that this evidence base sets the right district-wide priorities, but because it stops at Place-making Area level and is not firmly wired into the Edenbridge allocations, it leaves Edenbridge at risk of taking far more housing than its share of identified need, without

sufficient assurance that the mix and affordability of those homes will genuinely match local needs.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Housing – Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2025

1. What the document does (plain English)

This assessment updates the earlier 2022 Gypsy and Traveller Accommodation Assessment (GTAA), using the 2021 Census and the latest Planning Policy for Traveller Sites (PPTS 2024) definition.

It counts all Gypsy and Traveller households on sites and in bricks-and-mortar housing, looks at household growth and movement, and identifies a district-wide need for 192 additional residential pitches between 2025/26 and 2042/43, with 115 pitches needed in the first five years.

It reviews all current authorised, unauthorised, and temporary sites – including LA1 (the Council's site) and Seven Acre Farm on Hever Road, Edenbridge – and surveys households living there.

It identifies a “potential supply” of 140–151 pitches, mainly from regularising unauthorised sites and intensifying/expanding nine existing sites, including up to 15 extra pitches at Seven Acre Farm.

It recommends a criteria-based policy in the Local Plan and negotiated stopping (short-term transit places rather than a large formal transit site) and advises that the 192 pitches should be treated as a minimum, with updates every five years.

The Local Plan then lifts the 192 figures directly into Table 2.2 in the Housing Choice for All chapter and uses the “potential supply” list to help choose allocations under Policy GT1, including EDEN17 Seven Acres Farm (+5 pitches) and EDEN15 Mead Road (+5 pitches) in Edenbridge.

2. What's good (especially for Edenbridge)

Up-to-date and aligned with national policy

The assessment uses 2021 Census data and recognises the new PPTS 2024 definition, which is what the National Planning Policy Framework (NPPF 2024) expects. This is better than relying on older datasets.

Clear headlines need that matches the Plan

The 192-pitch figure, including 115 pitches in the first five years, is clearly set out and then directly repeated in the Local Plan's Housing chapter, so there is at least a consistent baseline between the evidence and the policy.

Proper recognition of existing sites in Edenbridge

The GTAA correctly records both the Council's Hever Road site (LA1 – 17 pitches) and Seven Acre Farm (16 pitches) as permanent authorised sites with households interviewed. This means the evidence does not “forget” the existing heavy concentration at Edenbridge.

A range of supply options, not just new greenfield sites

The document looks at regularising unauthorised pitches, intensifying some existing sites, and natural turnover/dissolution, rather than assuming all need is met by entirely new allocations. In principle this reduces pressure for new Traveller sites on sensitive greenfield land.

3. What's vague or risky (for Edenbridge and comparison between settlements)

a) No settlement-level picture of who is taking what

The GTAA is entirely district-wide in its conclusions. There is no breakdown of:

- How many existing pitches are in each settlement; and
- How the 192 extra pitches might reasonably be shared out.

Yet we know from the site list that Edenbridge already has substantial provision on Hever Road (the Council's LA1 site and Seven Acre Farm).

The Local Plan is then using this district-wide evidence to underpin 10 allocated pitches in Edenbridge alone (EDEN17 and EDEN15), with no evidence showing that other settlements are taking an equivalent share relative to their size or housing growth.

This opens the door to Edenbridge being used as the “go-to” area for meeting Traveller need without any proper check on proportionality between settlements.

b) Heavy implied reliance on intensifying Seven Acre Farm

Tables ES3/ES4 and Table 8.3 show 47–58 potential intensification pitches across nine sites, with 15 of those at Seven Acre Farm – around a third of the intensification total – on top of its existing 16 pitches and close to the Council's 17-pitch LA1 site.

The GTAA simply labels this as “potential” and says, “Council to review capacities,” but:

- There is no analysis of cumulative impact on Edenbridge as a town (schools, health, highways, character, amenity).
- There is no comparison of this option with intensification elsewhere in the district, or with new smaller sites in other settlements.

Yet the Local Plan has already picked Seven Acre Farm for EDEN17 (+5 pitches) based on this list and then adds a brand-new Edenbridge site at Mead Road (EDEN15 +5), while still stating that Policy GT1 does not yet meet the 192 pitches, and more sites will be found.

This combination – large “potential” at Seven Acre Farm in the evidence, plus multiple allocations in Edenbridge but still a district shortfall – creates a clear risk that Edenbridge will be pushed harder again at Regulation 19 stage.

c) Intensification is treated as normal, not exceptional

The GTAA explicitly notes that councils often “tolerate” subdivision and intensification of existing pitches to provide space for newly forming households.

By not spelling out the planning limits or the physical/environmental capacity of sites, it implicitly normalises intensification as a standard response. For Hever Road and Edenbridge, this risks:

- Unplanned intensification by stealth,
- Retrospective regularisation becoming the norm, and
- A de facto assumption that “family growth = more pitches at the same place,” rather than looking at district-wide options.

d) “Minimum need” with no clear upper scenario or safeguard

The GTAA recommends that:

- 192 pitches are treated as a minimum, and
- Additional need (for example from households moving into Sevenoaks) may arise,

but it does not provide any upper estimate or location strategy.

If extra need arises, in practice the easiest short-term response will be to intensify existing clusters, including those on Hever Road, rather than going back and rebalancing provision between settlements. The evidence offers no safeguards against that.

e) Transit recommendations are vague on where

Transit need is dealt with at a very high level – “negotiated stopping” and possible encampments of various sizes – but there is no mapping of likely routes or pressures, and no indication of where these arrangements should be made or avoided.

Given Edenbridge’s road connections and proximity to the district boundary, there is a real risk that:

- Short-term encampments end up repeatedly in and around Edenbridge, with little strategic oversight; and
- The settled community and existing Traveller residents are both left dealing with unmanaged pressure.

f) Equalities and cohesion are not explored by place

Gypsies and Travellers are a protected group under equalities law. The GTAA rightly highlights overcrowding and housing stress within that community, but it does not:

- Look at the equalities implications of concentrating such a large proportion of pitches in a few locations, including Edenbridge; or
- Consider the impact on community cohesion in those towns.

The Local Plan then leans on this evidence to justify new allocations in places like Edenbridge without a clear equalities narrative.

g) “Minimum” need and regular updates risk a one-way ratchet

The GTAA advises that the 192-pitch figure should be treated as a minimum and that the assessment should be updated at least every five years. In practice this creates a one-way

ratchet: numbers can go up as more households are identified or move into the district, but they are unlikely ever to go down. There is no guarantee that, when the figures are revised, the distribution of pitches will be reviewed to avoid over-concentration in a small number of locations. For a town like Edenbridge, which already hosts a large concentration of pitches along Hever Road, this raises a real risk that future “updates” will simply be used to justify further intensification or new sites locally, rather than looking first at under-provided parts of the district.

4. What to change (RA’s proposed wording)

Because this is evidence, not policy, our suggested changes are mostly extra text in the GTAA plus a small adjustment to how the Local Plan says it will use the GTAA.

a) Add a proportionality and cumulative impact paragraph to the GTAA

New paragraph after the 192-pitch summary:

“Alongside the district-wide requirement of 192 additional residential pitches between 2025/26 and 2042/43, the Council will monitor and report the distribution of existing and proposed pitches by settlement. This will include cumulative impact, access to services and facilities, and environmental constraints, so that future provision is planned in a proportionate way between communities and does not over-concentrate pitches in a limited number of locations.”

b) Turn the “potential” intensification list into a proper sieve

Replace the generic “Council to review capacities” wording around Tables ES3/ES4 and 8.3 with:

“Any potential intensification or expansion of existing sites will be subject to a transparent, plan-led assessment that considers: (i) the existing concentration of pitches in each settlement; (ii) the capacity of local services, schools and health facilities; (iii) highway safety; (iv) environmental constraints including flood risk, Green Belt and National Landscapes; and (v) the views of both Gypsy and Traveller communities and settled residents. This assessment will ensure that no single settlement, including those which already host a significant number of pitches, is required to take a disproportionate share of future need.”

c) Clarify that “potential” pitches are not guaranteed

Add a short clarifier next to the 140–151 “potential” pitches text:

“These potential supply figures are indicative only. They are not a commitment that all such pitches can or should be delivered, and any site-level increases will depend on detailed technical work and full consideration of cumulative impact, site constraints and planning policies through the Local Plan and/or planning applications.”

d) Put a clear cap principle on Seven Acre Farm

Add a short site comment:

“Given the existing concentration of public and private pitches along Hever Road, Edenbridge, and the scale of the settled community nearby, any additional capacity at Seven Acre Farm should be limited to a small, clearly justified number of pitches, and only if cumulative impact assessments confirm that further intensification would be acceptable in planning, environmental and equalities terms.”

e) Strengthen transit evidence

Replace the generic negotiated stopping text with:

“Negotiated stopping arrangements should be supported by mapping of likely transit routes and preferred stopping areas, including constraints such as flood risk, local services, and existing levels of provision. The Council should identify a small number of suitable locations across the district so that short-term transit needs are not repeatedly focused in a small number of communities.”

f) Add proportionality wording to the Local Plan where it quotes the GTAA

Next to Table 2.2 in Housing Choice for All, add:

“In applying the 2025 Gypsy and Traveller Accommodation Assessment, the Council will ensure that new and expanded sites are planned in a proportionate way between settlements, considering the existing concentration of pitches and the capacity of local services in each area. The district-wide need of 192 pitches will not be met by relying disproportionately on intensification in locations, such as Hever Road, that already host a large share of the district’s Gypsy and Traveller community.”

5. We request

- We ask that the Council updates the Gypsy and Traveller Accommodation Assessment 2025 to include settlement-by-settlement figures and a cumulative impact assessment, so it is clear that Edenbridge is not being required to take a disproportionate share of pitches compared with other settlements.
- We ask that the Council amends the GTAA text on “potential” supply (including the 15 extra pitches at Seven Acre Farm) to make clear this is indicative only and subject to strict tests on capacity, environment, highways, equalities, and community views, rather than being treated as automatically deliverable.
- We ask that the Council amends the Local Plan text around Table 2.2 and Policy GT1 to state that the 192-pitch requirement will be met in a proportionate way between settlements and not largely through intensification along the Hever Road corridor in Edenbridge.

6. Regulation 19 soundness & legal points

Positively prepared

The evidence is not sound because it does not show how the 192-pitch need will be shared across the district in a way that balances responsibilities between settlements. It only gives a district total and a list of potential intensification sites, including very significant capacity at Seven Acre Farm in Edenbridge, without testing cumulative impact or alternative distributions. This undermines the “positively prepared” test and the NPPF’s expectation of planning for inclusive, balanced communities.

Justified

The evidence is not sound because the “potential supply” figures (140–151 pitches) are presented as if they were realistic, deliverable capacity, but there is no site-specific technical evidence on highways, services, environmental constraints, or equalities to back that up,

especially for the already intensive Hever Road corridor in Edenbridge. This does not meet the “justified” requirement for a proportionate evidence base and for considering reasonable alternatives, such as distributing new provision more evenly between settlements.

The evidence is not sound because it advises treating the 192-pitch figure as a minimum and anticipates extra need from households moving into the district, yet it does not model any upper range or spell out how and where this extra demand would be absorbed. In practice this leaves an open-ended risk that further need will simply be loaded onto existing clusters at Edenbridge, without proper plan-level testing of alternatives, contrary to the “justified” and “effective” tests.

Effective

The evidence is not sound because it assumes that most of the 192 pitches can be found by regularising, intensifying, and turning over existing sites, but then defers to a later “review of capacities” the crucial question of whether those numbers are deliverable on the ground. Without settlement-level analysis or clear implementation steps, there is a real risk that the Local Plan will rely on pitch capacity that cannot be achieved, so the plan would not be “effective” over the period to 2042.

Consistent with national policy / legal compliance

The evidence is not sound because it does not explore how intensifying already large Gypsy and Traveller sites in places such as Hever Road, Edenbridge, will comply with NPPF and PPTS requirements to promote peaceful and integrated co-existence between Gypsy and Traveller and settled communities, and to create safe and inclusive places. By omitting any settlement-level cumulative impact or equalities analysis, it is difficult to see how the Council has properly had regard to its public sector equality duty towards both the Gypsy and Traveller community and the settled communities living alongside them.

The evidence is not sound because transit needs are treated in very general terms, with no indication of where negotiated stopping should be focused or avoided. For a cross-boundary settlement like Edenbridge, this lack of spatial evidence is inconsistent with PPTS and NPPF expectations for managing unauthorised encampments in a planned and sustainable way.

7. Edenbridge Impact

On the current evidence, Edenbridge – and especially the Hever Road corridor – is at clear risk of being used to absorb a disproportionate share of both intensified and new Gypsy and Traveller pitches compared with other settlements.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Housing – Sevenoaks District Employers Housing Needs Survey (October 2017)

1. The document

This is the Sevenoaks District Employers' Housing Needs Survey (October 2017).

The Council emailed a questionnaire to just over 2,100 organisations.

Only 100 employers completed it; 65 part-completed responses were excluded from the main statistics. That is under 5% completion, and about 9% including partials.

Results are broken down by Place-making Area, not by town. "South" includes Edenbridge, Hever, Cowden, Chiddingstone, Penshurst and Leigh. 19.2% of the 100 respondents are based in the South area.

The survey simply records what this tiny, self-selecting group of 100 employers said about:

- whether they felt housing was adequate,
- what types of housing they felt were in short supply,
- how housing affected their recruitment and the local economy, and
- where, very broadly, they would like to see more housing.

It is not settlement-level, not about Edenbridge specifically, and not a robust basis for deciding that Edenbridge should take 2,801 homes.

2. What's good (for Edenbridge) – in context of the tiny sample

Even though the sample is tiny, a few points are helpful background.

It shows some employers felt housing costs were a problem

Among the \approx 100 respondents (i.e. about 5% of all organisations approached):

- 43% of respondents said there was not adequate housing provision in the district. That is 43 out of 100 respondents – roughly 2% of the 2,100+ organisations contacted.
- 41% of respondents said they had experienced recruitment difficulties due to housing in the last two years – i.e. 41 of the 100, about 2% of all contacted organisations.

- For the local economy, 64% of respondents rated lack of affordable housing as the highest impact issue and 17% as the second highest – so 64 and 17 out of 100 respondents, roughly 3% and 1% of all contacted organisations.

So, the honest takeaway is:

- A small minority of all the district’s employers (the ones who chose to reply) thought housing affordability was a serious problem for the local economy.

That still supports our view that genuinely affordable housing matters to the local economy – but it is not a district-wide mandate.

It points towards the types of homes some employers felt were missing

Again, among the 100 respondents only:

- A large share felt there was a shortage of:
 - affordable homes to rent,
 - affordable homes to buy (shared ownership / Help to Buy),
 - Starter Homes and key worker homes, and
 - terraced housing, especially in Sevenoaks & Surrounds and the South area (Edenbridge and nearby parishes).

All those percentages are of 100 respondents, not of 2,100 businesses. So, we can say:

- A small group of employers in 2017 felt there were not enough affordable, smaller, terraced and key-worker-type homes.

That is useful background for arguing that if new housing comes to Edenbridge, it should be this kind of stock, not just expensive larger homes.

3. What’s vague or risky – and why this document “shows nothing much at all”

a) Every percentage is “% of about 100 respondents”, not “% of employers”

For soundness we have to be clear about this:

- 43% inadequate housing = 43 of 100 respondents \approx 2% of all employers approached.
- 64% saying lack of affordable housing has highest impact = 64 of 100 respondents \approx 3% of all contacted employers.
- 41% reporting recruitment difficulties due to housing = 41 of 100 respondents \approx 2% of all contacted employers.
- 88% saying buying a home is a problem for staff = 88 of 100 \approx 4% of all employers contacted.

Any other percentage in this report is by definition X of 100 – never more than 5% of the employer population contacted, and often much less once you convert back.

The report itself warns about response bias: employers with housing problems are more likely to respond than those who are content.

So, in strict evidence terms:

- The survey tells us only that a very small number of employers, who chose to respond, had certain opinions about housing in 2017. Nothing more.

b) The “South” area figures are based on just a handful of employers

Location breakdown:

- 19.2% of respondents were in the South area – that is 19 out of 100, covering Edenbridge plus five other parishes.

For the “where should more housing be built?” question:

- Only 26 respondents gave usable location answers.
- Of those 26, 26.9% chose “South” – i.e. about 7 employers. The rest chose other areas (Upper Darent, Northeast, Sevenoaks & Surrounds, etc.).

So, when the report says something like “most of the demand for more housing is focused in South, Upper Darent, Northeast and Sevenoaks & Surrounds,” what it really means is:

- “Of the 26 employers who answered this question, 7 mentioned the South area alongside similar numbers mentioning other areas.”

That is nowhere near enough to justify anything as big as 2,801 homes in Edenbridge.

c) It is old – and long since overtaken by more detailed evidence

The survey is 2017:

- Before the 2019 and 2024 versions of the National Planning Policy Framework (NPPF).
- Before the Targeted Review of Local Housing Need (TRLHN 2025).
- Before the Edenbridge 2022 Parish Housing Needs Survey.

Those later documents are far more detailed, recent, and robust, especially:

- TRLHN for district and South-area need and mix; and
- The Edenbridge parish survey for actual local housing need in Edenbridge.

Compared with those, this employer survey “shows nothing much” beyond:

- “Some employers in 2017 thought housing affordability was a problem.”

d) It does not say anything specific about Edenbridge's capacity or position

The survey:

- Works at Place-making Area level only.
- Says nothing about:
 - settlement capacity,
 - infrastructure,
 - Green Belt and environmental constraints, or
 - whether Edenbridge, Swanley, Sevenoaks etc. should be treated differently.

Yet it sits in the housing evidence list, where it risks being used to support broad claims like “business wants more housing in the South.”

For Edenbridge, that is problematic: it can be misused to imply some business endorsement for very high housing numbers where none exists.

4. What to change

We do not need to re-write this old report; we need to downgrade its weight and sharpen the description in the 2042 evidence base.

a) Reframe it in the Housing Topic Paper as tiny-sample, historic context only

Suggested wording:

“The Employers’ Housing Needs Survey (2017) contacted over 2,100 organisations across the District but received only around 100 completed responses (a completion rate of under 5%). All percentages reported in the survey therefore refer only to this small group of respondents and should not be treated as representative of all employers in the District. The survey is used solely as historic contextual evidence that some employers in 2017 perceived housing affordability as a constraint on recruitment and the local economy, and it does not influence the Local Plan housing requirement or the distribution of housing between settlements.”

b) Stop using phrases that imply representation, like “43% of organisations”

Wherever the Council repeats the survey findings, replace “X% of organisations” with wording that makes the reality clear. For example:

“Among the 100 organisations which responded to the 2017 survey (around 5% of those contacted), 43% did not agree that there was adequate housing provision in the District and 64% identified lack of affordable housing as having the highest impact on the local economy. These figures should be interpreted as the views of a small self-selecting sample, rather than being representative of all employers.”

c) Make explicit that “South” findings cannot justify loading housing onto Edenbridge

Add a sentence to the evidence narrative:

“Responses in the ‘South’ Place-making Area refer to a broad area including Edenbridge, Hever, Cowden, Chiddingstone, Penshurst and Leigh. Only a small number of respondents expressed a preference for additional housing in this broad area. These responses do not provide a robust or current basis for deciding that any particular settlement, including Edenbridge, should accommodate a disproportionate share of housing growth.”

d) Commit to updated employer engagement if business views are to be used at all

Include:

“If employer perspectives are to play a role in future spatial decisions, the Council will undertake updated engagement using current data, a robust sample size and, where possible, settlement-level analysis, rather than relying on the 2017 survey.”

5. We request

- We ask that the Council explicitly records in the Housing Topic Paper that the 2017 Employers’ Survey achieved a completion rate of under 5%, and that all percentages in that report (for example “43% felt housing was inadequate” or “64% saw lack of affordable housing as the highest-impact issue”) are percentages of this small group of respondents, not of all employers in the District.
- We ask that the Council confirms this survey will be treated only as historic contextual evidence and will not be relied upon to justify the scale or distribution of housing growth in any settlement, including Edenbridge, given the very small and self-selecting sample and the age of the data.
- We ask that, if business views are to inform future plan-making, the Council carries out updated employer engagement with a robust sample and settlement-level analysis, instead of relying on a 2017 snapshot from which only very limited conclusions can safely be drawn.

6. Regulation 19 soundness & legal points

Justified

The evidence is not sound because the Employers’ Housing Needs Survey (2017) contacted over 2,100 organisations but received only around 100 completed responses (completion rate under 5%), and all percentages reported in the survey refer only to this small, self-selecting group. The survey itself acknowledges potential response bias. Treating statistics such as “43% felt there was inadequate housing provision” or “64% saw lack of affordable housing as the highest-impact issue” as if they were representative of all employers or using them to steer the distribution of housing growth, fails the “justified” soundness test and the National Planning Policy Framework (NPPF) requirement for proportionate and up-to-date evidence.

Positively prepared / effective

The evidence is not sound because if the Council relies on this very small 2017 employers' survey to support a spatial strategy that places a heavy housing burden on particular areas such as Edenbridge, it is basing long-term decisions on the opinions of roughly 2% of contacted employers rather than on robust, current evidence of need, capacity, and infrastructure. This undermines the Plan's ability to be positively prepared and effective in delivering an equitable and sustainable pattern of development across the District.

Consistent with national policy

The evidence is not sound because national policy expects local plans to be underpinned by clear, transparent data. Retaining a 2017 survey with a sub-5% completion rate in the housing evidence base, without consistently explaining that every percentage is of that small respondent group, risks misleading readers and decision-makers about the extent of employer support for more housing in particular areas such as the South (which includes Edenbridge). This presentation is inconsistent with the spirit of the NPPF's guidance on evidence and engagement.

7. Edenbridge impact – one line

In reality this survey shows only that a handful of employers in 2017 had concerns about housing affordability, and it gives no credible basis at all for loading thousands of new homes onto Edenbridge.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Housing – Parish housing needs survey - Edenbridge (January 2022)

Before turning to the detail, we note that although parish housing needs surveys are included in the evidence base, the draft Local Plan itself gives them very limited weight. Policy H1 (Housing Mix) states that: “Evidenced local need at Place-making level should not be taken as a restriction to wider housing need and the delivery of new homes.” In practice, this means that even where a parish survey shows only modest local need, the Plan allows much higher housing numbers to be imposed on a settlement. This begs the question, why bother putting all these housing needs surveys in the evidence base?

Parish Housing Needs Survey – Edenbridge (January 2022)

What this document does

This survey was produced by the Rural Housing Enabler with Sevenoaks District Council and Edenbridge Town Council as part of the District’s five-year Local Housing Needs Survey programme. A form was sent to every household in Edenbridge (around 4,018 homes) and 715 responses were received, an 18% response rate.

The survey identifies a need for up to 46 affordable homes for local households (25 single people, 10 couples and 11 families) and 16 older owner-occupier households wanting to downsize or move to more suitable homes. All of these households have strong connections to Edenbridge. The survey is clear that it is designed to identify local need for small-scale developments and is not intended to determine Local Plan housing numbers.

For Edenbridge, this provides directly relevant local evidence of housing need at a point in time, sitting alongside the later Targeted Review of Local Housing Need 2025 (TRLHN), which sets district-wide requirements.

What’s good

The survey quantifies a small and very specific local need: up to 46 affordable homes and 16 older downsizing households, all already living in or closely connected to the town. Against a Local Plan and existing permissions pipeline of 2,801 homes in Edenbridge, this is modest and shows that only a small proportion of the proposed housing is required to meet local need.

The survey provides clear evidence of affordability pressures. In 2021 the cheapest home for sale was a 3-bed semi-detached house at £410,000, requiring an income of around £86,555. The cheapest rent was £630 per month for a studio flat (income around £25,200), with a two-bed flat at £1,000 per month (income around £40,000). This demonstrates that Edenbridge is already an expensive place to live, with limited scope for large-scale development to resolve affordability on its own.

The survey comments show that residents were already raising concerns about the pace of development and the strain on infrastructure, including health services, schools, and town character. These concerns were expressed before the full extent of the 2,801-home pipeline had emerged.

What's vague or risky

Although the survey identifies its own limits, an 18% response rate and 2021/22 baseline data, it still provides a clear order of magnitude for local need. That need is in the low tens of homes, not thousands.

The Local Plan gives the survey limited weight through its wording on settlement-level needs not determining housing numbers. This creates a gap between the evidence for Edenbridge, and the scale of growth planned.

What to change

The Edenbridge section of the Local Plan should refer directly to the survey's findings, explaining that the local need identified (up to 46 affordable households and 16 older downsizing households) is modest and will be exceeded many times over by the current 2,801-home pipeline and that the growth in Edenbridge is being driven by district-wide strategy rather than local need.

We request

- We ask that the Council recognises in the Edenbridge chapter and housing topic paper that the 2022 survey identifies only a modest local housing need.
- We ask that the overall housing requirement for Edenbridge is reconsidered so that growth reflects both local evidence and realistic infrastructure capacity.

Regulation 19 soundness and legal points

The evidence is not sound because the Plan is not positively prepared for Edenbridge. The local survey identifies small-scale need, yet the Plan assigns growth far above that level with no clear justification and still insists on calling it local need. This does not meet the National Planning Policy Framework (NPPF) requirement for housing to be planned in a balanced and sustainable manner across the District.

The evidence is not sound because the scale of development proposed in Edenbridge is not justified. The Council's own survey forms part of the evidence base but is effectively disregarded when determining housing numbers, without alternative evidence demonstrating that 2,801 homes is the most appropriate strategy.

The evidence is not sound because it risks being ineffective. The survey identifies concerns about **infrastructure capacity** and the impact of rapid growth. By not addressing these concerns or linking them to the proposed scale of development, **the Plan risks allocating homes that cannot be supported by the necessary services.**

The evidence is not sound because it is inconsistent with national policy on proportionate and transparent use of evidence. The Plan does not explain why Edenbridge's small local need contrasts so sharply with the large scale of growth planned, nor why this settlement is required to take a **significantly higher share** of development than its local evidence suggests.

Edenbridge Impact

This survey shows Edenbridge has only a small local housing need, highlighting how disproportionate the planned 2,801 homes would be for the town.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Housing – Settlement Capacity Study addendum May 2022

1. The document

The Settlement Capacity Study (July 2019) and its Addendum (May 2022) are technical reports for Sevenoaks District Council. They estimate how many *extra* homes could be fitted **within the existing built-up areas** of the main settlements (Sevenoaks, Swanley, Edenbridge, Westerham, New Ash Green, Otford, and Hartley) on small and medium sites, over a 15-year period.

For Edenbridge, the study:

- identifies sites within the existing settlement (Edenbridge North & East and Edenbridge South & West).
- applies density assumptions around town centres and stations.
- discounts sites for viability and deliverability; and
- phases capacity into 0–5, 6–10 and 11–15 year bands.

It finds that Edenbridge has:

- **unconstrained mid-point capacity of 73 dwellings (ENE) + 116 dwellings (ESW) = 189 dwellings** within the town.
- **discounted, phased mid-point capacity of 45 dwellings (ENE) + 116 dwellings (ESW) = 161 dwellings** over 15 years.

Crucially, the Study and Addendum make clear that the **1,094 dwellings** identified across all settlements are:

“over and above that already accounted for in the emerging Local Plan” and “in addition to those sites already identified and accounted for through the emerging Local Plan.”

So, at the time, Edenbridge had a Local Plan/SHELAA baseline (around 1,534 homes, from the previous draft Local Plan), and the Settlement Capacity Study then said, in effect: “*on top of that, there is scope for roughly another 160 homes within the town over 15 years.*”

The current Local Plan now proposes a **higher Edenbridge baseline of 2,136 homes (2,801 with extant permissions)**. The Settlement Capacity Study has never been transparently reconciled with this higher figure.

2. What's good

- **Clear, settlement-based methodology**
The Study is explicit about assessing capacity in the main towns in the settlement hierarchy – including Edenbridge – using ward-based mapping and site surveys.
- **Transparent treatment of sites and densities**
It sets out how sites were identified, sifted, and then assessed using gross-to-net ratios and the Council's own density matrix (higher densities in central areas and around stations, lower at the edge).
- **Proper discounting and phasing**
It reduces 201 identified sites down to 81, and then to 66 after discounting for small size, viability, and delivery issues. It then phases them into three 5-year bands, with more complex sites in years 11–15.
- **Edenbridge has clearly identified, quantified capacity**
Edenbridge's two wards (ENE and ESW) are clearly listed in the tables, with unconstrained and discounted capacity figures. We can see that the Study considered the town carefully and concluded that, *over and above* the then-emerging Local Plan and SHELAA baseline, there is scope for around **161 additional dwellings** within the existing built-up area over 15 years.
- **The Study is honest about its role and limitations**
It states this is not policy, but one technical piece in the wider evidence base, and that it is a **snapshot in time** which must be reviewed, and read alongside infrastructure, open space, employment, and retail evidence.

3. What's vague or risky for Edenbridge

- **No clear narrative linking Edenbridge's "extra 160" to the old 1,534 baseline and the new 2,136 baseline**
The Study is clear that the 1,094 dwellings it identifies district-wide – including the ~161 in Edenbridge – are *on top of* the then-emerging Local Plan and SHELAA baseline.
 - At that time, Edenbridge's plan baseline was about **1,534 homes**.
 - The Settlement Capacity Study therefore implies a total "old picture" of roughly **1,534 + 160 = around 1,700 homes** for Edenbridge.
 - The current Local Plan has subsequently increased the Edenbridge baseline to **2,136 homes (2,801 including extant permissions)**, but there is **no published reconciliation** explaining:
 - which of the ~160 SCS sites are now counted within the 2,136.
 - what additional allocations beyond the built-up area account for the rest; or
 - how this step change compares with other settlements.

Without that reconciliation, we cannot see whether settlement capacity has been properly absorbed, double-counted, or simply disregarded.

- **The Edenbridge figures are buried in tables, not spelled out for readers**

To understand the Edenbridge position you must:

- find the two Edenbridge rows in the unconstrained capacity table ($73 + 116 = 189$).
- find the same wards in the phased capacity table (mid-point $45 + 116 = 161$).
- then link this back to the “over and above the emerging Local Plan” statement. None of that is pulled together in a simple sentence such as “*Edenbridge has capacity for about 160 extra homes beyond the previous plan baseline.*” This lack of clarity makes it easier for later documents to ignore the scale and context of Edenbridge’s capacity.

- **Plan period and policy context are now out of step with the 2042 Local Plan**

The Settlement Capacity Study was written for a Local Plan to 2035, and the addendum moves thinking towards 2040. The current Local Plan runs to **2042**, under the **December 2024 National Planning Policy Framework (NPPF)**, but the Study has not been explicitly updated to cover that full period or aligned with the latest national policy.

- **No integration with Edenbridge-specific infrastructure and environmental limits**

The Study recognises that infrastructure, open space, employment and retail evidence could directly affect the capacity of individual settlements, but it does not itself assess schools, health, roads, utilities or flood risk for Edenbridge.

The later uplift from approximately $1,534 + 160$ to **2,136–2,801** homes for Edenbridge has not been clearly justified in terms of infrastructure or environmental capacity.

- **Risk of using a “purposely proactive” capacity exercise to justify a very large uplift in Edenbridge**

The Study was framed as a **proactive** trawl for additional capacity “over and above” existing allocations.

It is now at risk of being used, in combination with the Settlement Hierarchy, to argue that Edenbridge can bear a much higher overall number of homes, without showing how that conclusion actually flows from the Study’s quantified capacity work.

4. What to change

We are not asking the Council to discard this Study. We are asking that it is used **honestly and transparently** and fully reconciled with the new Edenbridge numbers.

a) State clearly what the Settlement Capacity Study actually says for Edenbridge

Add a short paragraph in the Study/Addendum and cross-refer to it in the Local Plan housing and Edenbridge chapters, for example:

“For Edenbridge, the Settlement Capacity Study identifies a mid-point unconstrained capacity of 189 dwellings across Edenbridge North & East and Edenbridge South & West, which is reduced, after discounting for viability, deliverability, and phasing, to a realistic capacity of approximately 160 additional dwellings within the existing built-up area over a fifteen-year

period. These dwellings were identified as being over and above the then-emerging Local Plan and Strategic Housing and Economic Land Availability Assessment (SHELAA) baseline for Edenbridge.”

b) Publish a reconciliation between: (1) the old 1,534 baseline, (2) the ~160 settlement capacity, and (3) the new 2,136/2,801 total

We ask the Council to publish, as part of the evidence base, a simple reconciliation table that:

- lists the Edenbridge allocations and permissions making up **2,136 homes** (and the 2,801 including extant permissions).
- shows which of those correspond to Settlement Capacity Study sites within the built-up area and which lie beyond it; and
- explains how the previous Edenbridge total (~1,534 homes in the earlier draft plan) plus the ~160 settlement capacity has been converted into the new 2,136 baseline.

This would make it clear whether the Study’s Edenbridge capacity has been fully absorbed into the 2,136, replaced by other sites, or effectively ignored.

c) Confirm the limited function of the Study as a “top up” to, not a justification for, strategic-scale growth

In the Study and addendum, and where it is referenced in the Local Plan, add something along the lines of:

“This Settlement Capacity Study is a technical assessment of potential on small and medium sites within existing built-up areas. It was prepared to supplement, not replace, the then-emerging Local Plan and SHELAA. It does not, in itself, provide evidence to justify strategic-scale allocations in any settlement. In Edenbridge, any proposal to allocate substantially more homes than the circa 160 additional dwellings identified by this Study within the existing town would require separate, settlement-specific evidence on infrastructure capacity, transport, flood risk, environment and landscape, and a clear explanation of how that higher quantum has been derived from and reconciled with this Study.”

d) Update the Study (or provide a short addendum) to align it with the 2042 plan period and 2024 NPPF

- Confirm whether each Edenbridge capacity site remains available, suitable, and viable.
- Check that density assumptions are still appropriate in light of the District-Wide Characterisation Study and any updated town-centre work.
- Explicitly state how updated capacity at Edenbridge compares with that at Sevenoaks, Swanley and other settlements, so that the Inspector can test the distribution of growth and its sustainability.

5. Our requests

- We ask that the Council **explicitly state**, in both the Settlement Capacity Study/Addendum and the Local Plan text, that the Study identified **around 160 additional dwellings within the existing built-up area of Edenbridge over a fifteen-**

year period, in addition to the previous Local Plan/SHELAA baseline (around 1,534 homes).

- We ask that the Council **publish a clear reconciliation** showing how the previous Edenbridge total (~1,534 homes), the circa 160-dwelling settlement capacity inside the town, and the new Edenbridge baseline of 2,136 homes (2,801 with extant permissions) relate to each other, including which Settlement Capacity Study sites are now assumed to come forward.
- We ask that the Council **confirm, within its evidence base, that this Settlement Capacity Study does not by itself justify strategic-scale growth at Edenbridge**, and that any proposal for thousands of homes in and around the town will be supported by separate, up-to-date, settlement-specific evidence on infrastructure, environmental capacity, and transport, consistent with the December 2024 NPPF.

6. Regulation 19 soundness & legal points

- **The evidence is not sound because** the Settlement Capacity Study and its May 2022 Addendum were prepared for an earlier Local Plan (to 2035–2040) under previous national policy, yet are now being used, without clear updating, as part of the evidence base for a Local Plan running to 2042 under the December 2024 NPPF. This fails the “**justified**” and “**effective**” soundness tests, as the evidence has not been transparently aligned with the full plan period or with current national policy expectations for proportionate and up-to-date evidence.
- **The evidence is not sound because** the Settlement Capacity Study explicitly states that it identifies **approximately 1,094 dwellings** on physically identifiable sites “over and above” the then-emerging Local Plan and SHELAA, including around **160 additional dwellings within the existing built-up area of Edenbridge**, yet the Council has increased the Edenbridge total from about **1,534 homes to 2,136 (2,801 with extant permissions)** without publishing any clear reconciliation showing how this uplift relates to the Study’s findings. This lack of reconciliation means the strategy for Edenbridge is not “**justified**” and is inconsistent with the NPPF requirement to base the plan on a transparent, proportionate evidence base.
- **The evidence is not sound because** the Edenbridge capacity figures are buried in technical tables and never clearly explained in narrative text, making it impossible for residents or decision-makers to see that the Study envisaged only about **160 additional dwellings within the town over 15 years, on top of the earlier baseline**. This lack of clarity undermines the “**justified**” and “**consistent with national policy**” tests, given the NPPF’s emphasis on accessible, transparent evidence.
- **The evidence is not sound because** the Study itself stresses that it is a **technical, non-policy document**, a snapshot in time, and that its findings must be read alongside infrastructure, open space, employment, and retail evidence that could alter settlement-level capacity. The Council has not provided Edenbridge-specific evidence to show that infrastructure and environmental limits can support the step change from roughly **1,534 + 160 to 2,136–2,801 homes**. This fails the “**positively prepared**” and

“effective” tests and is not consistent with national policy expectations that plans be deliverable and infrastructure led.

7. Edenbridge Impact

This evidence shows that the Council once envisaged roughly **1,534 + 160** homes for Edenbridge but has since increased that to **2,136–2,801** without clearly explaining how this jump relates to its own capacity work, leaving Edenbridge at serious risk of being planned for more growth than its built-up area and infrastructure can realistically support compared with other settlements.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Transport & Infrastructure – Baseline

1. What the document does

This is an early, high-level transport study prepared by Jacobs for Kent County Council (KCC), using the 2019 Kent Transport Model to:

- describe current transport conditions in Sevenoaks District
- identify 2019 congestion “hot spots”
- build an initial 2040 “forecast baseline” including only committed development (list to March 2021), and
- highlight where more detailed modelling and data collection will be needed for later Local Plan stages

For Edenbridge it:

- identifies B2026 / Stangrove Road and B2026 / Station Road as 2019 hot spots (junctions at or over capacity)
- shows increased flows and pressure on the Edenbridge network in the 2040 baseline, and
- adds B2026 / Lingfield Road as an extra 2040 hot spot

The Local Plan Transport chapter explicitly cites this 2022 Initial Baseline as the study that “determines the baseline transport data” and shows congestion hot spots at M25 J3, Swanley, Sevenoaks, the A25 and the Edenbridge by-pass.

2. What’s good for Edenbridge

Acknowledges Edenbridge as a main congestion problem area.

The report clearly lists Edenbridge town centre junctions (B2026 / Stangrove Road and B2026 / Station Road) as critical 2019 hot spots and shows that these remain problematic in 2040, with additional stress at B2026 / Lingfield Road.

Recognises high car dependence.

It records 87% of district households having at least one car and notes that roads converging on Swanley, Sevenoaks and Edenbridge operate at or near capacity in the peaks.

Recognises poor rural public transport.

It highlights limited and infrequent bus services in rural and outer areas, and poor rail–bus interchange, which is particularly relevant to Edenbridge.

Honest about limitations.

It is clearly labelled as an “initial,” high-level assessment to support Regulation 18, and explicitly says detailed Local Plan-specific modelling is still required before Regulation 19.

3. What’s vague or risky (especially for Edenbridge)

a) Out-of-date and overtaken by later work

- The horizon year is 2040, not 2042, and the development list is frozen at 31 March 2021, so it does not reflect later consents, completions, or the final Local Plan period.
- The Local Plan text still treats this 2022 report as “the” baseline, even though a newer 2042 Forecast Baseline now exists.

b) Limited Edenbridge detail despite being a hot spot

- The report identifies Edenbridge town centre as a key congestion area but gives no settlement-level narrative for Edenbridge equivalent to what the Local Plan text later gives for M25 J3, Swanley and the A25 corridor.
- “Hot spots” are shown on district-wide maps and town-scale plots, but there is no explanation of queue lengths, delays, safety records, or pedestrian/cyclist conditions for the B2026 corridor through Edenbridge.
- It does not link the congestion explicitly to the pattern of committed housing in Edenbridge (for example, the 340 dwellings at Land North of Town Station Cottages, now with outline planning permission, and other Edenbridge schemes in Appendix A).

c) Modelling and spatial balance risk

- The 2019 and 2040 hot spot summary lists Swanley, Sevenoaks and Edenbridge together, but the subsequent Local Plan narrative and strategic thinking are much more developed for Swanley and Sevenoaks (Local Cycling and Walking Infrastructure Plans (LCWIPs) completed, detailed movement strategy routes) than for Edenbridge (LCWIP only “progressing”).
- There is a risk that Edenbridge’s problems are treated as an inevitable rural issue rather than something requiring the same level of modelling detail and infrastructure planning as the north of the District.

d) No link through to specific mitigation for Edenbridge

- The report finishes by saying detailed modelling is needed and further work is required on environmental and public transport impacts, but it does not set out any indicative mitigation package for Edenbridge or test options for the B2026 corridor.
- The Local Plan Infrastructure chapter refers generally to the Infrastructure Delivery Plan (IDP) and site development briefs, but there is no clear line of sight from Edenbridge hot spots in this report to specific actions, costs, and phasing in Edenbridge in the Plan text.

4. What to change

Proposed changes to the Local Plan and its evidence, not to the 2022 report itself.

a) Update references in the Local Plan Transport chapter

Replace the existing text in paragraph 10.6 that only refers to the 2022 Initial Baseline, with wording such as:

“The Initial Baseline Transport Assessment 2022 and the Sevenoaks 2042 Forecast Baseline Report together determine the baseline transport conditions and identify challenges and opportunities across the District, including specific congestion hot spots in Swanley, Sevenoaks and Edenbridge.”

b) Add an Edenbridge-specific summary paragraph in the Transport chapter

Add text after paragraph 10.6 such as:

“For Edenbridge, the evidence shows that the B2026 corridor, including the junctions with Stangrove Road, Station Road and Lingfield Road, already operates close to or over capacity in the morning and evening peaks, with congestion forecast to worsen by 2042 even before additional Local Plan growth is considered. This has implications for air quality, road safety, and reliable access to Edenbridge’s town centre and railway stations and will require targeted mitigation and active travel improvements as part of the Local Plan strategy.”

c) Ensure district-wide policy wording still encompasses Edenbridge

In Policy T1 (Sustainable Movement Network) and the Infrastructure chapter, add a clause committing to:

“prepare and deliver, through the Infrastructure Delivery Plan, specific packages of transport and public realm measures for the District’s main towns, including Swanley, Sevenoaks and Edenbridge, with particular attention to named congestion corridors such as the A25 and the B2026 through Edenbridge, informed by the relevant Local Cycling and Walking Infrastructure Plans and the latest transport modelling.”

5. We request

- We ask that the Council no longer treats the August 2022 Initial Baseline Transport Assessment as the main baseline for the Local Plan, and instead clearly signposts the later 2042 Forecast Baseline as the primary evidence, with the 2022 report retained only as historic context.
- We ask that the Council adds a **specific** Edenbridge transport summary into the Transport chapter, drawing out the B2026 corridor hot spots and their implications, rather than only referring generically to “the Edenbridge by-pass.” Specifics should also apply for Swanley and Sevenoaks.
- We ask that the Council links the Edenbridge hot spots identified in the Initial Baseline to a **defined programme of mitigation in the Infrastructure Delivery Plan** and **site development briefs**, including junction improvements and active travel links, as part of a clearly stated district-wide approach for the main towns.

6. Regulation 19 soundness & legal points (Initial Baseline TA)

The evidence is not sound because it relies too heavily on an initial 2022 baseline that is now out of date and superseded by more recent 2042 modelling, so the transport evidence is not “proportionate” or properly up to date as required for the “justified” test. (Justified; National Planning Policy Framework (NPPF) expectation that plans are based on proportionate, current evidence.)

The evidence is not sound because it identifies Edenbridge as a congestion hot spot at 2019 and 2040, but this is not followed through into clear, Edenbridge-specific mitigation or infrastructure commitments in the Local Plan or IDP, which means the Plan has not been “positively prepared” or “effective” in addressing known transport constraints in one of its main settlements.

The evidence is not sound because without settlement-level analysis for Edenbridge (such as queue lengths, safety records and realistic alternatives to car use), the Council cannot demonstrate that Local Plan growth here will provide “safe and suitable access for all users” or avoid “severe” residual **cumulative impacts** on the road network, as required by national policy. (Consistent with national policy; Justified.)

7. Edenbridge Impact

This evidence confirms Edenbridge already suffers serious congestion on the B2026 and that problems will worsen, but the way it is currently used in the Local Plan does not yet secure the same level of detailed transport response for Edenbridge as for Swanley and Sevenoaks.

Sevenoaks 2042 Forecast Baseline Report & Appendices (with Edenbridge data)

1. What the document does

This later transport report builds a 2042 “forecast baseline” for the Sevenoaks road network using the Sevenoaks Local Transport Model.

For Edenbridge, it:

- includes all committed housing and other developments in and around Edenbridge that are judged “near certain” or “more than likely” to happen by 2042
- tests how those commitments and wider traffic growth affect key Edenbridge junctions and links on the B2026 corridor
- identifies where, by 2042, Edenbridge roads and junctions are working at or beyond their practical capacity, using:
 - “Level of Service” (LOS) – a traffic “grade” from A (free flowing) to F (failure, heavy queues)
 - “volume-to-capacity ratio” (V/C) – how full a road or junction is as a percentage of what it can realistically handle

The report is clear that this 2042 forecast baseline is the reference case that the later “with Local Plan” scenario should be compared against.

2. What’s good for Edenbridge

The baseline now matches the Local Plan end date (2042).

The forecast year is 2042, the same as the Local Plan period, so the results for Edenbridge are directly relevant to the Plan, not stuck at 2040.

It uses a structured “uncertainty log” to choose which developments to include.

The report explains how it only includes developments that are already built, permitted, or very likely to come forward by 2042, based on a formal “uncertainty log”. That is good practice and makes the Edenbridge results very clear.

It confirms that the B2026 through Edenbridge is under serious strain before any extra Local Plan growth.

The modelling shows that by 2042, with just committed schemes and background growth:

- The B2026 Station Road / Station Road junction in Edenbridge worsens from a traffic grade of D to E in the morning peak (moving from “very busy” to “near breakdown”), and from D to F in the evening peak (the worst grade, meaning very heavy queues and long delays).
- The B2026 link between Station Road and Four Elms Road operates at a higher volume-to-capacity ratio than in 2019, with traffic loads above 85 per cent of what the road can sensibly carry, which is where long queues and delay become common.
- The Stangrove Road / B2026 junction changes from a traffic grade of E (very congested) to F (effectively failing) in the evening peak.

In plain English, the Council's own baseline evidence says that the main north-south road through Edenbridge and key town junctions are already at, or beyond, their comfortable working limits by 2042, even before new Local Plan allocations are added.

It shows that committed development in and around Edenbridge is significant.

The appendices list a series of schemes in Edenbridge and nearby (including "small sites – Edenbridge 1–6", each adding dwellings, and other committed permissions in the town), which together add up to a meaningful number of homes feeding onto the B2026 corridor.

This helps demonstrate that baseline problems in Edenbridge are not just "background traffic", they arise from real, committed growth that is already in the system.

It gives Edenbridge its own mapping of hot spots.

The appendices include specific maps and tables for Edenbridge 2019 and 2042 "hot-spots" and for the main traffic-signal junctions on Mont St Aignan Way (B2026) with Station Road, Stangrove Road and Lingfield Road.

3. What's vague or risky for Edenbridge

a) The Edenbridge story is buried in technical language

The Edenbridge results are present, but they are buried in tables and phrases like "Level of Service E or F" and "volume-to-capacity ratio above 85 per cent".

There is no short plain-English summary in the main text stating, for example: "By 2042, Edenbridge's main north-south route (B2026) and town-centre junctions are predicted to have long queues and regular delays at peak times, even before any new Local Plan allocations."

This makes it easier for the Council, in practice, to play down the severity of the Edenbridge findings.

b) Confusion between the main report and the appendices for Edenbridge junctions

- The main report talks about B2026 Station Road / Station Road and Stangrove Road / B2026, and stresses how their traffic grades worsen sharply by 2042.
- The appendices, however, label Edenbridge junctions as "B2026 Mont Saint Aignan Way / Station Road / Stangrove Road / Lingfield Road" and give numerical volume-to-capacity values and traffic grades that appear, on the face of it, much less alarming (for example, volume-to-capacity ratios around 35–60 per cent and grades B or C, which in isolation sound fairly comfortable).

Without a clear map and explanation of how these junction labels relate to each other and to the town centre, this creates real ambiguity about:

- which exact Edenbridge junctions are judged to be at "failure" level (grade F), and
- whether the bypass section, the town-centre section, or both are the critical pinch points.

That ambiguity is risky when the Local Plan is deciding how much extra traffic Edenbridge can reasonably take.

c) Still only a “baseline” – the Local Plan growth has not yet been fully tested in public

- The report is a “with commitments only” scenario. It does not include the additional Local Plan allocations for Edenbridge or elsewhere. It is meant to be the “before the Local Plan” case.
- The Local Plan text talks about a later “with Local Plan” modelling stage, but does not yet publish clear, settlement-by-settlement results for that second stage, so Edenbridge residents cannot see how much worse things get once new allocations are added on top of an already congested baseline.

This leaves a gap: the Council can say it has done the modelling, but the Edenbridge impacts are not visible or easily understood.

d) Risk of inconsistent treatment between settlements

The 2042 baseline clearly puts Edenbridge in the same category as the other main towns, with junctions and links that are already under strain.

However, in the Local Plan narrative and the way investment is discussed, Edenbridge does not appear to receive the same clear, named package of transport interventions as the other main towns, despite having evidence of very serious congestion on its main road.

In other words, there is a risk that **Edenbridge is treated as a place where congestion is accepted**, while other towns are given explicit mitigation packages.

4. What to change (wording suggestions)

These are drafted as changes the Edenbridge Residents’ Association would ask the Council to make to the Local Plan and its evidence, not to the technical report itself.

a) Make it clear that the 2042 baseline is the main evidence for the District’s towns, including Edenbridge

Add a sentence to the Transport chapter along the lines of:

“For the District’s main towns, including Swanley, Sevenoaks and Edenbridge, the 2042 Forecast Baseline Report is the main piece of transport evidence. It shows how the road network will perform in 2042 with all committed developments and background growth in place.”

b) Add a short, plain-English Edenbridge baseline summary

Insert a new paragraph under the Edenbridge section of the Plan’s transport text:

“In Edenbridge, the 2042 baseline modelling shows that the main north–south route (the B2026) and several town-centre junctions are already working at or beyond their comfortable capacity before any new Local Plan growth is added. At the Station Road junction and the Stangrove Road junction with the B2026, the model predicts long queues and significant delays at peak times (what the technical report grades as ‘Level of Service E or F’). The stretch of the B2026 between Station Road and Four Elms Road is also shown to be carrying over 85 per cent of its practical capacity in both directions. Together, this means that Edenbridge starts the Local Plan period as a town with a road network already under severe strain.”

c) Require a clear, published “with Local Plan” scenario for the main towns, including Edenbridge

Add a clause to the Transport policy supporting text:

“The Council will publish a ‘with Local Plan’ 2042 transport modelling scenario, comparing conditions with and without Local Plan development, with clear summaries for each of the District’s main towns, including Edenbridge, showing the expected change in traffic, junction performance, and delay on key corridors and through town centres.”

d) Clarify the Edenbridge junction references

Ask for a supporting figure or short note in the evidence to:

“provide a simple plan and explanation of the Edenbridge junctions referred to in the 2042 modelling (including Station Road, Stangrove Road, Lingfield Road and Mont St Aignan Way) and clearly set out which of these are predicted to reach the worst traffic grade (Level of Service F) by 2042.”

5. Our Requests

- We ask that the Council formally identifies the 2042 Forecast Baseline Report as the main transport evidence for the District’s main towns, including Edenbridge, and clearly explains, in plain English in the Local Plan, that the B2026 corridor and key town junctions in Edenbridge are already at or beyond comfortable capacity in 2042 before any new Local Plan growth.
- We ask that the Council publishes the results of the 2042 “with Local Plan” transport modelling for Edenbridge, showing how much extra delay and queuing is expected on the B2026 and at town-centre junctions once Local Plan allocations are added.
- We ask that the Council uses this evidence to design a specific package of transport measures for Edenbridge within a clearly stated district-wide approach for the main towns, including improvements on the B2026 corridor and better walking, wheeling, and cycling access to the town centre and both stations, so that Edenbridge is treated consistently alongside the other main towns in the District.

6. Regulation 19 soundness & legal points (for use in representations)

The evidence is not sound because although a robust 2042 baseline has been prepared, the Local Plan does not clearly use it as the main transport baseline for the District’s main towns, including Edenbridge, or explain the results in plain English. This fails the “justified” test, because the evidence is not presented in a way that allows people to understand how the chosen strategy for Edenbridge performs compared with reasonable alternatives.

The evidence is not sound because Edenbridge is shown in the Council’s own 2042 baseline modelling to have its main road and junctions working at or beyond their comfortable capacity before any extra Local Plan growth is added, yet the Plan does not provide a clear, committed package of measures to tackle this for Edenbridge as one of the main towns. This means the Plan has not been “positively prepared” or “effective” for Edenbridge over the plan period.

The evidence is not sound because without a published 2042 “with Local Plan” modelling scenario for Edenbridge, the Council cannot demonstrate that additional development in the town will provide safe and suitable access for all users, or that it will avoid severe cumulative

impacts on the road network. This risks inconsistency with the National Planning Policy Framework (NPPF), which requires plans to ensure that development does not result in unacceptable highway impacts.

7. Edenbridge Impact

The 2042 baseline evidence shows that Edenbridge's main road and town-centre junctions are already overloaded before any new Local Plan growth, but the Plan does not yet match that with a clear, equitable, and deliverable transport strategy for Edenbridge alongside the other main towns.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Transport & Infrastructure – Local Model Validation

1. Explain the document

We understand that this report explains how the Tonbridge & Malling and Sevenoaks Local Transport Model has been built and checked using the Kent-wide transport model as a starting point. It validates a 2019 “base year” for road traffic across the whole area, including Edenbridge, so it can then be used to test Local Plan options.

The model is a highway model only, it represents cars, vans and lorries (including “Light Goods Vehicles (LGVs)” and “Heavy Goods Vehicles (HGVs)”) but does not have a public transport, walking or cycling model for this project.

The Local Model Validation Report (LMVR) pulls in a large set of traffic counts (including in Edenbridge) and journey time data, then shows how well the model reproduces these. It uses Transport Analysis Guidance (TAG) from the Department for Transport as the benchmark. The key quality test is the “GEH” statistic, a standard measure of how close the modelled traffic volume is to the observed traffic, and target percentages of counts that must fall within agreed ranges.

For Edenbridge, the detail sits mainly in Appendix D (link counts) and Appendix E (journey time routes), which show traffic on the High Street, B2026 Main Road, B2027 Four Elms Road, B269 Pootings Road, Hartfield Road, Spode Lane, Blowers Hill, and Station Road.

The Local Plan Transport chapter leans on this modelling work (alongside the earlier 2022 Initial Baseline Transport Assessment) as the technical basis for saying the network can accommodate growth with appropriate mitigation.

2. What’s good for Edenbridge

The Edenbridge area sits inside the “detailed model area” where the network is modelled in more detail and junction delays are explicitly represented using “Intersection Capacity Analysis (ICA),” a VISUM feature that models queues and blocking back at junctions.

The report openly explains why 2019 has been kept as the base year (pre-Covid) and uses national data to show that, by 2022, overall traffic levels had broadly returned to pre-pandemic levels. That is helpful context and avoids building the plan on unusual lockdown-era data.

Appendix D includes a decent spread of Edenbridge locations:

- B2026 Main Road north and south of town
- Edenbridge High Street at Mont St Aignan Way

- B2027 Four Elms Road / Station Road
- B269 Pootings Road
- Hartfield Road, Spode Lane, and Blowers Hill

This is better than nothing and means the model has at least been checked against real Edenbridge traffic.

Many of the Edenbridge count locations show “✓” under the Design Manual for Roads and Bridges (DMRB) / GEH test, meaning modelled flows are reasonably close to observed flows. That suggests the model is broadly capturing the pattern and level of traffic in the town.

The LMVR is clear that it is about base model quality and that “additional checks will be required during the forecasting phase” and that the model is suitable for Local Plan scenario testing “in combination with other analytical techniques” to provide an initial ranking of impacts. This is important: it avoids claiming that the model alone answers every question.

3. What’s vague or risky for Edenbridge

Highway-only, does not support wider “sustainable movement” claims. The model used here does not include public transport, walking or cycling assignment; yet the Local Plan Transport chapter talks about a “sustainable movement network” and future modal shift. Using a car-only model to underpin wider claims about buses, rail, walking and cycling in Edenbridge is a stretch.

Edenbridge detail is buried in long appendices. From an Edenbridge perspective, all the key information is in long tables in Appendix D and route lists in Appendix E. There is no simple Edenbridge specific summary of how good or weak the model fit is in the town, compared with Tonbridge, Swanley or the A20/M20 corridors.

Some Edenbridge locations fail the calibration criteria, but this is not highlighted.

While many Edenbridge links pass the tests, a few do not – for example:

- At least one direction on Edenbridge High Street / Mont St Aignan Way shows a “X,” meaning the model differs from observed flows by more than the TAG thresholds.
- Some instances of B2026 Main Road and Hartfield Road counts also show mismatches in certain time periods.

The main body of the LMVR only reports overall percentages across the whole detailed model area. This hides where Edenbridge is weaker than average.

No clear comparison of model reliability between settlements. The LMVR gives overall statistics (for example, that 86–88% of journey time routes are within 5% or 1 minute of observed times) but does not show whether Edenbridge routes perform better or worse than, say, Sevenoaks urban area or Tonbridge. That makes it hard for residents and decision-makers to judge whether Edenbridge growth is being planned on equally robust evidence.

Base model scope is narrower than the Local Plan narrative. The LMVR focuses on reproducing 2019 traffic flows and journey times. It does not assess:

- Access to individual Edenbridge sites
- Level crossing impacts, town-centre air quality, or road safety
- The detailed impacts of the Local Plan allocations themselves (that is left to later forecasting)

If the Local Plan text reads as if this report proves that future Edenbridge growth is acceptable, **that will go beyond what the LMVR actually says.**

Post-Covid behaviour handled only at national level. The report justifies the 2019 base and uses national data to say traffic in 2022 is back to about “normal”, but there is no Edenbridge-specific check on longer-term changes (for example, increased working from home or changing commuting patterns to London). That is a potential weakness for a remote town like Edenbridge with a distinct commuting profile.

Limitations are clearly stated in the LMVR but not clearly carried through into the Plan text. The LMVR’s own limitation statement and its emphasis on being one technical input “in combination with other techniques” are good. But the main Transport chapter, as provided, does not clearly explain these caveats to the reader when it refers back to the modelling.

4. What to change

These suggestions are for the Local Plan text, not for rewriting the LMVR itself.

a) Clarify what the LMVR does and does not do

Add to the Transport chapter (immediately after the paragraph that first refers to the transport modelling and Initial Baseline Transport Assessment 2022):

“This work has been underpinned by a Stage 2 Local Model Validation Report for Tonbridge & Malling and Sevenoaks. That report validates a 2019 highway transport model against observed traffic counts and journey times, including in Edenbridge. It confirms that the base model is of sufficient quality for use in assessing Local Plan scenarios. It does not model public transport, walking or cycling and does not in itself demonstrate that the proposed spatial strategy will deliver a fully ‘sustainable movement network’.”

b) Acknowledge local variation in model quality, including Edenbridge

Add a further sentence:

“Model calibration quality varies between different parts of the District. While overall performance meets Department for Transport Analysis Guidance benchmarks, some individual roads, and junctions, including in Edenbridge town centre, do not fully meet the flow and GEH targets. The Council will therefore treat model outputs at these locations with caution and supplement them with local data, junction-specific analysis, and site-specific transport assessments.”

c) Require Edenbridge-specific checks when using the model

Under the policy section dealing with transport assessments and mitigation (for example within the development management transport policy), add:

“For Edenbridge, where the validated model shows some localised mismatches with observed traffic flows, planning applications for major development must be supported by up-to-date local traffic surveys and junction capacity assessments in addition to any use of the strategic Local Transport Model. The Council will not rely solely on strategic model outputs where calibration is weaker than average.”

5. We request

We ask that the Council clearly explains in the Transport chapter what the Stage 2 Local Model Validation Report does, and does not, show, including that it validates a 2019 highway model only and does not itself prove that a “sustainable movement network” will be achieved in Edenbridge.

We ask that the Council explicitly acknowledges in the Local Plan text that model calibration quality varies across the District, that certain roads and junctions in Edenbridge do not fully meet the benchmark criteria, and that outputs for these locations will be treated with caution.

We ask that the Council requires Edenbridge major developments to provide fresh, local transport evidence (counts and junction assessments) alongside any use of the strategic model, so decisions for Edenbridge are taken on evidence that is at least as robust as for other settlements.

6. Regulation 19 soundness & legal points

Positively prepared

The joint working with Tonbridge & Malling and Kent County Council, and the use of the Kent Transport Model as a base, are positives and show constructive engagement on cross-boundary transport issues. However:

The evidence is not sound because the Local Plan appears to use a highway-only validation report to support wider claims about a “sustainable movement network” and modal shift in Edenbridge without any equivalent validated model for public transport, walking or cycling. This goes to *Justified* and *Consistent with national policy*, which expects transport issues to be considered in a way that promotes sustainable transport choices, not just private car traffic.

Justified – proportionate, robust evidence, reasonable alternatives

The evidence is not sound because the LMVR only reports average model performance across the whole detailed model area, while Edenbridge specific weaknesses in calibration (for example, at High Street / Mont St Aignan Way and certain flows on B2026 and Hartfield Road) are buried in appendices and not carried through to the Plan’s transport narrative. For a town earmarked for growth, this is not proportionate or transparent evidence. This engages the *Justified* and *Effective* tests.

The evidence is not sound because the LMVR is clear that further checks will be required during the forecasting phase and that the model is for initial spatial assessment “in combination with other techniques,” yet the Local Plan text risks implying that this modelling alone demonstrates that Edenbridge can accommodate the planned growth. That goes beyond what the evidence

actually shows, failing the *Justified* and *Effective* tests and raising concerns about being *Consistent with national policy* on using robust, proportionate evidence.

The evidence is not sound because post-Covid travel behaviour is treated only through national-level statistics, with no Edenbridge-specific checks, despite Edenbridge's distinctive pattern of long-distance commuting and limited alternatives to the car. This weakens the justification for relying on a 2019 car-based model to plan for 2042 for this particular settlement, affecting the *Justified* test.

Effective – deliverable over the plan period

The evidence is not sound because the LMVR does not provide a clear, accessible picture of model reliability for Edenbridge versus other settlements. Without that, it is hard to be confident that transport mitigation for Edenbridge has been identified and prioritised on an equal footing with, for example, Tonbridge and the A20 corridor, undermining *Effectiveness*, and consistency between settlements.

Consistent with national policy (including December 2024 NPPF at high level)

National policy expects plans to:

- Be based on robust and proportionate evidence about infrastructure and transport capacity.
- Promote sustainable transport and ensure that any significant impacts on the transport network can be mitigated to an acceptable degree.

The evidence is not sound because **the Plan risks presenting the LMVR as a comprehensive answer to Edenbridge transport impacts, when in reality it validates only a highway model and explicitly requires further scenario-specific checks**. This is not fully consistent with national policy's emphasis on clear, transparent evidence about the local transport impacts of significant development, especially in more remote, car-dependent settlements like Edenbridge.

On legal compliance and equalities, the LMVR itself is a technical report and does not attempt equalities analysis; that will need to be picked up elsewhere in the evidence base. From what we have, there is no obvious equalities breach, **but the current use of the LMVR in the Plan text is not yet transparent enough for Edenbridge residents to understand how their town's transport has been treated**.

7. Edenbridge Impact

Overall, this evidence gives Edenbridge a reasonable technical base model for car traffic but hides local weaknesses in calibration, so unless the Local Plan is tightened as above, Edenbridge risks having major growth justified on transport evidence that is thinner and less transparently explained than for some other parts of the District.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Transport & Infrastructure – Infrastructure Delivery Plan (IDP)

1. What this document does

This is the latest Infrastructure Delivery Plan (IDP) Statement. It explains what infrastructure is currently expected to be needed to support the emerging Local Plan, and it sits alongside Chapter 9 of the Regulation 18 Local Plan.

- Sets out the national policy context under the 2024 National Planning Policy Framework and emphasises the need to make sufficient provision for infrastructure and to work closely with providers.
- Explains how the Council collects developer contributions through Section 106 agreements and the Community Infrastructure Levy (CIL) and notes that a Community Infrastructure Levy review is planned alongside the Local Plan.
- Summarises, in Table 1, the latest projects, improvements and capacity constraints identified by key providers across the district, including specific entries for Edenbridge on education, rail, wastewater and clean water.

For Edenbridge in particular, Table 1 says:

- Kent County Council Education expects:
 - Additional primary school places in the Edenbridge planning area (expansions and/or new schools),
 - A requirement for a new secondary school in the Edenbridge planning area.
- Network Rail requires:
 - Accessibility improvements and better station entrance and parking at Edenbridge Town station,
 - Step-free interchange between platforms at Edenbridge station,
 - Anti-trespass fencing for adjacent development and a push towards sustainable access for commuters.
- Southern Water already has projects in the 2025–2030 investment period, including resilience and life-extension works at Edenbridge Wastewater Treatment Works.
- Sutton & East Surrey Water say clean water capacity must be increased in Edenbridge, as current demand is degrading network resilience and risks loss of supply.

Alongside this, the Council has indicated that some infrastructure will be defined and delivered “as sites come forward” and as development is built out, with further Infrastructure Delivery Plan updates over time.

The Statement is explicitly presented as an evolving document that will be updated again as the Local Plan progresses.

2. What’s good for Edenbridge

It clearly acknowledges Edenbridge’s education needs.

Kent County Council Education confirms that both more primary places and a new secondary school in the Edenbridge planning area will be required for the Local Plan growth. This strongly supports the case that the Plan should secure a secondary school for Edenbridge, rather than assuming pupils can travel long distances. Although we have not seen any solid plans for a primary school.

It recognises serious water and wastewater constraints in Edenbridge.

The Statement records:

- Existing investment at Edenbridge Wastewater Treatment Works to improve resilience,
- The need to increase clean water capacity in Edenbridge to prevent risk of loss of supply.

This is good evidence that the town’s networks are already under pressure and must be upgraded alongside any growth.

It at least records some rail issues at both Edenbridge stations, but only at a local level and not completely.

The Statement notes step-free access, improved entrances, anti-trespass fencing, and parking/sustainable access measures at both Edenbridge Town and Edenbridge stations, recognising that many residents commute to London and that access to the railway is important for Edenbridge. This is helpful in that it anchors some station-specific works in the evidence, but it only deals with some local station facilities and does not address the more fundamental strategic rail requirements for the Edenbridge diesel line (Uckfield line), including electrification and associated works. The government plan to phase out Diesel trains by 2040. There is nothing relating to this anywhere in the plan or the IDP.

3. What’s vague or risky for Edenbridge

Edenbridge’s secondary school is identified as needed but not costed or confirmed and under time restraints.

The Statement says there will be new secondary schools in the Swanley/Rural North and Edenbridge planning areas, but gives no indication of:

- How it will be funded and by which allocations.
- Whether KCC intend to put a secondary school into Edenbridge, as at the Town Council meeting the KCC representative clearly stated that it would be their choice what type of school would go in. This could end up suiting the needs of KCC but not necessarily Edenbridge.

This creates a major risk that Edenbridge could end up taking housing growth based on the assumption of a new secondary school which is, in practice, undeliverable or we get another type of school entirely.

Kent County Council highways projects for Edenbridge are missing at this stage.

Kent County Council Highways report “no specific projects identified” so far and rely on ongoing transport modelling, which will be reflected in the next version of the Infrastructure Delivery Plan. This contrasts with earlier Infrastructure Delivery Plan material, which clearly listed:

- Edenbridge junction improvements, and
- Edenbridge sustainable transport improvements (walking, cycling, buses and trains).

The absence of updated, Edenbridge-specific highway schemes at Regulation 18 weakens the evidence for the Local Plan’s transport chapter, especially when Edenbridge is expected to accommodate further growth.

Strategic rail requirements for the Uckfield (diesel) line, including electrification, are completely missing.

The Statement is silent on the need to modernise and electrify the Edenbridge diesel line (Uckfield line), and on the associated bridge, signalling, clearance, and capacity works that such an upgrade would require. **Given that the government want a phasing out of diesel lines by 2040** and the level of commuting from Edenbridge to London, and the Local Plan’s reliance on rail as a sustainable transport option, **this is a significant gap in the infrastructure picture**. Without acknowledging and planning for the strategic upgrade of the line, not just minor station works, the Infrastructure Delivery Plan underestimates what is needed to support growth in Edenbridge and to deliver a genuinely low-carbon, future-proof transport network for the town.

Water and wastewater upgrades are identified in principle but not fully aligned to Local Plan growth.

Southern Water’s investment in Edenbridge Wastewater Treatment Works and Sutton & East Surrey Water’s warning about degraded resilience are recorded, but the Statement does not spell out:

- Whether these works assume the full Local Plan housing numbers,
- Whether further upgrades will be needed if more growth is directed to Edenbridge,
- The phasing relationship between new housing and the completion of these works.

This creates a risk that Edenbridge residents may face water supply or foul flooding problems if growth comes forward ahead of network upgrades.

Network Rail’s Edenbridge requirements are not yet pulled through into Local Plan transport policies.

The Infrastructure Delivery Plan Statement is clear about required station improvements at both Edenbridge stations, but Chapter 10 Transport of the Local Plan is largely generic and does not specifically commit to these Edenbridge schemes or explain how contributions will be secured from relevant sites. The risk is that Edenbridge’s stations continue to struggle with accessibility, parking, and safe access while growth is directed to the town. Some elements have not been considered at all, for example, Edenbridge needs an accessible bridge or underpass to get from one platform to the other. This features nowhere in the local plan or IDP.

Infrastructure is treated as something to be dealt with as development comes forward, not as a full, town-wide package.

The Council's 2025 position that some infrastructure will be identified and delivered "as sites are built out" means **there is no single, holistic overview of everything Edenbridge will need to 2042**. There is no comprehensive list covering health, education, highways, strategic and local public transport (including any Uckfield line upgrade), active travel, community facilities, and utilities for the town as a whole. **That piecemeal, site-by-site approach is particularly risky for a settlement that may be taking significant growth** and makes it difficult for residents and the Inspector to judge whether the overall strategy for Edenbridge is genuinely sustainable.

There is no realistic match between Edenbridge's infrastructure needs and what CIL and Section 106 can deliver.

The Statement explains how the Council uses Section 106 agreements and the Community Infrastructure Levy and notes that a CIL review is planned, but it does not address the basic point that **developer contributions will not be able to fund the full scale of infrastructure required for Edenbridge if the current level of growth is pursued**. Major items such as a new secondary school, substantial highway improvements, a meaningful upgrade to rail services (including any electrification of the Uckfield line), utilities reinforcement and expanded health and community provision will require significant non-developer funding. Without identifying likely additional funding streams and setting out how the gap will be bridged; the approach risks over-reliance on CIL and Section 106 and leaves Edenbridge exposed to serious under-provision of infrastructure.

Policing and Security Infrastructure

Policing and security infrastructure are treated as part of the District's infrastructure in national policy and in the Infrastructure Delivery Plan, and Kent Police are listed as an infrastructure provider, but the IDP schedule contains no policing entries anywhere in the District, including Edenbridge.

For Edenbridge, the draft plan proposes around 2,801 new homes, which at 2.35 people per dwelling (ONS figures) is roughly 6,582 extra residents, close to doubling the town compared with the 2021 census figures, yet there is no assessment of current policing capacity, no identification of additional policing infrastructure or staffing, and no indication of how neighbourhood policing, response times or local bases will be strengthened.

This omission is vague and risky because it leaves policing and community safety unplanned for a town that is expected to grow very significantly and creates a real question mark over whether the plan is positively prepared, properly justified, effective over the period to 2042 and clearly consistent with the National Planning Policy Framework requirement to make sufficient provision for security infrastructure.

4. What to change

a) Add a clear Edenbridge-specific subsection after Table 1

We ask that, after Table 1, the Council inserts a short, dedicated subsection:

Edenbridge – education, transport, utilities, and community infrastructure requirements

“For the Edenbridge planning area, the emerging Local Plan proposes significant new development. The following strategic infrastructure is therefore required to support growth at Edenbridge over the plan period:

- A new secondary school in the Edenbridge planning area, with land safeguarded through the Local Plan and delivery funded in part by development contributions from Edenbridge sites and in part by other public funding.
- Additional primary school places in Edenbridge, to be provided through expansion of existing schools and/or a new primary school, as determined by Kent County Council.
- Highway and junction improvements in Edenbridge, including capacity and safety enhancements at key junctions, and a package of walking, wheeling, cycling and bus improvements to reduce car dependency.
- Strategic and local rail improvements serving Edenbridge, including the station accessibility and safety measures identified by Network Rail and residents, in the longer term, upgrades to the Uckfield line, to provide a resilient, lower-carbon rail service for commuters.
- Upgrades to the Edenbridge wastewater network and Edenbridge Wastewater Treatment Works, and increased clean water capacity in Edenbridge, to ensure that growth does not lead to loss of supply or increased risk of foul flooding;

This turns the current high-level references into a clear list of Edenbridge requirements, recognising that more than the earlier, site-based packages is now needed.

b) Clarify continuity and uplift of Edenbridge benefits and funding beyond CIL and Section 106

In section 1 (Introduction) or 4 (Engagement with providers), we ask that the Council adds:

“Earlier evidence identified a package of health, education, transport, and utilities improvements associated with growth at Edenbridge. Given the higher overall level of growth now proposed, the current Infrastructure Delivery Plan will ensure that any significant development at Edenbridge in the new Local Plan is **supported by an enhanced, town-wide package of infrastructure, addressing existing deficits as well as the cumulative impacts of new development**. The Council recognises that Community Infrastructure Levy and Section 106 contributions alone will not be sufficient to fund this package and will therefore work with infrastructure providers, Government, and other partners to identify and secure additional funding sources.”

c) Strengthen the link between the Infrastructure Delivery Plan, Local Plan policies and phasing for Edenbridge

In paragraph 4.8, which currently explains that infrastructure needs should be read with Chapter 9, we propose adding:

“For settlements such as Edenbridge, the Local Plan’s site-specific policies will be expected to secure land and contributions for the education, transport, health, community, and utilities projects identified in this Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be updated before submission to include, for Edenbridge, **a single, comprehensive schedule of infrastructure projects with indicative phasing, funding sources (including but not limited to Community Infrastructure Levy and Section 106) and responsibilities, so that the cumulative impacts of growth on the town’s infrastructure are properly addressed.**”

5. Our requests

- We ask that the Council add a clear Edenbridge-specific subsection to the October 2025 Infrastructure Delivery Plan Statement, listing the required secondary school, primary provision, station improvements, strategic rail upgrades, highway schemes, utilities upgrades and wider community infrastructure needed to support growth in Edenbridge.
- We ask that the Council amend the Infrastructure Delivery Plan Statement to confirm that any significant growth directed to Edenbridge will be matched by a town-wide infrastructure package which addresses existing deficits and the cumulative impacts of all development, and which goes beyond the more limited, site-based packages previously identified.
- We ask that the Council acknowledge, in the Infrastructure Delivery Plan and Chapter 9 of the Local Plan, that Community Infrastructure Levy and Section 106 contributions will not be sufficient on their own to fund Edenbridge’s infrastructure needs, and commit to identifying additional funding sources and setting out a comprehensive, phased infrastructure schedule for Edenbridge before the Plan is submitted for examination.

6. Regulation 19 soundness and legal points

The evidence is not sound because it is not yet fully justified for Edenbridge.

While the October 2025 Infrastructure Delivery Plan Statement identifies that a new secondary school and additional primary places are needed in the Edenbridge planning area, it does not identify how delivery will be funded or whether the school will come forward before the deadline. This fails the “justified” test and risks inconsistency with the National Planning Policy Framework 2024 requirement to make sufficient provision for infrastructure and to set out the contributions expected from development.

The evidence is not sound because it undermines effectiveness and deliverability of growth at Edenbridge.

Key transport schemes for Edenbridge are deferred to future modelling and are not listed, despite earlier evidence already identifying Edenbridge junction and sustainable transport improvements. Strategic rail needs, including the future of the Uckfield diesel line and any electrification or associated works, are entirely absent. **Without a clear package of schemes, costs and funding sources, the plan cannot robustly demonstrate that development at**

Edenbridge is deliverable over the plan period, contrary to the “effective” test and National Planning Policy Framework 2024 requirements on deliverability.

The evidence is not sound because infrastructure planning for Edenbridge is piecemeal rather than holistic.

The Council’s position that infrastructure will be identified and delivered as development comes forward means **there is no single, town-wide view of what Edenbridge needs** across health, education, strategic and local transport, community facilities, and utilities. That is not a positively prepared or justified basis for a main town expected to take significant growth, and it risks inconsistency with National Planning Policy Framework 2024, which expects strategic, plan-led infrastructure planning rather than a reactive, site-by-site approach.

The evidence is not sound because there is no credible funding strategy for Edenbridge beyond CIL and Section 106.

The Infrastructure Delivery Plan relies heavily on Community Infrastructure Levy and Section 106 contributions and simply notes that a CIL review is planned, but it does not demonstrate how these tools could realistically fund the scale of infrastructure Edenbridge needs, including a secondary school, major transport improvements and utilities reinforcement. Without identifying additional funding sources and setting out how any gap will be closed; the evidence base does not meet the “effective” or “positively prepared” tests and is at risk of inconsistency with the National Planning Policy Framework’s requirement for a deliverable strategy.

The evidence is not sound because it could lead to inconsistent treatment of Edenbridge compared with other settlements.

Network Rail’s requirements for Edenbridge stations and Kent County Council Education’s need for a new secondary school in the Edenbridge area are clearly stated in the Infrastructure Delivery Plan Statement, but they are not matched by equally clear commitments in Local Plan policies or by a comprehensive Edenbridge infrastructure schedule. At the same time, other locations and strategic sites benefit from more defined infrastructure packages in earlier material. This risks Edenbridge taking growth without proportionate, policy-backed infrastructure, undermining the “positively prepared” and “justified” tests and raising equality and inconsistency concerns.

7. Edenbridge Impact

As it stands, the October 2025 Infrastructure Delivery Plan Statement acknowledges some of Edenbridge’s key infrastructure needs but treats them in a piecemeal way, underestimates the funding challenge and completely omits both strategic rail upgrades such as electrification of the Uckfield line and any planning for increased policing capacity, so it does not yet set out the town-wide package that would be required if the level of growth envisaged to 2042 is to be genuinely sustainable.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Transport & Infrastructure – Cycling and Walking

1. Document Details

Sevenoaks Urban Area LCWIP (January 2023)

This Local Cycling and Walking Infrastructure Plan (LCWIP) for Sevenoaks Urban Area sets out a 10-year walking and cycling network, with mapped primary and secondary cycle routes and “core walking zones” for Sevenoaks town centre, Bat and Ball and Riverhead. It is prepared by Sustrans using Government LCWIP guidance and Local Transport Note 1/20, with stakeholder workshops and community mapping. It explicitly states that it helps to deliver the emerging Local Plan’s low-carbon and active travel policies.

Swanley LCWIP (February 2024)

This is the equivalent LCWIP for Swanley and nearby settlements (Crockenhill and Hextable). It defines a study area, explains current barriers to walking and cycling, proposes a local route network, and prioritises schemes. It is again prepared by Sustrans, commissioned in spring 2023, and funded by Active Travel England with Kent County Council. It explicitly links to the Movement Strategy and to Plan 2040 / Policy TLC1 on town and local centres, including walking, cycling and public transport in Swanley’s regeneration.

Relevance to Edenbridge

The Local Plan Transport chapter leans heavily on LCWIPs. It states that LCWIPs for Sevenoaks Urban Area and Swanley are complete, and that an Edenbridge LCWIP “is progressing and will be completed in time for the next Local Plan consultation.” Policies T1 and T2 then expect developments to link into and help deliver LCWIP routes.

In practice, this means Sevenoaks and Swanley have detailed, published walking and cycling evidence in the Local Plan evidence base, while Edenbridge does not, even though Edenbridge is identified as a congestion hot spot around the bypass.

In Edenbridge, residents have only seen a simple online map-based consultation for walking and cycling (first with limited comment options, then a second “comments shown” version), and this ran 7–28 October 2025, overlapping with, but not integrated into, the Local Plan consultation which launched on 23 October 2025. Residents were not shown a joined-up picture of Edenbridge growth and Edenbridge walking and cycling infrastructure. The text in the Transport chapter suggesting that the Edenbridge LCWIP will be completed “in time for the next Local Plan consultation” does not reflect that the next stage is the Regulation 19 publication stage, which is a narrow, soundness-based process **with limited scope to influence the content of the LCWIP itself**.

2. What's good

- The LCWIPs use a clear, national method (LCWIP Technical Guidance and Local Transport Note 1/20) and set out route networks, core walking zones, and prioritised schemes. This is a strong and appropriate model that should also be applied to Edenbridge.
- The LCWIPs are explicitly integrated with the Local Plan and Movement Strategy, they are not just “nice to have” **but are treated as key evidence** for Plan 2042 transport and town-centre policies.
- For Swanley, the LCWIP ties directly into Policy TLC1 on town and local centres and into regeneration, with a focus on healthier communities and climate change. That is the level of seriousness and integration that should equally apply to Edenbridge town centre.
- The Local Plan Transport chapter recognises LCWIPs as key delivery tools and states that Edenbridge will have an LCWIP. This is an important admission by the Council that a town-level LCWIP is necessary for Edenbridge.

3. What's vague or risky for Edenbridge

a) No Edenbridge LCWIP in the evidence base

At this consultation stage, Sevenoaks and Swanley have full LCWIP documents in the evidence base, but **Edenbridge does not**.

At the same time, Policies T1 and T2 rely on “Local Cycling and Walking Infrastructure Plans” and explicitly state that major developments should connect to LCWIP routes and help to implement them.

Edenbridge is specifically named as part of the congestion hot-spot network (Edenbridge bypass) but has no equivalent active-travel plan to address local trips and reduce car use.

This creates a **clear inconsistency in the depth and specificity of transport evidence** between the main settlements, which is directly relevant to the Local Plan soundness tests, particularly whether the Plan is “justified” by proportionate evidence and “effective” in its delivery mechanisms.

b) Edenbridge LCWIP timing and lack of meaningful plan-stage comment

In Edenbridge:

- The first map consultation on walking and cycling went live about a year earlier, but with very limited scope for residents to give proper feedback.
- The second, more developed version (with comments visible) ran 7–28 October 2025.
- The Local Plan consultation launched on 23 October 2025, while the Edenbridge LCWIP work is still described in the Plan as “progressing” and “will be completed in time for the next Local Plan consultation”.

However, the next stage of the Local Plan process is the Regulation 19 publication stage, which is focused on legal compliance and the soundness tests. **In practice, this means Edenbridge residents are unlikely to have a meaningful opportunity to influence the Edenbridge LCWIP** as part of plan-making, even though LCWIPs are being used as core transport evidence.

As a result, Edenbridge residents are being asked to comment on growth and transport policy without being given the same level of LCWIP detail that Sevenoaks and Swanley already enjoy. This is not a robust “Vision and Validate” approach for Edenbridge; instead, growth is being planned now with a promise to complete the active-travel evidence later, after key choices have effectively been made.

c) Unequal use of LCWIP evidence across the District

- The Sevenoaks LCWIP clearly sets out a proposed network, prioritisation, and next steps, and is explicitly intended to inform developers of the Council’s ambitions so that they can contribute to delivery.
- The Swanley LCWIP does the same and specifically references Plan 2040 and the need to promote walking and cycling in Swanley town centre through Policy TLC1.

There is no equivalent published document for Edenbridge, despite Edenbridge being one of the main towns and having safeguarded land for a secondary school and well-documented issues around the bypass and station access.

The practical risk is that Sevenoaks and Swanley schemes will appear “evidence-ready” and therefore attract more investment and developer contributions under Policies T1 and T2, while Edenbridge is left with generic wording and ad-hoc schemes. This is a material planning concern about how infrastructure will actually be delivered and funded over the plan period.

d) Tension with national policy on transport evidence

The National Planning Policy Framework (December 2024) expects transport issues to be considered from the **earliest stages of plan-making**, including identifying and pursuing opportunities for walking, cycling and public transport use. Wider national guidance encourages local planning authorities to provide attractive, well-designed walking and cycling networks, drawing on LCWIPs as key evidence.

If LCWIPs for Sevenoaks and Swanley are in place and feeding into this Plan, but Edenbridge’s LCWIP is deliberately left to a later, more constrained stage of the process, **the approach for Edenbridge does not meet that national expectation** that transport and active travel are addressed at the formative stages of the Local Plan, before strategy and allocations are locked in.

4. What to change

These suggested changes are drafted as if they were being inserted directly into the Local Plan.

a) Strengthen Transport paragraph 10.12 for Edenbridge

Replace the last sentence of paragraph 10.12:

“A Local Walking and Cycling Infrastructure Plans (LCWIP) for Sevenoaks Urban Area and Swanley have been completed. These plans propose new walking, wheeling, and cycling routes to encourage people to move more sustainably. The Edenbridge LCWIP is progressing and will be completed in time for the next Local Plan consultation.”

With:

“Local Cycling and Walking Infrastructure Plans (LCWIPs) for Sevenoaks Urban Area and Swanley have been completed and form part of the evidence base for this Local Plan. An equivalent LCWIP for Edenbridge will be completed and published in full as part of the evidence base supporting the Regulation 19 (Publication) Local Plan, so that all main settlements benefit from a comparable level of active travel evidence at the final plan-making stage.”

b) Clarify Policies T1 and T2 so they do not disadvantage towns without a completed LCWIP

Add a new sentence at the end of T1(11):

“For Edenbridge and any other settlement where an LCWIP has not yet been adopted at the time of a planning application, the Council will identify the relevant walking and cycling measures through the Regulation 19 evidence base and ensure that planning obligations are only sought where they relate to clearly specified, publicly available schemes.”

Add a new clause after T2(5):

“Where an LCWIP exists for a settlement, major development must demonstrate how it will provide direct, convenient, and safe connections to the identified routes. In settlements where an LCWIP is still being finalised for inclusion in the Regulation 19 evidence base, major development must not be required to deliver or fund LCWIP-specific schemes until those schemes have been clearly defined, published, and consulted on as part of the Local Plan process.”

c) Evidence base and consultation explanation

In the supporting text or Regulation 19 consultation statement, add:

“The LCWIP for Edenbridge will be included in the transport evidence base for the Regulation 19 (Publication) Local Plan. The Council will ensure that the Edenbridge LCWIP is published alongside the Regulation 19 Plan so that residents, stakeholders, and the examining Inspector can see and comment on the Edenbridge walking and cycling network in the full context of proposed growth and infrastructure for the town, notwithstanding the more limited scope for change at this stage of the process.”

5. We request

- We ask that the Council complete, publish and submit an Edenbridge Local Cycling and Walking Infrastructure Plan, equivalent in scope and detail to the Sevenoaks Urban Area and Swanley LCWIPs, as part of the Regulation 19 evidence base, so that the examining Inspector can test the Local Plan for Edenbridge against proportionate and up-to-date transport evidence.
- We ask that the Transport chapter and Policies T1 and T2 are amended so that obligations to deliver LCWIP routes only apply where clearly specified schemes have

been published and are part of the Regulation 19 evidence base, and that Edenbridge is explicitly placed on the same evidential footing as Sevenoaks and Swanley.

- We ask that the Regulation 19 documentation clearly explains how the Edenbridge LCWIP has been prepared, what engagement has taken place, in comparison to Swanley and Sevenoaks, and how it relates to Edenbridge allocations and transport impacts, so that residents and the Inspector can properly assess whether the Plan is justified and effective for Edenbridge.

6. Regulation 19 soundness and legal points

- The evidence is not sound because the Plan relies on LCWIPs as a key delivery tool for sustainable transport, but only Sevenoaks and Swanley have LCWIP evidence in the base, while Edenbridge, a main settlement and congestion hot spot, does not. This means the Plan is not **justified** for Edenbridge, as required by the soundness test, because the evidence is not proportionate across the main settlements and does not support the Edenbridge strategy to the same standard. It also undermines **positively prepared** since active travel opportunities in Edenbridge have not been properly identified at the plan-making stage.
- The evidence is not sound because transport issues for Edenbridge have not been considered from the earliest stages of plan-making in the same structured way as for Sevenoaks and Swanley, contrary to the National Planning Policy Framework, which expects plan-makers to identify opportunities for walking, cycling and public transport across their area from the outset. The Council has prepared detailed LCWIPs for Sevenoaks and Swanley but has left the Edenbridge LCWIP to be completed around the time of Regulation 19, when the scope for changes is limited. This conflicts with the NPPF requirement to integrate transport and active travel into strategic plan-making rather than treating them as a late add-on.
- The evidence is not sound because the Plan's approach to LCWIPs is not **effective** across the District as a whole. Policies T1 and T2 expect major developments to connect to and help implement LCWIP routes District-wide, but in practice only residents and developers in Sevenoaks and Swanley have access to a mapped network and prioritised schemes at this stage. This uneven readiness of the evidence risks delivery being front-loaded into those towns and leaves Edenbridge without a clear framework for contributions or scheme prioritisation over the plan period, undermining effective implementation in Edenbridge.
- The evidence is not sound because the differing depth of LCWIP material for the main settlements raises legal compliance concerns about how the Council has had regard to national policy and to the needs of different groups in Edenbridge when preparing its plan. Active travel networks particularly benefit those without access to a car, children, older people, and disabled residents. By providing a detailed LCWIP framework and consultation process for Sevenoaks and Swanley, but only a limited, map-based exercise and no published LCWIP for Edenbridge at this stage, the Council risks failing to show that it has applied the National Planning Policy Framework's requirements on inclusive, sustainable transport consistently across the main settlements, and that it

has had due regard to the Public Sector Equality Duty when shaping transport and infrastructure policies affecting Edenbridge.

7. Edenbridge Impact

In simple terms, the way LCWIPs are currently handled leaves Edenbridge without the same level of transport evidence as Sevenoaks and Swanley, weakening the planning case for securing well-designed walking and cycling infrastructure to support the town's growth up to 2042.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Transport & Infrastructure – EV Infrastructure Study

1. What this document does

The Electric Vehicle Charging Infrastructure Study (June 2023) models expected electric vehicle (EV) uptake to 2030 across Sevenoaks District and estimates how many public chargers will be needed and where they should go. It uses Field Dynamics' data tools to identify demand "zones," including several in Edenbridge, and comments on local electricity network "headroom" that may constrain the delivery of new charging points.

For Edenbridge, the Study identifies 1,606 on-street households (9.7% of the District total), notes three of the top 25 district-wide public EV charging demand zones within the town, and flags that the local electricity network is already overloaded. It also refers to the Town Council's intention at that time to install four public chargers in the Market Car Park. The Study is then used in the draft Local Plan to support the approach to EV infrastructure and Policy T2 (Sustainable Movement).

We must also note that the Study is now dated (mid-2023) and already out of step with reality in Edenbridge, for example, the Market Car Park chargers it describes as an intention have since been delivered.

2. What's good for Edenbridge

- The Study clearly recognises that Edenbridge has a large number of residents who rely on on-street parking, with 1,606 on-street households and multiple "public" demand zones across the town. This is important evidence that Edenbridge should be treated as a high-priority settlement for public EV infrastructure, not simply placed behind Sevenoaks and Swanley.
- It identifies specific neighbourhoods in Edenbridge where demand is highest, for example Spitals Cross, the central residential area around Lingfield Road, Mont St Aignan Way and the High Street, and the residential area north of Edenbridge Station. This level of detail is helpful and can be used to direct infrastructure and developer contributions to the most suitable and effective locations.
- The Study directly acknowledges that **Edenbridge sits in one of the most constrained parts of the electricity network, with calculated "demand headroom" showing that the local network is already more than 5% overloaded.** This is strong evidence that any significant new growth or EV infrastructure in Edenbridge must be linked to **strategic electricity reinforcement**, and that it cannot be assumed that Edenbridge can simply absorb more demand.

- It highlights opportunities for partnership working in Edenbridge, including with the Town Council, supermarkets, and petrol filling stations, as a way to deliver destination and rapid charging that can serve a wider catchment. In practice, the chargers in the Market Car Park have now been installed, which demonstrates that local partners can deliver quickly where there is a clear focus and some support.

Overall, the Study provides a useful starting point for treating Edenbridge as a high need, infrastructure constrained town where **EV infrastructure and the electricity grid must be planned together with housing growth.**

3. What's vague or risky for Edenbridge

The Study only models EV uptake and charger need to 2030, while the Local Plan runs to 2042. This leaves a 12-year gap where Edenbridge is expected to accommodate major new development without an evidenced view of EV demand or infrastructure needs. **For a town with known grid constraints, this is a serious weakness.**

The Study states that Edenbridge has 1,606 on street households and shows this total again in its zoning table, yet a separate “priority locations” table gives Edenbridge only 439 on street households and ranks it behind other settlements. **The difference is not explained.** This inconsistency **risks under-prioritising Edenbridge** when investment and planning obligations are allocated, despite the zoning data clearly showing a much higher level of on-street dependence.

The Study suggests, for example, that a small number of chargers in the Market Car Park would serve a specific number of on-street households, and that further destination chargers with retailers could serve a larger number, but it does not clearly explain the assumptions behind these “coverage” figures (for example, walking distances, usage rates, or typical dwell times). For residents and decision makers, **these numbers appear arbitrary and make it difficult to assess whether Edenbridge will, in practice, be adequately served.**

For Edenbridge, **the Study rightly flags that the electricity network is already overloaded** and that grid capacity may be a limiting factor for EV infrastructure. However, it does not set out any clear strategy, phasing, cost estimate, or delivery partnership for resolving this constraint by 2030 or 2042. This is particularly risky given Utilities Policy UD1, which requires sufficient utilities capacity and allows development to be phased until reinforcement is delivered. Without a clear plan, **there is a real danger that Edenbridge residents will be pushed towards EVs by policy and new development but left without the practical ability to charge them.**

The Study is referenced in the Transport chapter, but the clear evidence on Edenbridge’s high on-street dependence and grid constraint is not translated into specific infrastructure requirements or phasing for Edenbridge allocations. **There is no explicit thread from the Edenbridge zoning data into the Infrastructure Delivery Plan (IDP), Policy IN1 (Infrastructure Delivery) or Policy T2 (Sustainable Movement) to secure public EV hubs and grid upgrades** as essential infrastructure ahead of, or alongside, development in Edenbridge.

The Study models EV uptake across the existing housing stock using national adoption curves but **does not explicitly factor in the additional demand from the draft Local Plan’s own site allocations** in Edenbridge or compare different growth distributions between settlements. It therefore does not answer the central question for Edenbridge: whether the proposed level and location of growth here can be supported by EV infrastructure and electricity capacity to 2042.

The Study is dated June 2023 and EV uptake is moving rapidly. Since then, Edenbridge has already moved on, the Market Car Park chargers have been installed, and the draft Local Plan Transport chapter uses more recent 2025 statistics on EV ownership. The Edenbridge figures in the Study are therefore already out of date and are likely to underestimate demand, particularly for the later years of the Plan period. This reinforces the need for updated evidence that reaches to 2042 and reflects what has actually been delivered on the ground.

We are concerned, and frankly disappointed, that this substantial, technical Study **appears to have entered the Local Plan evidence base relatively late in the process**, giving residents and community groups in Edenbridge limited time to read, digest and comment on it alongside the Plan itself. For a town that is heavily affected by its findings, this undermines the spirit of open and meaningful public engagement.

4. What to change

We consider that the Council should use this Study more robustly and transparently in the Regulation 19 Local Plan and associated documents, with clear Edenbridge-specific safeguards.

Transport supporting text (Policy T2 – Sustainable Movement)

Add the following sentence to the end of the paragraph that refers to the Electric Vehicle Charging Infrastructure Study:

“The Study shows that Edenbridge has one of the highest concentrations of on-street households in the District (1,606 households, or 9.7% of all on-street households) combined with a significantly constrained local electricity network, and is already partly out of date as some identified charging infrastructure (such as the Edenbridge Market Car Park chargers) has since been delivered; in Edenbridge, **the delivery of public EV charging infrastructure and associated grid reinforcement is therefore an essential pre-requisite for accommodating planned growth.**”

Policy T2 (Sustainable Movement)

Insert a new criterion after the current point that deals with EV charging:

“Major development must demonstrate how it will contribute to the delivery and expansion of public electric vehicle charging infrastructure to serve the on-street households identified in the Electric Vehicle Charging Infrastructure Study (June 2023) and any updated evidence, including measures to address local electricity network constraints. This will include, where appropriate, land, funding or other support for public charging hubs and off-street destination charging in the high-demand zones identified.”

Renumber subsequent criteria accordingly.

Policy UD1 (Utilities and Digital Infrastructure)

Add a new clause after the point that addresses utilities capacity:

“In locations where the existing electricity network is already operating above capacity, as identified in the Electric Vehicle Charging Infrastructure Study (June 2023) and any subsequent updates, major development proposals will only be supported where a clear and funded programme of reinforcement is in place to restore adequate headroom and to accommodate the additional demand from both new development and electric vehicle charging. This

reinforcement must be identified in the Infrastructure Delivery Plan and secured through planning obligations, planning conditions or other binding mechanisms.”

Re-number subsequent clauses accordingly.

Policy IN1 (Infrastructure Delivery) and the Infrastructure Delivery Plan

Under Policy IN1 and in the Infrastructure Delivery Plan schedules, explicitly identify:

- A strategic electricity network reinforcement scheme, where current capacity is already exceeded and where Local Plan growth is proposed.
- One or more public EV charging hubs serving the high-demand zones identified in the Study to include at least one rapid or ultra-rapid facility linked to existing or new commercial sites and public car parks.

Include the following sentence at the end of IN1’s list of essential infrastructure:

“Essential infrastructure includes electricity network reinforcement and public electric vehicle charging hubs in any town with a high proportion of on-street households, as identified in the Electric Vehicle Charging Infrastructure Study (June 2023) and any updated EV evidence for the period to 2042.”

Clarifications and updates to the EV Infrastructure Study (if republished at Regulation 19)

If the Study is to be republished or appended at Regulation 19, we consider that the following changes are required:

- Correct or clearly explain the Edenbridge on-street household figures so that the number used to prioritise investment matches the 1,606 on-street households identified in the zoning data or is transparently described as a defined subset.
- Add a short explanatory note setting out how household “coverage” numbers from individual charging sites (for example, Market Car Park and potential destination chargers with retailers) have been calculated, including assumptions on charger type, utilisation, dwell time, and acceptable walking distance.
- Provide updated, settlement-level projections for EV demand and charger need to 2042 or supply a clear and robust method for extrapolating the 2030 figures to the end of the Plan period, considering already-delivered infrastructure such as the Edenbridge Market Car Park chargers.

5. Our requests

- We ask that the Council explicitly recognise, in Policies T2, UD1 and IN1 and in the Infrastructure Delivery Plan (when there is an up to date one available), that Edenbridge combines a very high level of on-street parking reliance with an already overloaded electricity network, and that grid reinforcement and public EV charging hubs in Edenbridge are essential infrastructure for the Local Plan period.
- We ask that the Council correct and clarify the Edenbridge figures in the EV Infrastructure Study so that the number of on-street households used to prioritise investment is consistent and clearly explained, and that the methodology for estimating household “coverage” from charging sites in Edenbridge is made transparent.

- We ask that the Council update or supplement the EV evidence to reflect the Study’s June 2023 date, the chargers already delivered (such as those in the Market Car Park, Edenbridge), and to provide robust projections and infrastructure requirements to 2042 at settlement level, **so that decisions on growth and infrastructure in Edenbridge are based on current and proportionate evidence.**

6. Regulation 19 soundness and legal points

- The evidence is not sound because it is **not positively prepared or effective**: it stops at 2030 and does not demonstrate that EV infrastructure and electricity capacity can support the level and distribution of planned growth in Edenbridge and across the District to 2042. This undermines the tests of positive preparation and effectiveness and does not fully meet National Planning Policy Framework (NPPF) expectations that plans should be deliverable over the whole plan period, with necessary infrastructure planned alongside development.
- The evidence is not sound because it is **not fully justified**: the reliance on a single adoption curve, the unexplained discrepancy between the 1,606 on-street households and the lower figure used in the priority table for Edenbridge, and the opaque “coverage” assumptions mean the Study does not provide clear, transparent, and proportionate evidence for prioritising EV infrastructure between settlements. This weakens the “justified” test and casts doubt on whether reasonable alternatives and distributional impacts between towns have been properly considered.
- The evidence is not sound because it is **not clearly integrated with the Plan’s delivery mechanisms**: although the Study highlights severe network constraints in Edenbridge, these findings are not translated into specific, costed and phased infrastructure items in the Infrastructure Delivery Plan or clear requirements in Policies T2, UD1 and IN1. This weakens the “effective” test because there is no clear pathway from evidence to delivery, particularly in the most constrained settlement.
- The evidence is not sound because it is **not fully consistent with national policy on climate change and sustainable transport**: national policy expects Local Plans to support the transition to a low-carbon future, promote sustainable transport and ensure that significant development is focused on locations which are, or can be, made sustainable. The current EV evidence **does not convincingly show that Edenbridge’s planned growth can be supported by timely EV infrastructure and electricity capacity without causing localised failures or inequities between settlements, nor that the necessary infrastructure can in fact be secured in time.**
- The evidence raises **legal compliance and consultation concerns**: this Study appears to have been introduced into the evidence base at a late stage, despite its technical complexity and importance for a town like Edenbridge. This has given residents, the Town Council and local organisations limited time to understand and respond to its assumptions alongside the draft Local Plan, which sits uneasily with the principles of early, meaningful, and effective engagement underpinning the plan-making regulations and the Council’s own Statement of Community Involvement.

7. Edenbridge Impact

As it stands, the EV Infrastructure Study confirms high need and grid weakness in Edenbridge but, because it is already partly out of date and not fully carried through into policy and delivery mechanisms, it risks leaving Edenbridge with substantial new growth, ongoing grid constraints and incomplete EV infrastructure compared with other main settlements.



NEDRA (New Edenbridge District Residents' Association)

Evidence Base Response

Habitats Regulation Assessment

Appendix B – Ashdown Forest Air Quality Impact Assessment is currently identified as “to be confirmed, likely not applicable.” We understand that this work is focused on potential air quality impacts arising from development within or close to the Ashdown Forest 7km zone of influence.

From an Edenbridge Residents' Association point of view, the sensible position is that tighter control close to Ashdown Forest is good environmental planning. We do not object in principle to strong protection measures where there is clear evidence of risk to such a sensitive habitat. However, Edenbridge lies well outside the 7km influence area and should not be treated as if it were inside that constraint zone.

Why this matters for Edenbridge

If the Local Plan and its evidence do not clearly state that Edenbridge is outside the Ashdown Forest constraint zone, there is a risk that:

- Mitigation costs or obligations designed for developments within the 7km zone could be wrongly imposed on Edenbridge schemes, increasing costs for local projects without environmental justification.
- Comparative inconsistency between settlements could arise if other locations outside the zone are treated more favourably, while Edenbridge is left carrying constraints meant only for areas closer to Ashdown Forest.
- Delay to Edenbridge developments may occur if officers or consultees incorrectly assume that Habitats Regulations Assessment issues relating to Ashdown Forest apply to Edenbridge when they do not.

Requested change

We ask that the Council records explicitly in the Habitats Regulation Assessment and supporting text that Edenbridge lies well outside the Ashdown Forest 7km zone of influence and that development in Edenbridge should not be subject to Ashdown Forest-related constraints or obligations.