Date: 4th November 2026
By email only fairfax@your-feedback.co.uk

RE: Land North of Sevenoaks Wildlife Reserve – Fairfax Community Consultation

SUMMARY
Thank you for the opportunity to comment on Fairfax's proposal for the Land North of Sevenoaks Wildlife Reserve. Kent Wildlife Trust (KWT) is the long-term leaseholder and land manager of Sevenoaks Wildlife Reserve and Sevenoaks Gravel Pits Site of Special Scientific Interest (SSSI), which lie immediately south of the proposed development site. We have a longstanding interest in the protection, restoration and enhancement of this nationally important wildlife site and the wider landscape, including the River Darent and its surrounding floodplain.

We recognise the need for new housing and understand that Sevenoaks District Council faces significant challenges in meeting its housing requirements. However, we are concerned that the current proposals for up to 1,500 homes, alongside associated infrastructure and facilities, risk placing considerable additional pressure on the Wildlife Reserve, SSSI and wider ecological network. We do not believe that development on this scale, in its current proposed form, represents the right approach for this particularly sensitive location.

We believe there is an opportunity to take a different approach to the site, one which recognises its environmental value, responds to the priorities of the local community and demonstrates that housing and nature recovery can be delivered together.

Through our *Preserve Sevenoaks Wildlife Reserve* campaign, we have been working with the local community to develop an Alternative Vision for the future of the site. We would like to use this consultation as an opportunity to share that vision with Fairfax and encourage a more collaborative approach to the development of the proposals.

IMPACTS TO SEVENOAKS WILDLIFE RESERVE
At the in-person consultation event on 19th October 2026, it was encouraging to see that some positive design changes had already been made in response to concerns raised about the proposals. These included the removal of the proposed new entrance into Sevenoaks Wildlife Reserve and the provision of a buffer of more than 50 metres between the ancient woodland and development on the western side of Rye Lane. These are welcome steps in the right direction and demonstrate the value of addressing environmental constraints early in the design process. However, KWT still has concerns around the indirect impacts to Sevenoaks Wildlife Reserve and Sevenoaks Gravel Pits SSSI.

Sevenoaks Wildlife Reserve is a nationally important wildlife site, sitting within the Sevenoaks Gravel Pits SSSI and supporting more than 2,000 species. Its mosaic of lakes, wetlands, woodland and grassland habitats provides an important refuge for wildlife, including protected and red-listed birds, alongside a rich diversity of botanical and invertebrate life.

The River Darent, a globally rare chalk stream, flows through the Reserve / SSSI into the proposed development site and through the wider landscape, providing an important ecological corridor and supporting a range of associated wetland habitats. The surrounding countryside also plays an important role in maintaining connectivity between the Reserve / SSSI and the wider landscape.

The land identified for development represents the last substantial area of open countryside connecting the Reserve to the wider landscape. Its value is therefore not limited to the habitats currently present within the site. It also provides an important opportunity to strengthen ecological connectivity, restore the River Darent corridor and create a more resilient landscape for nature. We are concerned that developing such a substantial proportion of this land would significantly alter the character and function of this landscape, potentially leaving the Reserve increasingly enclosed by development and isolated from the surrounding countryside.

The proposed development also has the potential to generate significant additional pressures on the Reserve and SSSI. These extend beyond the direct loss of habitat and include increased recreational activity, disturbance from people and domestic pets, noise, artificial lighting, pollution and changes to surface water management and hydrology. These impacts need to be considered together, rather than as a series of isolated issues. Government guidance and legislation (such as Environmental Impact Assessment) confirms that developers and Local Planning Authorities must have regard to the possible cumulative effects arising from existing and/or approved development. It recognises that an application should not be considered in isolation where it forms part of a more substantial pattern of development (such as allocated sites in a Local Plan).

This is directly relevant to the approved Sevenoaks Quarry (22/00512/OUT) and approved Sevenoaks Gasholder Station (21/01254/FUL) developments. Sevenoaks Quarry provides up to 950 residential dwellings, together with associated employment, retail, leisure, community, education, open space and infrastructure. The development is located approximately 600m from the nearest boundary of Sevenoaks Wildlife Reserve and Sevenoaks Gravel Pits SSSI. Sevenoaks Gasholder Station consists of a 136-dwelling development, comprising 10 houses and 126 flats with limited greenspace. The Design and Access Statement for this development features Sevenoaks Wildlife Reserve and Sevenoaks Gravel Pits SSSI as “public open green space” for recreation. The development is located 45m from the nearest point of the SSSI. The scale and proximity of these already-approved developments mean that their effects cannot reasonably be excluded from consideration when assessing the capacity of the Reserve and SSSI to accommodate the additional pressures associated with a further development of up to 1,500 dwellings.

Fairfax must explicitly identify the Sevenoaks Quarry and Sevenoaks Gasholder Station developments (and any other nearby reasonably foreseeable developments) as cumulative projects, thoroughly assessing their interactive impacts with the proposed Land North of Sevenoaks Wildlife Reserve development, during both the construction and operational phases. Cumulatively, the Land North of Sevenoaks Wildlife Reserve, Sevenoaks Quarry, and Sevenoaks Gasholder Station developments will introduce 2,586 new dwellings to the immediate area. This housing influx will bring potentially 7,000 new residents within a 1km radius of the Reserve and SSSI boundary, representing a 33.1% population increase within the Sevenoaks Town civil parish area and an unprecedented 152% demographic surge relative to the existing population baseline of the Sevenoaks Northern Ward (4,589 residents) according to the 2021 Census. Given this significant concentration of hyper-local population growth, Fairfax and any planning application submitted, must rigorously evaluate the compounding, unmitigated pressures on the Reserve / SSSI and its supporting ecological network, specifically focusing on elevated recreational use, habitat disturbance, unmanaged access bottlenecks, traffic, light pollution, and urban encroachment.

As mentioned within our EIA Scoping Option (PA/26/00294) response for this development, any environmental assessment must ultimately provide the LPA and statutory consultees with

sufficient information to answer a fundamental question: can the proposed development, at the scale and in the form proposed, in combination with other existing, proposed, and approved developments, be accommodated without exceeding the environmental capacity of the Sevenoaks Wildlife Reserve, Sevenoaks Gravel Pits SSSI, River Darent and wider ecological network?

As the organisation responsible for managing the Reserve and SSSI, KWT has considerable knowledge of their ecological sensitivities, existing visitor pressures and long-term management requirements. We are disappointed that KWT was not approached directly by Fairfax at an earlier stage, and that engagement has only taken place following our repeated efforts to make contact and our attendance at the in-person consultation event.

FLOOD RISK, FUNCTIONAL FLOODPLAIN AND THE RIVER DARENT

Flood risk must be a fundamental consideration in determining the suitability, layout and scale of development at this site. The River Darent and its floodplain are important features of the landscape, providing space for floodwater, supporting wetland habitats and contributing to the resilience of the wider area. Development should work with these natural processes, rather than constrain them or transfer flood risk to neighbouring communities and land.

The *Sevenoaks Flood Risk to Communities* report explains that Flood Zones 2 and 3 represent areas that would be susceptible to flooding from rivers or the sea under specified conditions. Flood Zone 3 is the highest-risk zone and includes Flood Zone 3b, the functional floodplain. This is particularly important because Zone 3b is not simply land that may occasionally flood: it comprises land where water needs to flow or be stored during flood events. Its role in accommodating floodwater must therefore be protected.

Fairfax's presentation acknowledges that the site includes the River Darent and land within Environment Agency Flood Zones 2 and 3, however there is no mention of Zone 3b or functional floodplain. It also states that development is being considered in areas of historic landfill and land newly identified as Flood Zone 2 following a recent change in mapping. These constraints underline the need for a thorough and up-to-date understanding of flood risk before the layout or scale of development is established.

We recognise that Fairfax may be seeking to avoid locating houses directly within Flood Zone 3. However, avoiding the highest-risk areas for housing does not demonstrate that the wider development is acceptable. The proposed layout appears to place development immediately alongside the boundary of Flood Zone 3, while the proposed access road would cross Flood Zone 3, including areas identified as Flood Zone 3b, the functional floodplain. These elements must be assessed in their own right, alongside the effects of the development as a whole.

The National Planning Policy Framework (NPPF, 2026) is clear about the restrictions applying to development within the functional floodplain. Annex F, Table 3 states that development should be refused where its vulnerability classification is incompatible with Flood Zone 3b. Housing and other more vulnerable development, as well as less vulnerable development, are not compatible with this zone. The exceptions are water-compatible uses and qualifying essential infrastructure that has passed the Exception Test. Any proposal for infrastructure within Zone 3b must be supported by evidence that it can remain safe and operational during flooding, will not result in a net loss of floodplain storage, will not impede water flows and will not increase flood risk elsewhere.

The proposed access road therefore requires particular scrutiny. Essential transport infrastructure is recognised as a potential exception, but this classification applies to national infrastructure; it should not be assumed to apply automatically to any road associated with a housing development. Fairfax must demonstrate the road's necessity, explain why a lower-risk alternative cannot reasonably be achieved, and provide the evidence required to demonstrate compliance with the NPPF. The assessment must consider the road's physical presence and engineering, including any embankments, raised ground, culverts or other structures that could obstruct flood flows or displace floodwater. The effects must be assessed against the relevant flood scenarios, including climate change, rather than relying solely on the present-day flood-zone boundary.

The proposed development must also be considered in terms of its effect on flood risk beyond the site. Building close to the floodplain, changing ground levels, increasing impermeable surfaces and altering natural drainage pathways can affect how and where water is stored and conveyed. The flood-risk assessment should therefore demonstrate how the scheme will avoid increasing flood risk to existing homes, infrastructure, the River Darent corridor and surrounding land, both during construction and over the lifetime of the development. This assessment must consider cumulative impacts and all relevant sources of flooding, not only river flooding shown on the Flood Map for Planning.

KWT considers that the floodplain should be treated as an important part of the site's green and blue infrastructure, with space retained for natural flood management, wetland restoration and the movement and storage of floodwater. This would provide an opportunity to improve the condition and resilience of the River Darent corridor while delivering benefits for biodiversity, water quality and climate adaptation. Such an approach is consistent with the NPPF's emphasis on making use of natural flood-management opportunities and ensuring that development does not increase flood risk elsewhere. The extent and location of development should be determined by the site's environmental capacity, including flood risk, rather than treating a predetermined housing figure as fixed and seeking to accommodate it around these constraints.

Before progressing the proposal, Fairfax should demonstrate clearly how the scheme complies with the NPPF, including the requirements for any development within Flood Zone 3b. This should include a transparent assessment of the proposed road crossing, alternative access arrangements, floodplain storage, flood flows, climate change and effects on flood risk elsewhere. If the proposed access road cannot satisfy the applicable policy requirements, it should be relocated or redesigned. The functional floodplain must not be treated as an area available for a new road simply because housing is kept outside its mapped boundary.

LISTENING TO THE LOCAL COMMUNITY

Through our *Preserve Sevenoaks Wildlife Reserve* campaign, we wanted to ensure that local people had an opportunity to express what they value about the area and help shape ideas for its future. We therefore carried out a community questionnaire, which received 112 responses from residents and visitors to Sevenoaks Wildlife Reserve. The results demonstrated just how important the Reserve and surrounding countryside are to the local community.

The Reserve is clearly an important asset to the local community. Out of the 112 participants:

31.53% visit monthly
29.73% visit weekly
8.10% visit daily

26.13% visit a few times a year
100% said Sevenoaks Wildlife Reserve was important to them

The top three assets' people value most about the Reserve are:

81.98% - Wildlife
58.56% - Quiet and tranquillity
54.95% - Birdwatching

The questionnaire also identified overwhelming concern about the potential impacts of the proposed development. Participants were particularly concerned about:

99.77% - Loss of wildlife habitat and reduced habitat connectivity
98.80% - Increased recreational pressure on the Reserve
98.09% - Increased artificial light
99.30% - Increased noise
99.78% - Pollution of the River Darent

100% of participants opposed the proposed 1,500-home development. However, the responses did not simply demonstrate opposition to the current proposals. They also provided a clear indication of what people would like to see instead. There was overwhelming support (**91.89%**) for an alternative approach prioritising nature recovery, ecological connectivity, climate resilience and community wellbeing, with the remaining 8.11% preferring the site be left as it is (for agricultural use and farming purposes). When asked more specifically about the proposed development and number of houses, there was support for retaining some housing on the site, provided this was carefully planned, reduced in scale and delivered alongside significant nature restoration. In particular, 63.39% of participants supported an option comprising a smaller amount of carefully planned development alongside substantial nature recovery.

These results demonstrate that residents are not necessarily opposed to all development. Rather, they want to see an approach that respects the environmental importance of the area and protects the qualities that make Sevenoaks such a special place to live.

OUR ALTERNATIVE VISION
In response to the concerns raised by the community, KWT has developed an Alternative Vision for Land North of Sevenoaks Wildlife Reserve. The vision explores how the site could be planned differently, retaining the opportunity for some carefully located housing while dedicating a substantial proportion of the land to nature recovery, habitat creation and green and blue infrastructure. Rather than beginning with a predetermined housing number and attempting to accommodate nature around it, we believe the environmental characteristics and opportunities of the site should help determine where development is appropriate and how much could reasonably be accommodated.

Our Alternative Vision therefore proposes concentrating housing within the less environmentally sensitive areas of the site, broadly around the land west of Rye Lane and the north-western corner of the land east of Rye Lane. Any development west of Rye Lane would need to incorporate appropriate buffers to protect the ancient woodland to the south. The current proposed 50m+ buffer is adequate in principle. The remainder of the site, particularly the eastern half, would be protected and managed as a landscape-scale nature recovery area. This would provide a substantial opportunity to restore the River Darent corridor, strengthen ecological connectivity and create a diverse range of habitats, while protecting the setting and

ecological integrity of the existing Wildlife Reserve and SSSI. The area would incorporate extensive, carefully designed public access and recreational opportunities, providing residents with alternative places to walk, cycle and enjoy nature, helping to reduce additional recreational pressure on the existing Reserve and SSSI. Alongside this, dedicated wildlife areas would be established where access is restricted or carefully managed, allowing wildlife to thrive with minimal disturbance. This reflects the local community's expressed desire for both greater access to nature and quiet areas where wildlife is prioritised.

KWT does not wish to prescribe a specific number of dwellings for the site at this stage. We strongly believe that the scale of development should be determined by robust environmental surveys and an assessment of the site's ecological carrying capacity, including the capacity of Sevenoaks Wildlife Reserve and the Sevenoaks Gravel Pits SSSI to accommodate additional recreational pressure. This assessment must consider the cumulative effects of other proposed and approved developments within a 1km radius of the Reserve and SSSI, rather than assessing this site in isolation.

However, there are areas of the site where we consider development should be avoided from the outset. These include land immediately adjacent to Flood Zone 3, particularly the functional floodplain (Flood Zone 3b), and areas of historic landfill where the suitability of development requires careful consideration. We are also strongly opposed to the proposed spine road crossing the functional floodplain. The functional floodplain must be retained to accommodate floodwater, and introducing road infrastructure risks obstructing flood flows, displacing floodwater and increasing flood risk elsewhere. The necessity and acceptability of this crossing have not been demonstrated, and we consider that alternative access arrangements should be explored that avoid this sensitive area.

Based on the phasing plan presented by Fairfax, we consider that Phases 1b, 1c and 2d, which together comprise approximately 484 dwellings, fall within areas where development should be avoided. We recommend that these areas are removed from the developable area and that the proposals are redesigned around the site's environmental constraints, with the remaining land prioritised for nature recovery, climate and flood resilience.

The vision is intended to demonstrate what could be achieved through a different balance of development and nature recovery. It is not a finished masterplan or a fixed proposal, but a starting point for further discussion and collaborative design. We want to bring together residents, Sevenoaks District Council, local Councillors, Fairfax and other environmental and community organisations to explore how the site could become a genuine multifunctional landscape. An Alternative Vision could provide a legacy for the area, one that has been collaboratively designed to restore nature, strengthen ecological connectivity, protect Sevenoaks Wildlife Reserve and Sevenoaks Gravel Pits SSSI, and provide sustainable, carefully designed homes.

Kind regards,

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