Objection to Pedham Place Site Allocation

Tibbalds Planning and Urban Design

November 2025

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Quality Assurance	
Project title	6045 Pedham Place
Document title	Objection to Pedham Place Site Allocation
Client	Farningham PC, Eynsford PC and Crockenhill PC
Checked by Project Runner	LW
Approved by Project Director	RM
Project number	6045
Location of file on server	/TPUD - Main/Job Server/6045 Pedham Place Objection/6045 5.0 Statutory Planning/6045 5.3 Supporting Statements/6045 5.3 Objection Report/6045 5.3 Issued May 2025

Revision History		
Revision	**Date**	**Status**
1	27/05/2025	Final Draft
2	14/11/2025	Final

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1 Executive Summary

This report has been produced by Tibbalds Planning and Urban Design on behalf of Farningham, Eynsford and Crockenhill Parish Councils. Its purpose is to assess the principle of the location of a proposed new settlement at Pedham Place golf course and a proposed new rugby/events stadium at Petham Court Farm or Pedham Place.

The site promoter's description of the proposals for the Pedham Place 'standalone settlement' in the Sevenoaks District Council's Regulation 18 Local Plan consultation (Winter 2023) included:

- Around 2,500 homes, including affordable homes and homes for the elderly. These will be built at a range of densities and include an appropriate mix of homes;
- New primary and secondary education facilities including a SEN school;
- A town centre that will include retail, community, and health uses;
- New transport infrastructure including a park & ride transport hub;
- Employment land uses to generate new jobs and drive economic growth in a strategically important and well-connected location;
- A new leisure and hotel facility; and
- A new green buffer surrounding the development with significant tree planting. This will help deliver a biodiversity net gain.

If the Wasps Rugby Football Club stadium is taken forward then the below requirements, as identified in the Regulation 18 consultation by the site promoter, would need to be accommodated at Petham Court Farm or Pedham Place:

- Training ground facilities including: 4 x rugby football pitches
- A gym
- An indoor barn
- Changing rooms
- A medical centre and medical recovery suite
- A sports R&D centre
- Supporting offices
- A restaurant and players lounge
- A new multipurpose stadium complex (24-28,000 seats) that could host sport, concerts, conferences and events; and
- A supporting hotel for visitors.

From an initial review of the proposals and based on Tibbalds industry knowledge of new and extended settlements, it is not considered that a development of 2,500 homes and at this scale would be classified as a feasible standalone settlement. This is assessed in more detail in Section 4 of this report. This report assesses why the sites are not located in a sustainable location and are not suitable for the proposed development which are summarised through these key themes:

- Green Belt and National Landscape
- Standalone Settlement and Unsustainable Location
- The NPPF's description of sustainable development by reviewing how the proposals perform against the NPPF's environmental, economic and social objectives.

Green Belt and National Landscape

The NPPF (Dec 2024) remains clear that the government still attaches great importance to the Green Belt (para. 142) and that Green Belt boundaries should only be altered where *exceptional circumstances* are fully evidenced and

justified (para. 145). The most recent amendments to the NPPF, whilst seeking to facilitate housing delivery do not weaken the Green Belt protection afforded to Pedham Place and continue to place great weight on the value of National Landscapes. The NPPF re-emphasises that new housing development should be in locations that can be made sustainable and/or offer a genuine choice of transport modes which these Sites currently fail to deliver.

Standalone Settlement and Unsustainable Location

The proposals are not considered to be a feasible standalone settlement in a sustainable location for several reasons. Settlements of 2,500 homes should be located on the edge of an existing town (urban extensions) to benefit from existing services and transport connections. Standalone settlements need to provide at least 10,000 new homes to create self-sufficient settlements with new facilities and large-scale public transport infrastructure.

Our concern with the Pedham Place proposals is the number of homes provided and size of the development is closer in scale to an urban extension to an existing town but is instead being promoted as a standalone settlement. It is not connected to an existing town and is separated by the M25 and M20 motorways and Swanley Interchange junction, limiting safe and accessible connections into Swanley. From our experience at Tibbalds of working on new towns and urban extensions, this site is not appropriate for a standalone settlement because it is not large enough to work as a self-sufficient settlement. It is also not capable of expanding in size to meet the criteria for a new town due to the site's location in a National Landscape, Green Belt and its setting within Darent Valley.

A more sustainable approach to planning developments of approximately 2,500 homes is to deliver this in a location that adjoins an existing settlement and improves existing links and connections into the existing town to benefit from the town centre uses. Developments such as these can provide employment, education and retail facilities relative to the need driven by the estimated population increase and can provide financial contributions to expand existing facilities within the town if required, promoting the use of existing facilities. This is a more sustainable approach to development and more viable in an unstable economic climate.

NPPF Environmental Objective

The proposals do not protect and enhance the natural environment and meet the environmental objectives of the NPPF for the following reasons:

- The Sites are located within Green Belt and would significantly harm the Kent Downs National Landscape.
- Car ownership will be high and sustainable transport measures are not significant enough to deter car ownership, causing more congestion and pollution.
- Proximity to the M25 and M20 creates a barrier for sustainable transport journeys by foot, bike or public transport.
- It will cause significant traffic increases on several corridors including Junction 3 of M25 and this will have a negative impact on air quality.
- Impact on environmental designations and biodiversity is not assessed in detail.

NPPF Economic Objective

The proposed employment land is not located in the right place to promote sustainable development in accordance with the NPPF's economic objective for the following reasons:

- It would deliver 60% of the District employment need over the Plan period in an unsustainable and disconnected location at Pedham Place.
- Pedham Place would provide one job for every 0.42 expected economically active resident but one job per home or one job per economically active person would be expected to help create a self-sufficient community.
- At least 50% of residents with a job will need to commute outside of Pedham Place for work which will encourage car ownership and hinder sustainable growth.

NPPF Social Objective

The proposed development at Pedham Place and Petham Court Farm is not likely to support a vibrant community with accessible services as required by the NPPF for the following reasons:

- Overprovision of school places when compared to number of students living within the settlement. This causes viability concerns and encourages more trip journeys to the site.
- Primary and secondary school demand does not appear to be significant with schools in the Sevenoaks District in this area over the next 5 years jeopardising the viability of school delivery.
- Need to prioritise existing school sites in accessible locations (or community facilities) that could be redeveloped or expanded such as the Oasis Academy (Hextable School) that is currently closed before considering new developments. Orchards Acadamy in Swanley is another example of an existing school which has recently been redeveloped and opened.
- Day-to-day retail needs can be provided on-site, but residents will still need to drive to other destinations for all other purchases.
- White Oak Leisure Centre in Swanley town centre is a new leisure centre in an accessible location on Brownfield land and leisure uses should be prioritised there and not needed at Pedham Place or Petham Court Farm.

To summarise, from our review of the proposals, we do not consider the sites at Pedham Place and Petham Court Farm to be appropriate for a standalone settlement or the development of a a large-scale stadium. The Sites' location within Green Belt and a National Landscape is not given enough weight and assessment in the principle of development. It is not a feasible standalone settlement and would be more sustainable in the form of an urban extension to an existing town. The proposals do not meet all the relevant criteria for creating a sustainable development by meeting the NPPF's environmental, economic and social objectives. We would therefore strongly recommend these sites are not allocated for development in the emerging Sevenoaks District Council's Local Plan and are continued to be protected by Green Belt and within the Kent Downs National Landscape.

2 Introduction

This report has been produced by Tibbalds Planning and Urban Design on behalf of Farningham, Eynsford and Crockenhill Parish Councils. Its purpose is to assess the principle of the location of a new settlement at Pedham Place golf course and a new rugby/events stadium at Petham Court Farm or Pedham Place. This report has been produced to support the Parish Councils in objecting to the allocation of the sites for housing and stadium development. This report focuses on assessing the sustainability of the proposed location for development against the objectives of the National Planning Policy Framework (NPPF).

The Pedham Place Site is an existing golf course located in Farningham Parish and partly within Eynsford Parish in Kent and is situated close to junction 3 of the M25 and Swanley interchange to its immediate north and western boundaries; separating the Site from Swanley. This Site is located within the Green Belt and within the Kent Downs National Landscape. The Petham Court Farm site is located to the north-west of Pedham Place in Crockenhill Parish, separated by the M25 and located south east of Swanley town on the opposite side of the M20/A20. This site comprises agricultural land and is located within the Green Belt and is partly within the Kent Downs National Landscape.

As part of Sevenoaks District Council's (SDC) Regulation 18 Local Plan consultation in Winter 2023/2024, Pedham Place has been considered for a mixed-use development for up to 2,500 homes. The site promoters (Gladman and potentially Wasps Rugby Football Club) are working on various options for the site, including residential, education, employment, health and other facilities. The SDC Regulation 18 Local Plan refers to three strategic development options which include (as quoted from the draft Local Plan):

- Option 1 – Baseline sites plus Multiple Sites on the edge of higher tier settlements (Sevenoaks, Westerham and West Kingsdown) which are located in both the Green Belt and AONB.
- Option 2 – Baseline sites plus Stand-alone Settlement in a single location, mindful that there are wide ranging benefits to strategic growth, as set out at NPPF paragraph 73, including co-ordinated infrastructure investment.
- Option 3 - Baseline sites plus Combined AONB/ GB sites on the edge of higher tier settlements (Sevenoaks, Westerham and West Kingsdown) plus stand-alone settlement.

The 'standalone settlement' referred to in the draft Local Plan is Pedham Place. The site promoter's description of the proposals for the Regulation 18 consultation included:

- Around 2,500 homes, including affordable homes and homes for the elderly. These will be built at a range of densities and include an appropriate mix of homes;
- New primary and secondary education facilities including a SEN school;
- A town centre that will include retail, community, and health uses;
- New transport infrastructure including a park & ride transport hub;
- Employment land uses to generate new jobs and drive economic growth in a strategically important and well-connected location;
- A new leisure and hotel facility; and
- A new green buffer surrounding the development with significant tree planting. This will help deliver a biodiversity net gain.

Wasps Rugby Football Club (WRFC) have registered their interest in Pedham Place or Petham Court Farm for a new multi-use stadium accommodating 28,000 seats, training ground and a hotel as part of the Local Plan 'Call for sites', to come forward as part of a wider masterplan. Whilst this stadium would be the home ground for the Wasps rugby team it is also envisioned to be used for other events throughout the year.

If the WRFC stadium is taken forward then the below requirements, as identified in the Regulation 18 consultation by the site promoter, would need to be accommodated at Petham Court Farm or Pedham Place:

- Training ground facilities including: 4 x rugby football pitches
- A gym
- An indoor barn
- Changing rooms

- A medical centre and medical recovery suite
- A sports R&D centre
- Supporting offices
- A restaurant and players lounge
- A new multipurpose stadium complex (24-28,000 seats) that could host sport, concerts, conferences and events; and
- A supporting hotel for visitors.

A new Regulation 18 SDC Local Plan was published in November 2025 for consultation to meet a new housing target of 17,175 new homes during the plan period (2027-2042). There are two primary development scenarios presented in this Local Plan. Option 1 includes 16,321 homes and includes the WRFC stadium but not Pedham Place. Option 2 includes a surplus of homes against the housing target but includes all the sites in Option 1 plus Pedham Place (18,900 homes in total).

The Regulation 18 Local Plan (November 2025) is quite vague about the inclusion of the Wasps Stadium and doesn't provide many details on the potential proposals apart from the site allocation details mentioned previously, but it is included in Options 1 and 2. Pedham Place is included in Option 2 but the emerging Local Plan highlights that the site is not Grey Belt land and notes that the Government's recent planning reforms exclude AONB/National Landscape from its definition of 'grey-belt' land, where the application of policies relating to it would provide a strong reason for restricting development. Therefore, this site is not currently included as a site allocation in Option 1 but it will be tested through Option 2 and the Sustainability Appraisal as a potential option to meet the full housing need.

A standalone settlement or 'new town' has been described by the Government's New Towns Taskforce as having the potential to deliver 10,000 homes or more, in the right places with the right infrastructure. The 'building new towns for the future' policy paper (13 February 2025) states that new towns or standalone settlements can attract investment, stimulate job creation and contribute to boosting regional productivity. This can be achieved where housing delivery is accelerated, locating sites that are supported by existing infrastructure and have effective public transport within the town itself as well as links to wider transport networks.

From an initial review of the proposals and based on Tibbalds industry knowledge of new and extended settlements, it is not considered that a development of 2,500 homes and at this scale would be classified as a feasible standalone settlement. This is assessed in more detail in Section 4 of this report. This report assesses why the sites are not located in a sustainable location and are not suitable for the proposed development. The report is structured into the below sections:

Section 3- Green Belt and National Landscape

Section 4- Standalone Settlement and Unsustainable Location

Section 5- NPPF Sustainable Development

Section 6- Environmental Objective

Section 7- Economic Objective

Section 8- Social Objective

3 Green Belt and National Landscape

NPPF Amendments (December 2024)

The NPPF (Dec 2024) remains clear that the government still attaches great importance to the Green Belt (para. 142) and that Green Belt boundaries should only be altered where *exceptional circumstances* are fully evidenced and justified (para. 145). The NPPF goes on to confirm that exceptional circumstances include instances where an authority cannot meet its identified need for homes. SDC are exploring options for allocating Green Belt sites for housing, including Pedham Place, on this basis. The Council must however demonstrate that it has *examined fully* all other reasonable options for meeting its identified need for development including making use of brownfield sites, optimising density and discussions with neighbouring authorities (para. 147). This should continue to be closely scrutinised in any new evidence produced by the Council for the emerging Local Plan, particularly with reference to nearby Swanley.

Notwithstanding the above, and in the likelihood that SDC will need to continue to explore Green Belt options to meet its housing needs, the appropriateness (or otherwise) of potential Green Belt locations becomes a critical consideration. NPPF para. 148 states:

"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework."

As set out in this report, Pedham Place and Petham Court Farm are neither previously developed or grey belt, nor a location that could easily be made sustainable or offer a genuine choice of transport modes.

The latest version of the NPPF introduces the concept of grey belt land (within the Green Belt) and for development in such locations to not be considered 'inappropriate development', subject to meeting a series of criteria (para. 155). As for Green Belt release, grey belt land must also be able to support sustainable transport patterns. In the case of major development including housing on land released from the Green Belt, a series of 'golden rules' apply (para. 156). Accordingly, whilst there is a perception in the development industry that there is potentially greater opportunity for development in the Green Belt, this applies primarily to grey belt land in sustainable locations. Pedham Place and Petham Court Farm meet neither of these criteria and the most recent NPPF does not, and should not be considered to, provide greater weight to the allocation of Pedham Place and Petham Court Farm in the emerging SDC Local Plan on this basis. Further, the conclusions of the Council's own Green Belt Assessment[1] in relation to Pedham Place remain relevant and are not changed by the NPPF, this states (our underlining):

"The sub-area [Pedham Place] *performs strongly against the NPPF purposes, and it is concluded the sub-area makes an important contribution to the wider Green Belt. Therefore, the sub-area is not recommended for further consideration."*

The Green Belt acts as an important gap between Swanley and Farningham and Swanley and Eynsford which contribute to the overall openness and scale of these gaps, as noted in the Assessment. The topography of the Site is undulating allowing for views onto wider countryside, especially towards the north-east, south and south-west and the Assessment notes its rural character. It further states that only 3% of the Site is covered by built form so would not constitute as previously developed land overall.

Pedham Place and part of Petham Court Farm is also within the Kent Downs Area of Outstanding Natural Beauty and therefore a National Landscape in NPPF terms. The NPPF continues to provide significant protection to National Landscapes stating that *great weight* should be given to conserving and enhancing landscape and scenic beauty within them (para. 189) and, when considering applications for development, these should be refused for major development unless exceptional circumstances exist and development is in the public interest (para. 190). Collectively, these provide a 'high bar' for any such development proposal.

It is not clear from the proposals what the benefits would be for the public interest that can't be delivered in more sustainable locations, outside of the National Landscape, such as Swanley. The proposals provide an opportunity for new homes, employment uses and supporting social infrastructure but these are common uses that are delivered in all new towns or urban extensions. Any future proposals for the WRFC stadium are likely to have a negative impact on

[1] Sevenoaks District Council Stage 2 Green Belt Assessment – Additional Sites, ARUP 22 June 2023

the local community, causing more congestion on the local highway and railway network on event days. It is not a community facility as would be operated by a private entity and therefore has limited public interest.

Evidence for the Local Plan[2] concluded that, of the three spatial options considered, Option 2 (Pedham Place) would 'be likely to cause the least harm to the Kent Downs National Landscape'. However, in doing so it advises (pg 12):

"There is potential for some degree of mitigation within all of the sites in both options 1 and 2 that could lower the significance of effects. Furthermore, there is potential for additional mitigation to reduce the site area for some of the sites in order to avoid development in the most sensitive areas. However, whilst this would reduce effects, it would also reduce the numbers of houses able to be accommodated which may affect viability of the sites or leave Option 3 as the only alternative."

Such mitigation would further constrain the ability of the proposed Pedham Place development to function as a sustainable settlement in its own right (see Section 4 below) and place even greater emphasis on sustainable transport, which present a significant challenge as identified in Section 6 of this report.

A recently dismissed appeal decision in Somerset[3] grappled with the key planning considerations for a significant housing development within a National Landscape. Whilst it must be acknowledged that the Somerset site was at planning application stage and subject to its own circumstances and site specific considerations, like Pedham Place, it was on a plateau with views to and from the site from the National Landscape which was a key consideration. The Inspectors decision (para. 50) states:

'Although there would be some enhancements to the CNL [the National Landscape]*, these are outweighed by the adverse effects and the conflict with local and national policy."*

The planning balance (para. 113) concluded:

"I afford substantial weight to the adverse effects on the CNL and the policy conflict, mindful of the great weight that should be given to conserving and enhancing designated landscapes."

In summary, the most recent amendments to the NPPF, whilst seeking to facilitate housing delivery:

- Do not weaken the Green Belt protection afforded to Pedham Place;
- Continue to place great weight on the value of National Landscapes; and
- Re-emphasises that new housing development should be in locations that can be made sustainable and/or offer a genuine choice of transport modes.

Emerging Sevenoaks Local Plan (Regulation 18)

The emerging Local Plan (Strategic Objective OB15 and Policy NE1) is in alignment with the NPPF and states that the natural environment in Sevenoaks District is a key character component of the District, should be conserved and enhanced for current and future generations. More than 60% of the District lies within the Kent Downs or High Weald Areas of Outstanding Natural Beauty/National Landscapes. As Pedham Place and part of Petham Court Farm are located within the Kent Downs National Landscape, the proposals for a site allocation also contradict local planning policy which gives National Landscapes the highest level of protection. A more strategic approach is required across the District to address housing need, ensuring that housing is allocated in the 40% of areas not located in the AONB/National Landscapes.

The emerging Local Plan (Policy ST1) further states that sustainable patterns of development will be promoted by amending Green Belt boundaries only in 'exceptional circumstances', where sites have good access to services and facilities and their release has limited impact on the purposes of the Green Belt. As already indicated, the sites are disconnected from surrounding towns and villages, they still meet the purposes of the Green Belt and it has not been evidenced what the exceptional circumstances are.

[2] Sevenoaks District Council Landscape and Visual Evidence for Sevenoaks Local Plan 2040, ARUP, 15 November 2024
[3] Appeal reference APP/F0114/W/24/3349501 dated 14 March 2025, Combe Hay Lane, Bath

4 Standalone Settlement and Unsustainable Location

The Pedham Place proposals do not meet the usual criteria and scale of development for a standalone settlement when compared to other new towns and urban extensions that Tibbalds have worked on in recent years in the South of England. We therefore have significant concerns that this Site is not located in a suitable or sustainable location for a standalone settlement due to existing site constraints, such as its location within a National Landscape and Green Belt, and lack of physical connections to Swanley. Based on other projects Tibbalds have worked on in the UK, to create a viable standalone settlement that is self-sufficient, the below criteria are normally required:

- Homes: Minimum of 10,000 new homes
- Employment: Local Authorities often want 1 job per home or 1 job per person across a range of employment opportunities such as commercial business, schools, community, local centre, and other uses.
- Education: Normally 4,500 homes is the minimum threshold for a secondary school but this could also depend on provision and capacity nearby. Kent County Council's Developer Contributions Guide 2023 (Appendix 6 Primary and Secondary Education) had a primary and secondary education pupil yields per house/flat is 0.28 for primary or 0.07 per flat, and 0.20 for secondary per home or 0.05 per flat.
- Retail: Challenges around retail impact and retail capacity make it harder to justify this but often needed to make the new community work.
- Health/GP Surgery: Securing a facility for a GP surgery with the NHS and Clinical Commissioning Group can be very challenging and is often not successful for new developments below 5,000 homes.
- Sustainable transport measures: This is increasingly a key topic in the NPPF 2024, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Tibbalds have extensive experience working on new towns, urban extensions and standalone settlements in the UK and have provided a summary of the different uses that were required for various schemes to ensure they were viable and provide the necessary facilities.

Examples of Other New Settlements in the UK

A new urban extension and garden community in East Chelmsford in Essex includes 4,500 homes on the periphery of Chelmsford, 43,000sqm of employment floorspace plus additional workspace in the town centre. For education, three 2FE primary schools and one 6FE secondary school are planned based on Essex County Council formulas for school places needed. A GP surgery is proposed but there are deliverability concerns. This urban extension has a strong focus on sustainable and active travel, ensuring the site is well connected to the rest of Chemsford. Significant sustainable transport measures are proposed including a guided bus highway, with an aim of at least 65% of trips to and from the development to be from non-car means (this is normally 25%-45% on other similar schemes).

Northstowe in Cambridgeshire is a new town and standalone settlement of 10,000 new homes, 38,445sqm of employment space and 50,000sqm of commercial floorspace in the town centre. For education, there are two primary schools, a secondary school and 6 form college. There is provision for a 1,740sqm health centre with temporary services in nearby locations. This new town also have a strong emphasis on sustainable transport measures. Smart Journeys offer free bike services to residents and strong focus on connections. Cambridge North Railway is 14 minutes away by bus and there is a Park & Ride that serves the town with a dedicated guided busway adjacent to the spine road that runs through the town. A cycle way directly connects to the city of Cambridge. The Community Liftshare Scheme is also promoted as an alternative option.

On a slightly smaller scale of development, Hartley Gardens is a planned urban extension to Clacton-on-Sea in Essex for 1,700 homes. Up to a maximum of 7 hectares (70,000sqm) of employment land is proposed. For education, two primary schools are proposed, a new neighbourhood centre, no health centre is required, improved connections to Clacton-on-Sea are provided and the delivery of two mobility hubs.

A summary of examples of other projects Tibbalds have worked on is included in a table in Appendix 1.

Standalone Settlements vs Urban Extensions

The common theme with these schemes is that settlements under 10,000 homes are extensions to existing towns that benefit from infrastructure and services within the existing town. In contrast, developments of 10,000 homes or more are considered standalone settlements and new towns that are self-sufficient and provide new facilities and services for the future residents and are not treated as strategic solutions to District wide deficits. Urban extensions tend to

focus on integrating with existing towns through enhanced walking, cycling, and public transport connections within and around the development. Whereas new towns prioritise large-scale public transport infrastructure like mobility hubs and railway station upgrades and provide more services and facilities to serve a more self-contained community.

Our concern with the Pedham Place proposals is that the number of homes provided and size of the development is closer in scale to an urban extension to an existing town but is instead being promoted as a standalone settlement. It is not connected to an existing town and is separated by the M25 and M20 motorways and junction, limiting safe and accessible connections into Swanley. From our experience of working on new towns and urban extensions, this site is not appropriate for a standalone settlement because it is not large enough to work as a self-sufficient settlement. It is also not capable of expanding in size to meet the above criteria for a new town due to the site's location in a National Landscape, Green Belt and its setting within Derwent Valley.

A more sustainable approach to planning developments of approximately 2,500 homes is to deliver this in a location that adjoins an existing settlement and improves existing links and connections into the existing town to benefit from the town centre uses. Developments such as these can provide employment, education and retail facilities relative to the need driven by the estimated population increase and can provide financial contributions to expand existing facilities within the town if required, promoting the use of existing facilities. This is a more sustainable approach to development and more viable in an unstable economic climate.

Summary

The proposals are not considered to be a feasible standalone settlement in a sustainable location for the following reasons:

- Settlements of 2,500 homes should be located on the edge of an existing town (urban extensions) to benefit from existing services and transport connections.
- Standalone settlements need to provide at least 10,000 new homes to create self-sufficient settlements with new facilities and large-scale public transport infrastructure.
- National Landscape and Green Belt prevents expansion of the proposed settlement.
- Location of the sites are inaccessible, separated by the M20 and M25 junction.

5 NPPF Sustainable Development

The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. Para. 8 states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways as outlined below.

- an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The proposed development at Pedham Place in Kent raises significant concerns regarding sustainability when evaluated against the NPPF's core objectives for sustainable development. These concerns include environmental, social, and economic issues, as detailed in the report in turn below. The below sections identify why the sites are located in an unsustainable location and do not constitute sustainable development.

6 Environmental Objective

The NPPF seeks to protect and enhance the natural, built and historic environment, make effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution. The effects on the Green Belt and National Landscape are discussed in Section 3 of this report but the following points are discussed:

- Sustainable transport
- Highways impacts
- Air quality
- Biodiversity and landscape designations

Sustainable Transport

The Transport and Movement Update presentation (January 2022) by Gladman introduced the sustainable travel planning initiatives that would be developed for the Pedham Place proposals:

- Travel Hub on site (first of its kind in Kent)
- 'On Demand' opportunities to reduce car ownership and use – e-car, e-bike and e-scooter, plus traditional cycles and taxi via virtual concierge
- Community 'Park & Share'
- New Bus hub with flexibility to accommodate new electric vehicles

Whilst these initiatives are supported in principle, as previously stated in this report, due to the site's out-of-town location and easy access to the A20, M20 and M25, it is extremely likely that residents will be **reliant on a car** despite sustainable transport options. The 'park and ride' scheme for example, accommodates 400 car parking spaces at the travel hub at the north of the Site. Whilst a bus service would be operated to Swanley train station, this still encourages residents to own a car to drive to the car park as a minimum as it will likely be too far to walk to from most of the Site unless accessed by cycling. The key issues with the sustainable travel planning initiatives are:

- There is no indication of how frequent the bus services would run and the exact routes.
- No explanation of what the travel hub will include and why it will be the 'first of its kind in Kent'.
- There are no strategic plans for sustainable infrastructure such as providing a new train station within walking distance of the site.

This does not support the NPPF's requirement for developing in sustainable locations.

Whilst **cycling routes** to and from Swanley Station could be provided, the route is very unattractive for pedestrians/cyclists due to the motorway junction separating Pedham Place from Swanley so even if these routes were provided it is unlikely residents or visitors of the stadium would choose this route.

Kent County Council Highways Authority validates these concerns in their representation to the Regulation 18 Local Plan consultation. They note in their response that Pedham Place is the only site submitted in the draft Local Plan which has the potential scale to accommodate a 'stand alone' settlement. The County Council, as Local Highway Authority, has significant concerns with the location of the settlement. The proximity to the M25 creates a barrier for sustainable transport journeys by foot, bike or public transport and will make it more likely that this will become car orientated.

The County Council raised the need for safe and suitable access to be secured to both Pedham Place and Petham Court Farm site which currently lack active travel links. Possible development to the west of M25 will also have a pinch point due to Wested Lane railway bridge, this must be further considered by the District Council. It is also noted by the County Council that bus services will also struggle to serve the western development in its current form.

There is no information provided about the impact the proposed developments would have on Swanley Station and in particular if it has capacity on stadium event days if the WRFC proposals were developed. The train timetable for Swanley only allows four trains per hour travelling from the South in Kent so it is not clear how the station would manage event days.

Highways Impacts

The NPPF (Paragraph 110) states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. Policy T1 of the emerging SDC Local Plan states that new development should be located near to existing facilities, services and public transport infrastructure to enhance sustainable places. Pedham Place and Petham Court Farm are not located within close walking or cycling distance from a train station and the scale of the development is not large enough to warrant a new train station and rail infrastructure within the sites. This will inevitably mean that despite efforts to improve bus services and cycle routes, future occupiers of the sites will have a high level of car ownership, as previously noted.

Commuting

Pedham Place would provide around 2,500 new homes, resulting in a population of around 7,000 people that need to travel to work and access services. The Settlement Study, submitted with the Regulation 18 site promotion submission for Pedham Place, implies that when taking account of existing patterns of commuting, it is likely that most residents would look to work within London (despite providing employment opportunities within the Site). The concerns with the proposed transport hub, 'park and ride' and new bus services are highlighted above.

For Petham Court Farm and the proposals for a new sports events stadium for WRFC, no information has been provided by the site promoter in terms of numbers of visitors expected, likely number of event days in a calendar year, the times of the events and how this would impact the local highway network. No information has been provided on how visitors and fans would access the stadium and how sustainable transport measures would be promoted for a stadium that can accommodate 28,000 visitors. The location of Petham Court Farm and Pedham Place would encourage visitors to attend by car due to the M20 and M25 being easily accessible and Swanley train station not being within a short walking distance. The location for a new stadium does not therefore support a sustainable movement network.

Increased Congestion

The emerging SDC Local Plan notes that the District has higher than average car ownership in the majority of the wards indicating reliance on private vehicles. The land use patterns and the rural nature of the District encourages use of private vehicles as the primary mode of transport, and the distances involved and gradients do not allow for a high use of non-motorised transport modes. It is noted that travel also produces issues such as congestion, air pollution and noise and can have negative health implications.

The Initial Baseline Transport Assessment completed in 2022 for the Regulation 18 SDC Local Plan determines the baseline transport data identifying any challenges and opportunities. The study identified congestion hot spots within the District on the M25 junction 3, Swanley Town Centre, Sevenoaks Town Centre, the A25 and the Edenbridge by-

pass. This is the first stage assessment without the proposed site allocations included which means if the Pedham Place proposals and the new WRFC stadium came forward for development, this would exacerbate the existing congestion issues at junction 3 of the M25 and vehicle trips into Swanley Town Centre. The second stage Transport Assessment will be carried out to determine the transport implications of the proposed site allocations of the new Regulation 18 draft Local Plan once completed in Autumn 2025. However, SDC and Kent County Council also commissioned Jacobs to assess the Local Plan development options from the existing Regulation 18 Local Plan (Sevenaoks Local Plan Option Testing- August 2024). The transport assessment states that Option 2 (standalone settlement at Pedham Place) will cause significant traffic increases on the following corridors in the vicinity of the Pedham Place and Petham Court sites:

- M25 Junction 3
- M25 (between M25 J2 to M25 J5)
- A20 London Road / A20 Main Road
- A225 Dartford Road
- Button Street
- A20 (between M25 J3 and A224 Sevenoaks Way)
- B2173 (near A223 N Cray Road)
- Some traffic increases are also predicted on other roads such as Farningham High Street and the A225 Eynsford Road.

A Transport and Movement Update presentation (January 2022) was submitted by Gladman as part of the Regulation 18 site promotion submission which confirmed that the proposals would include improvements to junction 3 of the M25 and highways improvements to the A20 to accommodate additional traffic. The SDC Transport Assessment analyses the highways plans put forward by the site promoter and the assessment concluded that the proposed improvements at M25 Junction 3 would help accommodate the additional flows related to the Pedham Place proposals. However, there would still be capacity issues with traffic along the B2173 Arm and A20 London Road Arm.

The Sevenoaks Local Plan Tests Report (October 2025), prepared by Jacobs, assesses the highways impact predicted from Scenarios 1 and 2 from the Regulation 18 Sevenoaks Local Plan in November 2025. Pedham Place and WRFC are both included in Scenario 2. The report states that Scenario 2 shows similar patterns to Scenario 1 but with additional traffic increases in the area surrounding the Pedham Place development. Increases of more than 100 vehicles are predicted along the A20 Main Road, the M25, and the M26. Other roads affected by the inclusion of this development include Shoreham Road and the A225 Dartford Road. The report also refers to the proposed highways improvements to junction 3 of the M25 and indicates that, despite the inclusion of the improvement scheme at M25 Junction 3 in the highways modelling, issues are still predicted at this junction. The report concludes that a further review of the proposed junction design is required.

In terms of journey times, the report concludes that significant increases are observed only in areas close to the Pedham Place development. These include Route 2 which connects the B2173 London Road and the M25 and Route 5 which is along the A20 Main Road. The report advises that further local junction modelling to assess the junction performance in detail and identification of mitigation measures will be required for this scenario. This detailed assessment should be completed before selecting an appropriate scenario for the Local Plan site allocations.

For the journey time, the August 2024 SDC transport assessment also noted that a significant impact is predicted along Route 5 A20 London Road and Main Road, which is directly connected to the development access points. The analysis shows that the A20 London Road and Main Road might have a travel time increase of 37% or around 4 minutes in the PM Peak. This is due to the additional queues approaching M25 Junction 3, which could also reflect issues in the nearby corridor. Although below the 10% travel time increase, some increases in travel time along the B2173 London Road and M25 were predicted. This could still impact junction delays, especially in areas and junctions where congestion currently exists. Some traffic increases were also predicted along the local roads of Swanley Town, southern part of Dartford, Farningham, Crockenhill and Well Hill.

It should be noted that there has been no transport or highways assessment associated with the possible WRFC stadium location and proposals submitted as part of the Winter 2023 Regulation 18 Local Plan consultation. This raises significant highways concerns and reliance on car journeys and increased traffic. There are no details or a logistics and travel plan of how the site would be accessed on match or event days. There is no consideration of the

impact this would have on Swanley train station and if or how it would be possible to transport visitors from the train station to the stadium as it is not within easy walking distance.

It is not clear from the Sevenoaks Local Plan Forecast Baseline Report (October 2025) and Local Plan Tests Report (October 2025), prepared by Jacobs, what assumptions have been included in Scenarios 1 and 2 for analysing the number of vehicular trips expected on event days for the WRFC stadium location and there is no commentary in the reports to assess if this is acceptable or not. A detailed transport assessment of this would be required to understand the highways impact associated with the WRFC proposals.

Air Quality

In addition to the increased congestion and vehicular trips expected with the proposals, this has a negative impact on air quality. The Regulation 18 Local Plan (November 2025) states that vehicle emissions are the main contributor to poor air quality in the District and there is a high dependency on private vehicles to make journeys to key locations within, and outside of, the District. This has led to a number of hot spots in Sevenoaks, Swanley and other smaller settlements along the A25, where air quality is particularly poor. It further states that the District previously declared four Air Quality Management Areas (AQMA) in relation to traffic emissions. However, these have since been revoked, following Member agreement, as they were compliant to the threshold of monitored pollutants for at least five years. The Regulation 18 Local Plan confirms that SDC will continue to monitor air quality through an Air Quality Strategy.

Policy AQ1 of the emerging Local Plan states that new development should result in a positive or neutral impact on air quality for new residents, the existing surrounding area and other areas connected to the development. Whilst air quality assessments are normally undertaken at the planning application stage, this should be provided now to inform the Local Plan site allocation process due to the site's location adjacent to two motorways. An air quality assessment that compares the existing baseline data with the forecasted data for WRFC and Pedham Place proposals needs to be completed to understand the severity of this issue and if it is possible to be air quality neutral or positive with mitigation measures, given the Site's location.

Biodiversity/ Landscape Designations

There are also several designations in close proximity to the boundary of the Sites which create further challenges and restrictions for development. There is an ancient woodland, a Site of Special Scientific Interest (SSSI), a Local Wildlife Site, Registered Park and Garden and Scheduled Ancient Monument located to the south of Pedham Place and Land at Petham Court Farm, in addition to the National Landscape and Green Belt setting. To the north of Pedham Place, there is another SSSI, ancient woodland and Local Nature Reserve located in close proximity from the northern boundary. On the southern and eastern boundaries of the sites, there are many agricultural fields that are visible from an elevated location over Eynsford, Swanley, Crockenhill and across the Kent Downs National Landscape.

Protecting the natural environment is of paramount importance, especially given the Site's location in a National Landscape, Green Belt and near to important landscape designations as mentioned above. A Sustainability Appraisal, prepared by Stantec, on behalf of Gladmans was submitted as part of the SDC Local Plan Regulation 18 consultation response. The assessment focuses on the positive contributions the proposed development will make to biodiversity and the natural environment but does not focus on the principle of development and the negative impact of developing within a National Landscape and Green Belt. For example, Section 3 on Biodiversity, highlights that the proposals will deliver ecological improvements and states that the scheme will 'greatly exceed the required biodiversity net gain targets'. However, it does not provide any evidence of an estimated Biodiversity Net Gain score and calculation and does not provide a commentary on the negative impacts on biodiversity. Biodiversity is particularly important given the Site's location near to two SSSIs, Local Nature Reserves and ancient woodlands. This provides an example of how the Sustainability Appraisal is too positive and needs to reflect the impacts on the environment more transparently before being considered for development.

The Landscape Assessment (Landscape and visual evidence for SDC Local Plan 2040- November 2024) states that development at Pedham Place would see larger scale effects contained within one specific area and may have several effects on landscape and views including:

- Changes to the rural characteristics of the site and the wider landscape.
- Loss of recreational value of the golf course.
- Changes to long views across the Darent Valley – although views of development may be able to be screened, views would change to woodland, reflecting the woodland mitigation.
- Effects on the setting and sense of separation between Swanley and Farningham.

Whilst the report highlights these negative effects, it then concludes that the Pedham Place proposals would be likely to cause the least harm to the Kent Downs National Landscape compared to the other options. The report states that mitigation could more effectively minimise potential significant effects in the case of the Pedham Place site. This argument is not well justified in the report as planting new trees will not fully mitigate 'large scale effects' that would be caused by development. Consolidating severe impacts on landscaping and views to one area to help reduce development in other areas of the District is not a credible approach to allocating development. The negative impacts need to be clearly noted in this report given the Site's location in a National Landscape and not portrayed as having the 'least harm' as there is no evidence for this.

Furthermore, the site allocation details for the WRFC in the Regulation 18 Local Plan (November 2025) state that the Site has low landscape sensitivity but the Landscape Assessment does not refer to this Site and it is therefore not clear how this assumption has been made about the landscape quality. Part of the Site is located in the National Landscape and all the Site is within the Green Belt so it is unlikely that the Site will have 'low landscape sensitivity'.

Summary

The proposals do not protect and enhance the natural environment and meet the environmental objectives of the NPPF for the following reasons:

- Car ownership will be high and sustainable transport measures are not significant enough to deter car ownership, causing more congestion and pollution.
- Proximity to the M25 and M20 creates a barrier for sustainable transport journeys by foot, bike or public transport.
- It will cause significant traffic increases on several corridors including Junction 3 of M25 and this will have a negative impact on air quality.
- It will have large scale impacts on landscape and views within the National Landscape.

7 Economic objective

The NPPF emphasises the need to use land that is suitable and appropriate for economic development. Pedham Place and Petham Court Farm are located on Green Belt land and within a National Landscape which in itself does not meet the criteria of being the *'right type'* of land. Developing such areas could lead to environmental degradation, a loss of natural habitats and harm to local biodiversity, which is counterproductive to sustainable economic growth.

Employment Land

The Regulation 18 SDC Local Plan states that there is an employment land need of 5.7 hectares over the Plan period as identified by the Sevenoaks Economic Needs Study 2022. Pedham Place is proposing 3.5 hectares but this figure does not include the WRFC stadium proposals. This therefore means that over 60% of the employment need would be delivered at Pedham Place. However, Policy EMP1 of the emerging SDC Local Plan states that a competitive and strong economy must be located in areas that make the best use of public transport links and active travel routes. As previously noted in this report, Pedham Place and Petham Court Farm are not located in sustainable locations with good access to public transport links and are separated from Swanley by the M25 and M20 motorway junction. It is therefore concerning that over half of the employment need would be delivered at this location, dominated by car journeys.

The development strategy options included in the Regulation 18 Local Plan for Options 2 and 3 that include Pedham Place (not including WRFC stadium) will provide approximately 11.8ha (Option 2- settlement) or 13.69ha (Option 3- combined sites) which is significantly higher than the minimum employment need for the District. These are not broken down further into an employment land allocation for Pedham Place but the site promoter estimated the amount of employment space that would be delivered.

The Settlement Study, submitted by Gladman in May 2021, states that Pedham Place could deliver around 35,500 square metres (3.5 hectares) of new employment floorspace but the Call for Sites form submitted by Gladmans suggests 49,057sqm could be accommodated within the site. It is not clear from the studies if the employment space figures are based on the assumption that the WRFC stadium is included in the development but it is assumed this is not included given it is not part of the Masterplan provided.

Job Creation

The Study anticipated that this floorspace alone could generate approximately 1,180 jobs. It further explains that the proposals at Pedham Place are likely to generate a population of approximately 7,000 residents by 2035 and 4,700 of these are expected to be of working age (ages 18-64). The Study states that, of these, they would expect approximately 83% to be economically active equating to 3,901 people. Therefore, Pedham Place would provide 1 job for every 0.42 expected economically active residents. As mentioned earlier in this report, for new towns or urban extensions that Tibbalds have previously worked on, either one job per home or one job per economically active person would be expected to help create a self-sufficient community.

The Study states that likely sectors to be attracted to the new employment uses include construction, business administration and support services, and manufacturing. In addition, it is likely that it would support transport and storage uses, making best use of the M25 and M20 connection.

Unsustainable Location

Whilst the proposals are attempting to increase economic activity in a sustainable manner, we have several concerns regarding Pedham Place being the 'right place' to support this economic growth. Based on the above projections, at least 50% of residents with a job will need to commute outside of Pedham Place for work. There is also no guarantee that the 1,180 jobs created at Pedham Place will be taken by local residents which means employees are extremely likely to drive from surrounding areas to Pedham Place for work. This is largely due to the good accessibility of the Site from the M20 and M25. Whilst it is understood there would be a bus link available there is no indication of how frequent these would be and the exact routes so it would be very likely that employees would prefer to drive to work. This does not support the NPPF's economic objective for sustainable development.

Furthermore, the support of transport and storage use companies is concerning as this would promote more traffic movement, contributing to air quality issues and further CO2 emissions, not contributing to sustainable growth.

The WRFC have not provided any information on the likely economic growth and employment opportunities that would be associated with a new stadium. Employees would most likely access the stadium by car due to its location adjacent to the M25 and M20, and is not within easy walking distance of Swanley train station. This does not support the NPPF's objective (Para 8) of supporting economic development in the 'right places'.

Summary

The proposed employment land is not located in the right place to promote sustainable development for the following reasons:

- It would deliver 60% of the District employment need over the Plan period in an unsustainable and disconnected location.
- Pedham Place would provide one job for every 0.42 expected economically active resident but one job per home or one job per economically active person would be expected to help create a self-sufficient community.
- At least 50% of residents with a job will need to commute outside of Pedham Place for work which will encourage car ownership and hinder sustainable growth.

8 Social Objective

In response to the social objective, ensuring the proposed development supports a strong, vibrant and healthy community with accessible services, Gladman have completed a Community Infrastructure Audit as part of the Settlement Study in May 2021. This assessed the availability of amenities and services in the local area and District.

The map shown on page 9 of the Study shows the nearby town centres and main urban centres within a 10 minute or 20 minute drive of the Site. There are no town centres or main urban centres within 1600m of the Site. The enclosed map, produced by Tibbalds, shows the distances to local amenities from Pedham Place and Petham Court Farm which demonstrates that the sites are not within walking distance or easy cycling distance of Swanley town centre and other nearby amenities. This means that any services that are not available within Pedham Place will need to be accessed by car or at best by bike or bus. Whilst cycling routes to and from Swanley Station could be provided, the route would be very unattractive for pedestrians/cyclists due to the motorway junction separating Pedham Place from Swanley.

The Audit highlights a District-wide need for more services and facilities with or without Pedham Place and references the noticeable increase in committed development, suggesting that Pedham Place will help to deliver these facilities from employment to retail (convenience and comparison), leisure, education and health.

Education Facilities

The Study notes that the Kent Education Commissions Plan (2019-2023) suggested that even with existing plans for Special Education Needs (SEN) schools, there is still a need to increase provision. On the basis of this analysis, Gladman propose that Pedham Place can be a strategic solution to meet wider housing needs but also educational needs (including SEN needs) in the local area.

The Study further notes that Kent County Council confirmed that without Pedham Place, primary and secondary school demand from existing commitments would not be able to be accommodated locally as there is no scope to upgrade existing schools.

However, in the updated Kent Education Commissions Plan (2025-2030), primary and secondary school demand does not appear to be significant within schools in the Sevenoaks District, with demand fluctuating over the next five years. The Plan states that to manage the demand that will be derived from the additional housebuilding, the new secondary provision at the Alkerden school, will be expanded to its full capacity of 8FE, as and when required. A 2FE expansion is expected by 2027-2028 and another 2FE expansion by 2028-2029. Regarding demand for special educational needs, this remains high and a new special needs school for 250 pupils is planned to open in September 2027 at the old Birchwood Primary School site on Russell Way in Swanley. This is a more accessible location compared to Pedham Place and suggests that Pedham Place is not being relied upon for meeting strategic educational needs.

The proposed development at Pedham Place would deliver up to:

- Two 2 Form Entry Primary Schools (4FE total)
- a 6 Form Entry Secondary School
- a Special Education Needs ('SEN') School.

This would cater for 840 Primary School Places and 1,170 Secondary School Places. However, providing a secondary school for a development of 2,500 homes seems excessive and economically unviable when compared to other proposed developments of this scale. For example, a site Tibbalds are working on in Essex for 4,500 homes requires a co-located primary and secondary school with early years and childcare nursery (with potential for a sixth form) and the provision of two further new primary schools with co-located early years and childcare nurseries. This is a similar provision but for twice as many homes compared to Pedham Place. Another site in Essex for 1,700 homes requires only one primary school.

Whilst it is recognised that Pedham Place is offering an opportunity to provide new educational facilities, it is important to remember the NPPF's sustainability goal of 'ensuring that sufficient land of the right types is available in the right places'. Similar to our concerns noted above, if Pedham Place is being relied upon to meet educational needs within the wider District, there will be a reliance on car journeys to transport the pupils to Pedham Place, increasing CO2 emissions, which does not support sustainable growth. The number of school places created will exceed the demand for places generated by the number of homes proposed, encouraging students to attend from a wider catchment area. This contradicts the principles of creating a sustainable standalone settlement if students are required to travel to the school from outside of the settlement. A more strategic plan for expanding existing schools that are in towns with good accessibility to public transport should be prioritised and planned for before considering a new development with no train station and potentially limited bus services.

Orchards Academy in Swanley, which opened its new campus in September 2025, is a good example of a school that is located in a sustainable location, located in the centre of the town and in close proximity to Swanley train station. Furthermore, Oasis Academy (Hextable School), located in Hextable to the north of Swanley was permanently closed in 2016 due to declining student numbers. This was a secondary school and sixth form college that closed because it was not financially viable to operate but the building is still in place today. This is an existing school located in a more sustainable location than Pedham Place, in an existing settlement of Hextable and would also serve residents in Swanley town and Swanley Village. In alignment with the NPPF's priorities to promote and support the development of under-utilised buildings and focus development on Brownfield land (Paragraph 125 of the NPPF), the Oasis Academy school site should be prioritised before considering Pedham Place to achieve sustainable development.

Retail

The Settlement Study states that the role of the District Centre within Pedham Place would be limited to a more local offer, catering to the day-to-day needs of residents. The centre is likely to include a small supermarket (i.e. metro sized store), and other convenience goods stores; such as independent shops, greengrocers, newsagents,

comparison goods stores, such as a pharmacy, plus food and beverage outlets such as a café or take away and service uses such as a post office and hairdressers for example.

Whilst it is positive that the proposals would offer these facilities on site, they only cater for day-to-day needs, and it is therefore very likely residents will choose to drive to bigger supermarkets for their weekly food shop and other retail needs. Whilst it may be possible to offer a bus service to nearby larger supermarkets, it will be unlikely that residents will choose this option if they own a car.

On other projects Tibbalds have worked on in the UK, a new neighbourhood centre catering for day-to-day needs of residents is required for schemes providing up to 2,500 homes but to create a self-sufficient standalone settlement a significant amount of retail space is required. For example, Otterpool Garden Town in Folkestone in Kent has proposed 29,000sqm of retail space and Northstowe has proposed up to 50,000sqm of commercial space in a new town centre.

Leisure

The Study suggests that leisure provision in both the 5km radius and Sevenoaks District has a lower-than-average provision. Planning permission has been granted for a new White Oak Leisure Centre in Swanley town centre which is now open. The new centre re-provides enhanced facilities in place of the existing provision; for which the Study noted that the Pedham Place development could provide contributions to but this is no longer relevant as the funding has already been secured without financial support from Pedham Place proposals. The Study also implies that there is scope for an additional medium sized gym (up to 100 stations) within Pedham Place but not until 2035. Whilst the contributions towards a re-provided leisure centre in Swanley town centre is supported, this further emphasises our concerns with residents at Pedham Place relying on a car to access services in Swanley, which goes against the principles of the NPPF.

It is unclear how the potential WRFC stadium would operate and how it would connect to the wider Pedham Place masterplan, in regard to offering leisure facilities to the wider public and residents at Pedham Place. However, if facilities are open to the public during certain hours at Petham Court Farm or Pedham Place, this would attract visitors to an out-of-town destination, instead of supporting leisure uses within Swanley town centre and may compete with White Oak Leisure Centre in Swanley, which goes against the principles of the NPPF.

In regards to Pedham Place or Petham Court Farm being used for WRFC stadium, it is recognised that the emerging SDC Local Plan supports the Council's ambition to create a world class cluster of sporting facilities in the north of the District as highlighted in Policy SL1, and will support proposals for new large scale sporting facilities. However, this is on the basis that the proposals meet the below criteria:

- They meet an identified need;
- They are sustainably located with good transport links and access;
- They create new local employment and skills opportunities and contribute to the local economy;
- They make a valuable contribution to the health and wellbeing of the local community; and
- They are in accordance with other relevant Local Plan policies.

For the reasons set out in this report, it has been evidenced that the proposed location at Petham Court Farm or Pedham Place is not sustainable and does not have good access or transport links. The proposals are also not in accordance with various emerging Local Plan policies as previously noted in this report such as not harming the National Landscape. The proposals and site locations do not therefore meet all the criteria of Policy SL1.

Summary

The proposed development at Pedham Place and Petham Court Farm is not likely to support a vibrant community with accessible services for the following reasons:

- Overprovision of school places when compared to number of students living within the settlement. This causes viability concerns and encourages more trip journeys to the site.
- Primary and secondary school demand does not appear to be significant with schools in the Sevenoaks District over the next 5 years jeopardising the viability of school delivery.
- Need to prioritise existing school sites in accessible locations (or community facilities) that could be redeveloped or expanded such as the Oasis Academy (Hextable School) that is currently closed before considering new developments.

- Day-to-day retail needs can be provided onsite, but residents will still need to drive to other destinations for all other purchases.
- White Oak Leisure Centre in Swanley town centre is a new leisure centre in an accessible location on Brownfield land and leisure uses should be prioritised there and not needed at Pedham Place or Petham Court Farm.

End of Report