Tibbalds

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1	24/08/2026	Draft
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Proposed Site Allocation at Pedham Place

Response to Sevenoaks District Council Regulation 19 Local Plan, July 2026

1 Introduction

1.1 This note has been prepared by Tibbalds Planning and Urban Design on behalf of Crockenhill, Eynsford and Farningham Parish Council's, in response to the statutory consultation on the Sevenoaks District Council (SDC-'the Council') Local Plan Regulation 19 Publication (July 2026) regarding the draft site allocation at Pedham Place.

1.2 An objection report responding to the Regulation 18 Local Plan consultation was previously produced by Tibbalds on behalf of Farningham, Eynsford and Crockenhill Parish Councils (dated 14/11/2025 Rev 2). Its purpose was to assess the principle of the location of a proposed new settlement at Pedham Place Golf Centre and a proposed new rugby/events stadium at Petham Court Farm or Pedham Place.

1.3 This note follows our earlier submission on the Regulation 18 Local Plan. As such, this note should be read alongside the earlier submission as it does not look to repeat or duplicate all points previously made. To inform this note, we have reviewed the Regulation 19 Local Plan ('emerging Local Plan').

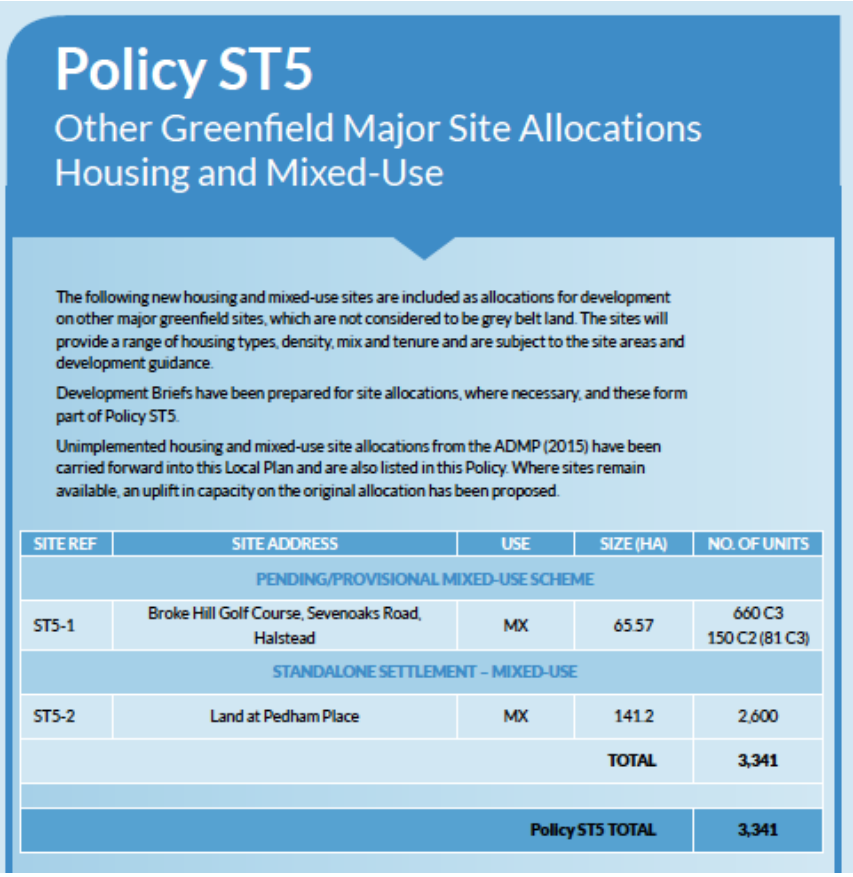
1.4 The previous objection report stated that from an initial review of the proposals and based on Tibbalds industry knowledge of new and extended settlements, it was not considered that a development of 2,500 to 2,600 homes would be classified as a feasible standalone settlement. The report assessed why the site at Pedham Place is not located in a sustainable location and is not suitable for the proposed development which were summarised through these key themes:

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

1.5 Paragraph 4.36 of the emerging Local Plan states that at the Regulation 18 stage the draft site allocation received mixed support/objection from across the District with concerns focusing on impact on local infrastructure, particularly traffic congestion and visual impact on the area. In the Regulation 18 Local Plan, Pedham Place was evaluated as an alternative growth option and was not guaranteed for development. It was presented as part of 'Option 2', a testing scenario created to see if the district could meet central Government's full housing need of over 17,000 homes for the District over the Plan period. 'Option 1' excluded Pedham Place but fell short of total housing targets.

1.6 The Regulation 19 Local Plan ('emerging Local Plan') however, officially allocates Pedham Place for approximately 2,600 homes under draft Policy ST5. The removal of the site at Petham Court Farm or Pedham Place for the use of the Wasps Rugby Football Stadium is welcomed and it is understood the Wasps proposal is no longer being considered in the Local Plan process. Our comments within this note relate to the proposed site allocation at Pedham Place for a standalone settlement (draft policy ST5).

1.7 The emerging Local Plan identifies Pedham Place as a potential standalone settlement, providing a range of facilities and services in addition to housing. Policy ST5 of the emerging Local Plan (Other Greenfield Major Site Allocations Housing and Mixed-Use), includes a mixed-use site allocation for 2,600 homes over a 141.2 hectare site at Pedham Place. A Development Brief for the site allocation has been prepared as part of the emerging Local Plan which forms part of Policy ST5 (see extract below).



Policy ST5

Other Greenfield Major Site Allocations Housing and Mixed-Use

The following new housing and mixed-use sites are included as allocations for development on other major greenfield sites, which are not considered to be grey belt land. The sites will provide a range of housing types, density, mix and tenure and are subject to the site areas and development guidance.

Development Briefs have been prepared for site allocations, where necessary, and these form part of Policy ST5.

Unimplemented housing and mixed-use site allocations from the ADMP (2015) have been carried forward into this Local Plan and are also listed in this Policy. Where sites remain available, an uplift in capacity on the original allocation has been proposed.

SITE REF	SITE ADDRESS	USE	SIZE (HA)	NO. OF UNITS
PENDING/PROVISIONAL MIXED-USE SCHEME				
ST5-1	Broke Hill Golf Course, Sevenoaks Road, Halstead	MX	65.57	660 C3 150 C2 (81 C3)
STANDALONE SETTLEMENT – MIXED-USE				
ST5-2	Land at Pedham Place	MX	141.2	2,600
			TOTAL	**3,341**
			Policy ST5 TOTAL	**3,341**

1.8 As established in our previous response and reiterated in the emerging Local Plan, the Government's recent planning reforms exclude 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.

1.9 Since the Regulation 18 Local Plan, as part of the Evidence Base for the emerging Local Plan, the Council has published a paper demonstrating why they believe there are exceptional circumstances for allocating development in the National Landscape at Pedham Place. There is also an updated Technical Note to the Sevenoaks Landscape and Visual Evidence (July 2026), prepared by Arup, which responds to objections made by Natural England regarding the potential site allocation at Pedham Place.

1.10 The emerging Local Plan includes a draft development brief for the Pedham Place site allocation (PED1, 2026) to support draft Policy ST5. The brief confirms the proposed uses including approximately 2,600 residential units (with a density of 30 to 60 dwellings per hectare), two primary schools, one secondary school, employment and mixed uses, gypsy and traveller pitches. The key placemaking priorities included in the brief are:

- A new local centre, two primary and one secondary schools and employment uses
- A new park to the centre of the site incorporating the scheduled monument
- A network of pedestrian and cycle routes for leisure and everyday life
- Improved cycle connections to Swanley Town Centre and to Eynsford
- Bus route provision connecting to Swanley Town Centre and Swanley station

1.11 The brief provides a development vision and masterplan principles, stating that the landscape setting of the National Landscape and Fort Farningham will be the defining features of this new neighbourhood, shaping its structure, identity, and relationship to the surrounding countryside.

1.12 Since the Regulation 19 Local Plan was published for consultation in July 2026, the Government has published a new version of the NPPF on 17th August 2026. Whilst the numbering and labelling of the policies has altered, the wording of the relevant policies in regard to developing in National Landscapes has not changed significantly. Therefore, the exceptional circumstances assessment provided by the Council under the previous NPPF criteria is still relevant.

2 Assessment of Exceptional Circumstances Case for a major development in National Landscape

2.1 Policy N1 (1c) of the NPPF (2026) states that Development Plans should steer the location of development, including through site allocations, in ways which utilise land of least environmental value. This should include limiting the scale and extent of development within Protected Landscapes which includes National Landscapes.

2.2 As part of the Evidence Base for the emerging Local Plan, a Sevenoaks National Landscape Exceptional Circumstances and Public Interest Paper was published in June 2026. This document outlines Sevenoaks District Council's justification for a major housing development at Pedham Place within the Kent Downs National Landscape.

2.3 Under Policy N4 of the NPPF (2026), there is a strong presumption against major development in National Landscapes and it states that applications should be refused unless exceptional circumstances are proven and the development is demonstrated to be in the public interest. To meet this exceptionally high bar, the Council's case must satisfy three strict tests set out under Paragraph 2 in Policy N4. This policy is a 'decision-making' policy rather than a 'plan-making' policy but it is relevant in this case to assess a site allocation, to understand if it would be acceptable for a planning application to come forward at this site.

2.4 Policy N4 states that development proposals within Protected Landscapes (including National Landscapes) should be limited in scale and extent and sensitively located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage.

2.5 Paragraph 2 in Policy N4 states that to inform a decision about whether exceptional circumstances exist, consideration of such proposals should include an assessment of:

- a) The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy;
- b) The cost of, and scope for, developing outside the Protected Landscape, or meeting the need for the development in some other way; and
- c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.

2.6 The Exceptional Circumstances and Public Interest Paper has been assessed in turn below in relation to each of these points.

Test A: The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy

2.7 It is understood that the Council has a large Government mandated housing shortfall, needing 1,164 homes per year whilst only delivering 261 homes per year in recent years and this is one of the key arguments for the exceptional circumstances case.

2.8 Housing need alone does not automatically override National Landscape protection. However, the Council argues that the scale of Pedham Place is uniquely required to unlock critical, district-wide strategic infrastructure (such as a new secondary school, primary schools, and healthcare facilities) that smaller sites cannot support.

2.9 It is understood that there is a housing need and supporting infrastructure is required in the District to meet existing need and planned growth, but this has to be assessed and weighed against the harm on the National Landscape, which is discussed in Test C below.

Test B: The cost of, and scope for, developing outside the Protected Landscape, or meeting the need for the development in some other way

2.10 It is understood that the District is uniquely constrained by 93% of its land being in the Green Belt and 60% located in National Landscape. The Council's sequential approach to assessing the sites for inclusion in the emerging Local Plan is set out below:

- Optimising existing urban areas within existing settlements first (1,459 homes in non-Green Belt locations);
- Allocating Previously Developed Land (PDL) sites in Green Belt that are considered 'grey belt' (452 homes);
- Greenfield sites in Green Belt that are considered 'grey belt' (7,236 homes);
- Formally asking neighbouring councils to absorb the remaining housing need but was rejected due to their own constraints; and
- Other major greenfield in Green Belt and/or National Landscape (Broke Hill and Pedham Place- 3,341 homes).

2.11 This totals 12,488 homes and when combined with extant permissions and windfalls (4,750 homes), there is still a minor shortfall of 222 homes.

2.12 The emerging Local Plan states that the housing need for the District cannot be fully accommodated through allocating sites in existing urban areas, PDL sites and grey belt sites. The Council believes they have exhausted all options for developing outside of the National Landscape.

2.13 The Development Strategy of the emerging Local Plan states that Pedham Place, a greenfield site which is located both within the Green Belt and National Landscape, is included to meet the housing need, by including this single strategic site in the National Landscape.

2.14 Paragraph 4.31 of the emerging Local Plan acknowledges that allocating this site will have an impact on the National Landscape which was evidenced in the Regulation 18 Local Plan. The Council had undertaken a Landscape and Visual Evidence study (2024) to inform the Regulation 18 Local Plan, to understand the impact of development in the National Landscape. This tested an option which disperses growth on medium-sized sites on the edge of three settlements (Sevenoaks, Westerham and West Kingsdown) and an option which concentrates growth in one location within National Landscape (Pedham Place). It then states that, *'Our evidence suggests that the latter strategy is the least impactful approach to accommodating development needs in the National Landscape and the most capable of accommodating mitigation and supporting strategic infrastructure.'* In short, the single likely 'high' impact of the Pedham Place proposal on the National Landscape is considered less than the cumulative impact of a more dispersed approach of growing three existing settlements. It is important to note that this conclusion relates to the impact on National Landscape *only*, not other impacts, or whether it is the right location for growth, which is addressed elsewhere in the emerging Local Plan.

2.15 The impact on the National Landscape is acknowledged in the emerging Local Plan but is still allocated for development. This suggests that the Council believe meeting the need for development is more important than preserving the National Landscape despite the NPPF's presumption against major development in National Landscapes. Whilst it is the conclusion of the Landscape and Visual Evidence study that allocating Pedham Place will have the least impactful approach compared to the other sites tested, it does not necessarily warrant the site being allocated because it provides better mitigation and better infrastructure, in our view. Similar to Test A, the need for housing needs to be balanced against the harm to the National Landscape, which is discussed in Test C below.

Test C: Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated

2.16 The Council acknowledges that a 2,600-home development at Pedham Place will fundamentally change the site from a rural to an urban character and with the likely significance of effects on the National Landscape considered to be 'high'. The Council's Landscape and Visual Evidence study concludes that by avoiding development on the sensitive southern and eastern slopes and using characteristic ridgetop woodland planting, the overall visual impact on the wider Darent Valley can be moderated from 'high' to 'low-medium'. However, it concludes that the Council recognises that even with the proposed mitigation measures the site allocation would have effects which it would not be possible to avoid or fully mitigate. The proposed tree screening will also take several years to develop therefore the scale of harm would be 'high' for years.

2.17 Even with the proposed landscape mitigation, the Landscape and Visual Evidence (2024) study identifies several fundamental conflicts and negative impacts on the Kent Downs National Landscape as detailed below:

- **Incompatibility with the local settlement pattern**: The study highlights that the traditional settlement pattern of this landscape character area consists of scattered, isolated cottages and farms and small linear settlements in sheltered areas. A strategic-scale urban development will be fundamentally inconsistent with the established rural form.
- **Erosion of the strategic gap**: Allocating Pedham Place for development would negatively affect the gap and sense of separation between Swanley and Farningham which are currently well-contained by surrounding woodland and landform and Swanley's motorway boundaries.
- **Permanent loss of tranquillity and darker skies**: Whilst the northern and western edges of the Pedham Place site are impacted by the motorway noise and lighting, the southern portion of the site is valued for its relative tranquillity, open views and darker skies. The study advises that it will not be possible to mitigate or compensate for the loss of relative tranquillity on the site.
- **Interrupted views across the Darent Valley**: The southern and eastern parts of the site are open and exposed, therefore any development would be widely visible as a backdrop and skyline to the wider landscape. The study identifies several unmitigated visual impacts on the below highly sensitive receptors and notes that even with extensive tree screening, some open views will be permanently affected:
  - The Darent Valley Path (interrupting sequential views along the valley);
  - Lullingstone Country Park and Lullingstone Castle (a Grade II Registered Park and Garden to the south);
  - Farningham and Eynsford Conservation Areas; and
  - Public footpath SD181 (the diversion of this footpath will permanently change the experience of open views for walkers and visitors).
- **Creates a more harmful urban character**: Although the site has been altered by landfill and earthworks for the golf course, it still retains distinct rural qualities. The study notes that while the development would remove detracting features such as the driving range and golf course buildings, the overall scale of the proposed development would result in an urban character that has a more harmful effect on the landscape than the current use as a golf course.

2.18 Natural England have also raised concerns about the detrimental effect on the National Landscape in their response to the Regulation 18 Local Plan consultation in January 2026.

2.19 Natural England has set out several concerns in relation to the Landscape and Visual Evidence study, including the scope of the assessment, the treatment of mitigation, the interpretation of baseline conditions, and the level of evidence supporting the conclusions in relation to the Pedham Place site allocation. They commented that there was not enough justification in the assessment to support the site allocation at Pedham Place.

2.20 Natural England challenged the conclusions of the study, confirming that Pedham Place caused less harm than other options does not justify the adverse impacts that are likely to occur and that existing harm on the National Landscape does not give grounds for additional harm.

2.21 Natural England is concerned that allocating Pedham Place for development will have a substantial effect on the landscape character and were unconvinced about the level of harm being reduced from 'high' to 'low-medium' when impacts cannot be avoided or fully mitigated.

2.22 Arup have issued a response to the comments received by Natural England in the form of a technical note, dated 02 July 2026, with the Regulation 19 Local Plan which summarises that the study was appropriate for a strategic high-level assessment to inform the emerging Local Plan site allocations. This raises concerns that if the site is allocated for development, further detailed design work and assessments may reach different conclusions that reveal there is a more significant impact on the National Landscape.

2.23 The Council has systematically addressed all three NPPF criteria listed in Policy N4, explaining that the District has an unmet housing need, demonstrated a lack of alternative sites outside of the National Landscape, and offered a comprehensive solution to providing strategic infrastructure and public benefits to attempt to offset the harm to the National Landscape.

2.24 However, to meet Test C of the NPPF (Paragraph 2, Section N4), great weight must be given to conserving the scenic beauty of the National Landscape. The emerging Local Plan does not fully meet this test because

there will be permanent damage to the National Landscape that cannot be fully mitigated or compensated as highlighted in this note. Therefore, this means there will be a detrimental effect on the environment, landscape and recreation which cannot be fully moderated. We therefore suggest that the Council reviews the level of harm on the National Landscape against the housing need in more detail against the three medium-sized sites on the edge of three settlements (Sevenoaks, Westerham and West Kingsdown). Exceptional circumstances for not meeting the full housing need in the District should be requested from the Government given the large proportion of Green Belt and National Landscape.

3 Conclusion

3.1 Farningham Parish Council strongly objects to the proposed major site allocation at Pedham Place (draft Policy ST5) for approximately 2,600 homes within the Kent Downs National Landscape and the Green Belt. While the Council's decision to remove the previously proposed rugby stadium from the emerging Local Plan is welcomed, the creation of a large, standalone urban settlement represents a fundamental conflict with the established local settlement pattern of isolated cottages, farms, and small linear villages and is located in an unsustainable location.

3.2 Under Policy N1 and N4 of the NPPF (2026), there is a strong presumption against major development in National Landscapes unless exceptional circumstances are proven and the development is demonstrated to be in the public interest. The Council's own evidence acknowledges that a development of this scale will fundamentally change the site from a rural to an urban character and cause permanent, irreversible harm that cannot be fully mitigated or avoided. As highlighted by Natural England, the fact that Pedham Place was assessed as less harmful than other tested options during the Local Plan process, does not justify the permanent impacts it will inflict. The proposed development would permanently erode the strategic gap and sense of separation between Swanley and Farningham, result in the permanent loss of relative tranquillity and dark skies across parts of the site, and create damaging, unmitigated visual intrusion across the sensitive Darent Valley.

3.3 It is therefore considered that the emerging Local Plan is not sound because it is not consistent with national policy in regard to the site allocation of Pedham Place because the NPPF states that site allocations in Development Plans should limit the scale and extent of development within National Landscapes. Furthermore, the NPPF (Paragraph 2c, Policy N4) states that any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated should be assessed to understand if exceptional circumstances exist. The emerging Local Plan confirms there will be a detrimental effect on the landscape at Pedham Place and that it cannot be fully moderated and mitigated and therefore we consider that this test is not met for exceptional circumstances.

3.4 While the District's pressing housing shortfall is acknowledged, housing and infrastructure needs alone cannot automatically override the statutory protections afforded to a National Landscape. Given that Sevenoaks District is uniquely constrained, with 93% of its land designated as Green Belt and 60% within National Landscape, Farningham Parish Council strongly urges the Council to seek exceptional circumstances relief from central Government to reduce its overall housing targets and modify the Local Plan to remove Pedham Place as a site allocation.

End of Note