1. What aspects of the Local Plan does this representation relate to

Comments on Policy ST5-2, Pedham Place

Farningham Parish Council (FPC) strongly objects to the proposed major site allocation at Pedham Place, Policy ST5-2, which includes proposals for approximately 2,600 homes, and requirements for three schools, including a 5 FE secondary school campus, a health hub, and up to 49,000m2 of employment space on a 141.2-hectare site within the Kent Downs National Landscape and the Metropolitan Green Belt and within the proposed UNESCO Geopark.

Site ST5-2 Pedham Place is the only proposed strategic site within the Sevenoaks District Local Plan to be fully located within both the Kent Downs National Landscape and Metropolitan Green Belt. FPC believe that the dependence on the delivery of Pedham Place by SDC to meet their Local Plan housing targets is not a credible or effective development strategy, which undermines policies ST1 and ST2 and means the Local Plan is unlikely to be undeliverable within the Plan timeframes. FPC believe that inclusion of ST5-2 increases the likelihood of the Plan to be found to be 'unsound', and in turn increases the timeframe for which the district will have no Local Plan in place.

FPC believe that the SDC Policy ST1 development strategy, and the reliance on Policy ST5-2 to meet their Local Plan need, should be found to be unsound; as it cannot be seen to be evidenced, justified, effective in its potential for delivery in the Local Plan period, and is inconsistent with the updated National Planning Policy Framework (August 2026) which reinforces the importance of retention of National Landscapes.

FPC do not believe that SDC have justified the 'exceptional circumstances' needed to release 141.2 hectares of National Landscape, and we feel that the benefits suggested to balance the loss of national landscape with public interest, are neither needed, now achievable within the Local Plan period.

SDC have tried to justify the release of ST5-2 Pedham Place through their accompanying document 'National Landscape Exceptional Circumstances and Public Interest Paper', where they attempt to describe Pedham Place as a sustainable location, and to outline the public benefit of bringing forward this strategic site to meet local needs.

To support our counterargument, FPC have employed Tibbalds Planning and Urban Design, as the UK's leading consultants on the delivery of new towns and sustainable settlements to interrogate the evidence and specific proposals for Pedham Place on our behalf. FPC have also employed LUC (Land Use Consultants) to further interrogate SDC's process and evidence review of the Landscape and Visual Evidence Base prepared by ARUP, on behalf of Sevenoaks District Council (SDC), in response to objections by Natural England to the inclusion of Pedham Place in the (Draft) Local Plan 2040, through the Regulation 18 consultation (December 2025). The detailed findings of both consultants can be supplied as evidence of our objection to the inclusion of Pedham Place in the Local Plan consultation and can be brought forward for consideration at any Local Plan interrogation by the planning inspectorate.

Based on evidence provided for FPC by Tibbalds Planning and Urban Design, we do not believe that the inclusion of Pedham Place as a proposed large, standalone urban settlement is legally complaint. FPC do not believe that SDC have undertaken an

appropriate sustainability appraisal and have not provided robust evidence to justify the release of this important national landscape site.

Proposals for Pedham Place as a standalone settlement at the highpoint of the Kent Downs National Landscape represents a fundamental conflict with the established local settlement pattern of the Darent Valley Character Area which consists of isolated cottages, farms, and small linear villages, in sheltered locations along the river valley.

Policy ST1 states that 'all proposals are expected to align with the place-making principles set out in the Local Plan'. It is notable that in the 'Place-Making Priorities' of the Regulation 19 proposals, Figure 1.2, p.40, the diagram has been updated from the same diagram in the Regulation 18 consultation to now include Pedham Place under *'Opportunities for Swanley'* for *'sustainable intensification and infrastructure improvements including at Pedham Place'*, rather than their previous suggestions that Pedham Place was a standalone settlement.

Factually, Pedham Place is fully within Farningham and Eynsford Parishes, separated completely from Swanley by the M20 / M25/ A20 motorway interchange. Pedham Place is located in a fundamentally unsustainable location, dependant on car access, and as such should not be seen as an appropriate location for a new standalone settlement, whilst its physical separation across the M25 motorway, ensures that it cannot be seen as a sustainable urban extension of Swanley.

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 the scale proposed at Pedham Place 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 in their response to SDC Local Plan Regulation 18 consultation, the fact that Pedham Place was assessed as less harmful than other tested National Landscape options during the Local Plan process, does not justify the permanent impacts it will inflict. This proposed development would permanently erode the strategic gap and sense of separation between Swanley and Farningham, and between Farningham and the 'historic town' of Eynsford. FPC's professional consultant opinion, is that the collective impact of Pedham Place and associated infrastructure, will result in the permanent loss of relative tranquillity and dark skies across large parts of the site, and create damaging, unmitigated visual intrusion across the sensitive Darent Valley, as a key location with the Kent Downs National Landscape.

Evidence produced for FPC by Tibbalds Planning and Urban Design concludes 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.

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, FPC strongly urges SDC 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.

FPC would encourage SDC to take a further look at potential brownfield sites across the district, and to consider opportunities to increase densities in identified sites to reduce the need for a strategic National Landscape site to be released. FPC also believe that further work can be taken by SDC to increase densities in alternative and more sustainably located sites to help meet their targets. The housing needs identified in the Local Plan suggest the greatest demand in the district is for 1- and 2- bedroomed homes, affordable homes, and housing for older residents to 'right-size', this would suggest higher density development in sustainable locations.

Whilst FPC do not support the release of any National Landscape sites, we would challenge the assumptions made by SDC and their consultants Arup, that ST5-2 Pedham Place is the most appropriate National Landscape site in the district to be released. SDC's recommendation to releasee ST5-2 rather than alternative sites in Westerham and West Kingsdown is based on a visual assessment carried out in 2024 by Arup, which contradicts previous assessments conducted by the same consultant on the same site only 5 years previous.

In their response to the SDC Local Plan Regulation 18 consultation, Natural England fundamentally objected to the release of National Landscape sites, stating *that 'we do not currently feel that there is sufficient justification… and therefore advise that more evidence is provided'*. Arup in their response to Natural England's concerns (Technical Note 2026) provided as supporting evidence to Regulation 19, do not provide additional evidence, but rather confirm that their recommendations are based on desk-top research and on scenarios that may or may not be realised. Natural England goes further to suggest that Arup's recommendation to include Pedham Place rather than other sites considered within the National Landscape is unjustified as *'causing less harm than other options does not justify the adverse impacts that are likely to occur…"*

Natural England has also contested how Arup's analysis for the change in impact of the proposed development at Pedham Place on the National Landscape has moved from 'high' to 'low-medium', in their recommendations. Natural England has stated *'we have concerns about this being reduced to Low-Medium with the additional mitigation measures… it does not appear that the impacts can be avoided or fully mitigated."*

FPC have employed Land Use Consultants (LUC) to review Arup's, reports and Natural England's comments. LUC have concluded that although the Landscape and Visual Evidence Report broadly follows the general principles set out in guidance for undertaking Landscape and Visual Impact Assessments, they found a few exceptions to established practice before inclusion could be justified.

LUC found that although the special qualities of the Kent Downs National Landscape are considered, and appropriate opportunities for mitigation and enhancement are identified, the following further evidence should be required before consideration for inclusion in the Local Plan.

- Further justification in relation to the judgement that Pedham Place will result in the least harm to the Kent Downs National Landscape, in terms of landscape and visual effects (due to its land use, character, context and larger size), when compared with the other national landscape sites.

- Further justification that the Pedham Place option provides more opportunities to enhance the special qualities of the Kent Downs National Landscape, both on and off-site (due to its larger size), when compared with the other options.

- Further justification regarding the judgement that potential mitigation at Pedham Place would reduce effects from High (i.e. 'substantial' significant effects) to Low-Medium (between some and no significant effects), given that there would be direct effects on landscape character and effects on the special qualities of the National Landscape.

LUC noted that the Zone of Theoretical Visibilities which accompany the site assessments may not illustrate a reasonable worst-case scenario, given that they take buildings and vegetation into account, which does not account for more open, winter views through deciduous vegetation, and given that buildings could be taller than the 10 m suggested. LUC also noted that there is no appraisal of cumulative effects on the Kent Downs National Landscape including for proposed employment space through the Arup assessments. It is also of note that the suggested woodland planting to mitigate impact may take decades before meeting this function.

FPC would also challenge why only visual impact has been considered in choosing the most appropriate National Landscape site to release. FPC would suggest that wider analysis including sustainability of location, and housing need should support site choice, and balance of public interest in considering National landscape release. FPC question why the National Landscape adjacent to Westerham was discounted, when there is a significant need for housing in that location. Westerham as one of only four towns in the district hierarchy is only accommodating 93 homes over the plan period.

Whilst SDC appear to have taken a reasonable approach to balancing growth across the district in general, the lack of homes in Westerham stands out as a notable exception. In contrast there appears to be an over-concentration of homes dependant on junction 3 of the M25, including Swanley, and Hextable, with over 7,500 homes proposed in the north of the district, where traffic congestion is already greatest.

Comments on Policy SL1, Sports and Leisure Facilities

The proposal for redevelopment of ST5-2 from a successful, accessible and affordable leisure asset contradicts Policy **SL1,** to retain sporting facilities in the district.

Comments on Policy EMP 1, Delivering Economic Success

FPC supports the ambition for a vibrant local economy focused on sustainable town centres. However, FPC do not support proposals for ST5-2 to include up to 49,000 m2 of employment place in an unsustainable location accessed only by motorway, when the clear Local Plan Priority is for new office development to be located in Sevenoaks, Swanley or Sevenoaks town centre. FPC are concerned that proposed commercial development at Pedham Place, together with the majority of employment growth for the district would undermine the regeneration of Swanley Town Centre.

Comments on Policy NE1, Landscape, including National Landscapes

FPC support the commitment to conserve and enhance the natural beauty of the Kent Downs National Landscape maintaining, enhancing, and protecting the National Landscape areas as outlined in the strategic objectives section of the National Environment section of the Local Plan. However, FPC fundamentally object to the inclusion of proposed site allocation ST5-2 which proposes to release 142 hectares on national landscape for development.

The revised NPPF (August 2026) reinforces the protection of the National Landscape and attaches significant importance stating that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced. The NPPF emphasises that new housing development should be in locations that can be made sustainable and/or offer a genuine choice of transport modes which ST5-2 Pedham Place cannot.

2. Do you consider the Local Plan to be legally compliant?

No

Paragraph 4.36 of the emerging SDC Local Plan states that at the Regulation 18 stage the draft site allocation received less than 30% support from across the district with concerns focusing on impact on local infrastructure, particularly traffic congestion and visual impact on the area. FPC are concerned that Sevenoaks District Council (SDC) has failed to listen to 70% of the responses to their Regulation 18 consultation who opposed the inclusion of Pedham Place, ST5-2 within their Local Plan.

In contrast, Policy ST1 in Regulation 19 has brought forward proposals with a greater emphasis on the use of sites within the Metropolitan Greenbelt, than was indicated in the Regulation 18 consultation. Whether defined by SDC as ‘grey belt’ or ‘greenfield greenbelt’ FPC do not believe the current proposals for over 60% of allocations to be on Metropolitan Greenbelt and National Landscape sites can be justified, and we do not believe that the SDC Local Plan process can be seen as legally compliant, both in terms of its process and recommendations.

FPC do not believe that proposals have taken account of local opinion. SDC have failed to meet their own objectives as set out in their Statement of Community Involvement. In particular during the regulation 18 consultation the engagement infrastructure utilised could not cope with what should have been an anticipated volume of responses, meaning that many residents struggled to upload comments, resulting in many complaints to SDC about their process. Many residents also commented on how

inaccessible the Regulation 18 consultation was, creating a barrier for many residents to have their voices heard.

FPC do not believe reasonable evidence has been provided to demonstrate SDC has maximised cooperation with Dartford Borough Council (DBC) who have identified a surplus in their Local Plan Dartford Borough Council (DBC)Local Plan 2024-37. SDC suggestion in their Local Plan that it is unreasonable to assume the surplus could be applied to Sevenoaks district due to local Government reorganisation was premature in its assumption and is no longer relevant. As Local Government Reorganisation in Kent has been paused for the foreseeable future, it is credible for the surplus from the Dartford Plan to be applied to housing need in the north of Sevenoaks district which works as a housing market area with Swanley, Hextable and Farningham.

FPC believe that Natural England's objection to the release of national landscape sites within Sevenoaks in their Regulation 19 consultation highlights that insufficient discussion has taken place with statutory authorities through the local plan process.

The emerging SDC Local Plan identifies Pedham Place as a potential standalone settlement, providing a range of facilities and services in addition to housing. Policy ST5-2 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, which requires the delivery of three schools including a 5FE secondary school and a health hub, together with 49,000 m2 of employment space.

SDC have not provided suitable evidence that they have had suitable engagement and endorsement from statutory consultees that the proposals at Pedham Place are either desirable, or achievable.

Despite the fact that the provision of the education is included as a 'requirement' in the accompanying Development Brief, no credible evidence has not been provided and endorsed by Kent County Council that the three schools proposed at Pedham Place, including a 5FE Secondary School are required or deliverable within the Local Plan period. Furthermore, no evidence has been provided to illustrate that the Integrated Care Board have been consulted and that they have approved the need and funding for a health hub on the Pedham Place site. In contrast, Swanley Town Council have been pursuing the building of a new health hub in Swanley Town centre as a priority. No evidence has been provided by SDC to give confidence from Highways England to prove that they are upgrading Swanley Interchange (M25 / M20) within the next funding window.

3. Do you find the Plan to be Sound?

No – for all four tests

Positively Prepared

FPC do not believe that sufficient evidence has been provided to demonstrate local need for the proposals at Pedham Place, including required education and health provision. The primary housing need for the district is affordable 1- and 2- bedroom apartments, including for older residents, which are not appropriate on the Pedham site due to its unsustainable location.

SDC have attempted to justify the release of 141.2 hectares of National Landscape be balancing suggested 'public interest' benefits to include education, health, and employment opportunities. However, SDC have not shown evidence of need for these facilities in this location, nor have they shown credible evidence that they are deliverable within the Local Plan period.

SDC's Regulation 19 site allocation has depended too heavily on the use of Greybelt, Greenbelt, Greenfield and National Landscape sites, rather than focusing on Brownfield and Town Centre regeneration across the district.

SDC are proposing more employment space at Pedham Place than is required across the district during the Plan period, despite the location not meeting the objective of Policy EMP1.

Consistent with National Policy

The inclusion of Pedham Place, a site within the National Landscape is UNJUSTIFIED and contrary to the National Planning Policy Framework. Inclusion of Pedham Place is a high- risk strategy for SDC which increases the likelihood of Local Plan to be found UNSOUND.

Evidence prepared by Tibbalds Planning and Urban Design for FPC and based on their expert industry knowledge of new and extended settlements, it was not considered that the development of 2,600 homes could be classified as a feasible standalone settlement. Their 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.

The Regulation 19 Local Plan ('emerging Local Plan') officially allocates Pedham Place for approximately 2,600 homes under draft Policy ST5-2, which conflicts with the Government's recent planning reforms which exclude National Landscape from its definition of 'grey-belt' land, and reinforces protection of such sites unless 'exceptional circumstances' can be proven.

As part of the Regulation 19 supporting documentation SDC 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 during the Regulation 18 consultation.

The emerging SDC Local Plan includes a draft development brief for the Pedham Place site allocation (PED1, 2026) to support their development strategy Policy ST5. The brief confirms the proposed uses including approximately 2,600 residential units and key

placemaking priorities. 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.

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.

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

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.

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

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.

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.

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.

Tibbalds Planning and Urban Desing have assessed 'The Exceptional Circumstances and Public Interest Paper' to inform FPC's response and 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

- 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.
- However, 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.
- 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 must 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

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).
- 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.

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.

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.

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.

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

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 decades to develop therefore the scale of harm would be 'high' for years.

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.

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. 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.
- 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.

- 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.

Arup has 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 raise 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.

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.

- 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.

To further support the conclusions of Tibbalds Planning and Urban Design that the inclusion of Site STC5-2 is not consistent with National Planning Policy Framework, PC have employed Land Use Consultants (LUC) to review Arup's, reports and Natural England's comments. LUC have concluded that although the Landscape and Visual Evidence Report broadly follows the general principles set out in guidance for undertaking Landscape and Visual Impact Assessments, they found a few exceptions to established practice before inclusion could be justified.

- Further justification in relation to the judgement that Pedham Place will result in the least harm to the Kent Downs National Landscape, in terms of landscape and visual effects when compared with the other national landscape sites.
- Further justification that the Pedham Place provides more opportunities to enhance the special qualities of the Kent Downs National Landscape, both on and off-site (due to its larger size), when compared with the other options.
- Further justification regarding the judgement that potential mitigation at Pedham Place would reduce effects from High to Low-Medium, given that there would be direct effects on landscape character and effects on the special qualities of the Kent Downs National Landscape.

Justified

Sevenoaks DC have not demonstrated the exceptional circumstances required to justify the release of 141.2 hectares within the Kent Downs National Landscape and Metropolitan Greenbelt. Further investigation of opportunities for higher density and additional brownfield development close to train stations, and existing Town Centres must be thoroughly exhausted first.

Pedham Place propose the wrong type of development in the wrong location to meet the district's need for office focused employment in sustainable, accessible places. Proposals for 49,000 m2 of Employment and commercial space at Pedham Place is greater than the total need identified for the district over the plan period. Such development at Pedham Place would detract from, rather than support, existing town centres such as Swanley Town Centre, contrary to the Economic Objective of the NPPF. Proposals at Pedham Place encourages employment uses that are not needed and unlikely to be taken up by the residents, resulting in both in and out migration for work, further contributing to traffic congestion and hindering sustainable growth.

Proposals at Pedham Place do not reflect or support the social objectives of the Farningham community. The scale and nature of development at Pedham Place is unlikely to support a vibrant, sustainable community, as required by the Social Objective of the NPPF. In contrast, Pedham Place currently provides affordable, accessible sports facilities. Its loss contradicts Policy SL1, to retain and support existing sports and leisure provision unless it is proven unviable.

Including proposals for Pedham Place in the Local Plan is reinforcing the challenges of traffic congestions, air pollution, and further reliance on cars as the primary mode of transport in the district. Furthermore, concentrating so much of the proposed new development on the location which has the greatest existing congestion is unlikely to be supported by Highways England or Kent County Council.

Proposals for Pedham Place will increase congestion and have a negative impact on air quality. The draft Sevenoaks Local Plan identifies 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. 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, and in a location already identified as having the greatest concentration of traffic congestion in the district. An air quality assessment that compares the existing baseline data with the forecasted data for 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.

Effective

Pedham Place is neither large enough to be a New Town or Standalone Settlement, nor in the right location to be a sustainable extension to Swanley due to its location

physically disconnected from Swanley by the M25 Motorway. The Government have clearly set out their principles for New Town scale development in their publication Building New Towns for the Future published in February 2025, which indicates new towns must generally provide more than 10,000 homes to have any chance of being viable, sustainable and self-sufficient. The New Town Taskforce Report to Government have made clear recommendations around placemaking principles, scale and location of New Towns, which include both standalone New Towns and sustainable extensions to existing places. Proposals for Pedham Place cannot achieve these principles.

Insufficient evidence has been provided in supporting documentation to give confidence that Pedham Place can be achieved within the plan period, specifically around the deliverability and financing of highway, education, utilities and mitigation measures, whilst also achieving 40% affordable homes.

Large-scale proposals of similar scales to Pedham Place generally take up to 30 years to deliver based on developers constructing an average of 70 homes per annum. Experience from a Kings Hill, the nearest comparator in terms of ambition to Pedham Place took 35 years to deliver 2650 homes. It is fundamentally unrealistic for Sevenoaks DC to depend on Pedham Place contributing 2600 of their target homes within the Local Plan period.

Pedham Place is in a fundamentally in an unsustainable location, where travel would be dominated by car use. Access to the nearest train stations and movement by walking and cycling is restricted by physical barriers, including London Road and Swanley Interchange, making sustainable travel unlikely. The Local Plan support documentation highlights that both the Swanley Interchange and the London Road between the Swanley Interchange and Swanley Town Centre are already two of the four most congested locations in the Sevenoaks District. Proposing a concentration of development on Junction 3 of M25, which has already identified as one of the 4 locations suffering from the greatest concentration of traffic congestion if not realisable without significant mitigation and investment.

Suggestions of a developer funding major highway improvements in unproven and unrealistic whilst options to connect Pedham Place in a sustainable way to Swanley Station is unachievable due to existing highway and built form constraints.

The upgrading of this junction is essential to the delivery of Pedham Place, which means that it will not be delivered to facilitate the delivery of ST5-2 within the Local Plan period.

No credible evidence been provided by the site promoters of Pedham Place, Gladman's that the realisation of Pedham Place will generate suitable funding to meet the required 'public interest' facilities, whilst meeting the infrastructure needs to deliver the site, whilst also providing 40% affordable housing.

The Infrastructure Delivery Plan

FPC is concerned that the Infrastructure Delivery Plan (IDP) has not fully captured the cumulative infrastructure impacts arising from the concentration of proposed development in the north of the District, including Swanley, Hextable, Farningham and the wider area. This concern is due to SDC omitting Town and Parish Councils from a targeted request for infrastructure information from Town and Parish Councils, despite

many having substantial developments proposed within their parishes. Such as, ST5-2 Pedham Place being located within Farningham and the Parish being directly affected by the proposed development and associated infrastructure requirements.

FPC welcomes the subsequent opportunity from SDC to share infrastructure issues, constraints and opportunities that we consider relevant as part of our Regulation 19 representation. FPC has evidence for infrastructure issues, constraints and opportunities Farningham's emerging Neighbourhood Plan.

FPC therefore asks the Inspector to satisfy themselves that the IDP adequately reflects the cumulative infrastructure requirements arising from proposed development in the north of the District, and that the infrastructure requirements associated with ST5-2, both individually and cumulatively, have been sufficiently identified to demonstrate that the Plan is effective and deliverable within the Plan period.

As SDC has invited FPC to identify infrastructure issues, constraints and opportunities through its Regulation 19 representation, FPC identifies the following priorities from its emerging Neighbourhood Plan for consideration within the IDP:

1) **Transport - Highways**

- **A20 and A225 improvements**, improvements to address existing highways issues and the additional pressure arising from planned development.

2) **Transport - Active Travel and Public Transport**

- **Walking, wheeling and cycling connections**, safe and convenient routes connecting Farningham to the north of the District and with Eynsford, Farningham Road and Swanley railway stations, providing a genuine alternative to private car use.
- **Village gateways and junctions**, improvements to safety and accessibility for pedestrians and cyclists.
- **Public realm**, improvements to the High Street and accessibility, for pedestrians, pushchairs and people with reduced mobility.

3) **Green and Blue Infrastructure**

- **Farningham Woods**, improved safe walking access and routes to Farningham Woods, together with measures to improve the quality and accessibility of this important natural asset.
- **Children and young people**, improvements to facilities for children and young people, including improvements to Oliver Crescent open space.

4. **Has the council maintained effective cooperation with their neighbouring authorities and relevant statutory authorities?**

   FPC do not believe reasonable evidence has been provided to demonstrate SDC has maximised cooperation with Dartford Borough Council who have identified a surplus in their Local Plan.

   Natural England's objection to the release of national landscape through the Regulation 18 consultation highlights the lack of prior engagement despite proposals to release National Landscape.

   Insufficient evidence has been provided from statutory consultees including Highways England, and Kent County Council to credibly evidence that highway and education infrastructure proposed at Pedham Place is deliverable within the Local Plan process.

5. **Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound?**

   - Remove site ST5-2 from the Local Plan site allocation
   - Do not depend on any strategic sites within the National Landscapes to meet housing targets.

   To ensure a sound and legally compliant Local Plan, FPC recommend to:
   - Open discussions with the Ministry of Housing and Local Government to seek exceptional circumstances relief from central Government to reduce its overall housing targets due to the high level of greenbelt and national landscape.
   - Consider the densification of alternative sites near train stations.
   - Reopen discussion with Dartford Borough Council to allocate their surplus homes to the Sevenoaks district allocation.

6. **If your representations are seeking modifications to the Local Plan, do you consider it necessary to request participation in the examination hearing?**

   Yes