



The Case for removal of Pedham Place from the emerging Sevenoaks Local Plan 2040

Pedham Place Golf Centre, BR8 8PP

Report to No Pedham New Town

January 2024





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1.0 OUR INSTRUCTIONS

- 1.1 hgh Consulting has been appointed by the No Pedham New Town ("NPNT") campaign to review the draft allocation for Pedham Place in Sevenoaks District Council's emerging Local Plan.
- 1.2 hgh Consulting employs 34 planners and related professionals, and is a busy planning consultancy practice, primarily acting for landowners, local authorities and developers. The practice is based in Marylebone, central London, but work is geographically dispersed around the United Kingdom.
- 1.3 The practice has much experience of new settlements and sustainable urban extensions, and also of major sports venues. In Kent, we are currently advising on the South East Faversham sustainable urban extension; and we have advised on potential major urban extensions at Tunbridge Wells and Gillingham. In the wider South East region, we are involved with new settlements/sustainable urban extensions in Essex, Cambridgeshire and the Royal Borough of Kingston Upon Thames.
- 1.4 We have studied the Local Plan consultation material; and we have visited the Pedham Place site and the surrounding area, and discussed the proposals with local people who know the area well.

2.0 BACKGROUND

- 2.1 Sevenoaks District Council is consulting over its new 2040 Local Plan. A Regulation 18 version has been published, and the consultation period runs until 11 January 2024.
- 2.2 In due course, this will be followed by a Regulation 19 version, which will be submitted to the Secretary of State for Levelling Up, Housing & Communities, and the Planning Inspectorate will appoint an inspector to examine it. It is likely to be at least another two years before an adopted new Local Plan is in place.
- 2.3 It should be noted that the promoters of Pedham Place have not yet submitted a planning application. They may be biding their time in the hope that the principle of the development is incorporated into the Regulation 19 version of the Local Plan. If this does not happen, they could still submit a planning application, but they might conclude that the chances of success are so low that it would not be worth the expense and effort.
- 2.4 Amongst other things, the draft Plan puts forward three growth Options for the District and is asking the public to express their preferences. Only Options 2 and 3 involve the proposed new settlement called Pedham Place.
- 2.5 The draft plan only mentions in passing the possibility of a stadium complex for Wasps. This is a speculative venture, late on the scene, linked to Pedham Place in a way which is currently unclear.

3.0 THE OBJECTIONS TO THE PROPOSAL

- 3.1 In our view, the proposed new settlement (with or without a new major sports stadium) is fundamentally flawed in planning terms. Below, we briefly explain why we are of this view.
- 3.2 First, the Council does not need Pedham Place in the Local Plan. The consultation acknowledges that Option 1 (i.e. without Pedham Place) "approximately" meets the District's needs (para. 1.25). If there is any doubt, the Council should take a closer look at the potential for optimising development opportunities within the existing settlements. It appears to us that the Council has been conservative in its assumptions about what might be achieved through the optimisation of the development potential of urban/brownfield sites. It is certainly not the case that they have proven that "*all reasonable alternatives [to Green Belt release] have been fully examined, including opportunities in neighbouring authorities*" (para. 1.9).
- 3.3 Pedham Place is a speculative scheme by Gladman. Gladman are well known for such schemes: they typically do deals with landowners, invest in trying to persuade the planning system to support their proposals, and, if successful, sell the land to volume housebuilders. Although the scheme is referenced in the draft Local Plan, it has no more planning status than that. We are surprised that such a deficient scheme has even been referenced in the draft Local Plan.
- 3.4 The land is Metropolitan Green Belt. There is a strong presumption against almost all forms of development in the Green Belt and the presumption is even stronger where the Green Belt serves one or more of the specified purposes of Green Belt. The Pedham Place land serves all five of the purposes defined by the National Planning Policy Framework (NPPF):
- (a) it checks the outward spread of Greater London;
 - (b) it prevents the merging of settlements (Swanley with Farningham/Eynsford);
 - (c) it safeguards the countryside from urban encroachment;
 - (d) it helps preserve the special historic character of Farningham; and
 - (e) keeping it green assists the recycling of derelict land elsewhere.
- 3.5 The Government amended the National Planning Policy Framework ("NPPF") just before Christmas. It says Councils must carry out a "*local housing need assessment, conducted using the standard method in national planning guidance*". However, "*The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need*". The Framework does not require Councils to review Green Belt or AONB/National landscape boundaries simply because they are struggling to meet housing needs as defined by the standard method.
- 3.6 This is a significant change from the advice that pertained whilst the draft Sevenoaks Local Plan was being prepared.

- 3.7 Arup have undertaken a Green Belt Assessment (Stage 2, June 2023) for Sevenoaks District Council. The Pedham Place site was assessed as performing strongly against the NPPF purposes for including land within the Green Belt, making an important contribution to the Green Belt.
- 3.8 The land is National Landscape (the new name for an Area of Outstanding Natural Beauty or AONB). The NPPF contains a strong presumption against major development in National Landscapes. This protection is quite separate from Green Belt protection.
- 3.9 Pedham Place would conflict with the statutory Purposes of the National Landscape designation (as set out in the Countryside and Rights of Way Act 2000), which include:
- (a) conserving and enhancing the natural beauty of the area of outstanding natural beauty, and
 - (b) increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty.
- 3.10 The proposed development would be in an elevated location and would be visible from important viewpoints within the National Landscape and the Green Belt, particularly those associated with the sensitive Darent Valley.
- 3.11 NPPF para. 11 says that there is in plan-making a presumption in favour of sustainable development unless *"the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area"*. Green Belt and AONB/National Landscape are specified (footnote 7) as being such areas.
- 3.12 Where exceptional circumstances can be shown to justify the redrawing of Green Belt and/or National Landscape boundaries, it is essential that the development that is enabled is sustainable. The development proposed at Pedham Place would be very unsustainable in two respects.
- 3.13 First, it would inevitably be heavily dependent upon travel by private car, which is at odds with national planning policy. The developer's claims about providing public transport seem hollow. Swanley station is 5km away and Eynsford Station does not have sufficient services or capacity to accommodate a development of this size. Providing buses is an easy thing for a developer to talk about, but it would be likely to be prohibitively expensive. The lack of public transport would be particularly problematic for a stadium. It is almost inconceivable that in 2024 anyone would propose a major sports stadium without good public transport.
- 3.14 We note that the maps in the draft Local Plan at Fig. 1.4 of the consultation draft Local Plan are very misleading. They imply that the Pedham Place land is effectively an extension to the built-up area of Swanley. This is not the case. The two are separated by the M25 motorway, the complex Junction 3 and the A20 dual carriageway. Together these constitute a major barrier to movement and also a psychological barrier.

- 3.15 Second, the proposed settlement of 2,500 homes would not be large enough to be self-supporting. It is generally accepted in the planning system that an isolated settlement needs to be at least twice the size of what is being proposed to be able to support an adequate range of shops, local services, community facilities and a secondary school. Building a settlement of insufficient size would just lead to even more car journeys, as well as imposing an additional burden upon facilities in the existing towns and villages.
- 3.16 If it was not self-supporting, the inevitable consequence is that trips would be made to facilities in nearby towns and villages. Since such trips would be very likely to be made by private car, this is not a sustainable position. Furthermore, it runs the risk of health facilities, schools and other infrastructure in those settlements becoming over-burdened.
- 3.17 The existing golf facility is part of the community infrastructure of the area. It is well used and it provides an important recreational facility. There is no serious suggestion that it is unprofitable and would close if Pedham Place did not go ahead. It counts as an *"open space[] of value to the local community, either through use or contribution to local character"*, which draft Policy OS1 seeks to retain. The proposed development would sweep it away.
- 3.18 Because Pedham Place would lead to so much road traffic, the already congested local road network would almost certainly be unable to cope without substantial upgrading. This has implications for the strategic road network as well as the local network.
- 3.19 The proposed development would introduce a significant urban feature which would further erode the dark sky qualities of the National Landscape.
- 3.20 It would harm the settings of Fort Farningham Scheduled Monument, Farningham Conservation Area (and the several Listed buildings within the village) and Eynsford Castle.
- 3.21 There is evidence of rare flowers and protected species within the proposed development area. The AONB Management Plan records the existence of white helleborine within and or very close to the proposed development site.

4.0 CONCLUSION

- 4.1 In our view, Pedham Place is a highly speculative venture, and there are strong planning objections to it. We are surprised Sevenoaks District Council planners have even put it forward as an option in the Regulation 18 version of the Local Plan, given that it is both so well protected (Green Belt, National Landscape and open space of value to the local community) and the proposed development would be so unsustainable.
- 4.2 Its inclusion in the consultation draft suggests desperation on the part of a Council very concerned not to cause unrest within existing communities by admitting higher density development on brownfield land. This was always misplaced, but is the more so in light of the recent revisions to the NPPF. The Council effectively admits that Option 1 (which does not involve Pedham Place) is likely to be sufficient to meet the District's needs. We therefore recommend that NPNT strongly opposes Options 2 and 3 for the reasons spelt out above.



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