

Policy ST2 – Pedham Place Site reference: PED1

Crockenhill Parish Council is unequivocally opposed to the proposal for a new housing development at Pedham Place. The Council maintains that this proposal is wholly unsuitable for the area and should be excluded from further consideration.

The Sevenoaks District Local Plan Regulation 18 Consultation 2025 describes Pedham Place as “a potential **standalone settlement** providing a range of facilities and services in addition to 2,500 units” (para 1.40 - P 59). (This becomes 2,579 units on P71.)

Pedham Place is an existing golf course located mainly in Farningham Parish and partly within Eynsford Parish and is situated close to junction 3 of the M25. The Swanley interchange to its immediate northern and western boundaries separates the site from Swanley. This site is located within the Green Belt and within the Kent Downs National Landscape.

A standalone settlement or ‘new town’ has been described by the Government’s New Towns Taskforce as a development having the potential to deliver 10,000 homes or more, in the right places with the right infrastructure.

The parish councils of Crockenhill, Eynsford and Farningham have jointly commissioned a report from Tibbalds Planning and Urban Design who have a wide industry knowledge of new and extended settlements. Their assessment of the Pedham allocation concludes that this proposed development of 2,500 homes can not be classified as a feasible **standalone settlement**. Thus the site is not suitable for the proposed development.

The Tibbalds report provides a much fuller assessment of the Pedham proposals than we shall go into here. A copy of the report is available on request.

Their methodology can be summarised through three key components of the NPPF (December 2024).

Green Belt and National Landscape

The NPPF 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. They 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 Pedham is unable to deliver.

The latest version of the NPPF introduces the concept of grey belt land within the Green Belt. In such locations, development may not be considered ‘inappropriate’ providing they meet a series of criteria (para. 155).

One of these (as with Green Belt release) is that the grey belt land must be able to support sustainable transport patterns. In the case of major development a series of ‘golden rules’ apply (para. 156).

The Sevenoaks District Local Plan appears to have a presumption that the revised NPPF offers a greater opportunity for development in the Green Belt. However this applies primarily

to grey belt land in sustainable locations. Pedham Place does not meet this criteria and so the most recent NPPF should not be considered to provide greater weight to the allocation of Pedham Place on this basis.

Furthermore, the conclusions of the Council's own Green Belt Assessment in relation to Pedham Place remain relevant and are not changed by the NPPF. This states: *"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 the villages of Crockenhill, Farningham 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.

Of even greater relevance is that 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). 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. The Pedham proposals provide an opportunity for new homes, employment uses and supporting social infrastructure. However these are common uses that are delivered in all new towns or urban extensions.

This site is particularly important in terms of its National Landscape status. It provides a buffer zone to protect the Darent Valley. Its position on top of the hill means that the development will be visible for miles, particularly when lit at night. The M25 is not lit at this section specifically because the Inspector agreed that lighting would adversely affect the National Landscape.

We refer Sevenoaks District Council to a recent planning appeal refusal for 290 homes in the Cotswold National Landscape in Somerset (Appeal reference APP/F0114/W/24/3349501 dated 14 March 2025).

When considering the planning balance the inspector concluded (para. 113): *"I afford substantial weight to the adverse effects on the (National Landscape) and the policy conflict, mindful of the great weight that should be given to conserving and enhancing designated landscapes."*

We believe that 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 National Landscapes. The modest shortfall in housing numbers (854 properties) could be met by modestly increasing building densities on other sites.

Elsewhere in the emerging Local Plan (Policy ST1) the council 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.

Putting forward Pedham Place for a new settlement is clearly contrary to the council's own stated policy. As already indicated, the site is disconnected from surrounding towns and villages, the land still meets the purposes of the Green Belt and it has not been evidenced what the *exceptional circumstances* are to allow major development in a high value area of National Landscape. Other sites are available within the district that are not in the Green Belt or the National Landscape.

Standalone Settlement and Unsustainable Location

The Sevenoaks District Local Plan Regulation 18 Consultation 2025 describes Pedham Place as “a potential **standalone settlement**”.

As stated earlier, 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.

In their report into this proposal, Tibbalds Planning and Urban Design, states that this development of just 2,500 homes can not be classified as 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.

The size of the Pedham Place 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.

The site is distant (more than 3kms) from Swanley Railway station with no accessible walking or cycle routes. Having to cross the interchange junction is a major barrier for journeys on foot and by bike. It is not a safe route. Swanley station has insufficient parking for current commuters. Farningham Rd station has only an hourly service, and there are no proposals to increase this. It is usual for passengers travelling on trains leaving Swanley having to stand as no seating is available during peak times.

Tibbalds conclude that: “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 criteria for a new town due to the site’s location in a National Landscape, Green Belt and its setting within Darent Valley.”

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.

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 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. The below sections identify why the site is located in an unsustainable location and does not constitute sustainable development.

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. The identified need of 40,400sqm is already met within other allocations totalling 51,231sqm.
- Pedham Place would provide one job for every 0.42 expected economically-active resident. 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 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 the 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.
- Before considering new developments, the need is 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. Orchards Academy 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.

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 site is 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.
- The 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 causing severe congestion, and having a negative impact on air quality.

Other considerations

Community Open Space

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. The proposed housing employment development would sweep it away.

It counts as an "open space of value to the local community, either through use or contribution to local character". The loss of this site would be contrary to Policy OS1 and it is also protected by Policy COM1 – Community Retention Uses.

Water Supply

The Environment Agency in 2021 declared the whole of SDC to be under water stress. The Darent River Preservation Society reported (DRIPS Report, Autumn 2019) that the proposed new housing development would put unsustainable pressure on the local water supply. The aquifers which draw on the river Darent are getting low and would run out within the next 20 years. Thames Water and the Environment Agency are aware of the situation, and Crockenhill Parish Council requests that Sevenoaks District Council requests Thames Water to respond to these concerns, if it has not already done so.

Impact on local roads and the village of Crockenhill

We do not feel that full weight has been given to the impact of this development on the existing local transport infrastructure,

The Sevenoaks Local Plan, Initial Baseline Transport Assessment (August 2022) shows that the M25 J3, the B258 & B2173 High Street, the B2173 London Road, the A20 Main Road/A225 Dartford Road, and Gorse Hill Main Road/Donkey Lane are already at capacity.

The Sevenoaks Local Plan Forecast Baseline Report (October 2025) shows that additional junctions and roads will reach capacity by 2042.

No overarching impact assessment has been undertaken to evaluate the combined impact of extra traffic generated by other developments, such as the 2,360 additional homes proposed on other sites in Swanley, the 1006 additional homes in Hextable, the new Lidl supermarket at the Broomhill site, near junction 3 of the M25, the Millwall football complex and the London Golf Course leisure and wellbeing destination in West Kingsdown. There would also be significant additional traffic generated if the proposed stadium is permitted on the site adjoining Pedham.

Extra traffic generated by the Pedham development will have an adverse effect on the following infrastructure

M25 congestion

- The M25 is regularly at a standstill at the Swanley Junction 3 and the issues that this junction experiences on a daily basis are well documented.
- When there are accidents or other hold-ups anywhere south of the Dartford Crossing, or congestion at the Dartford Crossing, the Swanley intersection is grid-locked. Traffic then tries to find alternative routes through Swanley or local lanes to avoid the jams. This has an adverse knock-on effect on the local road network.
- Gridlock on the M25/M20 intersection also occurs when there are highway incidents to the south at the junction of the M25 with the M26.
- When there is an event at the international motorsports venue of Brands Hatch (about 3½ miles to the east of the Pedham site) all major and local roads are congested.
- If car journeys generated by another 2,500+ households were added, plus up to 28,000 visitors to the proposed stadium currently proposed on the neighbouring land, traffic is likely to come to a standstill for everyone. Even with major highway alterations, traffic problems would not be solved, but merely displaced. In any case Highways England currently have no plans or funding to improve the road network at M25/M20 junction 3.

- The proposal by the developer to add a lane to all routes around the roundabout is in our view unfeasible and unsafe, because of the bottlenecks which will occur as the traffic from these extra lanes will have to merge with the local single lane network. The proposals also completely fail to acknowledge the environmental impact of this in terms of air quality and light pollution, neither do they take into account the additional traffic that would be generated by the proposed stadium.

Country lanes - Eynsford Road, Crockenhill Lane, Wested Lane

- When there are traffic jams through Swanley and on the M25 there is a tendency to use the B258 and its feeder lanes (Crockenhill Lane, Wested Lane, Eynsford Road to the east) as rat-runs. With the prospect of thousands of new housing units and a 24-28,000 seat stadium proposed, the situation will become untenable.
- In recognition of the traffic problems already faced by Crockenhill, KCC implemented a 20mph zone through the village. This is still not enough and the Parish Council is continuing to work with KCC in identifying further potential traffic calming measures. Work has been ongoing for decades, with still no suitable solutions found.
- It is noted that proposals include widening Wested Lane and installing traffic lights by the railway bridge, which has a weight restriction. They have been proposed to provide a bus service for housing. The new roundabout for Lidl at the point where traffic from J3 is trying to merge into a single lane, is bound to cause congestion, and drivers will seek a way round by turning off into Wested Lane. The congestion caused by the traffic lights at the bridge would further add to the issues experienced in Crockenhill.
- If carried out, this would draw even more 'rat-run' traffic through the village of Crockenhill which would worsen the traffic issues outlined above, due to the nature of country lanes. When the line of traffic created by the traffic lights meets traffic on Eynsford Road coming in the opposite direction, traffic will come to a standstill. It is important to note that in places the road is less than two cars' width, with few passing places and with sections not wide enough for vans to pass, let alone large vehicles.
- The whole route through from Swanley to St Mary Cray is single lane in both directions and single-decker buses, and vehicles of similar width, have difficulty in passing. Particularly narrow is the section along the approach to Kevington from Crockenhill. Improvements along Cray Road would be dependent on the London Borough of Bromley and outside Sevenoaks DC's control.
- Eynsford Road is an ancient sunken lane with farmland several metres above the road, which is lined by chalk banks as it descends to the village. To widen the road along this section would be more complex than is implied. Banks would need to be stabilised and probably inclined, taking away valuable farmland (Grade 2 - Very Good: Agricultural Land Classification - London & South-East (ALC007)).
- Even if the lanes were widened there would be no way to make improvements where the route enters and proceeds through Crockenhill. More traffic being enabled to negotiate the approach lanes would have the knock-on effect of causing chaos and preventing free flow of traffic in the village.
- It is impossible to widen the road once it enters the village (from whichever direction), because it is built up on both sides. Two burial grounds and two churches border the road, creating a significant bottleneck in the centre of the village.

- Eynsford Road leading to Main Road in the centre of the village is effectively single lane, because residents' cars are parked outside their terraced houses as there is no alternative parking. In the village this route has 2 junctions (Church Road and Westview) with traffic leading blindly into Eynsford Road.
- Crockenhill Parish Council is concerned about highway safety in the village if more traffic is generated. Eynsford Road only has a pavement on the north side, and Church Road only on the west side. All pavements are narrow and sometimes obstructed by cars parked on them to make the road wider for vehicles. Many pedestrians must cross Eynsford Road / Main Road because while the bulk of housing lies to the south, all the shops, school, and village hall lie to the north.
- The loss of ancient hedgerows would further detrimentally alter the character of the route and landscape from the village to the M25. Crockenhill Tree Survey (2011-2012) shows there to be 8-9 species of hedgerow trees along Wested Lane, and 14 on Eynsford Road above Gosenhill Farm, including ancient indicator species such as spindle, wayfaring tree and whitebeam.
- Sevenoaks Landscape Character Assessment highlights Crockenhill's 'Settled Farmland Landscape', and recommends that 'the existing characteristics of rural lanes including tall hedgerows and small spinneys be retained' and that 'urban roads respect the existing rural landscape character'. The proposals run counter to these recommendations.
- Compulsory purchase of private farmland or small holdings for additional roads would not be in local interest
- CPC does not believe that proposed 'improvements' would alleviate the traffic problems in the lanes generated by any development both at Pedham Place, rather it would cause more traffic and create more highway safety problems off site, and particularly in Crockenhill, which is in the front line for movements into the London boroughs.

In conclusion

We do not consider the site at Pedham Place to be appropriate for a standalone settlement. The sites' location within the Green Belt and a National Landscape has not been given enough weight in the assessment of 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. For the reasons stated above, it can never be viewed as an extension to Swanley.

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 this site is not allocated for development in the emerging Sevenoaks District Council's Local Plan and is continued to be protected by Green Belt and within the Kent Downs National Landscape.