

Strategic Planning Team  
Sevenoaks District Council  
Sent by email to: [planning.policy@sevenoaks.gov.uk](mailto:planning.policy@sevenoaks.gov.uk)

Registered Office:  
Gladman House  
Congleton Business Park  
Alexandria Way  
Congleton  
Cheshire  
United Kingdom  
CW12 1LB

11<sup>th</sup> December 2025

Dear Sir / Madam,

**RE: Sevenoaks District Local Plan – Regulation 18 Consultation 2025**

This representation is submitted by Gladman Developments Ltd. (Gladman) and Ramac Group to the consultation on the 2025 Regulation 18 Sevenoaks District Local Plan. It follows our earlier submissions on the emerging Local Plan. As such, this representation should be read alongside those earlier submissions as it does not look to repeat or duplicate all points previously made.

As detailed in earlier representations, Gladman and Ramac Group hold a land interest in and are promoting Pedham Place, Swanley as a residential-led, mixed-use development allocation in the emerging Local Plan. Land at Pedham Place is a sustainable location for development, and the delivery of a mixed-use scheme on the site would make a significant contribution to meeting the district's market and affordable housing and employment needs and the only way that the Council can meet the identified infrastructure needs. We can confirm that Pedham Place is suitable, available, and achievable for mixed-use development, as envisaged within development strategy Option 2.

This representation considers the development needs of the district over the emerging Local Plan period, and the development strategy options and related draft strategic policies and development management policies. Such discussion is preceded by a brief overview of recent changes to national planning policy and the Government's objective to significantly boost the supply of homes, 'Build, Baby, Build!' and a mandate for up-to-date Local Plans, which meets an area's identified housing needs and is implemented as soon as possible. Further commentary on other policy areas and development management policies will be provided at the later stage/s of the plan-making process.

**National Planning Policy and Guidance**

As a general point, we support the Council's commitment to preparing a new Local Plan for Sevenoaks District. The adopted Core Strategy (2011) and Allocations and Development Management Plan (2015) pre-date substantive changes in national planning policy and guidance. It is fundamental to the operation of the plan-led system that the Council adopts an up-to-date Local Plan capable of meeting the development needs of the district.

The Council must also ensure that the emerging Local Plan is consistent with applicable national policy and legislation if it is to be found sound at a future examination and adopted. In this context, it is recognised that the current Regulation 18 consultation focuses on the updates to the emerging Local



Plan made in light of changes to policy and guidance made by Government. The changes of most immediate relevance to the development strategy of the emerging Local Plan, and the rationale behind them, are considered in brief below.

### Planning Reform: Significantly Boosting the Supply of Homes

In July 2024 and following the close of the Council's Regulation 18 Part 2 consultation earlier that year, the Labour Government was elected to office. Immediately upon election, the Government set out its proposals for planning reform in England. With the overarching aim of getting the country building more housing and infrastructure, the centrepiece proposal was revising the National Planning Policy Framework (NPPF / the Framework). The importance of revising the NPPF was signalled in the Written Ministerial Statement (WMS) issued on 30 July 2024 by the then Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government. Titled 'Building the Homes we Need', the WMS made clear the Government's focus on addressing the country's '... most acute housing crisis in living memory'. Reiterating the Government's commitment to build 1.5 million homes by 2029, the WMS drew attention to the need for every area to have an up-to-date Local Plan in place to deliver growth in a plan-led manner.

To coincide with the publication of the revised NPPF in December 2024, a second WMS (also titled 'Building the Homes We Need') was issued by the Minister of State for Housing and Planning. Further committing to the Government's objective of significantly boosting the supply of homes, the WMS again highlighted the importance of up-to-date Local Plans to the operation of the planning system. In doing so, the WMS stressed, amongst other matters, the necessity of Local Plans to meet in full the development needs of the local area. The WMS also refers to revised local plan intervention criteria to ensure that up to date Local Plans are put in place as quickly as possible.

These two WMS have been supplemented by other announcements and updates from the Government. This includes the recent 'call to arms' in September 2025 from the current Secretary of State for Housing to 'Build, Baby, Build!' and speed up the delivery of development in Britain.

### The December 2024 NPPF

The NPPF was revised in December 2024<sup>1</sup>. As referred to above, the December 2024 NPPF is part of a range of planning reforms aimed at, amongst other goals, increasing the supply of housing. Some key differences to the former version of the NPPF include:

- I. In support of the Government's objective of significantly boosting the supply of homes (§61), the policy aim is to '...meet an area's identified housing need', rather than to meet as much of that need as possible.
- II. In determining the minimum number of homes needed (§62), strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance (PPG), rather than this approach being an advisory starting point which could be deviated from where exceptional circumstances exist.

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<sup>1</sup> With additional minor changes made in February 2025.

- III. In maintaining the supply and delivery of homes (§78), local planning authorities are required to identify and update annually a five-year supply of specific deliverable sites, rather than not being required to demonstrate such a supply if their adopted plan was less than five years old.
- IV. In seeking to meet their identified need for homes, commercial or other development (§146), local planning authorities where necessary should review Green Belt boundaries and propose alterations to meet these needs in full, rather than there being no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. The December 2024 also introduced a new category of 'grey belt' land, which comprises previously developed land and/or any other land in the Green Belt that, in either case, does not strongly contribute to any relevant Green Belt purposes.

For the purposes of preparing Local Plans, the policies of the December 2024 NPPF came into force in March 2025. Under the transitional arrangements (§234), the emerging Local Plan for Sevenoaks District will need to enable the delivery of sustainable development in accordance with the policies of the December 2024 NPPF (or potentially a subsequent version) and other statements of national policy if it is to be found sound at examination (§36). It will also, in accordance with §36 of the NPPF, need to be positively prepared and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; justified and provide an appropriate strategy for guiding development based on proportionate evidence and consideration of reasonable alternatives; and effective and deliverable over the plan period.

The Council should also be aware of the Government's stated intention to implement further revisions to the NPPF, with a consultation on a new "pro-growth and rules-based" NPPF expected to begin before the end of 2025. This is understood to include the introduction of National Development Management Policies which may negate, in whole or in part, some of the draft development management policies within the emerging Local Plan. It may, therefore, be necessary for the Council to refine its draft development management policies to avoid duplication with existing and/or future national policy wording to accord with the guidance in the PPG.

## **Development Strategy**

Chapter 01 of the draft plan addresses the emerging strategy for meeting the district's identified development needs over the new plan period. The focus below is on the housing need and strategy for meeting this need, with employment needs considered later in this representation.

### Housing Requirement and Plan Period

Table 1.1 of the plan sets out the identified development needs over the emerging plan period. For housing, the table shows a need for 17,175 homes over the plan period 2027 to 2042. This need is reflected in draft Policy ST1 (A Balanced Strategy for Growth), which seeks to ensure that a minimum of 1,145 homes per annum are developed over a 15-year period to 2042. We agree that 17,175 is the minimum number of homes the Council should be planning for over the emerging plan period and is the housing need identified for this area pursuant to NPPF §61. The figure is informed by the district's

local housing need calculated using the standard method and therefore aligns with §62 of the Framework.

It must be recognised, however, that this figure (17,175) is the minimum number of homes the Council should be planning to deliver based on the 15-year plan period. Typically, local plans across the country have needed to allocate sites beyond the minimum in order to deliver at least the minimum, and to allow for sites, assumptions for committed sites and windfalls, which may not deliver as per expectations. Accordingly, it is recommended that the Council continue to consider whether circumstances exist that would indicate a need to plan for housing growth above that arrived at using the standard method (i.e., the minimum requirement).

As to the plan period itself, it is noted that the draft plan refers to the emerging Local Plan covering the period to 2042. This is said to comply with the requirement in the Framework for strategic policies to look ahead over a minimum '15-year period from adoption' (§22). We are supportive in principle of proposed plan period 2027 to 2042. It is advised that the Council maintain its commitment to planning for a full plan period of at least 15 years, and, in doing so, keep the end date of the new Local Plan under review to ensure that any delays in the preparation and/or examination of the plan do not result in it covering less than the minimum (15 years) period required by the Framework from adoption.

#### Strategy Options – Option 1 & Option 2

Two development strategy options are proposed in the draft plan. These two options revolve around the exclusion (Option 1) or inclusion (Option 2) of Pedham Place (site Ref: PED1) as a development allocation, and whether it is preferable to include this strategic site and meet the district's full need (Option 2) or exclude this development and not meet the full need (Option 1). Option 1 places more reliance/scrutiny and risk on the ageing permissions within the extant list and that windfalls can all still be realised over and above all of the sites identified and allocated within the emerging plan.

Option 2 is the only credible option for the Council to progress to the next stage of the Local Plan. This would accord with National Policy, meets many of the current Government requirements/mandates and avoids the risk of significant concerns being raised at examination, and the Local Plan failing again, or at best the need for an immediate review. Also, having a sufficient buffer over the minimum would enable the Council to have greater control over the housing sites which come forward for residential development in the plan period. Option 2 would also be the only way to realise many of the identified needs within the Infrastructure Delivery Plan (IDP) October 2025. Option 1 is not an option, as it fails to meet the identified housing needs (including affordable housing) and could not deliver many of the identified infrastructure needs.

The Government, as previously discussed, has pressed the importance of every area having an up-to-date Local Plan in place at the earliest opportunity. Government has also stipulated that each Local Plan should look to meet the needs of the area in full, not just partially or proportionally meet those needs. For plan-making, the presumption in favour of sustainable development in the Framework means that all plans should seek to meet the development needs of their area and strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses (§11). This

'presumption' then flows into the examination of Local Plans at §36, which requires plans to be positively prepared and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. The aim, therefore, is to meet an area's identified development needs (including its housing need), as opposed to meeting as much of that need as might be deemed necessary or expedient to do so.

In respect, therefore, of the development strategy options advanced by the Council, it stands that only one of the two options provides a credible and policy-compliant way forward. That is, Option 2 and the inclusion of Pedham Place as a strategic site allocation in the new Local Plan. As shown clearly in Table 1.2 of the draft plan, it is only through the allocation of Pedham Place that the Council will be able to meet the minimum housing needs of the district over the plan period to 2042. In the interests of ensuring the preparation of a Local Plan that meets the applicable tests of soundness (as set out in §36 of the Framework), we strongly encourage the Council to progress with Option 2 as the chosen development strategy for the new Local Plan. To do otherwise, and advance with Option 1, would incur significant risk, and potentially another failed plan-making process and more difficulty maintaining a suitable five-year housing land supply. The consequential result of such a scenario would likely be Government intervention in the Council's plan-making because of general development need and a likely requirement for an immediate review.

The Framework, at §145-146, is clear that, once established, Green Belt boundaries should only be altered where exceptional circumstances apply. Exceptional circumstances in this context include, amongst others, instances where an authority cannot meet its identified need for homes, commercial or other development through other means (i.e., on non-Green Belt sites). If that is the case, authorities are directed to review and propose alterations to existing Green Belt boundaries to meet the needs of their area in full. That is the case here. Sevenoaks District includes land predominantly designated as Green Belt. As the emerging evidence base and draft plan show, the Council cannot meet the district's development needs without utilising land within the Green Belt.

It follows that to align with national planning policy and guidance, the Council will need to allocate land currently designated as Green Belt and, in doing so, propose alterations to existing Green Belt boundaries. With respect to the above, this means allocating Pedham Place as a strategic site allocation and releasing the land from the Green Belt to meet the district's identified development needs, to realise the benefits of the site's development, and to aid in preparing a 'sound' plan that is capable of adoption.

#### Policy ST1 (A Balanced Strategy for Growth)

We are supportive in principle of draft Policy ST1 (A Balanced Strategy for Growth). This includes the recognition that the delivery of 1,145 dwellings per annum over the plan period marks a minimum requirement. We encourage the Council to apply the policy in this context, treating this figure as a minimum and not a maximum nor a cap on further development and to recognise that more sites over this number need to be allocated and permitted, to then deliver at least this minimum.

With our consideration that the Council should take forward Option 2 as the development strategy for the plan, as the only credible and policy requirement option, we recommend that the wording of

draft Policy ST1 is revised to include specific reference to the development of a sustainable new settlement at Pedham Place. This would help in affirming the policy support for the creation of the new settlement and provide more clarity to decision-makers, developers, and members of the local community. It would also further clarify that the development strategy of the plan is underpinned by the delivery of the Pedham Place allocation.

## **Economy and Employment**

We have concerns about the employment needs expressed within draft Policy ST1. Table 3.1 of the plan sets out the employment need over the emerging plan period (2027-2042). It identifies a need for a minimum of 40,400 sqm of additional floorspace, split into 25,800 sqm for office uses (Class E(g)(i)) and 14,600 sqm for industrial uses (Classes B2/B8). The needs will be different depending upon whether development strategy Option 1 or 2 is taken forward.

The identified employment needs do not appear to align with the conclusions of the Sevenoaks Economic Needs Study (2025 Update), which identifies a requirement of an additional 26,000 sq.m of floorspace for offices and 37,000 sq.m of floorspace for industrial/distribution. We submitted in 2024 an economic needs study by Lichfields which identified an Experian led need of more than 23ha of employment land but needing to increase to more than 33 ha to balance with the then option 3 of 12,000 homes. Clearly, the minimum housing need of 17,175 is likely to necessitate employment land of more than 40 ha to achieve a balance, to avoid unduly suppressing economic growth. The Council may also wish to recognise the locational advantages of Sevenoaks District which will attract additional sub-regional demand due to the proximity of major road and rail routes. It is recommended that the employment need study is updated accordingly. This level of need is not at all out of kilter with the 15ha proposed at Pedham Place identified to deliver c. 49,000 sq.m of employment floorspace and other sites listed which could deliver a further 60,000+ sq.m. These will deliver significant economic benefits and growth, will help to provide local and sustainable employment for the district's workforce and avoid increasing levels of out-commuting, and assist with delivering the infrastructure requirements identified within the IDP. Only Option 2 would achieve this in the same way as the residential delivery.

Pedham Place's strategic location adjacent to Junction 3 of the M25 offers unique advantages. As highlighted in the Council's Economic Needs Study (2025 Update):

*"This site was being promoted at the time of the 2022 Study. It is noted here only because, notwithstanding environmental and other constraints that may exist, if it were allocated for development as part of the Local Plan's development strategy, its combination of scale, at 25 ha, and adjacency to M25 J3 would potentially create the only inward-investor class development site in the district."*

This demonstrates that Pedham Place is the only site in the district capable of attracting inward investment at scale, providing a significant opportunity to strengthen the local economy. Allocating Pedham Place for mixed-use development would be pro-growth and consistent with national policy objectives set out in the NPPF, which require plans to build a strong, competitive economy and ensure sufficient land of the right type is available in the right places.

A mixed-use allocation at Pedham Place would:

- Deliver 15.36 ha of employment land capable of delivering 22,000 sq.m of offices and 27,000 sqm of industrial/distribution floorspace, helping meet the employment and economic growth aspirations within the district.
- Provide housing and employment together, reducing the need for long-distance commuting and supporting sustainable development principles.
- Create a flexible, strategic site capable of accommodating a range of employment uses, ensuring resilience against economic uncertainty.
- Attract inward investment, supporting local job creation and economic diversification.

Gladman is supportive of the principle of draft Policy EMP2 and strongly recommends that Pedham Place is allocated as a mixed-use strategic site within the Local Plan. There is also a wider supporting role that Pedham Place could provide to Swanley and the surrounding area, as has been identified within the Pedham Place Settlement Study prepared by Lichfield in 2021 (Attached at Appendix A). This will ensure the plan is positively prepared, meets identified economic needs, and delivers sustainable growth in line with national policy objectives, particularly NPPF §82, 83, and 105.

### **Pedham Place – A Sustainable New Settlement for Sevenoaks**

The Council are aware that we are promoting land at Pedham Place as a strategic site allocation through the plan-making process. Pedham Place has a significant prospect to deliver a sustainable new settlement for circa 2,500 homes alongside community, commercial and employment uses. The site is available, suitable, and achievable and can make a substantial contribution towards meeting the district's development needs over the emerging plan period.

Our earlier submissions on the emerging Local Plan have been accompanied by technical and other studies showing the suitability of the site as a strategic development allocation and the cumulative benefits that would accrue from its development as a sustainable new settlement for Sevenoaks. These documents are still of material relevance to the Council's consideration of the site for allocation, and we strongly encourage the Council to continue to have regard to them as it continues to prepare its new Local Plan.

We would like to take this opportunity, however, to reiterate some of the essential features and benefits associated with the allocation of Pedham Place.

#### Vision and Proposals

Pedham Place comprises circa 144 ha of land on the southeastern edge of Swanley. The site occupies a strategic and accessible location, near to Swanley railway station and close to Junction 3 of the M25 (i.e., the Swanley Interchange) which connects with the M20 motorway. Its proximity to Swanley provides direct links by rail and road to Ashford, Sevenoaks, London and the wider southeast of England. Central to the proposals for the site is the delivery of sustainable transport measures and infrastructure, such as, but not limited to, a park-and-ride facility providing convenient bus connectivity to Swanley railway station. These, coupled with the design and provision of community,

retail and other services within the new settlement, will function to minimise journeys made by car, promote sustainable and active travel, and reduce single occupancy vehicle travel.

A Settlement Study and a Vision Document were given with our earlier representation to the Regulation (Part 2) consultation. The Vision Document set out a concept vision for the development of a new sustainable settlement at Pedham Place. We continue to believe in this vision. It is a vision about more than housing; it is about creating a new sustainable settlement that supports Sevenoaks District. Combining a full complement of land uses and infrastructure, Pedham Place will deliver a sustainable new neighbourhood comprising a mix of housing, employment, public amenities, education, retail, transport, and public green space with sustainable links to Swanley and beyond. Its location can also aid in enhancing and expanding the provision of existing services on the edge of the urban area.

Key features of our proposals for Pedham Place include:

- Housing – circa 2,500 homes, including affordable homes and specialist accommodation for older people apartments/village.
- Employment – circa 15.36 ha of employment generating land uses (Use Classes B2, B8 and E).
- Education – new primary and secondary education facilities including special educational needs and disabilities (SEND) provision.
- Community facilities – including a new local centre providing retail, community and health facilities.
- Leisure – a new leisure and hotel facility, including a potential new tennis centre with indoor and outdoor courts.
- Transport – a new transport hub with cycle hire and repair facilities, ticketing, park and ride bus stops and electric vehicle charging points.
- Green Infrastructure – including a new central park, areas of parkland, amenity and rewilded green spaces, and significant structural landscaping and planting that will provide benefits for both people and the natural environment.
- As previously identified, there is the potential for a solar scheme to the east of Wested Lane to advance the renewable energy creation and net zero credentials for this settlement.

The delivery of these and other features will be delivered as part of a zero-carbon ready new sustainable neighbourhood. Pedham Place will be a no-gas neighbourhood, with all properties equipped with low-carbon and energy-saving technologies. This could include the installation of air source heat pumps, electric vehicle charging points and solar panels, as well as cycle storage. There is also potential for the neighbourhood to be powered by renewable energy generated from a solar photovoltaic system situated on land immediately to the east of Wested Lane (which is land within our control/landownership). Our plans for Pedham Place will help to meet local housing supply and deliver on the Council's climate change and sustainability agendas.

#### Suitable, Justified and Reasonable

The proposals for Pedham Place are considered suitable in view of their scale, existing land ownership, location in a highly accessible transport corridor, and the relatively unconstrained nature of the site. They are also justified and reasonable. This is because, and has already been said earlier, it is only through the inclusion of Pedham Place as a strategic allocation the Local Plan (Option 2) can meet the development needs of the district. The inclusion of Pedham Place and the delivery of a sustainable

new settlement in that location would be in keeping with the emerging settlement hierarchy, which identifies Swanley as one of the most sustainable settlements in the district and a focus for future growth. Pedham Place can deliver new homes, and employment uses in tandem with new infrastructure and community facilities on the edge of Swanley, and in a way far more deliverable and sustainable than some other alternative locations identified by the Council. Indeed, of those tested through the Sustainability Appraisal process to date, the scenario that includes Pedham Place (Scenario 4) is the best performing under the greatest number of sustainability topic headings.

### Green Belt and Grey Belt

The land comprising Pedham Place is designated as Green Belt and National Landscape. National planning policy and guidance is clear, however, that whether a site is subject to such designations should not be treated as a consideration which in-principle overrides all other sustainability matters. The Framework (§145-146) explains that one of the exceptional circumstances required to justify a review of and propose alterations to existing Green Belt boundaries includes where an authority cannot meet its development needs. Cumulative public benefits that invariably flow from meeting housing and other development needs in full also contribute towards justifying development in areas designated as National Landscape.

Focusing and delivering development in the most sustainable locations and meeting housing, employment and other needs (such as education needs) fall firmly within the scope of the exceptional circumstances needed to release land from the Green Belt for development through the plan-making process. These circumstances are plainly met in this instance. The evidenced need for housing and other development (including employment), the lack of alternatives in sequentially preferable locations outside and the extent of the role the site plays in maintaining the purposes of the Green Belt, coupled with its sustainable location and achievement of wide-ranging objectives, justify its release from the Green Belt<sup>2</sup>. The proposals also offer scope to redraw the Green Belt boundary in a way that is logical, and which follows strong and permanent features.

We also note that the Council's most recent Green Belt Assessment<sup>2</sup> identifies Pedham Place (site ref: SW-14) as a provisional 'grey belt' site when measured against the definition set out in the Framework. The identification of the site as such reflects its weak performance against key Green Belt purposes, scoring poorly against purpose (a) to check the unrestricted sprawl of large built-up areas, purpose (c) to assist in safeguarding the countryside from encroachment, and purpose (d) to preserve the setting and special character of historic towns. It performs only moderately against purpose (b) to prevent neighbouring towns merging into one another and purpose (e) to assist in urban regeneration.

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<sup>2</sup> Sevenoaks District Council. Sevenoaks Stage 2 Green Belt Assessment – Stage 2 Annex Report. Arup. 10 October 2025.

The proposed development is capable of fully satisfying the “Golden Rules” for major housing development in Grey Belt locations, as set out in §156–157 of the NPPF:

### *1. Affordable Housing*

The site can deliver significant levels of affordable housing. Given the scale of the development, a substantial affordable housing contribution is deliverable and would make a meaningful contribution to meeting identified local needs.

### *2. Necessary Infrastructure*

The proposals for Pedham Place include a comprehensive package of infrastructure to support both the new community and the wider area, including:

- A supermarket and individual shopping units
- A hotel
- A transport hub
- Tennis centre
- A secondary school and two primary schools
- Office space and employment units
- A park and ride facility
- A range of community services and supporting infrastructure
- As identified previously, there is also a potential opportunity for a solar scheme to the east of Wested Lane to provide an additional on-site renewable energy source which could be combined with district battery storage and to assist energy credentials of the settlement.
- Local highway improvements including much needed upgrades to M25 Jct 3.

This level of provision is fully aligned with §156(b), ensuring that necessary social, community and transport infrastructure is integral to the delivery of the site.

### *3. New and Improved Publicly Accessible Green Space*

The development delivers extensive green infrastructure, including a central park, parkland, multiple green spaces, and connected open-space corridors. These areas provide high-quality, accessible, multifunctional green environments for residents and the wider community, consistent with §156(c). They will deliver landscape, recreational, ecological and health benefits.

### *4. Sustainable Development and Wider NPPF Compliance*


The site is capable of forming a sustainable new settlement that provides homes, employment, education, retail facilities, and transport connections in one integrated location. The range of uses proposed ensures a high level of self-containment, reducing the need for outward commuting and supporting sustainable travel choices through the transport hub, park and ride, and active travel networks.

The scale of development will make a significant and positive contribution to meeting the area’s demonstrable housing need, in line with §155. The scheme would be master planned to ensure high-quality design, strong place-making, improved access, and environmental enhancements.

The site represents a deliverable and sustainable opportunity (in accordance with NPPF para 148) to accommodate a significant proportion of the area’s future growth needs. Allocating Pedham Place will ensure the Local Plan is positively prepared, pro-growth, and aligned with national policy objectives to build a strong, competitive economy while delivering much-needed housing and infrastructure.

Benefits

The table below provides a summary of the emerging proposals for Pedham Place and the many associated benefits.


Key Issue	Benefits Delivered by Pedham Place
<p><b>Housing</b></p> 	<p>Sevenoaks District currently has a significant and pressing need for more market and affordable homes. Pedham Place proposes 2,500 homes, of which 40% will be affordable, alongside employment and social infrastructure.</p> <p>The Council claimed a 2.96-year supply of housing in the most recent Five-Year Housing Land Supply Statement dated October 2025<sup>3</sup>. This demonstrates the dire, and worsening level of housing delivery in the district.</p> <p>Sevenoaks District is also the least affordable area in the region with the average home costing circa £524,346<sup>4</sup> whilst the average full-time salary sits at circa £35,976<sup>5</sup>. This results in <b>an affordability ratio of 13.20<sup>6</sup></b> - significantly above the affordable level of 4.0-5.0.</p> <p>The delivery of <b>1,500 market and 1,000 affordable homes</b> against a significant and pressing need is a significant benefit of the scheme. The level of housing delivered at Pedham Place cannot be delivered elsewhere in the district and therefore significant weight should be attached to the 2,500 homes delivered by Pedham Place.</p>


<sup>3</sup> Sevenoaks District Council. Five Year Housing Land Supply Statement (October 2025). Available at: [https://www.sevenoaks.gov.uk/downloads/file/3893/five\\_year\\_housing\\_land\\_supply\\_statement\\_october\\_2025](https://www.sevenoaks.gov.uk/downloads/file/3893/five_year_housing_land_supply_statement_october_2025)


<sup>4</sup> HM Land Registry. UK House Price Index – House Price Statistics (Sevenoaks). Available at: <https://landregistry.data.gov.uk/app/ukhpi/browse?from=2019-04-01&location=http%3A%2F%2Flandregistry.data.gov.uk%2Fid%2Fregion%2Fsevenoaks&to=2022-12-01&lang=en>


<sup>5</sup> Office for National Statistics. House price to workplace-based earnings ratio. Release date 24 March 2025. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquarterileandmedian>


<sup>6</sup> Office for National Statistics. House price to workplace-based earnings ratio. Release date 24 March 2025. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquarterileandmedian>


	<p>Pedham Place also proposes <b>extra care apartments</b> and a <b>specialist village</b> for older people, helping to meet the needs of an ageing population as well as young people and families. This will also serve the additional benefit of freeing up other family homes in the wider area.</p>
<p><b>Climate Change</b></p> 	<p>Pedham Place will be delivered as a <b>zero-carbon ready settlement</b>, fully aligned with the Climate Change objectives and policies set out in <b>Chapter 4 of the draft Sevenoaks Local Plan</b>.</p> <p><b>Energy Efficiency and Zero-Carbon Readiness (Policy CC2 – Sustainable Design and Construction)</b></p> <p>All homes will adopt a <b>fabric-first design approach</b>, minimising operational carbon through high levels of insulation, airtightness, and passive design strategies. This ensures compliance with the <b>Future Homes Standard</b> and supports the emerging Local Plan’s requirement for energy-efficient buildings that are resilient to overheating and water stress. Homes will be designed to incorporate water-saving measures, meeting the optional Building Regulations standard of <b>110 litres per person per day</b>, as required under <b>Policy W3 (Water Supply and Quality)</b>.</p> <p><b>Low Carbon Heating and Grid Decarbonisation (Policy CC3 – Low Carbon and Renewable Energy)</b></p> <p>Heating systems will be fully electrified, reducing reliance on fossil fuels and supporting the transition to a decarbonised grid by 2035. This approach aligns with Policy CC3, which encourages low-carbon heating solutions and decentralised energy networks.</p> <p><b>Renewable Energy Generation and Storage (Policy CC3)</b></p> <p>The scheme will integrate <b>rooftop photovoltaic panels</b> on new homes, linked to intelligent energy storage systems. These will enable on-site energy use, demand response, and reduce reliance on the national grid, directly supporting the emerging Local Plan’s strategy for renewable energy generation and storage. Also, there is potential for a solar scheme to add to the renewable energy generation and net zero credentials for the settlement.</p> <p><b>Sustainable Movement and Transport (Policy CC1 – Mitigating and Adapting to Climate Change)</b></p> <p>Pedham Place will prioritise sustainable travel in line with the <b>Movement Hierarchy</b>. Measures include:</p> <ul style="list-style-type: none"> <li>• A <b>park-and-ride facility</b> to reduce private car trips.</li> <li>• An <b>accessibility hub</b> offering bike and car share services.</li> <li>• Infrastructure for <b>100% electric vehicle ownership</b>, including EV charging points.</li> </ul>


	<ul style="list-style-type: none"> <li>Active travel networks to promote walking and cycling. These initiatives reduce transport emissions and align with Policy CC1’s requirement to minimise carbon emissions through location and design.</li> </ul> <p><b>Blue-Green Infrastructure</b></p> <p>The development will incorporate extensive <b>blue-green infrastructure</b>, including natural drainage systems and green corridors, to manage surface water sustainably and enhance biodiversity.</p>
<p><b>Transport and Highways</b></p> 	<p>Pedham Place has been designed in accordance with the transport policies set out in <b>Chapter 10 of the draft Sevenoaks Local Plan</b>, ensuring sustainable movement, improved connectivity, and enhanced highway safety.</p> <p><b>Walkable Neighbourhood and Active Travel (Policy T1 – Sustainable Movement Network)</b></p> <p>The settlement will function as a <b>walkable neighbourhood</b>, with community facilities located within a <b>10-minute walking distance</b> of most homes. This aligns with draft Policy T1, which promotes compact, well-connected communities and prioritises walking and cycling over private car use.</p> <p>A comprehensive network of <b>segregated cycle routes and pedestrian paths</b> will connect key destinations, including schools, the high street, the transport hub, employment areas, and green spaces. These routes will be safe, attractive, and integrated with the <b>wider Sustainable Movement Network</b>, supporting active travel and reducing reliance on private vehicles. Existing public rights of way will be retained, with only minor diversions to integrate with the master planned street layout, and the scheme will deliver new pedestrian and cycle connections to enhance permeability and accessibility across the development.</p> <p><b>Park-and-Ride and Transport Hub (Policy T2 – Sustainable Movement)</b></p> <p>The scheme includes a <b>park-and-ride facility</b> designed to intercept car trips to Swanley railway station, reducing congestion at the M25 junction and supporting modal shift to public transport. This facility will be part of a <b>transport hub</b> offering:</p> <ul style="list-style-type: none"> <li><b>Bike hire and maintenance services</b></li> <li><b>E-scooter and e-bike hire stations</b></li> <li><b>Car share schemes</b></li> <li><b>Park &amp; Ride facility</b></li> </ul>

	<p>These measures directly support draft Policy T2, which encourages innovative transport solutions and shared mobility services to reduce carbon emissions and improve accessibility.</p> <p><b>Highways Improvements and Safety (Policy T4 – Transport Statements, Assessments and Plans)</b></p> <p>Pedham Place provides an opportunity to deliver <b>net improvements to the existing highways network</b>, including:</p> <ul style="list-style-type: none"> <li>• Contributions towards motorway junction upgrades.</li> <li>• Enhancements to the A20 access road.</li> <li>• Addressing existing safety issues identified in previous assessments.</li> </ul> <p>These interventions align with draft Policy T4, which requires major developments to mitigate transport impacts and improve highway safety and efficiency.</p>
<p><b>Biodiversity</b></p> 	<p>Although the site is currently green space, its use as a golf course means biodiversity is very limited. The existing tree cover and woodland around the site’s edges will be retained, but the remainder is predominantly short-mown grass with no ponds and minimal habitat diversity. The development will <b>substantially enhance biodiversity</b>, fully aligning with draft <b>Policy BW1 (Safeguarding Places for Wildlife and Nature)</b> and the Local Plan’s commitment to <b>biodiversity net gain</b>.</p> <p><b>Meadow Grassland and Species-Rich Landscapes (Policy BW1 &amp; Biodiversity Net Gain Requirement)</b></p> <p>The scheme will transform the plateau slopes into flower-rich meadow grassland, creating habitats associated with ancient species-rich landscapes. Public access will be carefully managed via designated footpaths to protect these habitats. Elsewhere, species-rich amenity grassland will be designed for recreation while maximising biodiversity value, supporting the statutory requirement for 10% biodiversity net gain.</p> <p><b>New Woodland and Tree Planting (Policy CC4 – Tree Planting &amp;)</b></p> <p>Extensive areas of new native woodland will be planted, creating rich habitats and screening the development from long views. In addition, street trees will be incorporated throughout the scheme, and greenways will include significant tree planting and wildlife corridors. This approach <b>aligns with draft Policy CC4</b>.</p>

	<p><b>Greenways and Sustainable Drainage (Policy W2 – Surface Water Management)</b></p> <p>The <b>greenway network</b> will form the backbone of a <b>sustainable drainage system (SuDS)</b>, incorporating swales, rain gardens, reed beds, and wetlands. These features will attenuate surface water runoff while creating habitats for aquatic and semi-aquatic species, delivering multi-functional benefits in line <b>with draft Policy W2</b>.</p> <p><b>Biodiversity-Led Design Features (Policy BW1 &amp; National Biodiversity Net Gain Requirements)</b></p> <p>The scheme will integrate <b>habitat-creating features</b> such as bat and bird boxes, hedgehog highways, native planting, and ponds. These measures will enhance ecological connectivity and support species recovery, consistent with the Local Plan’s biodiversity objectives.</p>
<p><b>Communities and Infrastructure</b></p> 	<p>The masterplan for Pedham Place has been designed to create a <b>small, traditional settlement</b>, delivering all the infrastructure, services, and facilities expected in a thriving and sustainable settlement. This approach aligns with draft <b>Policy IN1 (Infrastructure Delivery)</b>, ensuring that development is supported by the necessary infrastructure and does not place additional pressure on existing services.</p> <p><b>Integrated Local Services and Facilities (Policy IN1)</b></p> <p>Pedham Place will provide a <b>high street with at least 20 individual shop units</b>, a café, restaurant, hotel, and dispersed retail units within residential areas to meet micro-local needs. The scheme also includes:</p> <ul style="list-style-type: none"> <li>• <b>Primary and secondary schools</b></li> <li>• <b>Healthcare facilities</b></li> <li>• <b>Employment space</b></li> <li>• <b>Transport hub and park-and-ride facilities</b></li> <li>• <b>Sports and leisure facilities, including tennis courts</b></li> <li>• <b>A central park and green spaces for recreation</b></li> </ul> <p>By delivering new education, healthcare, and transport infrastructure, Pedham Place will <b>avoid placing additional strain on existing facilities</b>. Instead, it will <b>increase local choice and capacity</b>, particularly in relation to schools, healthcare provision, and sustainable transport options.</p> <p>These facilities will ensure that residents have access to essential services within the development, reducing reliance on external infrastructure and supporting the Local Plan’s objective of creating <b>self-sufficient, sustainable communities</b>.</p>

	<p><b>Health and Wellbeing (Policy HW1 – Healthy Communities)</b></p> <p>Pedham Place will be a <b>healthy neighbourhood</b>, designed to promote physical activity, social interaction, and mental wellbeing. Residents will have access to <b>formal and informal recreation opportunities</b>, walking and cycling routes, and spaces to connect with nature. This <b>aligns with draft Policy HW1</b>, which seeks to create environments that support health and reduce inequalities.</p>
<p><b>Education</b></p> 	<p>Pedham Place will deliver a comprehensive education offer in line with draft <b>Policy ED1 (Education)</b>, ensuring that new development is supported by appropriate educational infrastructure and does not place additional pressure on existing facilities.</p> <p><b>New Schools to Meet Local and Strategic Needs (Policy ED1)</b></p> <p>The proposed scheme includes:</p> <ul style="list-style-type: none"> <li>• <b>Two 2FE Primary Schools (providing 840 pupil places)</b></li> <li>• <b>One 5FE Secondary School with Sixth Form (providing 1,170 pupil places)</b></li> <li>• <b>One Special Educational Needs (SEN) School</b></li> </ul> <p>All schools will be designed and sized in accordance with the latest <b>Kent Education Commissioning Plan (2025–2029)</b>, ensuring compliance with local authority standards and futureproofing for anticipated demand.</p> <p><b>Capacity and Over-Provision for Wider Area Needs (Policy ED1)</b></p> <p>While this provision exceeds the demand generated solely by Pedham Place, it is correctly sized when considering <b>other committed developments</b> and the wider growth strategy. Pedham Place therefore represents a <b>strategic solution</b> to address both housing and education needs across the northern part of Sevenoaks District.</p> <p>Kent County Council has previously confirmed that there is <b>insufficient primary and secondary capacity in the local area</b>, and without Pedham Place, demand from existing commitments could not be met locally due to the lack of scope for expanding existing schools. This development directly responds to that challenge, aligning with draft Policy ED1’s requirement to ensure education infrastructure is delivered alongside growth.</p>

	<p><b>Benefits to Surrounding Communities</b></p> <p>The education provision at Pedham Place will not only meet its own needs but will also <b>support wider educational capacity</b>, benefiting:</p> <ul style="list-style-type: none"> <li>• Primary school provision in Swanley and Hextable</li> <li>• Secondary school provision across North Sevenoaks</li> </ul> <p>This approach ensures that the development contributes positively to the resilience and accessibility of education services in the district.</p>
<p><b>Landscape / National Landscape</b></p> 	<p>The masterplan for Pedham Place has been developed with a detailed understanding of the <b>landscape character and ecological context of the site</b>, aligning with draft <b>Policy NE1</b> and draft <b>Policy BW2</b> of the Sevenoaks Local Plan.</p> <p><b>Visual Containment and Landscape Sensitivity (Policy NE1)</b></p> <p>The site benefits from <b>strong visual enclosure</b> due to its elevated plateau form, sitting above steep-sided and wooded valleys. Views into the site are heavily screened by existing woodland and rolling topography, particularly from the north, east, and southeast. Beyond 4–5 km, the potential for views of the development recedes significantly, resulting in <b>negligible levels of change</b> to the wider landscape character.</p> <p><b>Masterplan Testing and Design Response (Policy NE1)</b></p> <p>The latest refinements to the masterplan, including adjustments to commercial development areas, have been tested through landscape sections to assess visual impact. These confirm that retained woodland and vegetation provide robust screening, and <b>that new planting will further enhance this enclosure</b>, ensuring the development integrates sensitively with its surroundings and conserves the natural beauty of the Kent Downs setting.</p> <p><b>Commitment to Biodiversity and Green Infrastructure (Policy BW2)</b></p> <p>In addition to retaining existing woodland, the scheme will <b>introduce new native planting and habitat features</b> to strengthen ecological networks and deliver measurable biodiversity net gain. This includes:</p> <ul style="list-style-type: none"> <li>• <b>Extensive tree planting and green corridors</b> integrated into the masterplan.</li> <li>• <b>Blue-green infrastructure</b> such as swales, rain gardens, and wetlands to manage surface water and create habitats.</li> <li>• <b>Wildlife-friendly design features</b> including bat and bird boxes, hedgehog highways, and species-rich planting.</li> </ul>

	<p>These measures align with draft <b>Policy BW2</b>, which requires development to enhance biodiversity and integrate nature-based solutions into site design.</p>
<p><b>Economy and Employment</b></p> 	<p>Pedham Place will deliver <b>15.36 ha</b> of employment land which could deliver c. 49,000sq.m of employment floorspace (22,000 sq.m offices, 27,000sq.m industrial), supporting a wide range of jobs during both the construction phase and long-term occupation. This approach aligns with draft <b>Policy EMP1 (Delivering Economic Success)</b> and draft <b>Policy EMP2 (New Employment Land)</b>, which seek to ensure that new development contributes to a strong, competitive economy and provides employment opportunities in sustainable locations.</p> <p><b>Employment Land and Job Creation (Policy EMP2)</b></p> <p>The scheme includes <b>49,000 sq.m of employment floorspace</b>, designed to accommodate a mix of uses that meet modern business needs. This provision supports the Local Plan’s objective ensuring Pedham Place plays a strategic role in meeting this requirement. There will also be significant other employment opportunities via schools’ hotels, and the other land uses across the settlement.</p> <p><b>Economic Impact and Local Investment (Policy EMP1)</b></p> <p>Based on Lichfields’ Economic Toolkit calculations and assuming a build period of 10–15 years, Pedham Place is expected to generate:</p> <ul style="list-style-type: none"> <li>• <b>£441.8 million total construction cost</b></li> <li>• <b>603 full-time equivalent construction jobs, plus 42 indirect jobs</b></li> <li>• <b>£1.2 billion Gross Value Added (GVA) over the build period</b></li> </ul> <p>New residents will also contribute significantly to the local economy, with:</p> <ul style="list-style-type: none"> <li>• <b>£15.3 million first occupation expenditure</b></li> <li>• <b>£90.8 million annual spending power</b></li> </ul> <p>This level of investment aligns with draft Policy EMP1’s aim to <b>support economic resilience, attract investment, and strengthen local supply chains.</b></p> <p><b>Fiscal Benefits to the Local Authority</b></p> <p>Pedham Place will generate substantial fiscal benefits, including:</p> <ul style="list-style-type: none"> <li>• <b>£4.9 million per annum in Council Tax to support local services</b></li> <li>• <b>£21 million from the New Homes Bonus scheme</b></li> </ul>

	These contributions will help fund infrastructure and community facilities, reinforcing the Local Plan's commitment to sustainable growth.
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## Conclusion

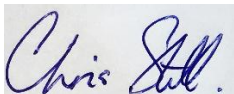
We support the Council's commitment to preparing a new Local Plan for Sevenoaks District. To ensure that the new Local Plan can be found sound at examination, when measured against the tests of soundness set out in §36 of the Framework, it is crucial that the plan seeks to meet the development needs of the district in full. In this respect, we consider the inclusion of Pedham Plan as a strategic allocation the only credible and viable development strategy for the new Local Plan. It is only through the allocation of Pedham Place (development strategy Option 2) for circa 2,500 new homes, employment, employment and community uses can the Council plan to meet the district's development needs in a manner consistent with national planning policy and guidance.

The development needs of the district are such that they cannot be met without releasing land from the Green Belt. In the context of those needs, which include not only housing but also employment and education needs, it is necessary for the Council to review and redraw Green Belt boundaries based on exceptional circumstances and fundamentally to promote sustainable development.

We trust this representation is of assistance in taking the plan forward to the next stage of preparation and examination. I would also like to express our commitment to supporting the Council to achieve a new Local Plan for Sevenoaks District.

Should you have any questions or wish to discuss any of the matters raised in this representation, please do not hesitate to contact me.

Yours faithfully,



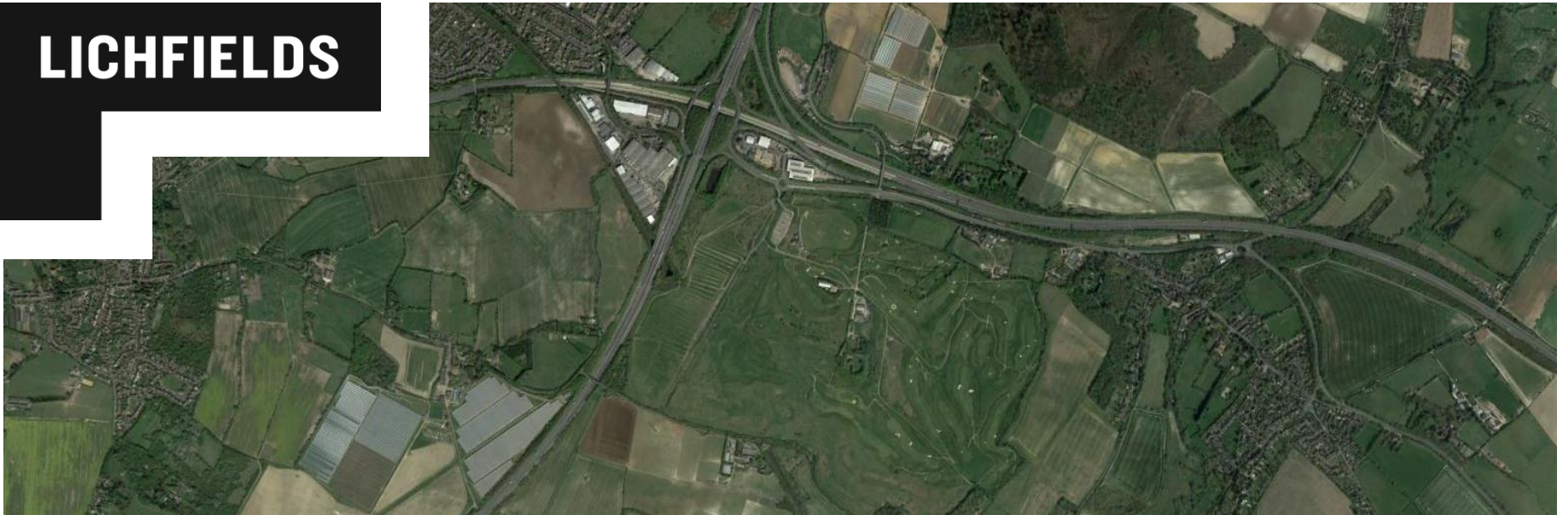
Chris Still | Senior Planning & Development Director  
**Gladman Developments Ltd.**

Enc:

- Appendix A: Pedham Place Settlement Study

## **Appendix A: Pedham Place Settlement Study**

**LICHFIELDS**



# Settlement Study

Pedham Place

May 2021



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Registered Office:  
The Minster Building  
21 Mincing Lane  
London EC3R 7AG

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# 1. Introduction

This report establishes the role of Pedham Place in the wider Sevenoaks settlement hierarchy, demonstrating that it can be a place in its own right without detracting from nearby Swanley

## A sustainable settlement to help meet the needs of Sevenoaks, creating a new place in its own right.

This report considers the role the development of a new settlement at Pedham Place will have within the Sevenoaks District settlement hierarchy; and whether it is capable of meeting the needs of its future residents without adversely impacting the vitality or viability of existing nearby settlements; principally Swanley. In this context, can Pedham Place provide an economic boost to the district, help meet acute housing needs, and deliver appropriately-sized infrastructure (i.e. health, schools, and retail) to be a new settlement in its own right?

To consider this, the report undertakes a desk-based audit to determine:

1. what facilities and services currently serve the local community; and
2. the available capacity of these to accommodate greater demand.

This has involved identifying the capacity of existing community and social infrastructure in the area as well as establishing what unmet requirements will arise from any proposed and committed growth.

For the purposes of this baseline review, the study considers the existing social infrastructure around Pedham Place and nearby local centres. This focuses on Swanley, Farningham, and Eynsford. It also considers the likely population growth in the local area as a result of the proposed development and other already committed developments in Swanley and the local area.

This analysis informs an overview of how Pedham Place will fit in the district's settlement hierarchy. It considers how the new settlement and Swanley will relate to each other and – as part of this – consider their effective interrelationship. This will explore how far the communities either side of the M25 Motorway will utilise each others' facilities and demonstrate how they will complement each other with appropriately sized infrastructure.

This study also provides an assessment of forecast expenditure to be generated by Pedham Place residents. This to inform and demonstrate that an appropriately-sized and phased town centre can be delivered in the settlement without harming Swanley's vitality and viability.

In undertaking this analysis, the report demonstrates that a development at Pedham Place can be formally allocated in a new local plan for a new sustainable settlement whilst according with the wider strategic aims and objectives of the local plan. It is a strategic solution to meeting wider infrastructure needs, acute housing needs, and economic needs.

## Structure of Report

The report is structured as follows:

- **Section 2.0** provides an audit of community infrastructure facilities within the surrounding area and determines where there are surpluses and deficiencies for the purposes of meeting existing and future needs. It also includes an assessment on the projected housing delivery and population growth in the local area.
- **Section 3.0** overviews the provision of community infrastructure, employment and retail proposed at Pedham Place.
- **Section 4.0** sets out an analysis of how Pedham Place will fit it to the wider settlement hierarchy and its relationship with nearby Swanley and other settlements.
- **Section 5.0** provides a summary and conclusion of the key findings.

# 1. Introduction

Pedham Place is strategically well located for growth; afforded with high levels of accessibility at a strategic Junction of the M25 and M20 in the north of Sevenoaks District

## Pedham Place: The Site

The proposed location for the Pedham Place development is to the south west of Swanley, near Junction 3 of the M25 where it meets the A20/M20 motorway. The motorways form a rectangular shaped plot with Crockenhill Lane to the south and Sparepenny Lane to the east. Beyond Sparepenny Lane are the villages of Farningham and Eynsford which are located along the River Darent.

The site itself is primarily in use as the 'Pedham Place Golf centre' which offers an 18 hole championship course as well as a 9 hole par 3 course. An area of land on the site's eastern border with the M25 is used for car boot sales, and there is also some employment uses in the centre of the site. It's an undulating site that is mainly covered by grass with little built development or woodland. Electricity and communications pylons also cross the site as does a railway line in the south west corner through an underground tunnel. A scheduled ancient monument is also located in the centre of the site.

The area surrounding the site is mixed but is characterised by the M25 and M20 motorways to its immediate north and western boundaries; separating the site from Swanley. Employment uses as well as a recycling centre is also located along the northern boundary. To the immediate south and east, the landscape becomes more rural with the villages of Farningham (c.600m from the edge of the site) and Eynsford (c.900m). Eynsford has a railway station which is on the Thameslink line with services to Sevenoaks and London Bridge.

More widely, the site is c.12km north of Sevenoaks and it is c.7.6km south of Dartford; both accessible via the A225 Shoreham Road. It is also close to the built edge of London's outer suburbs; including centres such as Orpington, St Paul's Cray, Foots Cray, and Bexley. It is therefore near the boundaries of multiple different local planning authorities including Dartford, the London Borough of Bromley, and the London Borough of Bexley. The site is also close to key local landmarks including the Brands Hatch motor racing circuit, Lullingstone Roman Villa, and the Eynsford Viaduct.



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# 1. Introduction

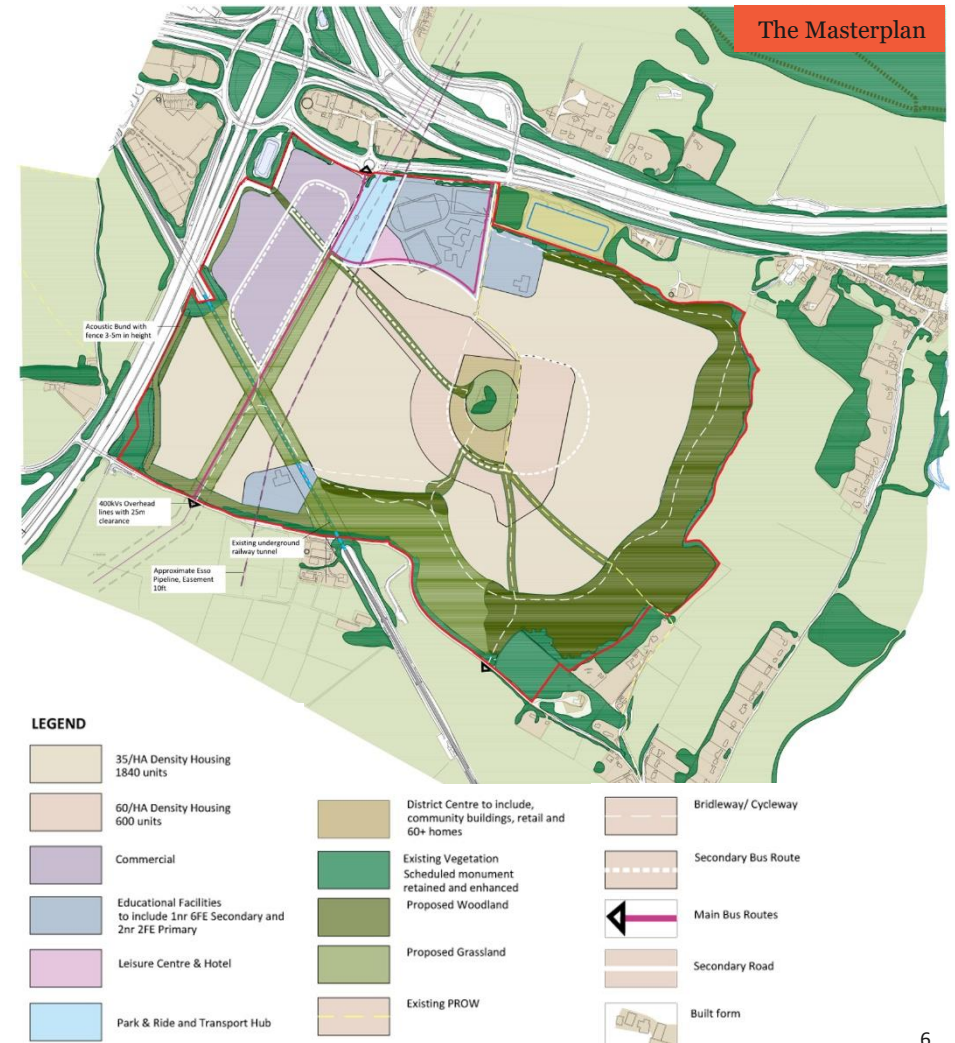
The proposed development at Pedham Place can deliver around 2,500 homes and supporting community infrastructure to meet its future residents' day-to-day needs

## The Proposed Development

Pedham Place presents an opportunity to deliver a new sustainable settlement within Sevenoaks District. The adjacent illustrative masterplan shows a proposal for the location of land uses, road network, and planting that will form the new settlement focused around the central grassed area surrounding an existing scheduled ancient monument. The development will comprise:

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

From the above, Pedham Place will become a place in its own right. It is a development that will provide for the day to day needs of its future residents and provide a significant quantum of homes to help Sevenoaks district meet its housing needs.



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## 2. Community Infrastructure Audit

The site is within Sevenoaks District, to the south east of the town of Swanley (the District's second largest settlement) and close to the villages of Farningham and Eynsford.

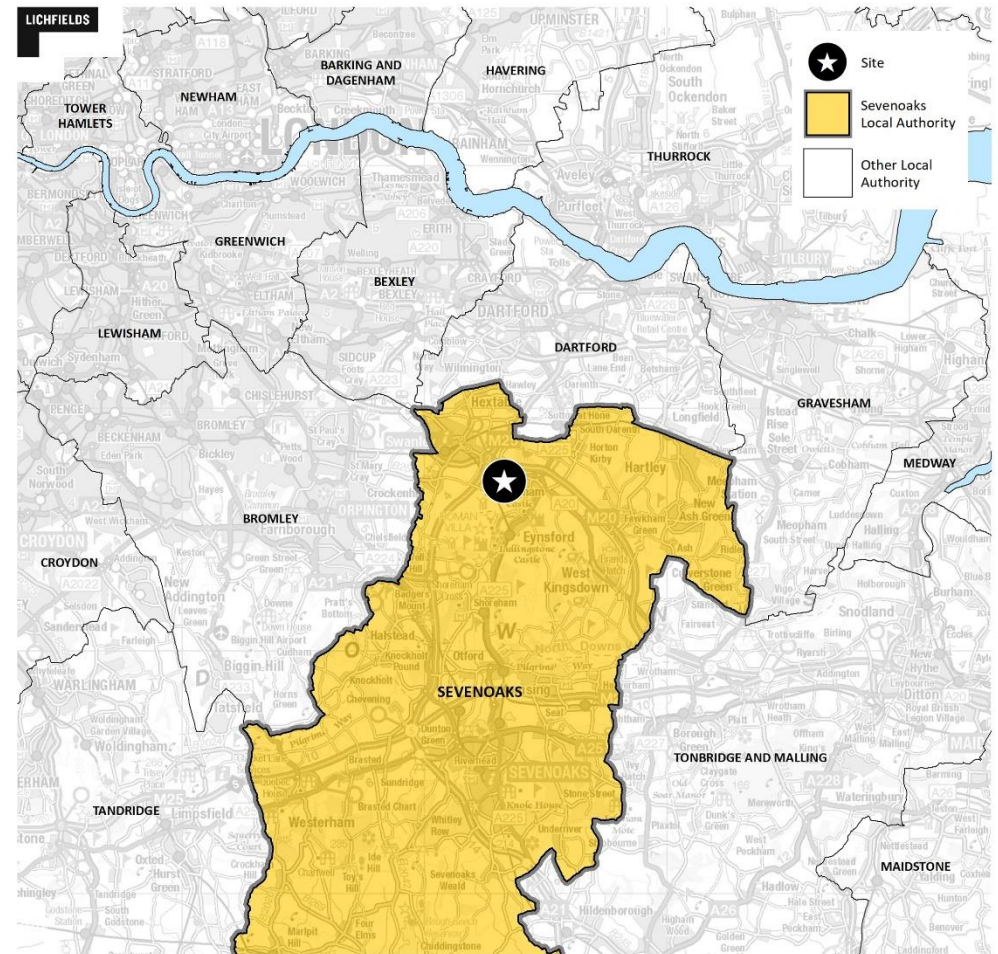
### Planning Context

The site falls within the Sevenoaks District Council area; however, it is at the northern edge of the District and is nearby to multiple other local authority planning areas. The Council's current development plan includes the Sevenoaks Core Strategy (2011) alongside the adopted Allocations and Development Management Plan (2015).

The Council prepared a new Local Plan that recognised the opportunity for development at Pedham Place (ref. MX 48). The site was identified as a broad area for future growth; with an aim to accommodate around 2,500 homes at the site. This Local Plan was submitted for examination. However, the plan was found to have failed legal requirements in relation to the 'duty to cooperate' and a new plan is now in preparation. No findings were put forward in respect of the spatial strategy and the site itself.

As part of the Local Plan preparation a Settlement Hierarchy study (April 2018) was carried out. It identified Swanley as a 'town' (one step down from the Sevenoaks Urban Area) and Farningham and Eynsford as villages, the latter being identified as having 4+ key 'sustainability services/facilities'.

The new Local Plan will need to grapple with many issues, including the housing needs of the District which – as per the Government's Standard Method – currently amounts to 715 dwelling per annum. How growth to meet housing needs will complement the existing settlement hierarchy is an important consideration.



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## 2. Community Infrastructure Audit

The site is near multiple urban centres on the edge of London. The assessment area for our analysis is generally focused on Swanley and the nearby rural villages to the south east of the site

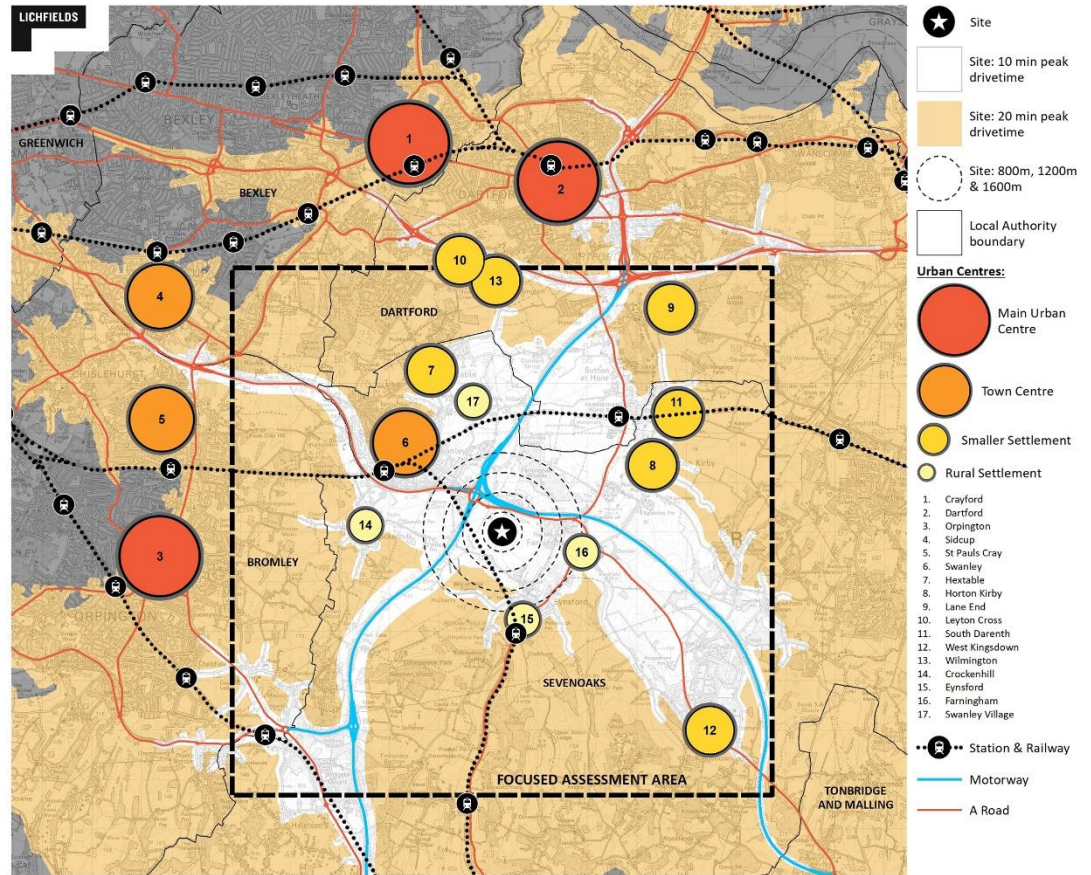
### Area of Assessment

As the adjacent map shows, Pedham Place is close to several urban centres on the edge of London. Given the large numbers of centres nearby and considering the scale of the Pedham Place, our area of community infrastructure assessment focuses principally on Swanley, Farningham and Eynsford; roughly a 5km radius from the site. This localized area of assessment is shown by the black box.

We have reviewed local education services; health services; food & beverage provision; convenience shopping & retail provision; community facilities; sports provision; local attractions, country parks and hotels; and existing levels of employment. We have also undertaken an assessment of population growth taking account of other nearby committed development.

This audit of existing social infrastructure is then benchmarked against the current and future projected population; determining whether there is existing over or under provision. It has also taken account of the former emerging Local Plans evidence base, representations made to the plan, and other sources to determine baseline provision.

See Appendix 1 and 2 for assumptions, sources, and for mapping of local infrastructure and services.



## 2. Community Infrastructure Audit

Pedham Place would increase the number of homes committed in the Local Area by around 2,500, resulting in an additional 7,000 people by 2035

### Projected Housing Delivery and Population Growth

As of 2019 there are just over 17,400 people living in Swanley (Parish) and a further 3,200 living in Eynsford and Farningham Parishes, bringing the total population in the local area to just over **20,600** as of 2019.

#### Current commitments

There are currently 950 homes committed in Swanley (including 250 homes at the Swanley Centre, 100 at Bevan Place, 80 at White Oak Leisure Centre, 74 at Kingdom Hall and 71 at Harringtons Nursery). There are a further 96 in Eynsford and Farningham (55 at Gorse Hill Nursery and 35 at Maplescombe Farm, plus a number of small sites) totalling 1,046 homes in the Local Area up to 2035 (excluding Pedham Place).

With this level of development we would expect Swanley's population to increase to nearly 19,000 by 2035 (an increase of just over 1,500) and the total population of the Local Area to increase to just over 22,300 (an increase of nearly 1,700). This is shown in Table 1 and the projected population by age in 2035 is shown in Figure 1.

#### Pedham Place

Pedham Place is expected to provide a further 2,500 homes (for the purposes of this assessment we have put these homes in Swanley Parish), commencing delivery in 2026 and completing by 2035. This would bring total provision in the area to 3,450 homes, resulting in a population growth of 8,516 in Swanley and 8,688 in the Local Area. Therefore the net impact of Pedham Place in Swanley/the Local Area is to generate an *additional* 6,994 people (compared with population growth arising solely from the other 950 committed homes), as shown in Table 1.

Figure 1 shows the biggest impact would be in the younger working age group (18-44) which would grow by an additional 3,500 people (i.e. making up around half the overall net increase) with Pedham Place.

**Table 1:** Comparison of Population and Housing Growth in Swanley and Local Area, with and without Pedham Place

		Without Pedham Place	With Pedham Place	Difference
Swanley (Parish)	Current (2019) population	17,243		
	New homes to 2035	950	3,450	<b>+2,500</b>
	Population in 2035 (change)	18,945 (+1,522)	25,939 (+8,516)	<b>+6,994</b>
Local Area (Swanley, Eynsford and Farningham)	Current (2019) population	20,638		
	New homes to 2035	1,046	3,546	<b>+2,500</b>
	Population in 2035 (change)	22,311 (+1,673)	29,306 (+8,688)	<b>+6,994</b>

Source: ONS Small Area MYEs, Lichfields analysing using PopGroup and ONS 2018-based SNPP.

**Figure 1:** Population by age in 2035 for Swanley and Local Area, with and without Pedham Place



Source: Lichfields analysing using PopGroup and ONS MYEs/2018-based SNPP.

## 2. Community Infrastructure Audit

Current services will likely be unable to be able to accommodate committed growth with or without Pedham Place. More local infrastructure is needed which Pedham Place can help deliver

### Infrastructure Capacity and Gap Analysis – (See Appendix 2 for local mapping)

Infrastructure	Baseline Provision	Surplus/Shortfall and Gaps against Baseline (existing)	Surplus/Shortfall and Gaps against Population Growth	Surplus/Shortfall and Gaps against Population with Pedham Place
Employment	The former emerging Local Plan evidence identified a shortfall of employment land across the District amounting to 11.6ha to 2035 including new allocations. There is a clear need for more employment land to service current and future needs.	<b>Shortfall</b> – need for Employment Land	<b>Shortfall</b> – need for Employment Land	<b>Shortfall</b> – need for Employment Land
Retail / food and beverage	The Sevenoaks District Retail Study (November 2016) identifies a need for additional convenience and comparison goods floorspace across the District, including a requirement for growth in Swanley. However this is relatively limited in the short term, and does not take into account the implications of Covid-19 on likely future retail spending.	<b>Shortfall</b> – need for retail floorspace	<b>Shortfall</b> – need for retail floorspace	<b>Shortfall</b> – need for retail floorspace
Leisure	Compared to the regional average, there is a shortfall of health and fitness facilities both within the District as a whole and in the local surrounding area.	<b>Shortfall</b> – need for health and fitness facilities	<b>Shortfall</b> – need for health and fitness facilities	<b>Shortfall</b> – need for health and fitness facilities
Hotels	There are a few hotels within the audit area including one in Swanley (in addition to B&Bs) and others near Brands Hatch. The 2015 ‘Tourist Accommodation Study’ identifies limited local stock, increasing demand for more hotels, and increasing occupancy rates.	<b>Shortfall</b> – limited stock identified	<b>Shortfall</b> – limited stock identified	<b>Shortfall</b> – limited stock identified
Community facilities	There are a range of local community facilities in the audit area. However, the former emerging Local Plan Infrastructure Delivery Plan notes the need to both upgrade existing and provide new facilities to accommodate growth.	<b>No Shortfall Identified</b>	<b>Shortfall</b> – local upgrades needed	<b>Shortfall</b> – local upgrades needed
Education	Locally schools are over-subscribed. Kent County Council confirmed (as part of the former emerging Local Plan) that local schools could not be expanded and that new facilities were needed to meet committed growth with or without Pedham Place.	<b>Shortfall</b> – lack of capacity	<b>Shortfall</b> – lack of capacity	<b>Shortfall</b> – lack of capacity
Health	GPs locally are well above the standard ratio of 1 GP per 1,800 patients. The former emerging Local Plan Infrastructure Delivery Plan also noted the need to build more GP surgeries and a ‘health and well being’ centre in Swanley to accommodate growth.	<b>Shortfall</b> – lack of capacity	<b>Shortfall</b> – lack of capacity	<b>Shortfall</b> – lack of capacity

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### 3. Provision at Pedham Place

Pedham will provide sufficient education facilities for future residents; from nursery to secondary school. It would also help meet wider education needs arising from other development

#### Education

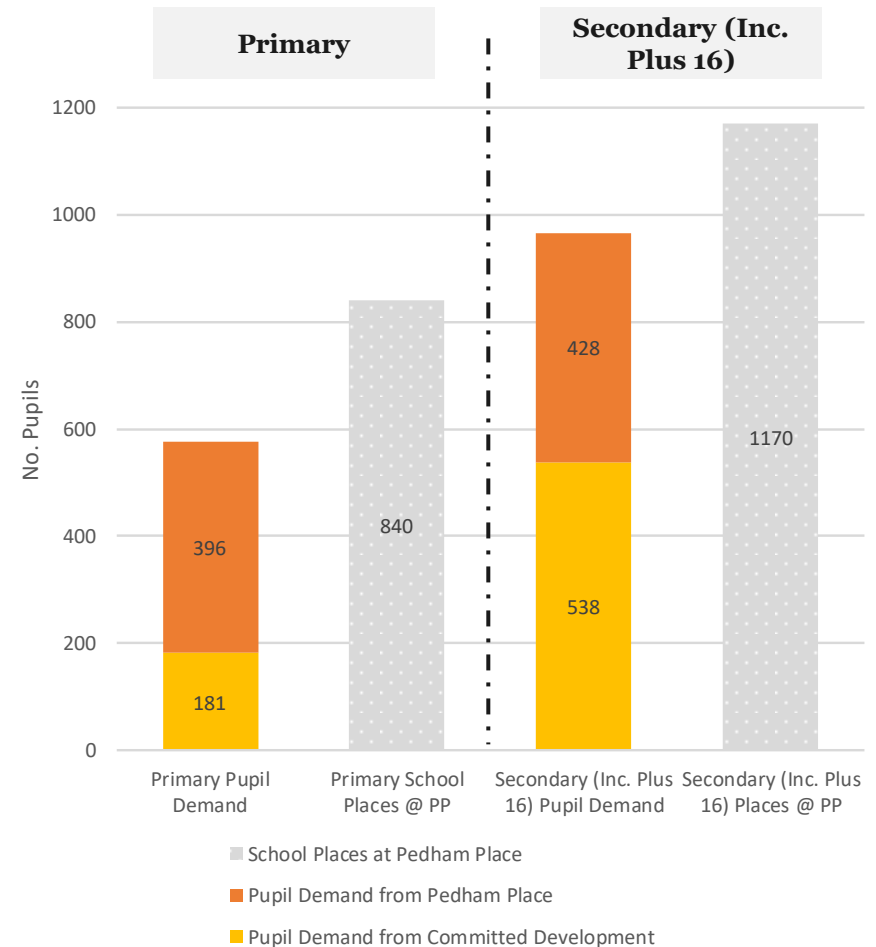
The proposed development will deliver up to 2x 2FE Primary Schools (4FE total), a 6FE Secondary School (including a 6<sup>th</sup> Form), and an Special Education Needs ('SEN') School. The schools are sized as per the latest Kent 'Education Commissions Plan' (2019-2023) which, for example, recommends secondary schools to be at least 6FE in size. The provision equates to (not including the SEN School):

- 840 Primary School Places;
- 1,170 Secondary School Places (including a 6<sup>th</sup> Form).

Against the need generated from solely Pedham Place, there is an over-provision in terms of education facilities. However, when you take in to account other committed developments its correctly sized to meet both its own demands as well as educational demands in the local area. This is against a backdrop of existing over-capacity in local schools especially at primary level. See Appendix 2 and 3 for more detail on this analysis.

New schools at Pedham Place will also provide a dual use, with sports and other facilities shared with the wider public. The development can also deliver an SEN school. Kent Education Commissions Plan (2019-2023) notes that even with existing planned for SEN schools, there is still a need to increase provision. On the basis of this analysis, Pedham Place can be a strategic solution to meet wider housing needs but also educational needs (including SEN needs) in the local area.

Our conclusion is consistent with Kent County Council's; its representation to the former emerging local plan confirming there was insufficient primary and secondary capacity in the local area. It also confirmed that without Pedham Place, primary and secondary school demand from existing commitments would not be able to be accommodated locally as there is no scope to upgrade existing schools. Pedham Place can therefore have a positive impact upon education provision and capacity in the wider Swanley Area.



### 3. Provision at Pedham Place

A health hub or GP surgery can be provided on site as well dental facilities to meet the health needs of the future community

#### Health

Our modelling projects that Pedham Place will have a population of just under 7,000 people by 2035 (when the housing development is expected to have been completed). Based on a standard of 1,800 patients per GP (Full Time Equivalent), the development would generate a need for around 4 GPs. In addition, based on a standard of 2,000 patients per dentist, the development would generate a need for 3 to 4 dentists.

In addition, when taking account of other developments in the immediate local area these are projected to increase the local population by a further c.3,200 people in 2035. Using the same standard ratio for GPs and dentists, this increase in population would generate a demand for around 2 GPs and 1 to 2 dentists irrespective of Pedham Places' delivery.

#### Is there capacity in the local area to meet this growth?

In the immediate and wider local area, our baseline assessment shows that most GPs are oversubscribed. Locally, the Braeside Surgery in Farningham currently has 2,446 patients per FTE GP while The Cedars Surgery in Swanley has a ratio of 3,417. Clearly, there is a need for enhanced health facilities locally. In respect of Dentists, there are 5 surgeries in the local area but we do not have the data for the number of practitioners in each.

#### Provision at Pedham Place

Pedham Place can deliver a health hub or GP surgery in its District Centre. This is to both provide for the needs of local community but also a place-making tool to increase activity in the centre. The health hub can be sized to meet the needs of Pedham Place alone (i.e. c.4 GPs and 3-4 Dentists) or be sized to help meet wider local health needs. Whether or not Pedham Place meets wider local needs will depend on the anticipated delivery by the local CCG of an additional 7 GPs practices in the northern area and the potential development a new 'health and well being centre' in Swanley (as set out in the Sevenoaks Infrastructure Delivery Plan, 2019).

	Population Growth	GP Requirements	Dentist Requirements
<b>Standard</b>	~	1 GP per 1,800 Patients	1 Dentist per 2,000 Patients
<b>Committed Development</b>	c. 3,200 Persons	Additional 2 GPs	Additional 1 to 2 Dentists
<b>Pedham Place</b>	c. 7,000 Persons	Additional 4 GPs	Additional 3 to 4 Dentists



### 3. Provision at Pedham Place

To provide day-to-day needs, a new District Centre will be provided at the heart of Pedham Place. This will include retail floorspace commensurate to the new population

#### Retail / Food and beverage

Our assessment has made assumptions about the amount of retail and food and beverage expenditure generated by the Pedham Place population and how much resident expenditure within the local area is likely to be retained (see Appendix 3). The assumptions have taken into account the location of existing facilities and development. This has then been used to estimate the appropriate amount of floorspace within the centre.

In total, we estimate that the District Centre could support around 2,400 sqm gross. The breakdown of floorspace and final mix may change within the development.

The role of the District Centre would be limited to a more local offer, catering to the day to day needs of residents. The centre is likely to include a small supermarket (i.e. metro sized store), and other convenience goods stores; such as independent shops, greengrocers, newsagents etc, comparison goods stores, such as a pharmacy, plus food and beverage outlets such as a café or take away and service uses such as a post office, hairdresser etc.

Proposed Floorspace breakdown	Sqm (gross)
Supermarket	800
Other convenience goods	300
Comparison goods	600
Food and beverage	450
Other service uses	250
<b>Total</b>	<b>2,400</b>

The level of trade diversion and impact caused by the development will depend on the scale of floorspace and the timing of development. The projections assume most of the District Centre's turnover will be generated by new residents within Pedham Place, rather than the local populations from Swanley, Eynsham or Farningham.

Our assessment concludes, that there would be no adverse impact on Swanley or other nearby centres caused by the proposed size of new floorspace within Pedham Place. Indeed, the expenditure generated by residents within Pedham Place will benefit rather than harm existing designated centres, because not all of the new expenditure will be taken by the District Centre. This benefit will help to offset trade diverted from existing shopping destinations: i.e. the net effect will be beneficial to those existing destinations.



### 3. Provision at Pedham Place

A new leisure centre (in addition to the redevelopment of the White Oak Leisure Centre) can help meet the wider leisure needs of the District

#### Leisure

The Sport England/Active Places data indicates that there are four registered health and fitness suites in the 5km radius, with 183 fitness stations in total. Three of these facilities are open for the public to register as members and one is a ‘pay and play’ facility. With the current population in 2019 in the 5km radius of 37,412, this indicates that the study area has about 4.9 fitness stations per 1,000 people.

Name	Type	No. of stations
Birchwood Park Golf Club	Registered Members	56
Mercure Dartford Brands Hatch Hotel	Registered Members	50
Utopia Spa (Rowhill Grange)	Registered Members	19
White Oak Leisure Centre	Pay and Play	58
<b>Total</b>		<b>183</b>

For Sevenoaks District as a whole, the Sport England/Active Places data indicates that there are 14 registered health and fitness suites providing 390 fitness stations. With a population of 120,800 in 2019, this equates to just 3.2 fitness stations per 1,000 people.

The existing provision of registered health and fitness suites equates to around 7.2 fitness stations per 1,000 people in the South East region. This suggests that provision in both the 5km radius and Sevenoaks District as a whole has a lower-than-average provision. If provision within the 5km radius increased to 7.2 stations per 1,000, the study area could theoretically support a total of 269 stations, 86 higher than the existing provision in the study area.

Planning permission has been granted for a new White Oak Leisure Centre in Swanley Town Centre. The new centre would re-provide enhanced facilities in place of the existing provision; for which this development could provide contributions to.

Growth in population between 2019 and 2035 in the study area, including Pedham Place, is +9,234 people. This additional population could support a further 66 fitness stations based on the South East regional average (7.2 stations per 1,000 people). The population of Pedham Place by 2035 (6,994) on its own could support around 50 fitness stations.

While there will be residents within the study area who will use facilities elsewhere, there is scope for an additional medium sized gym (up to 100 stations) within Pedham Place by 2035. This would make up for losses as part of the area and would not be detrimental to the White Oak Leisure Centre given wider local shortfalls.



### 3. Provision at Pedham Place

Pedham Place can provide community, sports facilities, and open space to meet its future residents needs without being detrimental to other nearby services and spaces

#### Community and Sports/Open Space Provision

##### Community Spaces

Pedham Place is expected to generate a need for 1 to 2 formal community spaces based on a standard of 1 space per c.4,000 residents. Schools will also be dual purpose to provide community spaces. In addition, the Council’s latest Infrastructure Delivery Plan (2019) noted the need for a new library and youth facility at Pedham Place. This delivery is alongside other facilities to support expected growth around Swanley; so the delivery of new services at Pedham would not preclude or prejudice the improvement/development of existing/proposed nearby facilities.

##### Sports/Open Space

The development will provide for a range of formal and informal open spaces that will also provide sports provision. Schools will also be dual purpose providing community access to sports facilities. Based on ‘Fields in Trust’ guidance, the development will need to provide for c.15ha of formal outdoor spaces (including equipped play areas) and 22.4ha of informal outdoor spaces (including parks, amenity space, and natural greenspace).

The exact quantum of open space and sports facilities (in addition to leisure facilities) to be provided will be formalised as the design progresses. At present, approximately 45ha of land will deliver varied landscapes as part of AONB enhancements that can help meet ‘Fields in Trust’ guidance. New sports facilities will also be sized to ensure the loss of the existing golf course and leisure functions (as set out earlier) is justified. Further work will be undertaken to justify the loss of the golf course taking account of other provision in the local area.

	Provision at Pedham Place
<b>Formal Community Spaces</b>	<ul style="list-style-type: none"><li>• 1 to 2 formal community spaces</li><li>• Library</li><li>• Youth Centre</li></ul>
<b>Formal Outdoor Spaces</b>	15ha minimum requirement
<b>Informal Outdoor Space</b>	22.4ha minimum requirement



### 3. Provision at Pedham Place

In total, Pedham Place could deliver around c. 35,500 sqm of new employment floorspace. This floorspace along could generate c. 1,180 jobs; supporting economic growth

#### Employment, Jobs and Economic Output

As part of the Pedham Place development, employment space will be delivered to provide jobs for the new and wider local community. In total, Pedham Place will deliver c.8,550 sqm of office/managed work spaces (Class E) (c.1.7ha of land) and c.26,940 sqm of light industrial/research and development/warehousing space (Class E, Class B2, Class B8) (c.7.7 ha of land). In total, this equates to c. 9.4 ha of land. Analysis of local employment needs is included at Appendix 3.

Based on an assumed split of floorspace (see Appendix 3) this employment floorspace alone would generate c. 1,180 jobs total (1,081 FTE jobs). These uses would also generate an economic output of c. £101.4 million GVA per annum.

Taking account of other uses proposed at Pedham Place (i.e. retail, health, schools etc.), it could support c.1,622 jobs (1,381FTE jobs); with an annual economic output of £116 million GVA.

#### How does this relate to the population of Pedham Place?

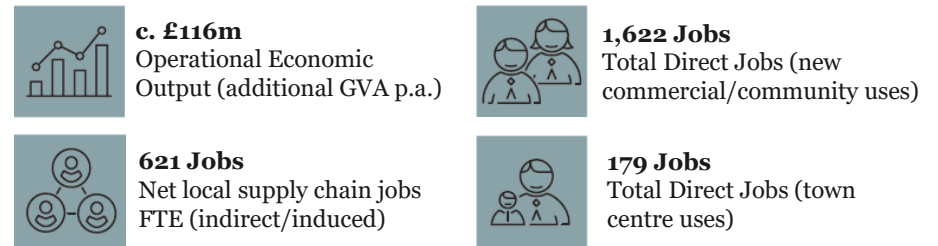
Of the projected c.7,000 Pedham residents in 2035, c.4,700 will be of an economically active age (ages 18 to 64). Of these, we would expect c.83% to be economically active (i.e. the District economic activity rate of Jan to Dec 2019 - prior to the pandemic): equating to 3,901 persons. Therefore, Pedham Place will provide 1 job for every 0.42 expected economically active residents.

The settlement would therefore not provide a 1-to-1 ratio of jobs to employment needs from the population, but in this location it would be expected that some people commute for work, either to other nearby locations, including Swanley, or further afield to London. Equally, we would also expect that a significant number of future residents would work from home or a local flexible workspace given likely long-term structural shifts in working patterns. In this respect it is considered Pedham Place would create an appropriate balance.

#### What sectors are likely to be attracted?

Likely sectors to be attracted to the new employment uses include construction, business administration & support services, and manufacturing. In addition, its likely that it would support transport and storage uses; making best use of the M25 and M20 connection. Further analysis is included at Appendix 3.

#### Pedham Place Economic Output & Jobs



### 3. Provision at Pedham Place

Based on existing commuting patterns, many future workers will likely look towards London and the immediate local area. Pedham Place can support these flows with sustainable travel options

#### Commuting Patterns

##### What are existing commuting patterns?

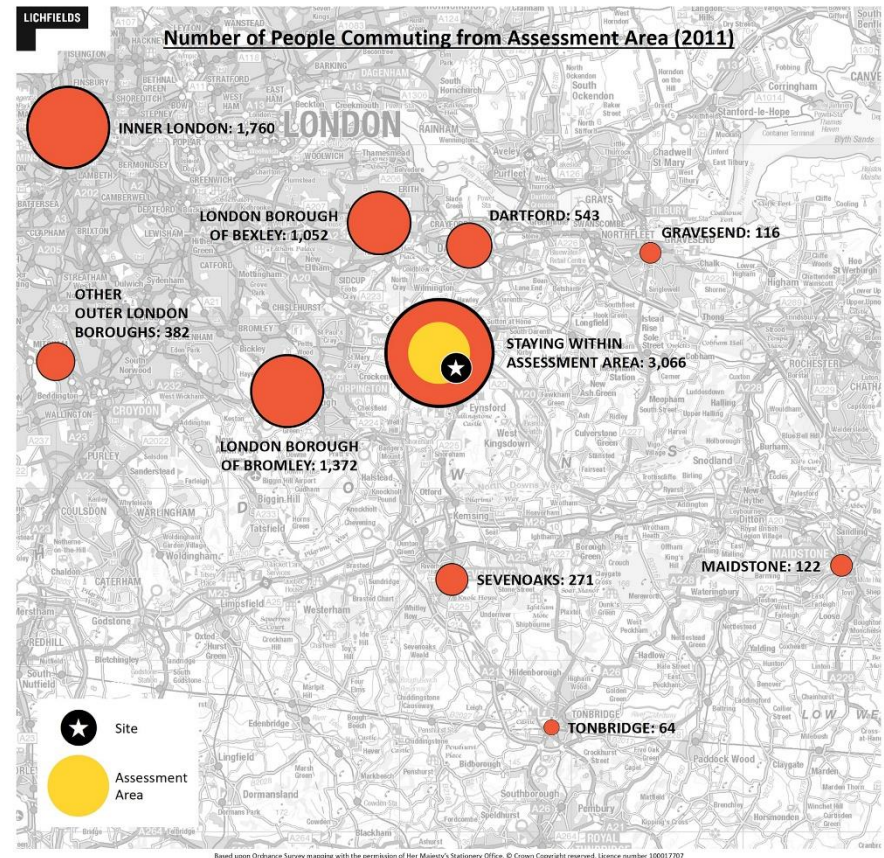
Based on the latest available data from the 2011 Census (see Appendix 3 for more detail), workers in the local assessment area (based on MOSAs and LSOAs) mainly look towards London for work; with more working in a London Borough than those staying in the assessment area for work. The strongest flows of commuting are to inner London Boroughs followed by strong flows to both the London Borough's of Bexley and Bromley. Outside London, flows are mainly focused towards Dartford to the north rather than Sevenoaks to the south.

For people working in the assessment area, most in-commuters come from the wider Sevenoaks District, followed by Dartford, Bexley and Bromley local authority areas. Akin to out-commuting, there is a stronger relationship with South East London and Dartford compared to the wider Kent area to the south and south east.

##### How will Pedham Place support sustainable commuting?

Taking account of existing patterns of commuting, it is likely that most residents will look to work within London. A transport hub is proposed at Pedham Place that will provide a new 'park & ride' to Swanley train station and new pedestrian/cycle access will also be provided. In addition, improved access routes to Eynsford station may also provide options for to further sustainable transportation by rail. Both can help sustain the likely draw of commuting towards London while also enabling commuting south towards Sevenoaks. Bus services can also be provided to other nearby centres and improved local pedestrian/cycle access to nearby and on-site employment.

It is likely commuting patterns will have changed from the 2011 Census; particularly as a result of the COVID-19 pandemic. With a shift to more flexible patterns of work – with many working from home or local flexible office space – there is likely to be less demand for commuting from some sectors. These changing patterns of commuting can be taken into account as a detailed masterplan develops.



### 3. Provision at Pedham Place

Community infrastructure and uses proposed at Pedham Place is either sized to either meet induced demand, to have wider District benefits, or to ensure no negative wider impact

#### Summary of Proposed Provision

Infrastructure	Surplus/Shortfall and Gaps against Baseline	Infrastructure Provision at Pedham Place		Pedham Place's Infrastructure Impact
Education	<b>Shortfall</b> – lack of capacity	<ul style="list-style-type: none"> <li>• SEN School</li> <li>• 2x 2FE Primary School</li> <li>• 6FE Secondary School (Inc. +16 facilities)</li> </ul>	Pedham Place can deliver nurseries, an SEN school, primary and secondary education facilities. This delivery can provide a strategic solution to meet wider housing needs but also educational needs in the local area.	<b>Wider Benefit</b> – Sized to meet wider shortfalls.
Health	<b>Shortfall</b> – lack of capacity	<ul style="list-style-type: none"> <li>• Health Hub (at least 4 GPs and 3 to 4 Dentists)</li> </ul>	Pedham Place will deliver at least a local 'health hub' or GP surgery/Dentist in the local District Centre. There is also scope to meet wider needs should this be required noting that there is other local planned for provision.	<b>Sized to meet Pedham demand</b> – Also scope to meet wider needs.
Retail	<b>Shortfall</b> – lack of capacity	<ul style="list-style-type: none"> <li>• Supermarket (800 sqm gross)</li> <li>• Other small retail units (900 sqm gross)</li> </ul>	The role of the District Centre within Pedham Place should be to cater to day to day needs of residents, and is likely to provide a small supermarket plus other smaller convenience and comparison units along with a range of service uses. The centre will be of a scale to ensure it does not adversely impact on existing centres, including Swanley Town Centre.	<b>Sized to ensure no wider negative impact</b> – Including appropriate phasing. Wider benefits also given not all demand met at Pedham.
Food and beverage	<b>No shortfall identified</b>	<ul style="list-style-type: none"> <li>• Food and beverage outlets (450 sqm gross)</li> </ul>	The District Centre should include a range of food and beverage outlets, which could include a coffee shop, café, restaurant, pub or take away.	<b>Sized to ensure no wider negative impact</b> – Including appropriate phasing.
Leisure	<b>Shortfall</b> – lack of capacity	<ul style="list-style-type: none"> <li>• Medium sized gym (up to 100 stations)</li> </ul>	There is an existing shortfall in health and fitness facilities in the local area (even with the new White Oak Leisure Centre), and the provision of a new medium sized gym within Pedham Place will help to meet this need.	<b>Wider Benefit</b> – Will meet induced demand but also help deliver improved White Oak facility.
Hotels	<b>Shortfall</b> – limited stock identified	<ul style="list-style-type: none"> <li>• 150 – 200 bed hotel</li> </ul>	A new hotel will help meet wider shortfalls identified as part of the former emerging Local Plan. This will also support the employment land function at Pedham Place.	<b>Wider Benefit</b> – Will help meet wider shortfalls.
Employment	<b>Shortfall</b> – need for Employment Land	<ul style="list-style-type: none"> <li>• c. 8,550 sqm office</li> <li>• C. 26,940 sqm (Class E/B2/B8)</li> </ul>	There is a significant District wide shortfall in employment land. Pedham can deliver a range of employment uses: from flexible office work spaces to warehousing and manufacturing making best use of its well connected location.	<b>Wider Benefit</b> – Will help meet wider shortfalls.
Community facilities	<b>No Shortfall Identified</b>	<ul style="list-style-type: none"> <li>• 1 to 2 Spaces</li> <li>• Library</li> <li>• Youth Centre</li> </ul>	The delivery of community facilities at Pedham will meet the demand of new residents. New schools will also be dual use to provide additional community space.	<b>Sized to meet Pedham demand</b> – Also scope to meet wider needs.

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# 4. Settlement Roles and Hierarchy

Pedham Place will be a settlement in its own right, with uses and infrastructure to serve its population. New uses are sized though to complement, not outcompete, nearby Swanley

## Role and Benefits of Pedham Place

From our analysis, Pedham Place would become a new ‘Town’ in the District’s settlement hierarchy. It would be a settlement more akin to the size of Edenbridge than nearby larger Swanley. It would therefore be subservient to Swanley – which has a greater population and more comprehensive service provision – and have a close relationship with nearby Eynsford and Farningham, but would work to complement the existing three settlements, rather than detract. Its role in strategic planning terms would be to provide much needed new homes (including affordable and elderly), new infrastructure, and new employment opportunities as well as a series of other benefits (below) which would work to improve the overall standard of infrastructure in the wider area.

	2,500 new homes, including affordable and elderly homes		Nursery, SEN, Primary, and Secondary education facilities
	New town centre, with a range of uses		Health centre enhancing local primary health service provision
	Flexible community space, providing a focus for a range of activities		Enhancing public transport accessibility
	New modern offices and flexible workspaces		Light industrial, R&D, and warehousing space
	Sports & leisure facilities, plus a contribution to White Oak		Complimentary AONB improvements, new open spaces, biodiversity net gain

## Pedham Place – Swanley Relationship

Key to the successful delivery of Pedham Place is to ensure a complementary relationship with Swanley. There is a key requirement that new provision at Pedham Place is correctly sized and phased such that it does not undermine services or regeneration within Swanley. However, our analysis demonstrates that a complementary relationship can be achieved and maintains.

The analysis in this report demonstrates that the uses and community infrastructure provision at Pedham Place are not sized to a point where it would undermine or preclude Swanley’s primacy. Most uses will either meet the new settlements own needs, provide wider District level benefit, or will be sized to ensure no negative impact to Swanley. For example:

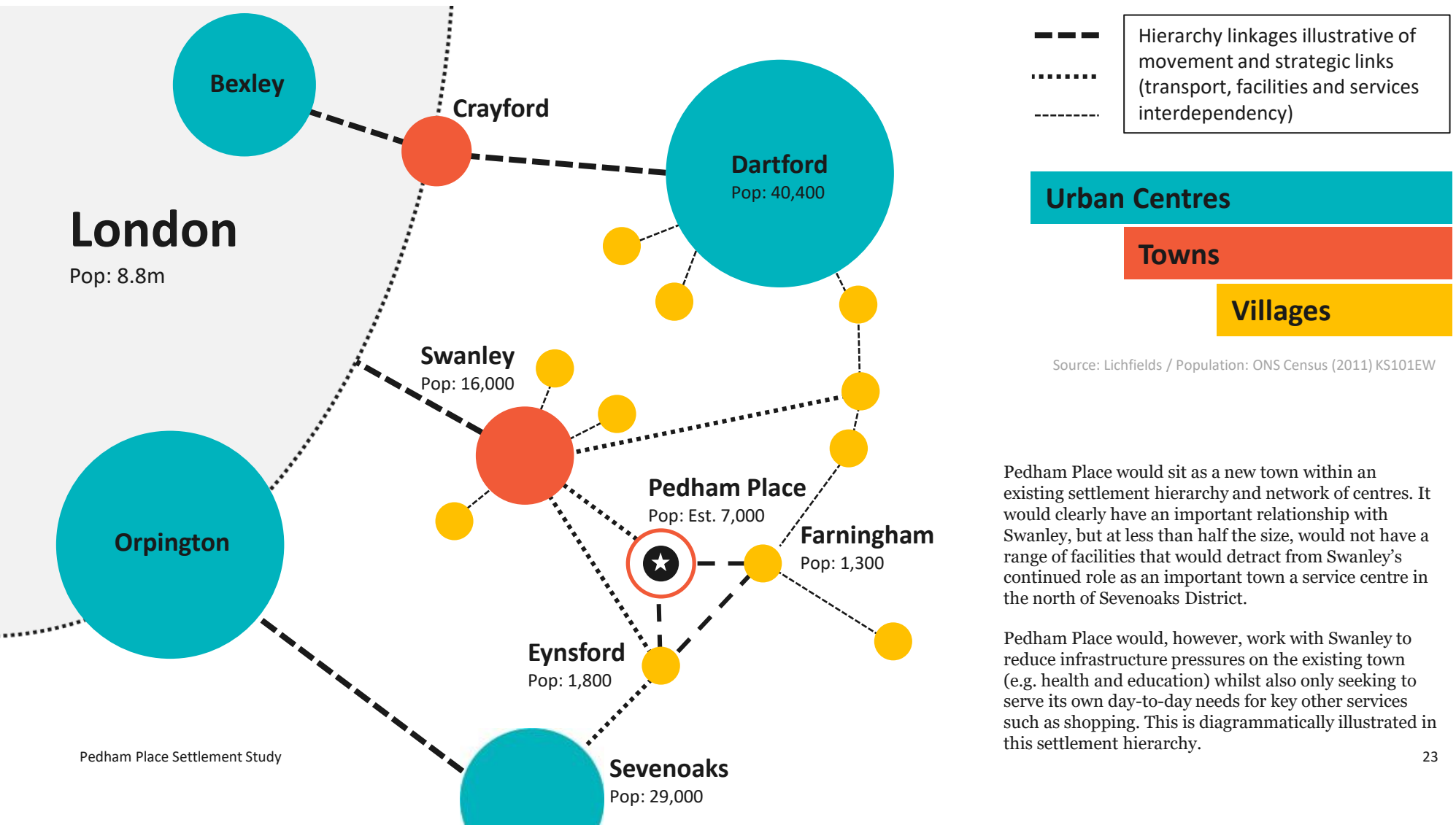
- The new town centre uses are sized and can be appropriately be phased so as not to divert trade from Swanley, taking account of expected expenditure growth;
- New education facilities will help meet wider shortfalls that cannot be met through expansion in Swanley, providing a wider net benefit, ensuring from arising needs committed development in and around Swanley to be met; and
- Health facilities can be sized to meet the needs from Pedham Place alone or help meet wider needs should it be required to accounting for proposed expansions.

The development will also provide contributions to improve Swanley; including contributions to the White Oak Leisure Centre and train station upgrades.

The two settlements will be physically separated by the M25. While new pedestrian and bus links would be provided and there will be some cross-utilisation of the two towns facilities, we expect Pedham Place will have a greater symbiotic relationship with nearby Eynsford and Farningham. These villages will benefit from improved local infrastructure and new sustainable travel options within Pedham Place. Overall, we conclude a positive relationship between the two settlements can be achieved.

## 4. Provision at Pedham Place

Pedham Place would sit as a new town within the settlement hierarchy, below Swanley, with strategic links between the nearby local villages of Eynsford and Farningham



Pedham Place would sit as a new town within an existing settlement hierarchy and network of centres. It would clearly have an important relationship with Swanley, but at less than half the size, would not have a range of facilities that would detract from Swanley’s continued role as an important town a service centre in the north of Sevenoaks District.

Pedham Place would, however, work with Swanley to reduce infrastructure pressures on the existing town (e.g. health and education) whilst also only seeking to serve its own day-to-day needs for key other services such as shopping. This is diagrammatically illustrated in this settlement hierarchy.

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## 5. Summary and Conclusion

A settlement in its own right that can deliver wider housing and economic benefits; complementing nearby Swanley and benefiting the local area

### Conclusions

This report has considered the role and function of Pedham Place: a proposed new settlement comprising of c.2,500 homes alongside community infrastructure, a District Centre, and employment land. It provides a sound and robust evidential basis upon which the site can be taken forward through to an allocation in a new District Local Plan; demonstrating it can be a complementary development can be achieved to help meet acute housing needs, provide a local economic boost, and enhance local community infrastructure provision.

#### The assessment's key findings:

1. Pedham Place is well located at the key junction of the M25 and M20. It is to the south of Swanley and is physically separated by the motorway network. By 2035, the new settlement would have a population of c.7,000 people.
2. In the local area, there is currently a shortfall in capacity for most community infrastructure; including education and health facilities. Taking account of planned for growth, existing facilities are unable to meet the demands of a growing population: with or without development at Pedham Place. Development at Pedham Place can help meet these demands without prejudicing the primacy of nearby Swanley.
3. In respect of education facilities, the new settlement would include 2x 2FE primary schools, a 6FE secondary school, and an SEN school. Without Pedham Place, there is not sufficient local capacity to meet committed growth as nearby schools are at capacity and cannot be upgraded. Pedham Place therefore provides a strategic solution to meeting these needs.
4. There is also a local shortfall in health services, with a need to provide additional GP capacity. The local CCG plan on delivering an additional 7 practices in the local area and Pedham Place will deliver a new health hub/GP surgery in its District Centre. It can be sized to meet the needs of Pedham Place alone or help meet wider needs if required.

5. Based on Experience forecasting, Pedham Place can deliver a District Centre with a total of 2,400 sqm – including a small supermarket (800 sqm) – without adversely impacting nearby centres. Indeed, expenditure growth will benefit rather than harm existing designated centres, because not all of the new expenditure will be taken by the District Centre. This benefit will help to offset trade diverted from existing shopping destinations.
6. The new settlement would include c.9.4ha of employment land from Class E offices to a range of light industrial, research/development, and warehousing space. In combination with community and other uses, the settlement would support c.1,600 jobs (not accounting for home working) with an annual operational economic output of c.£116m (GVA). This employment land would help meet local deficits in employment land supply.

#### Role and relationship with Swanley:

Key to the successful delivery of Pedham Place is to ensure a complementary relationship with Swanley. The analysis in this report demonstrates that the uses and community infrastructure provision at Pedham Place are not sized to a point where it would undermine or preclude Swanley's primacy. Most uses will either meet the new settlements own needs, provide wider District level benefit, or will be sized to ensure no negative impact to its neighbour.

Importantly, the two settlements are physically separated by the motorway network. While new links will be provided, we expect the new settlement will equally look towards nearby Eynsford and Farningham, together providing a varied set of local services and facilities. These villages will benefit from improved local infrastructure and new sustainable travel options within Pedham Place. Improved links to these villages – such as the Eynsford train station – can be explored further as the design progresses.

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# Appendix 1: Community Infrastructure Audit

## Benchmarks and Sources

Infrastructure	Unit of Measurement/Benchmark Assumptions	Source
Education		
Early years	<ul style="list-style-type: none"> <li>30% of infants (0-4 years) require nursery provision at any given time</li> <li>Benchmark nursery size of c.50 children per nursery</li> </ul>	<ul style="list-style-type: none"> <li>Based on guidance in <a href="#">Hampshire CC</a></li> </ul>
Primary	<ul style="list-style-type: none"> <li>30 pupils per Form of Entry (FE), 7 year groups (reception to year 6)</li> <li>2FE to 3FE school size (420 to 630 pupils)</li> </ul>	<ul style="list-style-type: none"> <li>Building bulletin 103: <a href="#">Area Guidelines for Mainstream Schools</a></li> <li>Local Capacity data from: <a href="https://get-information-schools.service.gov.uk/">https://get-information-schools.service.gov.uk/</a></li> <li><a href="#">INS001 Sevenoaks District Infrastructure Delivery Plan (March 2019)</a></li> <li>KCC – Commissioning Plan for Education Provision in Kent 2021</li> <li>KCC Comment to Policy T1 (ref. LPS2010)</li> </ul>
Secondary (incl Post-16)	<ul style="list-style-type: none"> <li>30 pupils per Form of Entry (FE), 6.5 year groups (year 7 to half size year 13)</li> <li>5FE to 8FE school size (975 to 1,560 pupils)</li> </ul>	
Health and Community		
GPs	<ul style="list-style-type: none"> <li>1 GP per per 1,800 population</li> <li>Up to 8 GP's per surgery</li> </ul>	<ul style="list-style-type: none"> <li>HU DU Model</li> <li>Local Capacity data from: <a href="#">General Practice Workforce Interactive Workboard</a></li> </ul>
Dentists	<ul style="list-style-type: none"> <li>1 Dentist per 2,000 population</li> </ul>	<ul style="list-style-type: none"> <li>Department of Health benchmark - NHS Dental Statistics for England 2014/15</li> <li>Local Dentists from: <a href="https://www.nhs.uk/service-search/find-a-dentist">https://www.nhs.uk/service-search/find-a-dentist</a></li> </ul>
Community Centres/Spaces	<ul style="list-style-type: none"> <li>Benchmark of 1 centre per 4,000 persons (“centres” encompass a range of different formats/uses e.g. could be sports pavilion, could be village hall, could be sports hall, could be multi-use)</li> </ul>	<ul style="list-style-type: none"> <li>Barton, Grant and Guise (2003) Shaping Neighborhoods: A Guide for Health, Sustainability and Vitality</li> <li><a href="#">INS001 Sevenoaks District Infrastructure Delivery Plan (March 2019)</a></li> </ul>

# Appendix 1: Community Infrastructure Audit

## Benchmarks and Sources

Infrastructure	Unit of Measurement/Benchmark Assumptions	Source
Open Space/Sport		
Formal Outdoor	<ul style="list-style-type: none"> <li>2.15ha per 1,000 population comprising:               <ul style="list-style-type: none"> <li>1.6ha outdoor sports (incl. 1.2ha playing pitches)</li> <li>0.25ha equipped/designated play areas</li> <li>0.3ha other outdoor (e.g. MUGAs, skate park etc.)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Fields in Trust - <a href="#">Guidance for Outdoor Sport and Play Beyond the Six Acre Standard</a></li> <li>Sport England Active Places Database - <a href="https://www.activeplacespower.com/">https://www.activeplacespower.com/</a></li> </ul>
Informal Outdoor	<ul style="list-style-type: none"> <li>3.2ha per 1,000 population comprising:               <ul style="list-style-type: none"> <li>0.8ha parks and gardens</li> <li>0.6ha amenity green space</li> <li>1.8ha natural and semi-natural greenspace</li> </ul> </li> </ul>	
Leisure	<ul style="list-style-type: none"> <li>7.2 fitness stations per 1,000 population (South East average)</li> </ul>	
Retail		
Retail, Shops and Services (Use Class E)	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">ECO002 Sevenoaks District Retail Study (November 2016)</a></li> <li>Experian's Retail Planner Briefing Note 18, October 2020</li> </ul>
Employment		
Employment Land and Employment	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li>BRES (2019)</li> <li><a href="#">ECO001 Sevenoaks District Economic Needs Study (August 2016)</a></li> </ul>
Hotels		
Visitor Accommodation	<ul style="list-style-type: none"> <li>n/a</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">ECO004 Sevenoaks District Tourist Accommodation Study (September 2015)</a></li> </ul>

# Appendix 2: Community Infrastructure Audit

## Mapping local provision

### Education

Locally, most schools are concentrated to the north east in Swanley and further north. As can be seen, the vast majority of schools near or over capacity. The closest school to the site is the Anthony Roper Primary School in Eynsford. Kent County Council has already confirmed local schools unable to expand.



### Health

Nearby there are very limited health facilities with only a few GPs – all of which are over subscribed – and a few dentists. The nearest hospitals are the Darent Valley, Queen Mary, Princess Royal, and the Orpington hospitals.

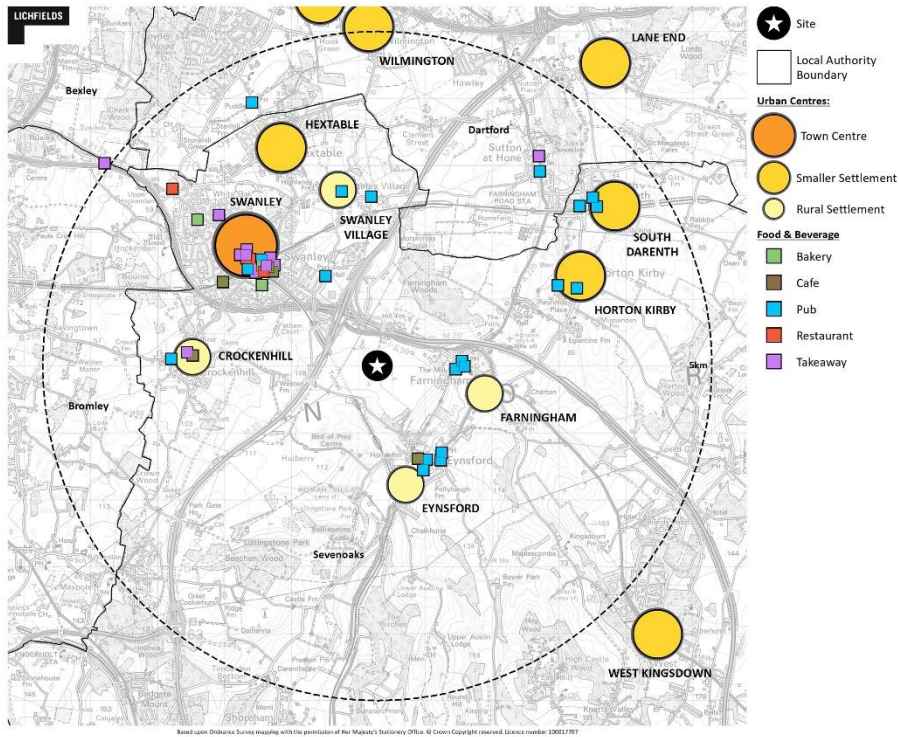


# Appendix 2: Community Infrastructure Audit

## Mapping local provision

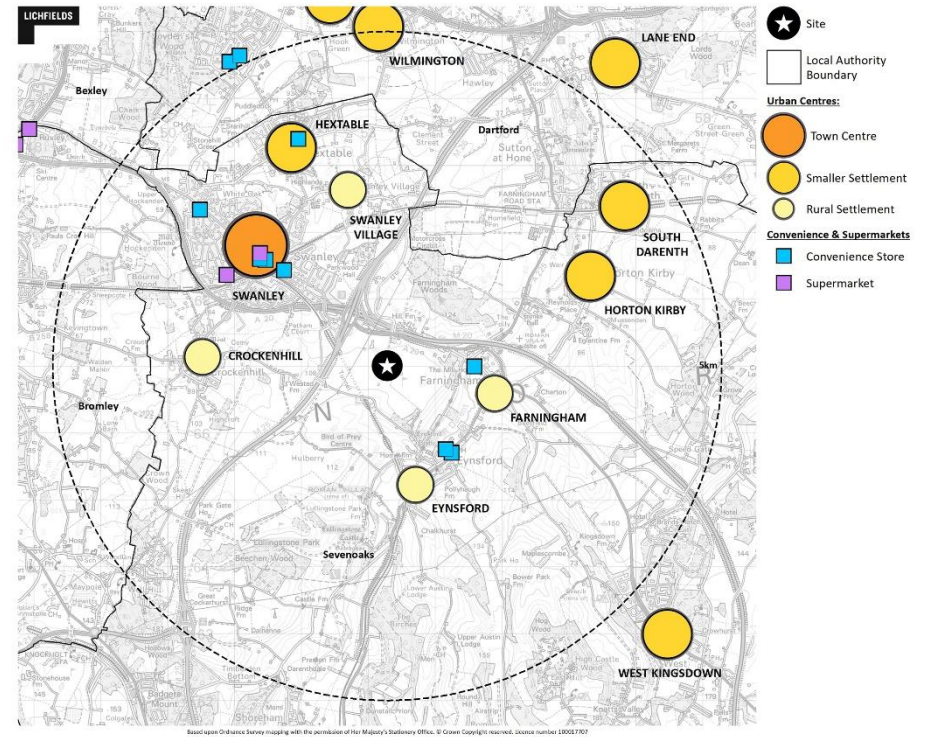
### Food and Beverage

Locally, there are a range of food and beverage outlets near to the site. These are primarily focused in and around Swanley town centre; as are a number of nearby country pubs and cafes in Farningham and Eynsford.



### Convenience Shopping & Comparison Retail

Nearby to the site, the closest supermarkets are located in Swanley town centre. This is also where local comparison retail is concentrated in. There are a few local convenience shops – such as local butchers and a local village store – in Eynsford and Farningham.

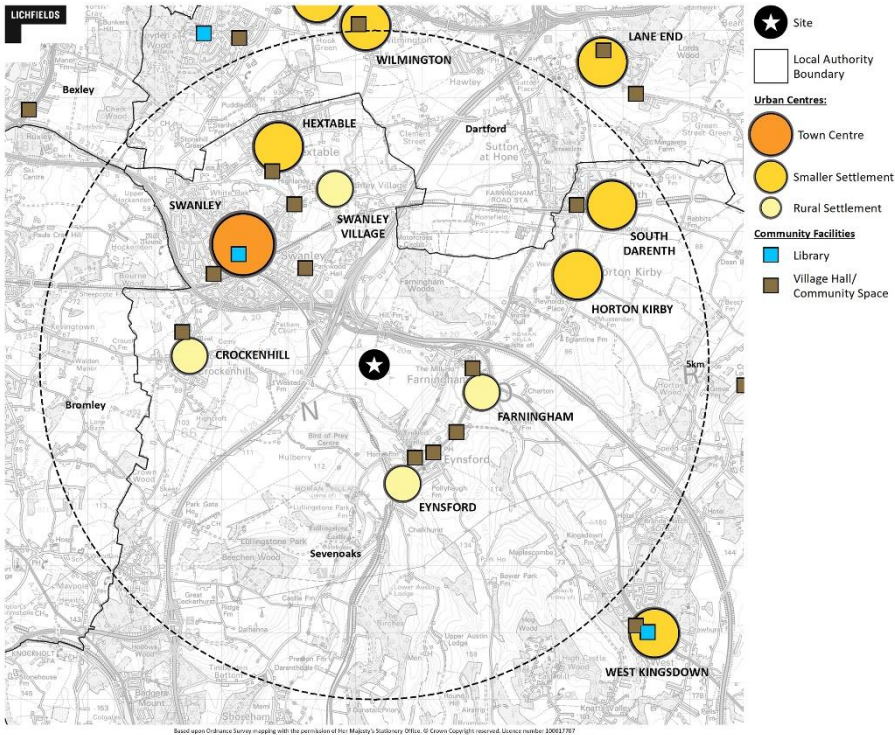


# Appendix 2: Community Infrastructure Audit

## Mapping local provision

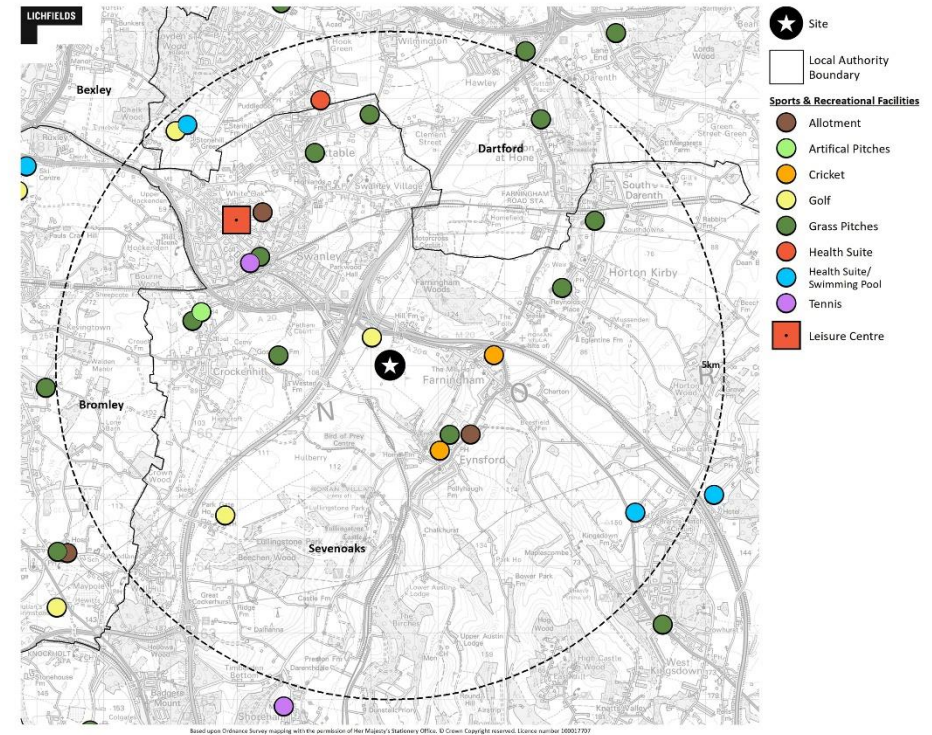
### Community Facilities

Most community facilities nearby are village halls and scout huts in local villages. There are also larger community facilities – such as the Alexandra Suite – in Swanley where there is also the closest local library.



### Sports Facilities and Allotments

There are a full range of sports facilities nearby the site. These range from golf courses, football grounds, and cricket greens. The closest leisure centre is in Swanley – The White Oak Leisure Centre – which has a range of sports facilities including a swimming pool.

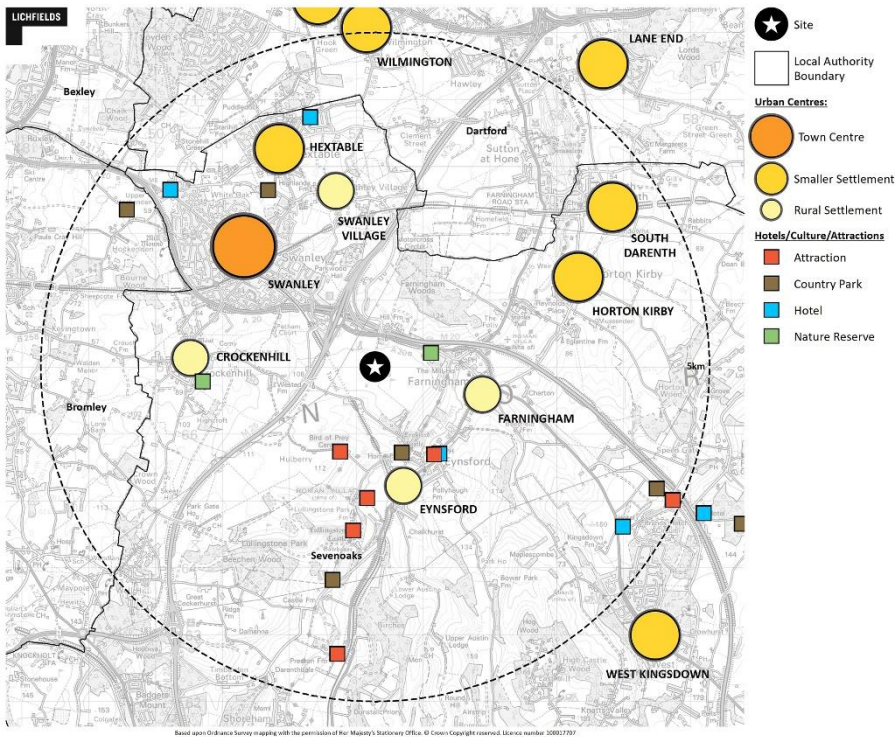


# Appendix 2: Community Infrastructure Audit

## Mapping local provision

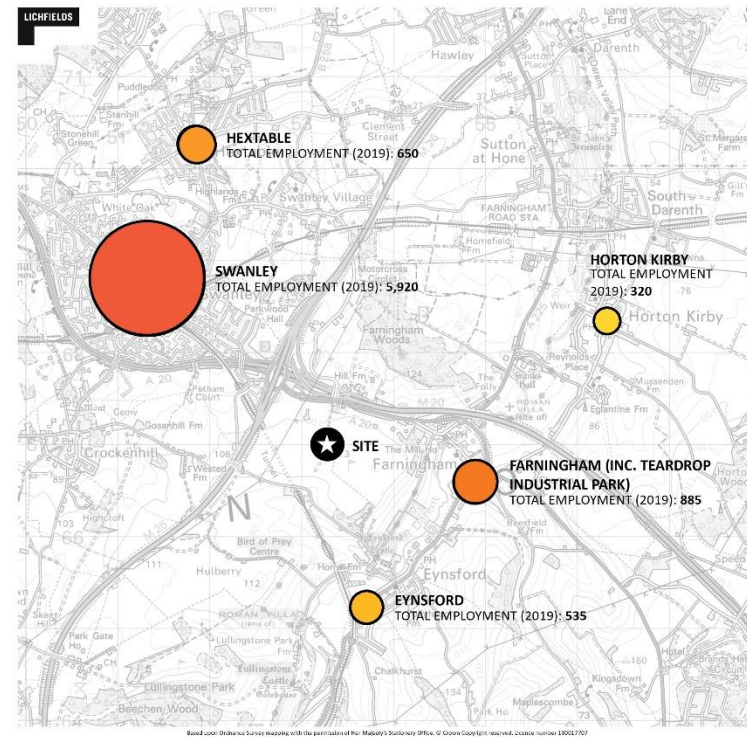
### Local Attractions, Country Parks and Hotels

The site is situated near several local cultural attractions and landmarks. This includes country parks and other green spaces such as Swanley Park, Cray Valley Park, and Centenary Wood. Brands Hatch race circuit is nearby served by hotels. There are also a number of nearby attractions such as Eynsford Castle.



### Local Employment

The below maps BRES (2019) data mapping local levels of employment. Swanley is unsurprisingly the largest local centre with employment at 6,000 persons in the town. Nearby Farningham also has a relatively high levels of employment given its LSOA includes the Teardrop Industrial Park.



# Appendix 3: Pedham Place Provision Analysis

## Education Service Assessment

### What is the requirement for education facilities given the scale of the proposed development?

By 2035, when Pedham Place is expected to complete, our modelling projects that the new settlement alone will induce a demand for 3 to 4 nurseries, 538 primary school places, and 299 secondary school places. In addition, there will be an additional need for 129 post-16 education places.

As a comparison, the 2017 Kent County Council 'A Guide to Development Contributions and Provision of Community Infrastructure' includes 'Pupil Product Ratios' from 2005/2006 based on the provision of homes and flats in a development. Using these figures, the development is expected to generate a need for 648 primary school places and a combined 463 places for secondary school post post-16 education.

### What about other developments in the local area?

Based on our modelling, by 2035 there will be a need for an additional 181 primary school places, 337 secondary school places, and 59 post-16 education places from other committed development. Without Pedham Place, there is projected to be a decline in the requirement for nursery places.

### Is there capacity in the local area to meet this growth?

No. Based on the current capacity in local schools there is not sufficient places to meet the demands of both Pedham Place and other planned for development. For example, all the local 8 primary schools (in Eynsford and surrounding Swanley) are over capacity (>95%).

There is capacity at the Orchards Academy secondary school, but this does not at present have the capacity to accommodate the growth expected by 2035 with and without Pedham Place. Other local secondary schools are also over-capacity.

## Local Employment Demand Assessment

### Is there market demand for employment land at Pedham Place?

The recently emerging Sevenoaks Local Plan identified a need for 11.6ha of employment land to meet needs to 2035 (based on a 2016 Economic Needs Study). This plan also identified Pedham as a broad location for the growth of employment land. It was also noted that the Council had asked neighbouring LPAs to see if they could help meet the districts need. On this basis, clearly there is a need for more employment land in the district, of which this scale of development can help meet. The site is also strategically well located at the junction of the M25 and M20 motorways close to London and on a strategic link towards the Dover crossing.

### What sort of sectors would be attracted to this location?

Assessing the latest BRES data (2019), the key employment sectors locally (i.e. in Swanley, Eynsford, and Farningham) are Construction (17% of local employment), Business administration & support services (10%), Manufacturing (8%), Professional (6%), and Transport and Storage (5%). These are the likely sectors from which future occupiers will come from making best use of the sites accessible location to the wider strategic road network.

Also, on the eastern side of the M25 is also a business park called the 'Interchange'. This is characterised by distribution centres, delivery services, and some industrial uses. Its likely, based on its location and taking account of key sectors identified in BRES (2019) data, that Pedham would support similar types of sectors; especially given the rise in demand for distribution centres as a result of online retail growth.

### Assumptions for employment jobs and economic output

To calculate the job generation and economic output, we have assumed the full amount of office development is built and 25% of the other floor space is light industrial/B2 use and 75% is B8 use for warehousing/distribution,

# Appendix 3: Pedham Place Provision Analysis

## BRES (2019) Sector Data & Economic Activity Rates

Area	Sevenoaks		Local Area	
1 : Agriculture, forestry & fishing (A)	900	2%	0	0%
2 : Mining, quarrying & utilities (B,D and E)	300	1%	30	0%
3 : Manufacturing (C)	3,500	7%	605	8%
4 : Construction (F)	6,000	11%	1,230	17%
5 : Motor trades (Part G)	1,250	2%	185	3%
6 : Wholesale (Part G)	1,500	3%	300	4%
7 : Retail (Part G)	4,500	9%	915	12%
8 : Transport & storage (inc postal) (H)	1,250	2%	385	5%
9 : Accommodation & food services (I)	4,000	8%	395	5%
10 : Information & communication (J)	2,500	5%	185	3%
11 : Financial & insurance (K)	1,500	3%	115	2%
12 : Property (L)	1,250	2%	170	2%
13 : Professional, scientific & technical (M)	6,000	11%	455	6%
14 : Business administration & support services (N)	4,500	9%	700	10%
15 : Public administration & defence (O)	900	2%	175	2%
16 : Education (P)	4,500	9%	515	7%
17 : Health (Q)	5,000	10%	510	7%
18 : Arts, entertainment, recreation & other services (R,S,T and U)	3,000	6%	470	6%
<b>Total.</b>	<b>52,350</b>		<b>7,340</b>	

Economic Activity (Jan 2019-Dec 2019)	No.	Total	%
Economic activity rate - aged 16-64	58,400	70,300	83.1%
Employment rate - aged 16-64	55,600	70,300	79.1%
Unemployment rate - aged 16-64	2,800	58,400	4.9%
% who are economically inactive - aged 16-64	11,900	70,300	16.9%

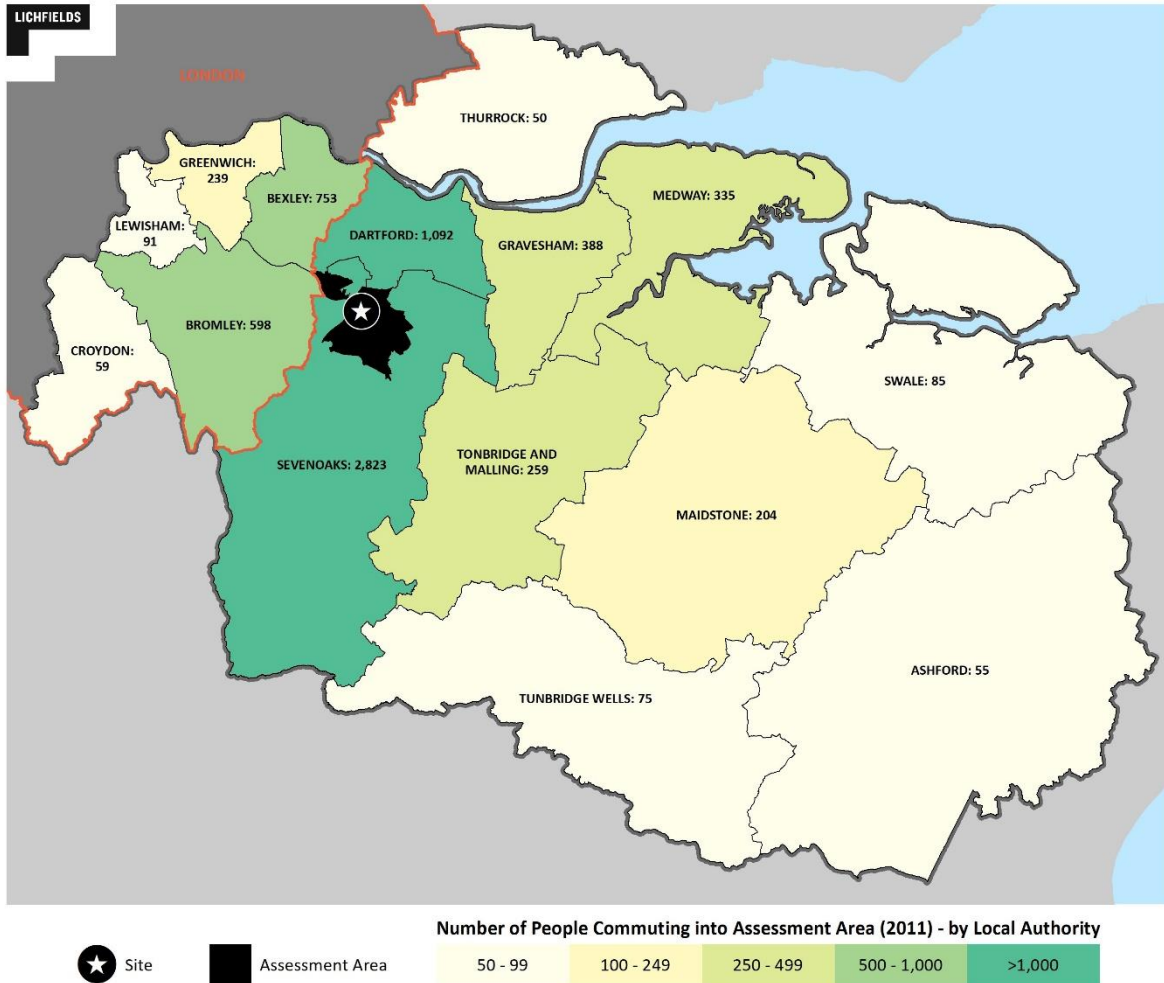
## Local Commuting

### What are existing commuting patterns?

Based on the latest available data from the 2011 Census, the local assessment area (based on MOSAs and LSOAs) has a total resident workforce of 10,700 people. Of these, c.3,060 both live and work in the area. London is the largest draw for commuting, with over c.4,560 people commuting there for work. Most work in inner London Borough's (c.1,760 people) followed by the London Boroughs of Bromley (c.1,370 people) and Bexley (c.1,050 people). There is some commuting further south and east, but this is far more limited. For example, only c.270 people travel to the wider Sevenoaks urban area for work, c.60 people work in Tonbridge, and c. 120 work in Maidstone. Clearly, people in the assessment area are drawn towards the north and north west for work.

In respect of in-commuting, the majority of people working within the assessment area are from the Sevenoaks (c.2,820 people), Dartford (c.1,090 people), and Bexley (c.750 people) local authority districts. Less significant flows of commuters come from Bromley (c.600 people), Medway (c.355 people), and Greenwich (c.239 people). A map of local in-commuting is included on the next page.

# Appendix 3: Pedham Place Provision Analysis



# Appendix 3: Pedham Place Provision Analysis

## Retail & Leisure

Convenience goods expenditure	Total 2035 (£m)	Retention (%)	Retained (£m)
Pedham Place	16.17	30%	4.85
5km Radius	91.68	2%	1.83
<b>Total</b>	<b>107.85</b>		<b>6.68</b>

Comparison goods expenditure	Total 2035 (£m)	Retention (%)	Retained (£m)
Pedham Place	30.54	10%	3.05
5km Radius	173.16	0.5%	0.87
<b>Total</b>	<b>203.70</b>		<b>3.92</b>

Food and beverage expenditure	Total 2035 (£m)	Retention (%)	Retained (£m)
Pedham Place	11.05	15%	1.66
5km Radius	62.65	1%	0.63
<b>Total</b>	<b>73.70</b>		<b>2.28</b>

Convenience floorspace requirement, 2035	£m	Turnover (£ / sq.m)	sq.m net	sq.m gross
Supermarket - convenience	5.35	12,000	446	
Supermarket - comparison			79	
<b>Supermarket – total</b>			<b>525</b>	<b>807</b>
Other convenience shops	1.34	7,000	191	273
<b>Total</b>	<b>6.68</b>		<b>715</b>	<b>1,080</b>

Comparison floorspace requirement, 2035	£m	Turnover (£ / sq.m)	sq.m net	sq.m gross
Comparison goods stores	3.15	7,000	450	600

F&B floorspace requirement, 2035	£m	Turnover (£ / sq.m)	sq.m gross
F&B outlets	2.28	5,400	423

Source: Experian's local consumer expenditure estimates per capita 2019, projections applied from Experian's Retail Planner Briefing Note 18, October 2020

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