

Sevenoaks District Council
National Landscape Exceptional Circumstances and
Public Interest Paper
June 2026

National Landscape Exceptional Circumstances and Public Interest paper for the proposed allocation at Pedham Place

1. The National Planning Policy Framework 2024 at paragraphs 189 and 190 directs how development within the National Landscape should be dealt with. This sets out that great weight should be given to conserving and enhancing landscape and scenic beauty; that they have the highest status of protection; that the conservation and enhancement of wildlife and cultural heritage are important considerations and that the scale and extent of development should be limited. At paragraph 190 it directs that permission should be refused for major development, except where there are exceptional circumstances and where it can be demonstrated to be in the public interest. Assessment of major development must address the requirements of paragraph 190, which comprise the following:
 - a) The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

2. The Council is also subject to the recently strengthened duty set out at section 85(A1) of the Countryside and Rights of Way Act 2000, which states that:

'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'

Does the site allocation constitute 'major development'?

3. The Regulation 19 publication version of the Sevenoaks District Local Plan (2027-2042) includes strategic scale growth at Pedham Place. This would deliver approximately 2,600 homes and a range of other facilities and services, including education, leisure, recreation, employment and community uses. It would be located in the Kent Downs National Landscape and we consider it would constitute 'major development', having had regard to its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the areas has been designated or defined (footnote 67 of the NPPF 2024).

The exceptional circumstances and public interest test

- a) *The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*

4. Sevenoaks has a high level of housing need. The headline identified development needs for Sevenoaks District are as follows:

Types of development need	Quantum of development need
Homes	1,164 units per annum

Types of development need	Quantum of development need
	1,164 x 15 years = 17,460 units over plan period (a figure provided by central government)
Employment floorspace	40,400 sqm (see ENS)
Gypsy and Traveller pitches	192 pitches (see GTAA)
Retail floorspace	Maintaining existing provision

5. This includes a high need for affordable housing which our evidence (Targeted Review of Local Housing Need 2022 (including 2025 update)) identifies at 353 dwellings per annum. Furthermore, we have a changing demographic structure, including a growing ageing population, and as such we also need to meet their needs as well as enabling our younger residents, be they first time buyers or younger families, to remain or return to this district.
6. The quantum of need for housing now required as a result of the standard methodology, as set by the Government, is a significant increase from the housing requirement figure of 165 dwellings per year set out in our Core Strategy 2011. The housing need figure compares to completion levels which in 2022-2023 amounted to 261 units, representing less than a quarter of our current housing need figure (Authority Monitoring Report 2022-2023).
7. The NPPF at paragraph 11 sets out that all plans should promote a sustainable pattern of development that seeks to, inter alia, **meet the development needs of their area and that strategic policies, as a minimum, provide for objectively assessed needs for housing and other uses.**
8. Moreover, the current Government has put forward a need to deliver 1.5 million new dwellings nationally in its first term (2024-2029) and has sought to amend the planning system to help address this ambition and need. A number of activities have and continue to be undertaken to effect this change. This includes alterations to national policy, such as the introduction of the concept of the grey belt, changes to the emphasis on meeting objectively assessed need and a new approach to identifying/calculating a local planning authority's housing need. Furthermore, in dealing with councils which have put forward plans with housing requirements that represent a significant shortfall against need, the Government has made it clear that further sites should be allocated, and in one case (Three Rivers) has directed the council to include specific sites, including major development in the National Landscape.
9. We have therefore sought to meet this need despite the district's very significant constraints including:
 - High levels of National Landscape (60%), of which the Kent Downs National Landscape makes up 45%.

- 93% Green Belt
- Significant areas at a high risk of flooding
- 1,700 listed buildings, including buildings of national significance
- 17 Sites of Special Scientific Interest
- 65 Local Wildlife Sites
- Ancient Woodland
- Portion of the district falling within the Ashdown Forest SPA 'zone of influence'.
- A larger number of smaller settlements, including small clusters of dwellings and hamlets as well as a smaller number of larger settlements, including our Principal Town of Sevenoaks.
- A strategic road network predominantly focused on the north of the district, with the south of the district defined by a rural network.
- A rail network that predominantly runs on a north-south axis, with a more limited service running east-west through Edenbridge and Penshurst.

10. We have fully investigated reasonable alternatives to meeting our housing need whilst promoting sustainable patterns of development, by firstly focussing on optimising development within our towns and settlements. However, this would only deliver 1,459 units. Together with our extants and windfall, the number of units would amount to approximately c6,160 units. This would leave a shortfall of approximately 11,300 units.

11. We have undertaken discussions with our neighbouring authorities, including sending formal requests to assist Sevenoaks with its unmet need (sent in November 2025 and May 2026). However, none of our neighbouring authorities have been able to assist due to their own constraints and challenges in meeting their own development needs. It is noted that a small surplus of housing provision had been identified by Dartford BC, but local government reorganisation is likely to mean any potential surplus will be re-directed to other authorities which have a more functional relationship with them.

12. As such, we are proposing the release of Green Belt. First focussing on brownfield/previously developed land within and adjacent to our higher tier settlements, followed by greenfield grey belt sites (not PDL), which are adjacent to our higher tier settlements or close to train stations. Together these deliver approximately 7,700 units, with the majority coming from the greenfield sites. Nevertheless, a shortfall of approximately 3,600 units remains.

13. We have then focussed on other major greenfield Green Belt locations, comprising Broke Hill and Pedham Place and these would deliver approximately 3,300 units between them.

14. Even taking all of these together, there remains a modest shortfall. Our housing supply is shown in the table below.

Housing Supply Element	Units
Urban sites (within existing settlements) (Policy ST2)	1,459

PDL sites (in Green Belt) - 'grey belt' (Policy ST3)	452
Greenfield sites (in Green Belt) - 'grey belt' (Policy ST4)	7,236
Other major greenfield in Green Belt and/or National Landscape (Broke Hill and Pedham Place) (Policy ST5)	3,301
Total from allocations	12,448
Extants	3,756
Windfalls (73x13 years)	949
Total	17,153
Shortfall from 17,460?	Minimal shortfall (307 units)

15. We consider it important to meet our need as this will mean we can:

- Deliver infrastructure improvements for existing residents - schools; GPs; community facilities etc;
- Deliver locally affordable housing for local people;
- Stimulate employment opportunities, inward investment and economic growth;
- Protect our important landscapes, including 98% of our Green Belt;
- Leave a positive lasting legacy for all.

16. We consider that Pedham Place is well placed to help address all of our identified needs and its allocation will include up to 2,600 dwellings, of which 40% will be affordable amounting to 1000 dwellings, employment floorspace and provision of Gypsy and Traveller pitches. Pedham Place will also include retail provision sized to meet the needs of future residents, without impacting on the vitality and viability of the retail provision found in surrounding settlements. Furthermore, it will include extra care apartments and a specialist village for older people, helping address a growing part of our demographic.

17. However, it is not just meeting need alone that constitutes the requisite exceptional circumstances and public interest. We consider development at this scale, providing strategic scale growth, is important for securing strategic infrastructure. Furthermore, of the sites put forward for consideration, no others which are of a comparable site size comply with the strategy, which is to focus development in sustainable locations. The next largest site, which is considered to be suitable, available and accords with our strategy, being ST4-7: Land north of Sevenoaks, west of Otford Road, which has been put forward for 1,500 dwellings. The site-specific circumstances which justify

the allocation of major development at Pedham Place and within the Kent Downs National Landscape are as follows.

- Its sustainable location.
- Its ability to deliver strategic infrastructure, which will both serve the new community and existing residents, and which will help address current need and which otherwise may not come forward or would be considerably delayed.

Sustainable location

- Proximity to Swanley, which is the second largest settlement in our district (Settlement Hierarchy 2025) and which includes a 'well-connected' station on the Darent Valley Line, running from Swanley to Sevenoaks, and providing a connection with the South Eastern Main Line at Sevenoaks Station and providing direct links to Ashford, Sevenoaks, London and the wider south east.
- Proximity to two other railway stations at Eynsford and Farningham Road.
- Location adjacent to the M25, which provides east-west and north-south connections and runs past Swanley. It provides a connection between the M20 at Swanley and the A21 to the west of Sevenoaks. It is also connected to the M26.
- Location adjacent to the M20 – this corridor provides an east-west connection and is located to the north of Sevenoaks District and east of Swanley. It has a direct connection to M25 (via M25 J3) and M26 (Wrotham Heath).
- M26 – Similar to M20, this corridor provides an east-west connection providing direct link between M25 and M20.
- A20 – this corridor provides an east-west connection between Wrotham, West Kingsdown, Farningham and Swanley.
- Proximity to bus stops on the Button Street, serving two bus routes (421 and 429)
- Continuous footway along the south side of the A20 and leading into Swanley.

Strategic Infrastructure

- Two new 2FE primary schools, with nurseries (840 places).
- New non-selective 5FE secondary school with sixth form and 30-place specialist resource provision.
- Local centre providing new primary and community healthcare facility for Swanley and Hextable and retail and community facilities.
- Leisure centre including tennis centre.
- M25 J3 improvements providing capacity improvements.
- Junction improvements to A20, Crockenhill Lane (south-west access), Crockenhill Lane/Wested Lane, Wested Land corridor enhancement and Wested Lane railway bridge.
- Contributions towards Swanley Station improvements including step-free access at Everest Road entrance and public realms improvements.
- New/improved bus service between Pedham Place and Swanley town centre.
- Travel hub and park and ride providing improved bus connectivity, cycle hire and repair facilities, electric vehicle charging points.
- Improved cycling and pedestrian route into Swanley.

18. Pedham Place will also include employment floorspace, which will help support our well performing and growing industrial market. Whilst the school provision and healthcare facilities will also help support the wider community.

The local economy

19. The proposal would give rise to positive economic impacts benefiting the wider community. Initially the site's development over a period of approximately 10 years would offer employment opportunities, as well giving rise to spending associated with its development and as such would have wider impacts during that time. The land promoter indicated in their Regulation 18 consultation submissions that the total construction cost is likely to be approximately £441 million and would deliver 603 full time equivalent construction jobs and in addition, 42 indirect full time equivalent jobs.
20. Over the longer term, the introduction of strategic scale growth in this location and the residents living there would have an ongoing impact on the local economy. Pedham Place will have some on-site retail but this will be designed to meet day-to-day needs, and as such future residents are likely to make use of and help sustain the services and facilities found elsewhere within the district but notably those provided in Swanley. The land promoter has indicated that new residents are likely to have total first occupation expenditure totalling c. £15 million, with continued gross potential spending power of close to £91 million per year.
21. Finally, the site will include a range of employment uses which will support the local economy, including by providing employment opportunities for both existing and new residents of the district. These include the employment opportunities offered by the schools, GP services, dentists and retail elements. Furthermore, the proposed allocation would include provision for 27,000 sq. m for general industry/storage and distribution (Use Class B2/B8) and 22,000 sq. m for offices (Use Class E(g)(i)). Of note is that our Economic Needs Assessment 2022 (and its 2025 update), highlights that the industrial market is performing well and growing, driven by an increased demand for storage and distribution and given this site's location adjacent to two major motorways which connect to London, the north and the port at Dover, it can contribute to this market. Moreover, it notes that Pedham Place's '*combination of scale, at 25ha, and adjacency to M25 J3 would potentially create the only inward-investor class development site in the District.*'
22. The site is currently used as a golf course and contains some small-scale commercial elements and as such contributes to the local economy and provides some employment. However, should this site not be allocated the expectation is that it would continue in its current use and there is nothing to indicate that there would be a negative or detrimental impact on the local economy. Furthermore, our policy and strategy for employment uses allows for sufficient flexibility to ensure we can support employment uses elsewhere.

b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way

23. As noted above, 60% of the district (60.9%) is designated as National Landscape, leaving 39% not designated. However, land falling outside of the National Landscape

is also subject to a degree of protection where it falls within its setting, with the NPPF (paragraph 189) explaining that development within its setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

24. The north of the district is designated as part of the Kent Downs National Landscape and abuts the Surrey Hills National Landscape at the boundary with Surrey to the west. The Kent Downs National Landscape constitutes 44.91% of the National Landscape covering our district, with the High Weald National Landscape making up the remaining 16%. The Kent Downs National Landscape spans much of the northern and central parts of the district, whilst the High Weald National Landscape spans the bottom portion.
25. How the National Landscape and areas outside of it interact with district's most sustainable towns and settlements, its strategic road network and railway are key considerations. Some of our most sustainable settlements are either washed over by or tightly bound by the National Landscape and we are allocating some sites which are within settlements washed over by the National Landscape or sites within the National Landscape where they fall within Previously Developed Land. The Sevenoaks Urban Area, our Principal Town, is bound by the Kent Downs National Landscape whilst Westerham, our fourth most sustainable settlement (identified as Town in the Settlement Hierarchy 2025), is washed over by the Kent Downs National Landscape.
26. Areas outside of either National Landscape comprise a relatively narrow strip of land between the two National Landscapes, which contains Edenbridge (our third largest Town), whilst to the north of the district are a number of areas which do not fall within either National Landscape. Swanley (our second largest Town) and a number of Service Settlements (Primary and Secondary), which sit below our Principal Town and Towns within the Settlement Hierarchy, fall within these areas to the north.
27. Our approach to allocating sites has focused on our higher tier settlements and includes the release of Green Belt (predominantly sites identified as being grey belt) outside of the National Landscape. Those settlements outside of the National Landscapes, from our Towns to Primary and Secondary Service Settlements, are subject to allocations, with the greatest number of allocations directed towards the more sustainable of those settlements i.e. Swanley and Edenbridge. We have also included some smaller allocations in our villages and hamlets.
28. However, whilst these settlements may not be constrained by the National Landscape, consideration has to be given to a broad range of factors in determining what is an acceptable and sustainable quantum increase in development in order to ensure those developments are sustainable. The factors to which regard has been had include:
 - The impact of significantly higher densities on the character of our settlements, many of which also include heritage assets.
 - The impact on highways, much of which is rural in nature.
 - Opportunities to rely on public transport.
 - The services and facilities available in the settlement.

- The distance of sites from services and facilities.
- Whether allocations could result in the loss of strategic gaps between settlements.
- Whether the settlement includes 'well-connected' railway stations.
- Whether it would provide the opportunity to secure strategic scale infrastructure.
- Whether it is an appropriate location for employment uses.
- Impacts on designated environmental sites.

29. As noted above, we have also explored whether any of our need can be met in some other way, including through discussions with our neighbouring authorities. However, responses have confirmed that those authorities are unable to meet any of our identified need. The Council is therefore unable to meet any of its need in other administrative areas and as such is proposing the release of Green Belt and major development in the National Landscape. The Council has considered the scope for allocating further sites sufficient to address the shortfall arising without allocating Pedham Place and outside of the National Landscape but consider the scope to be limited and the cost of doing so would result in harmful and unsustainable development.

c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Environment

30. The site contains a links style golf course, which was constructed/formed using inert aggregates. Its habitats predominantly comprise improved and managed grassland, with some individual and some groups of trees, including mature trees lining the boundary with the M25.
31. Our Landscape and Visual Evidence 2024 notes that tree coverage within the site is not extensive and that impacts on trees could probably be avoided, particularly those covered by a Tree Preservation Order (TPO). It also notes that there may be remnant chalk grassland remaining on the site and that it could be possible to conserve/restore/reintroduce grassland, if development towards the south and east of the site was avoided. The site does not contain any environmental designations.
32. The information submitted by the land promoter sets out that some of the tree cover and woodland around the edges of the site will be retained. It also sets out the following measures which would enhance the site's biodiversity:
- Plant the slopes as flower rich grassland.
 - Planting amenity grassland to be species rich.
 - Creation of areas of native woodland.
 - Tree planting within the settlement, including street trees on most streets.
 - A sustainable drainage system using swales, rain gardens, reed beds and wetlands.
 - Incorporation of features such as bat and bird boxes, green walls and roofs, native planting and ponds.
33. The site is approximately 600m south of Farningham Woods Site of Special Scientific Interest. This is separated from the site by the M20. The key concerns would be whether the proposal would have an adverse impact as a result of recreational

pressure/disturbance due to the significant increase in visitors. However, Natural England has advised that they consider it unlikely there would be a significant effect due to the presence of the M20 infrastructure. Any application would need to address the relationship with the SSSI and any impacts, including any mitigation measures should any be required to ensure there would be no adverse impacts.

34. The site is also located close to the River Darent, a chalk stream and priority habitat, which lies approximately 477 metres to the east/south-east of the site at its nearest point and which is a priority habitat. The main issues in relation to the River Darent are over abstraction and the impact of run-off. Thames Water would supply the water for Pedham Place and the IDP notes that whilst Kent is within an area identified as seriously water stressed and water supply requires long-term management to ensure growth can be accommodated without adverse environmental impacts, this is managed through the water companies' Water Resource Management Plans. The next iteration (WRMP29) is expected to provide the first full opportunity for the water companies to incorporate growth proposed through the Local Plan. Of note is that their current Water Resources Management Plan 2024 sets out their intention to reduce abstraction and also that steps have already been taken over the last 25 years, with a 47.6 megalitres per day reduction in water abstraction over this period. In terms of surface water run-off, the introduction of strategic scale development in this location would be subject to a requirement to secure suitable surface water drainage by means of a sustainable drainage system in accordance with Policy W2: Surface Water Management and ensuring that flood risk and pollution are not increased. The supporting information indicates that the site would do so, incorporating swales, rain gardens, reeds beds and wetlands to attenuate surface water run-off. In addition, the proposed mitigation in relation to visual impacts, such as the planting additional trees along the ridges, would also contribute to the management of surface water.
35. Sevenoaks District faces air pollution primarily from Nitrogen Dioxide (NO₂) and Particulate Matter (PM₁₀ and PM_{2.5}) and this mainly originates from road traffic. As noted elsewhere this site is adjacent/close to two motorways (M25 and M20), which both connect with the M26. These three major motorways connect London and the north of the UK to the port of Dover and the Channel Tunnel. Consequently, there is a continuous flow of Heavy Goods Vehicles, as well as domestic traffic. This has contributed to several air pollution hotspots, including at Swanley. However, all remaining Air Quality Management Areas have been revoked as the monitored levels fell below the threshold of monitored pollutants for at least 5 years. The Council will continue monitor air quality and the Council's Air Quality Action Plan remains in place. This includes a range of measures, including the need for the Local Plan to contain an Air Quality policy (Policy AQ1 Air Quality). However, the site is well linked to a town centre and there is potential to cycle to two train stations. The supporting documentation also sets out that there is potential to enhance existing public infrastructure, including new cycling and pedestrian routes, whilst the inclusion of a transport hub could provide a bus interchange, enabling existing bus services to extend into the site. The proposal is also intended to be a walkable neighbourhood, with active travel networks and services and facilities within 10 minutes walking distance of most homes.
36. It is considered that its environmental effects could be mitigated to a suitable level.

Landscape

37. The site predominantly comprises a golf course, with a landform artificially altered (both height and configuration) using inert landfill. It is covered in amenity grass and includes some trees, particularly along the site's boundaries. The site also includes buildings associated with its use as a golf course, including flood lit driving range, as well as hardstanding used for parking and other buildings, including 3 residential properties and other commercial buildings. It also includes Fort Farningham, a Scheduled Monument. It is bound by the M25 to the west, the M20/A20 (London Road) to the north and Crockenhill Lane to the south. It is traversed by electricity pylons along the western portion, beyond which land is occasionally used for Sunday markets/car boot sales. Whilst an underground railway tunnel extends under the site in the south-western corner. To the north and west (beyond the site boundaries) are further commercial/industrial buildings.
38. It is located at the north-west extent of the Kent Downs National Landscape, with the north-west edge of the National Landscape extending to the M20 to the north and across the M25 to west, with its western boundary largely aligning with Wested Lane. Due to its location within the National Landscape, great weight should be afforded to its conservation and enhancement.
39. The Kent Down National Landscape Management Plan 2021-2026, which is a material consideration, sets out the Kent Downs National Landscape's core components, characteristics and qualities. It is supported by the Kent Downs Landscape Character Assessment Update 2020 (Revised and published 2023). This site falls within 4A Darent Valley Landscape Character Area, which is further subdivided into local character areas, with this site sitting within the Shoreham local character area. The Council also has a Sevenoaks District Landscape Character Assessment (2017) and Landscape Sensitivity Assessment (2017). The Sevenoaks Landscape Character Assessment 2017 looks at the district at a more granular level, with the site falling within the 2a. Farningham Downs Landscape Character Area. These documents together help understand the site's landscape characteristics and that of the wider landscape and how it contributes to the Kent Downs National Landscape.
40. In addition, we commissioned Landscape and Visual Evidence for the Sevenoaks Local Plan 2040 (LVE) from Arup in 2024. This provides a comparative assessment of three options to deliver new housing, including Option 2, comprising strategic scale development at Pedham Place. It provides an indication of the likely sensitivity and potential effect of development with respect to landscape and views. Indicative because at the site allocation stage we do not have detailed drawings. This document considers the extent to which the special qualities of the Kent Downs National Landscape are reflected in each site and the effects of potential development, making use of existing evidence referred to above. It also considers whether any potential mitigation may reduce or avoid harm on the landscape and National Landscape, and highlights opportunities to conserve and enhance the National Landscape. This study contributes to understanding of item 190 (c) with respect to potential detrimental effects on the landscape and extent to which that could be moderated (pages A67-A76).

41. The LVE considers landscape sensitivity, outlining the site's key characteristics, which are included below:

'The site is characterised by a broad plateau on the edge of rolling chalk downland, which has been altered locally with artificial landforms for the golf course. From the middle of the site at the high point there are extensive views across the Darent Valley and an open, exposed character.

- *Rolling chalk downland and a steep slope adjacent to the Darent Valley to the east.*
- *In the wider landscape, settlement is typically scattered, with isolated cottages and farms and small linear settlements in sheltered areas. Mixed 20th century residential properties are found along roads including converted barns and horse paddocks.*
- *The golf course is popular for recreation and supports other uses, including an extensive area for car boot sales.*
- *Long, open views across the Darent Valley.*
- *Pylons and motorway infrastructure are intrusive features, which create hard boundaries and lines of severance in the landscape.'*

42. The LVE draws on our 2017 Landscape Sensitivity Assessment, which concluded that the area within which this site falls (SW2: Swanley east) has low-medium sensitivity, with the areas of lower sensitivity being those close to Swanley and the motorway junction. It also notes existing on-site development and the alterations to landform.

43. Key susceptibilities relevant to the site have been identified as follows, as are key valued features and characteristics:

- *The steeply sloping landform of the slopes of the Darent Valley (east of the site) and the south-facing slopes at the south of the site.*
- *The Scheduled Monument at Fort Farningham at the centre of the site, dating from the 1890s.*
- *The narrow, winding rural lands which are often banked by high hedges, including Sparepenny Lane to the east of the site and Crockenhill Lane to the south of the site.*
- *The rural nature of the landscape including sparse settlement of isolated farms and detached houses outside the main settlements.*
- *The role the site plays as a backdrop and skyline in views from the Darent Valley.*
- *The relationship with existing settlement, which is currently well-contained by the motorway boundaries (Swanley) and woodland/landform (Farningham).*
- *The role the landscape provides as a rural setting to Swanley, and as a gap between the town and Farningham.*

Key valued features and characteristics relevant to the site

- *Mature trees and hedgerows provide valued habitats within the intensively farmed landscape, as well as providing a strong landscape pattern. A section of woodland in the south-east of the site is covered by a tree preservation order.*
- *Historic buildings including the adjacent Grade II listed Eynsford Hill.*
- *Setting of nearby Grade II Registered Park and Gardens – Lullingstone Castle, approximately 1.2km to the south and Franks Hall, approximately 1.5km to the north-east.*
- *Potential areas of remnant chalk grassland.*

- *Recreational value of the golf course which allows an appreciation of the landscape.*
- *Long views across the Darent Valley to the Greensand Ridge around Sevenoaks from the Darent Valley Path. Views along the valley include the Eynsford viaduct.*

44. Furthermore, our LVE outlines how the site contributes to the Kent Downs National Landscape by looking at each of the special qualities identified in the Kent Downs National Landscape Management Plan 2021-2026 and how they are represented on the site.

Special qualities of the Kent Downs	How are they represented within the site?
Dramatic landform and views	The dramatic steep slopes of the Darent Valley sit outside of the site boundary. Within the site itself the topography ranges from 113m AOD to about 80m AOD in the southern corner of the site. There are also breath-taking, long-distance panoramas from the south of the site across the Kent Downs. Whilst as a broad scale landform reflects the special qualities of the National Landscape, at a local scale landform has been substantially altered by historical landfill tipping and earthworks associated with its use as a golf course.
Biodiversity-rich habitats	There may be some remnant chalk grassland within the site and there are some individual and groups of trees. However, most of the site is characterised by improved and managed grassland associated with the golf course.
Farmed landscape	The site is not a farmed landscape.
Woodland and trees	There is little woodland within the site, although there is a small section of woodland in the southern corner of the site which is covered by a TPO. There are some individual trees and groups of trees amongst the fairways.
A rich legacy of historic and cultural heritage	Fort Farningham Schedule Monument lies within the site. Constructed during the 1890s, it formed part of a comprehensive military scheme known as the London Defence Positions, to protect the capital in the event of enemy invasion. Unusually for this type of monument, Fort Farningham has remained largely free of alteration or renovation and, despite the infilling of the ditch, survives comparatively well and will retain evidence relating to the construction and use of mobilisation centres, including tunnels beneath the rampart. It also contains a later Royal Observer Corps underground Monitoring Post.
Geology and natural resources	Due to its undeveloped character, soil within the site is likely to represent an important natural capital resource. The site is classed as Grade 3 agricultural land (good to moderate quality), although its use as a golf course means it is unlikely to be potential productive land. The site does not contain any chalk rivers or streams although it may contribute to the chalk aquifer given its chalk geology.
Tranquillity and remoteness	Tranquillity varies across the site. To the north and west, perceptual qualities are negatively affected by noise, lighting and movement associated with the M25, M20 and A20 and their junctions, commercial development along the

Special qualities of the Kent Downs	How are they represented within the site?
	<p>A20, and buildings and development associated with the golf course including car parking, buildings, driving range and roads and track. Visually the site is also affected by the presence of electricity pylons. The southern part of the site is considered relatively more tranquil due to the sense of exposure and long-distance views, albeit there is still notable presence of activity associated with the golf course.</p> <p>Whilst the northern part of the site is affected by lighting associated with the major road junctions, commercial development, and flooding lighting within the golf driving range within the site, the southern part of the site is characterised by relatively darker skies, falling within a night light classification of 1-2 nanowatts/cm²/sr which is considered a low-medium level of radiance shining into the night sky.</p>

45. It concludes this section by stating as follows:

'The landform and views, heritage, natural resources and relative tranquillity and darker skies within the southern part of the site, means the site reflects many of the special qualities of the Kent Downs. These elements contribute to the natural beauty of the site and, albeit to a localised extent, to the natural beauty of the Kent Downs National Landscape.'

46. However, the LVE also notes that the site also includes or is adjacent to features which detract from the natural beauty of the Kent Downs National Landscape, as follows:

- Major road corridors adjacent to the site including M25, M20 and A20 (western and northern boundaries) affecting perceptual qualities including noise, views and lighting.
- Commercial development on the A20.
- Electricity pylons in the north and west of the site.

Visual amenity

47. The LVE also looked at visual amenity, including a Zone of Theoretical Visibility. This indicates that, without mitigation, views of development would be extensive, particularly from within the National Landscape to the south and east, including from the Darent Valley. Noting that some parts of the site of the south and east are open and exposed, with long-distance views. As such any development in those locations would be widely visible. However, views from the north are considered more likely to be screened by Farningham Woods, with possibility of views from the north-east. Views are also considered possible from Lullingstone Country Park and Lullingstone Castle and Grade II Registered Park and Garden to the south, as well as potential visibility from Farningham and Eynsford Conservation Areas to the east of the site. It also notes potential views for local residents and users of public footpaths, including sequential views from the Darent Valley Path.

48. The LVE then considers the potential effects on key susceptibilities and valued features or attributes, as well as outlining mitigation opportunities to avoid or minimise effects or to restore landscape features.

Key susceptibilities and valued features or attributes.	Potential effects and mitigation (avoid, minimise, restore or compensate).
The rural lanes including Sparepenny Lane and Crockenhill Lane.	Effects on the rural lanes to the east and south of the site could be avoided, with access restricted to the north-west of the site.
The rural nature of the landscape.	The site has some rural qualities, mainly towards the south and east of the site and at the high point in the centre of the site by the Scheduled Monument. It may be possible to avoid development within these areas, or carefully site development to avoid adverse impacts on valued attributes. Nevertheless the scale of development within the site means that the character of the would certainly change from a rural character to an urban/developed character.
The role the site plays as a backdrop/skyline to views from the Darent Valley, including views from Eynsford and Farningham and the Darent Valley Path.	The areas towards the south and east of the site contribute to the rural back drop to views from the wider landscape. It may be possible to locate development towards the northern and western parts of the site, whilst considering a strategy of tree planting which respects local character and preserves rural views from the wider landscape, particularly from within the Darent Valley and its west-facing slopes.
Mature trees and hedgerows	Tree coverage within the site is not extensive, and impacts on trees could probably be avoided, particularly the trees covered by tree preservation orders.
Setting of the adjacent Grade II listed Eynsford Hill	As the listed building is on the east facing wooded slopes outside the development boundary, important effects on its setting could be avoided through careful siting and design of development.
Setting of Lullingstone Castle and Franks Hall	The ZTV indicates that views from these locations are likely to be contained to parts of the assets, due to their locations within the valley landform.
Potential areas of remnant chalk grassland	It could be possible to conserve/restore/reintroduce areas of chalk grassland if development towards the south and east of the site was avoided.
Recreational value of the golf course	If developed, it is likely the use of the golf course would be lost, unless it may be possible to incorporate a small area of golf course within the masterplan. It may be possible to incorporate other recreation uses such as public rights of way and visitor facilities associated with the Scheduled Monument to encourage access to the landscape.
Long views across the Darent Valley	Existing views across the Darent Valley could be retained to an extent within a future development masterplan.
The relationship with existing settlement, which is currently well-contained	Development of the site would unavoidably affect the settlement pattern of the area, creating a new settlement pattern. If the site boundaries were well-defined by extensive new woodland planting to the south and east, then this could form an effective new settlement boundary.

<p>The role the landscape provides as a rural setting to Swanley, and as a gap between Swanley town and Farningham.</p>	<p>Development of the site may affect the rural setting to Swanley, however its existing role in this regard is not considered to be substantial as there is no visual interrelationship between the site and town, and the site is already affected by multiple detracting features.</p> <p>Development of this site would negatively affect the gap and sense of separation between Swanley and Farningham. Potential mitigation for this could involve enhancing the sense of separation between the site and Farningham through extensive woodland planting, including the A20. This, alongside a stronger association with Swanley (consider the site as an extension to Swanley and accepting the change in character in this respect) may help to reinforce a sense of separation with Farningham and the National Landscape to the east.</p>
<p>Special qualities of the Kent Downs</p>	<p>The site reflects some of the special qualities, some of which may be affected, including landform and views, heritage, natural resources and relative tranquillity and darker skies. With substantial mitigation it could be possible to mitigate impacts on views, heritage and darker skies, however it would not be possible to mitigate or compensate for effects on the sense of relative tranquillity (albeit still affected by activity associated with the golf course) which would be affected by development.</p>

49. Its conclusion highlights the following key effects on landscape character and views:

- Changes to the rural characteristics of the site and potentially the wider landscape
- Loss of recreational value of the golf course
- Changes to long views across the Darent Valley
- Effects on the setting and sense of separation between Swanley and Farningham.

50. With the likely significance of effects considered to be **high**. However, by avoiding/setting development back from the southern and eastern parts of the site and the use of extensive woodland planting on the ridges, this would likely reduce effects on views from the Darent Valley. This with other additional mitigation, as outlined in the guidance means that the likely significance of effect would be considered to be **low-medium**.

51. It is recognised that even with the proposed mitigation measures the site allocation would have effects which it would not be possible to avoid or fully mitigate.

52. The proposal would result in the removal of elements which currently detract from the natural beauty of the landscape, namely the removal of the golf course, its artificial landform and associated buildings and infrastructure. However, the site retains some rural characteristics and whilst their removal may be beneficial, the proposed site allocation for a strategic scale development comprising approximately 2,600 dwellings, buildings providing community and employment opportunities and

associated infrastructure, including highways, would result in an urban character, with a more harmful effect on landscape character than the current situation.

53. Moreover, the scale, form and location of this strategic scale development would not be consistent with the scale and form of development, including settlements within, this landscape character area, with settlement patterns in this landscape area comprising scattered, isolated cottages and farms with small linear settlements in sheltered areas.
54. It is noted that the perceptual elements of the site (tranquillity and remoteness) are already affected by the proximity to the motorways due to the associated noise, lighting, movement and unsympathetic planting, the visual impact of the pylons and the presence of the golf course and other commercial/industrial uses both within the site and close to the site. Whilst land in the southern part of the site is considered to be relatively more tranquil and have darker skies. However, whilst the careful siting of development could help mitigate the impact on the areas demonstrating higher tranquillity, the introduction of strategic scale development in this location is likely to further reduce tranquillity in the main built-up parts of the site.
55. It also may affect the rural setting to Swanley, although it is currently not considered to have a substantial role in this respect.
56. Visually the careful siting of development and the use of extensive tree planting, to shield views, and provide a sense of visual separation between Swanley and Farningham, could largely overcome harm to views from within the National Landscape. However, it is recognised that some views are likely to remain due to the topography of the locality, particularly from areas to the south which are at a similar height above ordnance datum levels to Pedham Place. The Landscape and Visual Impact Appraisal 2019 (updated January 2024) prepared by TPM Landscape Ltd for the land promoters does not suggest as significant levels of visibility as the LVE undertaken on our behalf. Noting that many of the views of the site from within the valley are restricted due to topography and screening. However for some viewpoints it acknowledges that views may be possible e.g. viewpoint 10, concludes that *'the potential visual change is large with all aspects of the site visible'* but that *'earth mounding and screen planting will have good long-term effects but layout should consider nature of potential visibility and plan for a new visual connection to urban centre.'* The use of new woodland/tree screening is considered an appropriate form, given ridgetop woodlands are characteristic of this landscape, however, use of earth mounding/bunds may not be appropriate in this location.
57. There are also currently views out from the site to the south, which are described by our Landscape and Visual Evidence 2024 as *'breath-taking, long-distance panoramas'*, and there is likely to be some impact on them but that existing views could be retained to an extent, whilst the evidence provided by the promoter indicates that mitigation should include a layout that retains views over the National Landscape.
58. Taking the definition of 'to conserve and enhance' to mean 'no harm', it is evident that by reason of its scale alone it would not conserve and enhance the natural beauty of the Kent Downs National Landscape. However, there is potential to limit the impacts

so that they are largely localised and the new settlement is contained and largely sheltered from wider views by extensive woodland planting. It is acknowledged that this may result in changes to views into the site but given wooded areas, particularly on ridges are characteristic of the National Landscape this change is not considered harmful. The LVE also suggests the potential for enhancements, which could be explored and secured where appropriate. These include:

- Undergrounding the existing pylon lines
- Investigating potential for a new public right of way connection to the Darent Valley Path
- Investigating potential for biodiversity enhancements e.g. chalk grassland, woodlands and new nature reserve
- Management of woodlands and trees to achieve a diversity of age and species, including locally characteristic species
- Sensitive planting schemes for trees outside of woodlands
- Continue/improve the co-ordination of habitat management.

59. The LVE also lists a range of off-site opportunities e.g. Improve the integration of the M25 into the landscape.

60. However, whilst these enhancements would help, they are not considered to outweigh the identified landscape harm and any remaining visual impacts, to which we afford great weight. Nevertheless, we consider there to be exceptional circumstances which justify and outweigh the harm arising from the proposed allocation, as detailed elsewhere within this document.

Recreational opportunities

61. The site currently serves as a golf course (Pedham Place Golf Course), providing an 18-hole Championship course and a 9-hole Par 3 course, with a 30-bay floodlit driving range, putting green and practice bunker. The site also contains a public footpath (SD181) that extends across the site from its northern boundary and leaving the site at its south-eastern corner, providing access and recreation to walkers. In addition, part of the site to the west is used to host car boot fairs, auctions and Sunday markets.

62. The proposed use of this site as a new settlement would result in the loss of the golf course. Use of the land for car boot fairs, auctions and Sunday markets are also likely to be lost. Access across the site by means of the public footpath (SD181) would be retained, albeit the proposal indicates that it would be diverted and users would have a very different visual experience from that currently.

63. Our Playing Pitch & Outdoor Sport Strategy (September 2024) includes an assessment of the supply of and demand for golf courses. Pedham Place is noted as an 18-hole, 72 par course, providing 36 bays with ball tracking technology. More broadly across Sevenoaks it notes that there is good level of provision offering a variety of courses, which is meeting demand as seen by current membership offers and recommending that all listed facilities should be protected.

64. However, submitted documentation (Pedham Place: A New Settlement Vision for Sevenoaks 2023) sets out that the new settlement would include the following recreational elements:

- Tennis centre with indoor and outdoor courts
- Secondary school with playing fields, providing a range of sport and recreation, with a shared use.
- Central park covering in excess of 4ha. This would provide a formal space.
- Local open spaces (Neighbourhood Parks), within easy reach of every home.
- Parkland; managed open space for informal recreation located on the edge and the slopes around the site.
- Re-wilded green space with access via designated footpaths.
- The re-use of Fort Farningham and its opening to the public.
- New public rights of way around the site.
- Play areas comprising a Neighbourhood Equipped Area for Play and a number of Locally Equipped Areas for Play.
- 55ha of greenspace.

65. Furthermore, our Playing Pitch & Outdoor Sport Strategy indicates that there is a need for the following in the Darent Valley area:

- Adult grass football pitches; Youth 11v11 pitches; Mini 7v7 pitches
- Third generation turf (3G) pitches 1 11v11 pitch.
- Insufficient level of senior rugby union provision in Sevenoaks to meet current and future demand, with no provision in the Darent Valley.

66. In addition, our LVE lists opportunities for new interpretation/visitor access to the Scheduled Monument, as well as opportunities to tie into public rights of way, including linking with the Darent Valley Path.

67. Therefore, whilst the proposal would result in the loss of existing recreational opportunities, it presents an opportunity to provide a much greater range of recreational activities which would be used by a larger number of people than currently are likely to make use of the golf course (evidence indicates an average Club membership of 458 in 2024 in affiliated facilities). These new recreational opportunities would be available for the wider public, beyond just future residents of Pedham Place, to use.

68. As such, whilst the allocation of this site for strategic scale growth would result in the loss of the golf course, contrary to paragraph 104 of the NPPF, which explains that existing open space, sports and recreational buildings, including playing fields and formal play spaces, should not be built upon, it is considered that it satisfies one of the exceptions, as follows. The golf course is not shown to be surplus to requirements (a) and it would not be replaced by equivalent or better provision in terms of quantity and quality in a suitable location (b) but it would include a range of alternative sports and recreational provision, providing the opportunity to secure facilities for which

there is a need and which would serve a broader range and a larger number of people, the benefits of which would clearly outweigh the loss of the current use (c).

Conclusion

69. Sevenoaks has a high housing need, as derived from the Government's standard methodology. Sevenoaks is also a highly constrained district. We have explored opportunities to deliver and meet our housing and other development needs, and in doing so we have sought to avoid the National Landscape, except where sites are within a settlement washed over by the National Landscape or where a site constitutes Previously Developed Land. We focussed first on our settlements and then we explored whether any of the remaining significant unmet need (when factoring in extant permissions and windfall sites) can be met by our neighbouring authorities. However, given their high need levels and significant constraints that option is not available to us. We then explored previously developed land (including some within the Kent Downs National Landscape), followed by greenfield grey belt development but a sizeable shortfall remains. We have also included an allocation for major development on greenfield Green Belt (Broke Hill Golf Course – currently the subject of a planning application) but nevertheless a shortfall remains. The relatively limited extent of non-Green Belt and non-National Landscape land within our district, coupled with our other constraints has meant that our options for delivering our need outside the National Landscape are limited and it is not possible to do so without considering major development within the National Landscape.
70. As such we have included strategic scale growth at Pedham Place, which is at the north-western extent of the Kent Downs National Landscape. We have looked at the impacts and opportunities arising from this site, including its impact on the National Landscape. There will be some harm arising, but there is high level of need and the site can make a significant contribution to help delivering that need within a sustainable location whilst also delivering strategic infrastructure, some of which will be beneficial to the wider community. Furthermore, the proposed allocation provides opportunities, not just to mitigate some of the impact, particularly with respect to views from the south, but it also provides the opportunity to secure some enhancements, including features which are currently absent such as chalk grasslands. These considerations, taken together, are considered to represent exceptional circumstances and to enable it to be demonstrated that the development is in the public interest, in accordance with NPPF paragraph 109. The benefits outweigh the identified harm, having regard to national policy. There is also compliance with s.85(A1) of the Countryside and Rights of Way Act 2000, in that the Council has sought to further the purpose of conserving and enhancing the natural beauty of the National Landscape, and to the extent that there is some residual harm after mitigation, that is justified by the considerations set out above.

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