



Sevenoaks District Council Plan 2040

Regulation 18 Consultation

January 2023



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1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments Ltd (Gladman) and Ramac Group welcome the opportunity to comment on the Sevenoaks District Council Plan 2040 Regulation 18 consultation and request to be updated on future consultations and the progress of the Local Plan.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK, alongside participating in many Examinations in Public. Gladman was involved throughout the preparation of the previous emerging Local Plan, having previously submitted representations throughout that plan making process.
- 1.1.3 Ramac Group is a promoter and developer of land and property, with an extensive portfolio of sites across the southeast. It has construction capabilities as part of its business, with the preference to invest and build out sites in order to deliver their development potential.
- 1.1.4 Gladman (land broadly to the east of the electricity pylons) and Ramac Group (land broadly to the west of the electricity pylons) (see Appendix 1) have a land interest in Pedham Place, Swanley and can confirm that the site is available, suitable, and deliverable for housing as summarised in Section 5.1 of this representation and the accompanying StoryMap. Gladman and Ramac Group looks forward to engaging further with the Council as the plan preparation process progresses.
- 1.1.5 Where reference to Gladman is made in the representations, this should be taken as being both Gladman and Ramac Group who are jointly promoting the development opportunity at Pedham Place, Swanley.

1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Sevenoaks District Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The revised Framework (2021) introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and

¹ PPG Reference ID: 61-001-20180913

what actions are required to ensure issues are proactively dealt with such as unmet housing needs.

- 2.1.4 Gladman welcome Sevenoaks' recognition of the importance of the Duty to Cooperate through their planning strategy including a clear step to work with neighbouring authorities to address unmet need. However, the Council should ensure that the Duty to Cooperate is addressed throughout the plan making process and not simply an isolated step. Evidence must be provided to show continuous and meaningful engagement with neighbouring authorities, but at this time there is no evidence within the evidence base to suggest this process is underway. Gladman look forward to the second Regulation 18 consultation which will evidence how this process has been undertaken and is progressing.

2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 Sevenoaks District Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the emerging Local Plan's decision-making and scoring should be robust, justified, and transparent.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) (2021) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Requiring plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.2 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social, and environmental priorities and to help shape the development of local communities for future generations.

3.1.3 In particular, Paragraph 16 of the Framework (2021) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

- 3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Plan 2040 Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should consider when identifying and meeting their housing needs. While Annex 2 of the Framework (2021) defines the terms "deliverable" and "developable".
- 3.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).
- 3.1.8 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are

required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).

- 3.1.9 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable, and distinctive places with a consistent and high-quality standard of design.

3.2 Planning Practice Guidance

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

3.3 National Planning Policy Framework Consultation

- 3.3.1 The government published draft changes to the NPPF for consultation in December 2022. As a set of draft proposals and where consultation remains ongoing any draft revisions currently carry no weight. It remains to be seen which draft revisions following that consultation the Government may decide to progress further.
- 3.3.2 At this stage Gladman would comment that the Council should not lose sight that its communities are facing a severe housing shortage and affordability crisis that cannot be addressed through limited development in the tightly defined settlement areas. To sustain the social and economic sustainability of Sevenoaks District, a greater supply of housing and employment growth is essential, which necessarily will require some revision of settlement boundaries.
- 3.3.3 In respect of whatever changes to the NPPF might be progressed, Gladman reserves its position to comment further to this or subsequent Local Plan consultations.

4 PLAN 2040- A NEW LOCAL PLAN FOR SEVENOAKS DISTRICT

4.1 Background

- 4.1.1 In December 2020, Sevenoaks District Council asked for permission to challenge the Judicial Review ruling that upheld the Planning Inspector's reasons for rejecting the previous iteration of the draft Local Plan. However, in April 2021, the Council was informed that it had not succeeded in the challenge.
- 4.1.2 Sevenoaks District Council is now currently preparing a new Local Plan to cover the period up to 2040.
- 4.1.3 Gladman generally support the Council's timescales relating to the new Local Plan as set out in the Local Development Scheme (July 2022) but consider that approximately 12 months between this 'Informal Consultation Reg. 18' and 'Draft Local Plan Consultation Reg. 18' to be excessive.
- 4.1.4 The sections that follow below include specific comments from Gladman on the issues discussed in the consultation document covering a range of the topics and questions that have been posed.

4.2 Introduction

1. Have we identified the right strategic issues that will influence the development of the district to 2040? Are there any other issues that we should identify?

- 4.2.1 Gladman consider that the right strategic issues and considerations have been identified, particularly with regard to providing homes to meet local needs. Sevenoaks District remains an expensive place to live and many residents continue to struggle to find a home to meet their needs. Delivering genuinely affordable homes remains a key priority for the Council, yet this iteration of the Plan does not explore how the housing requirement can be met in full. Limited development in tightly defined settlement areas will not meet the severe need for market and affordable homes as

well as jobs needed for prosperity. This is a considerable concern and is explored fully in section 4.3.

2. Do you support the strategic Vision and Objectives?

- 4.2.2 Gladman support the overarching vision and objectives of the District Plan. The creation of a District that is highly sustainable and a desirable place to live, work and visit is a place where housing needs are met, and affordability is much improved. Other elements should feature within this, but it is imperative that the District Plan is progressed with the intention to plan for and support the delivery of new sustainable communities and homes. The strategic objectives can be addressed through the delivery of new sustainable residential led developments.

4.3 Development Strategy

Summary of Development Needs

- 4.3.1 Based on the standard method, Sevenoaks are required to make provision for 714 homes per year, approximately three times the number of homes that have been delivered each year over the past ten years. The Council's housing need for the entire Plan period (2022-2040) is 12,852 homes. Due to difficulties in supply over recent years, the housing requirement will also require a buffer of one year (714) to provide flexibility in delivery which results in an overall housing need of 13,566. The Council has not delivered 714 dwellings in the previous three years, thus making the development needs of this plan period even more pressing.

1a. Do you agree with this proposed development strategy?

- 4.3.2 Based on the figures outlined above, and the fact that Sevenoaks is a highly constrained authority with 93% land subject to Green Belt policy and over 60% designated as Areas of Outstanding Natural Beauty, it is unlikely that the Council will be able to meet their housing requirement in full without reviewing the Green Belt and working closely with neighbouring authorities.

- 4.3.3 Though Gladman broadly support the approach, Gladman have concerns that this consultation document aims to solely focus on making best and efficient use of land in towns and settlements across the district.
- 4.3.4 The Council must endeavour to do all it can to maximise its sustainable use of all sources for development, this must include ensuring all areas which can be released from the Green Belt without providing overarching damage to the strategic function of the Green Belt are done so. The consultation document states, "Green Belt land will only be released where there are exceptional circumstances for doing so, when all reasonable alternatives have been explored, including opportunities in neighbouring authorities".
- 4.3.5 Whilst Gladman agree that directing growth to the most sustainable locations such as Swanley is a suitable approach, it is clear that the housing requirement cannot be met in full through this approach. In all of the approaches outlined, the housing requirement cannot be met in full.
- 4.3.6 Therefore, Gladman believe that working with neighbouring authorities and assessing Green Belt release should not be steps in a process that are isolated from each other. They should be considered at the same time, alongside a robust Sustainability Appraisal that results in the most sustainable approach being pursued.

1b. Which is your preferred approach?

- 4.3.7 This plan does not include an approach that would be preferred by Gladman or should be pursued as the overarching spatial strategy for the Plan 2040. Gladman recognise that the authority is highly constrained by Green Belt, but to simply defer the consideration of Green Belt release to an additional regulation 18 consultation in 2023 does not address at this important stage how the severe housing shortage within the district can be addressed.
- 4.3.8 As per paragraph 142 of the NPPF (2021), the Council have the opportunity to explore alternative strategies for growth in Sevenoaks, which promote sustainable patterns of development through a comprehensive review of the Green Belt.

2. Are you aware of any additional sites in existing settlements which we have not yet considered?

- 4.3.9 Gladman do not consider that this consultation document has given due consideration to sustainable sites within the Green Belt. A full site submission for Pedham Place, Swanley is included in Section 5. This is a highly suitable and sustainably located site that could make a meaningful contribution to the Sevenoaks housing requirement.

4.4 Housing Choice for All

1. Do you think the proposed technical and design criteria are reasonable and will help achieve the aims of Policy H1?

- 4.4.1 Gladman note the proposed policy requirement for all homes on new build housing developments to meet the M4(2) standard for accessible and adaptable homes.
- 4.4.2 Following consultation in summer 2022, Government advised that M4(2) standards would be set as the minimum standards for all new homes². It was noted that further consultation would be undertaken prior to amending the corresponding Building Regulations and statutory guidance.
- 4.4.3 It is advised that the Council closely monitor these emerging amendments and if they are implemented in national standards, it will not be necessary to duplicate this in local policy.
- 4.4.4 Policy H1 as drafted requires new build schemes of 20 units or more, commit to delivering at least 5% of homes to meet the M4(3)b standard for wheelchair user dwellings, to be delivered as affordable housing for rent.
- 4.4.5 The evidence set out in the Targeted Review of Local Housing Needs 2022, specifically Table 6.15, suggests an annual need for wheelchair accessible housing of 4.7% or 34 dwellings. However, this assessment does not provide any consideration as to the

² <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#implementation-and-next-steps>

number of wheelchair users in Sevenoaks who will be in accommodation to meet their needs, for example those moving into full time care or extra care facilities. Nor does the document take account of the accessibility of existing housing stock or its ability to be adapted to meet such standards.

4.4.6 Gladman also welcome reference within the Preliminary Overview Viability Assessment that setting a policy requirement for the delivery of M4(3)b standard housing would represent an additional cost to the development. It is vital that policy requirements are tested through an associated viability assessment to ensure that the cumulative costs of development do not render development proposals undeliverable.

4.4.7 Fundamentally, housing mix should be informed by local housing needs evidence to ensure that the right types of homes are built where they are needed.

4.4.8 Gladman support the Council's Net Zero 2030 commitment and to provide homes built to high sustainability standards with built-in resilience to climate change and fuel poverty. Given the viability issues that can arise from high sustainability standards, it is imperative that the Council allocate sites of the right scale to ensure that this aim can be delivered. As referenced elsewhere in this representation, Pedham Place can be delivered as a net-zero scheme and contribute significantly to the Council's Net Zero 2030 commitment and the housing requirement.

2. Do you think the proposed affordable housing contributions are reasonable and will help achieve the aims of Policy H2?

4.4.9 Gladman support the affordable housing requirements outlined in Policy H2, ranging from 20%-40%. Whilst the policy currently determines the affordable housing mix, Gladman contend that the mix should always be determined by local need at the time to ensure that the right types of affordable housing are delivered.

4.4.10 Fundamentally, the provision of affordable housing requires the delivery of market housing. Therefore, to ensure that the necessary level of affordable housing is provided in Sevenoaks, which is already a highly unaffordable place to live, the

Council must endeavour to meet their housing requirement in full. A suitable suite of allocations for residential development is the most effective and efficient way to ensure affordable housing needs are met and the Council must fully explore all options, including Green Belt release and co-operating with neighbouring authorities, to deliver this.

8. Is there anything else that we should include, or an alternative approach we should consider through Policy H6?

- 4.4.11 Gladman note that in Table 1.3: Breakdown of Housing Supply, 'windfall/small sites allowance', and 'future potential identified in Settlement Capacity Study' are separate components with separate contributions. However, in Policy H6, the supportive text says *'The Settlement Capacity Study 2022 (SCS) identifies the potential for approximately 1,000 units to come forward in our existing built up areas'* which reads as though sites within the Settlement Capacity Study are considered small sites. This would result in duplication within the breakdown of housing supply as small sites are being double counted. The Council should provide further clarity on what small sites within the SCS are and how they differ from small sites in the 'windfall/small sites allowance' to ensure the sub-categorisation is robust and justified.

4.5 Climate Change

1. Do you agree that the Local Plan should seek to ensure development mitigates and adapts to climate change?

- 4.5.1 In principle, Gladman support policies which seek to tackle climate change and reduce carbon emissions. Nonetheless, it is vital that any policy requirements are justified by robust evidence and drafted with reference and consideration to the relevant Building Regulations and emerging Future Homes Standard which offer the most appropriate mechanism to deliver low carbon and energy efficient developments.
- 4.5.2 Any policy requirement with regard to sustainable design and construction must be fully justified through clearly evidenced need, alongside thorough consideration of viability. It should be noted that a number of authorities have opted to introduce

climate change and sustainable construction supplementary planning documents to provide additional guidance to policies in their Local Plan, for example, East Hampshire and Warwick. The Council should consider whether an SPD would be appropriate to provide additional guidance to any climate change and sustainable construction policies.

2. Are there any other ways the Local Plan can address climate change? and 4. Are there any other ways the Local Plan can ensure low carbon developments?

- 4.5.3 The Local Plan can address climate change through the allocation of sustainable residential development sites and should consider allocating sites that are capable of delivering low and net zero carbon developments. Pedham Place will comprise of around 2,500 zero-carbon ready homes across a variety of densities over 70 hectares as well as employment to provide greater degree of self-containment. There will be a mixture of housing typologies providing 40% affordable housing (at least 1,000 affordable homes). The remaining area will deliver green and amenity space. Around 55ha of green space shall be provided, with a significant natural woodland buffer to the north, east and south boundaries.
- 4.5.4 The proposed site would include a local centre (including health facilities and a shop), electric transport hub, employment floorspace, two primary schools, a secondary school and leisure facilities ensuring a sustainable lifestyle for future residents.
- 4.5.5 Aside from specific net-zero carbon developments, the Council should be mindful that one of the most effective ways of mitigating climate impact is to facilitate sustainable, energy efficient housing delivery in areas that are well connected by public transport. These are likely to be on the edge of, or adjacent to, sustainable settlements and could require the release of Green Belt. Based on this, Gladman reiterate concerns with the choice to defer all Green Belt review and release considerations to a second regulation 18 consultation in 2023.

3. Do you agree with the use of climate impact assessments as a way to ensure developments significantly reduce carbon emissions?

- 4.5.6 Policy CC2 will seek to ensure development is built to significantly reduce carbon emissions and to be resilient to a changing climate including Climate Impact Assessments to be required for all developments to set out how they are achieving the lowest possible carbon rating, incorporating renewable energy measures and ensuring climate resilience. This will need to be consistent with national planning policy.

4.6 Design

1. What design policies do you think would support the successful delivery of the Strategic Objectives?

- 4.6.1 Gladman do not disagree with the use of design policies, but the Council should ensure that any design policies are not overly prescriptive and do not hinder sustainable development from being delivered.

4. Do you agree that Policy DE3 will help to make optimal use of the potential of a site?

Policy DE3 as drafted simply states that proposed densities within an outline planning application will be deliverable in accordance with national and local planning policies. It does not specify what these densities will be, and national policy highlights that minimum density standards should be set out in planning policy to optimise land use. It is also suggested that such minimum standards should be set out as ranges reflecting the character and context of different plan areas³.

6. Will Policy DE4 help to secure well-designed places?

- 4.6.2 This policy will seek to require large sites to demonstrate that their development meets these 10 characteristics of place, utilising the District Character Study. As previously stated, Gladman are committed to the delivery of well-designed schemes, but it should be noted that design matters in greatest detail are best considered at detailed application stage. The policy should be clear that it relates to Reserved Matters and Full applications to ensure that design matters for the determination of

³ NPPF (2021) Paragraph 125

Outline stage applications are appropriate and proportionate to the level detail provided and so are not unnecessarily delayed.

4.7 Health and Wellbeing

1. Do you agree that Health Impact Assessments (HIAs) should be included for certain new developments?

4.7.1 Gladman do not agree that Health Impact Assessments should be undertaken for all major housing developments of 10 or more units. The NPPF includes the general expectation that planning will promote healthy communities and the PPG⁴ confirms that HIAs can serve a useful purpose at planning application stage to understand the potential impacts of development proposals will have on existing health services and facilities.

4.7.2 However, the requirement for a HIA on all major residential developments of 10 or more dwellings without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local populations is not justified. Requirements for HIAs should be based on a proportionate level of detail in relation to the type and scale of development proposed.

4.7.3 Gladman suggest that HIA Screen Reports should be required for large strategic residential developments, and only if a significant adverse impact on health and wellbeing is identified should a full HIA be required.

3. Do you agree that all new developments should have a neutral or positive impact on air quality?

4.7.4 Paragraph 186 of the NPPF requires all new developments to 'sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.' Any policy within the local plan should reflect this and include flexibility to ensure that where a

⁴ PPG paragraph 53-004

neutral or positive impact cannot be evidenced, the harm is considered in a planning balance exercise.

4.8 The Natural Environment

1. What could be included in Policy NE1 and design criteria for development in the AONB?

4.8.1 Gladman support Policy NE1 as drafted which seeks to conserve and enhance the distinctive features that contribute to the AONB. Gladman welcome that the policy is not drafted to be a blanket ban on development within the AONB consistent with national policy and recognises that development within the AONB can be accommodated and designed to reflect the distinctive high quality area.

4.8.2 The policy as drafted would support the delivery of sites such as Pedham Place, which forms part of the AONB on paper, but in reality, is heavily impacted by its location next to two major motorways, existing built form, and pylons on site.

2. Do you agree that an Assessment of Landscape and Visual Impacts (LVIA) should be required for all new major developments?

4.8.3 Gladman do not disagree that LVIAs should be required for all new major developments, however the policy wording will need to be clear that any identified harm will be considered in a planning balance exercise and not used as a blanket ban on development.

4. Do you agree that locally designated sites should generally be protected from development?

4.8.4 Gladman agree that locally designated sites should generally be protected from development. The impact of development on these sites, however, should be assessed through an Ecological Appraisal and any benefits and/or harms should be considered in a planning balance exercise and not simply used to limit development.

6. Is the 20% biodiversity net gain target appropriate for Sevenoaks District?

- 4.8.5 Gladman do not consider a 20% BNG target to be an appropriate target for the district and is a deviation from national guidance within the Environment Bill which seeks a 10% BNG.
- 4.8.6 The costs of delivering BNG varies significantly depending on the level of biodiversity on a site and can significantly impact viability. While the Council's Preliminary Overview Report Viability Assessment states that the proposed requirement will not have a significant scheme viability impact, it should be noted that no indicative costs or testing has been provided or undertaken and it is welcomed that further testing will be included in the next stage of the viability assessment.
- 4.8.7 If the Council wish to deviate from the Environment Bill, they must present robust evidence justifying the need and choice for Policy BW2. Notwithstanding this, it is considered that there must be an element of flexibility built into the policy, whereby if viability or deliverability concerns arise then sites will be considered on a case-by-case basis.

4.9 Transport

1. Do you agree with our approach to a sustainable movement network?

- 4.9.1 Gladman support Policy T1's approach to a sustainable movement network and note that our site at Pedham Place offers the opportunity to enhance existing public transport infrastructure alongside creating new cycling and pedestrian routes linking to wider connections linking to Swanley. The site will also support a new Transport Hub housing a new bus interchange, a Community Park and Share facility including charging points for electric vehicles, access to new bus services, but importantly will also facilitate on demand use of hire vehicles.

9. Do you agree with our approach to electric vehicle charging points?

- 4.9.2 The document outlines that within new residential developments, all new houses with a garage or off street parking must include an external electrical socket with suitable voltage and wiring for the safe charging of electrical vehicles. Gladman do not disagree with the provision of electric vehicle charging points in principle but given

that the standards for electric vehicle charging points are now set out in Part S of the Building Regulations, it is not considered necessary to repeat this in a local plan policy.

5 SITE SUBMISSION PROFILE

5.1 Pedham Place, Swanley

Site Location and Suitability

- 5.1.1 Pedham Place is a sustainably located 144 hectare site which sits between Swanley and Farningham, ideally placed on the edge of the strategic road network and close distance to Swanley railway station with direct links to Bromley South, London Victoria, London Bridge, Charing Cross, Sevenoaks, and Ashford.
- 5.1.2 The proposed development will include around 2,500 zero-carbon ready homes across a variety of densities over 70 hectares. There will be a mixture of housing typologies providing 40% affordable housing (at least 1,000 affordable homes). Other areas include deliver green and amenity space. Around 55 Ha of green space shall be provided, with a significant natural woodland buffer to the north, east and south boundaries.
- 5.1.3 The development will also include a local centre (including health facilities and a shop), electric transport hub, major employment floorspace, two primary schools, a secondary school and leisure facilities. This is in line with the Infrastructure Delivery Plan, which outlines the need for a secondary school in this location and is therefore a significant benefit of development at this location. With regards to the sport and leisure facilities on site, we have ongoing discussions underway with the LTA and are currently considering three tennis courts covered with a canopy, two outdoor tennis/netball courts, three covered padels and a gym, sports hall, and ATP as part of a wider school sports facility.

A Net Zero Development

- 5.1.4 The vision for Pedham Place will align with existing and emerging local policies, sustainability objectives and Sevenoaks's commitment to become Carbon Neutral by 2030.

- 5.1.5 Approaches to delivering net zero homes may allow opportunities to support offsetting through developing relationships with existing decarbonisation projects in Sevenoaks.
- 5.1.6 The scheme will be built to Future Homes Standards meaning there will be no gas provision and the homes will be served entirely by electricity.
- 5.1.7 Once the electricity grid is de-carbonised (by 2035) the housing will therefore be zero carbon. It will still be important to ensure that the housing is energy efficient to reduce demands on the grid, to reduce bills and to ensure comfort. The housing will therefore meet energy standards and will be take advantage of orientation.
- 5.1.8 The scheme will incorporate renewable energy provision largely through connected Photovoltaic provision on roofs. It is likely that the surplus energy generated will be sold to the grid and used to reduce local energy bills via a local ESCO.

Green Belt

- 5.1.9 The site is currently located within the Green Belt. Although Green Belt release is not being currently being considered by this Regulation 18 consultation, Gladman have undertaken an assessment of the site's performance against the purposes of the Green Belt as defined by the NPPF. This assessment is included in the accompanying Story Map, but a summary is included in Table 1 overleaf.
- 5.1.10 The assessment concluded that the parcel of land comprising this site performs weakly against the NPPF Green Belt purposes overall. When the Council begins to consider the requirement to release Green Belt land in order to meet the housing requirements for the plan period/ensure the social sustainability of the district, the site should be considered as a suitable and sustainable location for release.

Table 1: Alternative Green Belt Assessment

Purpose	Criteria	Assessment
Purpose 1: To check the unrestricted sprawl of built-up urban areas.	a) Parcel is at the edge of one of more distinct large built up areas.	The parcel is at the edge of Swanley.
	b) Prevents the outward sprawl of large built up areas into open land and serves as a barrier at the edge of a large built up area in the absence of another durable boundary.	The parcel is connected to Swanley and is predominantly bordered by prominent, permanent boundary features comprising the A20 to the north, the M25 to the west, Crockenhill Lane to the south and a ridge of topography and tree belt to the east.
Purpose 2: To prevent neighbouring towns from merging.	Prevents development that would result in the merging of, or significant erosion of, gap(s) between neighbouring settlements, including ribbon development along transport corridors that link settlements.	Forms a wider gap between Swanley and Farningham/Eynsford. Development in the gap would reduce this gap. However, the ridge on the eastern boundary of the parcel would prevent the towns physically or visually merging. The parcel is semi-urban in character and connected to the edge of Swanley whilst Farningham/Eynsford are rural in character.
Purpose 3: Assist in safeguarding the countryside from encroachment.	Protects the openness of the countryside and is least covered by development.	The parcel is semi-urban in character and currently comprises a golf course and an area used for car-boot sales. Within the golf course there is built development comprising the clubhouse, parking, maintenance buildings, Pedham Place Farm and Fort Cottages.
Purpose 4: To preserve the setting and special character of historic towns.	Protects land which provides immediate and wider context for historic settlements, including views and vistas between the settlement and surrounding countryside.	The parcel does not abut an identified historic settlement core.
Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	This was not considered in the 2017 Assessment.	Swanley needs growth and regeneration, however the town is heavily constrained by the lack of developable land. Without land for development, the regeneration of the town cannot be supported.

Area of Outstanding Natural Beauty

- 5.1.11 The existing proposal site is located within the Kent Downs AONB and is currently an 18 hole golf course with 9 hole course and floodlit driving range. The site also includes an additional section of land which is rough grassland used for a Sunday market / car boot sales. The existing landscape across the site is manmade, as imported soil from major highway works and ecologically poor with little tree cover and managed grassland. The site also contains built infrastructure including the club house and associated commercial and service buildings and three residential dwellings.
- 5.1.12 The proposal site, bordered by the A20, M20 and M25 and crossed by a major pylon line and railway tunnel as well as being covered largely by a links golf course, clearly represents a section of the character that includes all of the detracting influences cited. The proposed development site is not typical of the AONB landscape and there is little woodland or tree cover and no ecological protection
- 5.1.13 The proposal site falls within the Darent Valley as the only character area within the AONB that would be directly affected by the proposals at Pedham Place.
- 5.1.14 The Darent Valley has characteristics that include parkland, broadleaved woodland, and blocks of once coppiced woodland. Although rural and secluded in places, the area is described as under pressure from transport infrastructure and new development including golf courses.
- 5.1.15 The scheme will continue to uphold the common aims of the AONB through a careful balance of development and landscape and ecological enhancement and an informed and sensitive approach to design.
- 5.1.16 The proposals would work with the AONB management and local wildlife groups to develop habitats across the site that will be characteristic to the Kent Downs and provide a local response to international issues such as species decline, habit

loss and climate change. This will deliver significant biodiversity benefit.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman and Ramac Group welcome the opportunity to comment on the Regulation 18 consultation for Plan 2040. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 6.1.3 Gladman's main concern is the choice to defer the consideration of Green Belt release until a further regulation 18 consultation this year. As the authority is highly constrained by Green Belt, and it is clear that the housing requirement cannot be met in full without the use of Green Belt land, Gladman consider that this should form part of this early issues and options consultation to allow the Council to give it its full and robust attention.
- 6.1.4 We hope you have found these representations informative and useful towards the preparation of the Sevenoaks District Local Plan and Gladman welcome any future engagement with the Council to discuss the considerations within forwarded documents.

APPENDICES

Appendix 1: Pedham Place, Swanley- Site Location Plan



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