



Sevenoaks District Council Plan 2024: A Local Plan for Sevenoaks

Regulation 18 Consultation

November 2023- January 2024



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1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments Ltd. (Gladman) and Ramac welcome the opportunity to comment on Plan 2040: A New Local Plan for Sevenoaks (the Local Plan) 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, as shown on Figure 1) and Ramac Group (land broadly to the west of the electricity pylons, as shown on Figure 1) have a land interest in Pedham Place, Swanley and can confirm that the site is available, suitable, and deliverable for housing, and employment development with associated infrastructure as summarised in Section 3.1 of this representation and the accompanying New Settlement Vision Document. Gladman and Ramac Group looks forward to engaging further with the Council as the plan preparation process progresses.



Figure 1: Pedham Place- Site Location Plan

- 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.
- 1.1.6 At the outset, it is important to highlight that a new Wasps stadium and associated development does not form part of the promoters'/landowners' proposals for Pedham Place. Whilst historically there had been some discussion, it was not considered to be a viable or deliverable proposition for this site, and furthermore could detract from many of the qualities of the scheme and the mitigation solutions for a development in this location.

1.2 National Planning Policy Framework (2023)

- 1.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires 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'.

1.2.2 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.

1.2.3 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.

2 PLAN 2024: A NEW LOCAL PLAN FOR SEVENOAKS

2.1 Background

- 2.1.1 Gladman and Ramac Group have previously submitted representations to the Regulation 18 consultation that was undertaken in December 2022. Within this submission, a significant concern was the Council's choice to defer consideration of Green Belt release as given that it is clear that the housing requirement cannot be met without Green Belt land, this should be given robust consideration at an early stage of the plan making process. Therefore, Gladman welcome this consultation that presents Green Belt release and the supporting evidence base.
- 2.1.2 Gladman are promoting Pedham Place, Swanley for mixed-use development. The proposed settlement will include around 2,500 homes alongside employment, primary and secondary school, leisure facilities, health facilities and retail spaces. The recognition of this location as a suitable option for delivering much needed housing, including 40% affordable housing against a very significant need in Sevenoaks is welcome, and Gladman would welcome the opportunity to continue working with the Council to deliver this scheme and address any issues that may arise from this consultation.
- 2.1.3 The sections that follow below include specific comments from Gladman on the Council's preferred options covering a range of the topics and questions that have been posed.

2.2 Introduction

Vision and Objectives

- 2.2.1 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 housing 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.

2.3 Development Strategy

Summary of Development Needs

- 2.3.1 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Sevenoaks Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 2.3.2 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.
- 2.3.3 Once the minimum number of homes that are required is identified, the Council should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.
- 2.3.4 The NPPF (2023) sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. Annex 2 of the Framework (2023) defines the terms "deliverable" and "developable".
- 2.3.5 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. Gladman welcome the district-wide approach that underpins this consultation which gives due consideration to Green Belt land through the Stage Two Green Belt Assessment (2023).
- 2.3.6 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. This is discussed further at 2.3.7.

Duty to Co-operate

- 2.3.7 Unmet housing need is a significant issue in this area, but in Sevenoaks, there is a clear argument for setting the housing requirement at LHN. The housing requirement is discussed fully elsewhere within this representation, but the Council should note that there is significant risk in exporting housing need, such as delayed delivery of housing, housing being located beyond where it is needed and even housing need not being met at all.
- 2.3.8 There are also very specific circumstances that means that exporting unmet need is unlikely to be a viable solution for meeting housing need in Sevenoaks. Dartford Borough is 56% Green Belt and currently cannot meet its own needs and directs growth to Ebbsfleet Garden City. Similarly, Tandridge District is 94% within the Green Belt and is currently proposing to release land from the Green Belt to meet housing needs.
- 2.3.9 The neighbouring authorities that could potentially help meet Sevenoaks' housing need are Tonbridge and Malling Borough, Tunbridge Wells and Maidstone. However, it is questionable whether Tonbridge and Malling would accept Sevenoaks' unmet need given the pressures from Medway despite being at the early stages of the plan preparation process. Tunbridge Wells and Maidstone are at the later stages of plan preparation, so unmet need would not be allocated for some time and even if unmet need was taken, it is questionable as to whether this would be a suitable location given that the authorities do not relate well to Sevenoaks.
- 2.3.10 As such, despite the requirement to meet the Duty to Cooperate and the potential to explore some of Sevenoaks' housing need in neighbouring authorities, this is unlikely to be a suitable approach and the Council should make every effort to meet its housing need within the boundary and suitably explore releasing Green Belt to facilitate this. There are sustainable and deliverable sites within Sevenoaks that can meet the housing needs of the district which are later explored in this representation.

Development Strategy Options

- 2.3.11 Based on the standard method, Sevenoaks is 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.

- 2.3.12 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, the Council will not be able to meet their housing requirement in full without reviewing the Green Belt.
- 2.3.13 The consequences of not providing sufficient market and affordable housing would be significant; first time buyers and young families would find it difficult to remain in the district which has the highest house prices in Kent, as recognised by this Local Plan consultation.
- 2.3.14 Gladman agree with the Council that Pedham Place provides a unique opportunity to deliver much needed homes, employment and accompanying infrastructure in the Sevenoaks area and include full details of the submission within section 3. A suite of supporting documents has been prepared to evidence the suitability and deliverability of Pedham Place. This includes, but is not limited to transport, highways and accessibility, heritage, and landscape. The assessments have been amalgamated within the Pedham Place: A New Settlement Vision for Sevenoaks brochure included at Appendix 7 to support the allocation of Pedham Place.
- 2.3.15 The NPPF, at paragraph 74, recognises that the supply of a large number of homes as required in the district to meet local need, can often best be achieved through larger scale development. It explains:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other

authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;

d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and

e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."

- 2.3.16 Gladman consider that Pedham Place is a suitable development to meet the significant market and affordable housing needs of the district against the criteria of this national policy.

Policy ST1: A Balanced Strategy for Growth

- 2.3.17 Table 1.2 outlines the development strategy options for Sevenoaks, and these have been assessed in the Sustainability Appraisal (SA) of the Sevenoaks Local Plan Interim SA Report, produced by AECOM in October 2023.

- 2.3.18 The Sustainability Appraisal (SA) is a mechanism for considering and communicating the effects of an emerging plan, and reasonable alternatives, with a view to

minimising adverse effects and maximising the positives. SA is required for local plans and must be undertaken in-line with the procedures prescribed by the SEA Regulations 2004. This 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.

2.3.19 Sevenoaks Council should ensure that the results of the SA process clearly justify the policy choices made in the emerging Local Plan. 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.

2.3.20 Gladman are encouraged that the Interim Report demonstrates that Pedham Place is a sustainable and preferable location for growth, as part of Option 2 or 3 as summarised in *Table A: The reasonable growth scenarios- summary appraisal findings*.

Gladman broadly agree with the conclusions of the report regarding Pedham Place and consider that the additional information included within and appended to this representation further support the allocation and delivery of Pedham Place.

Question 1: Which is your preferred option?

2.3.21 Gladman consider Option 2 and Option 3 to be the best options for Sevenoaks.

2.3.22 In the approaches outlined, the housing requirement cannot be met in full without the release of Green Belt land and will only be met when considering large scale opportunities for growth, such as Pedham Place.

2.3.23 Gladman note that Option 1 relies significantly on the delivery of brownfield sites within suitable settlements included within the baseline options of suitable sites. Whilst Gladman appreciate that brownfield sites can deliver homes, the Council should be considerate of the issues that can arise when focussing on this type of development. Brownfield sites can be subject to extensive viability constraints and lead in times, while assumed densities can be considerably higher than what is delivered. As such, Gladman do not consider that an approach that relies entirely on

this type of development to be suitable. Rather, the Council should consider a balanced strategy that, most importantly meets housing need, whilst balancing a range of site types and sizes. Fundamentally, an option that does not meet the housing need, and is particularly vulnerable to delivery issues pertaining to the complexities of brownfield development should not be pursued in isolation.

Question 2: Please explain your answer.

- 2.3.24 Gladman support Option 2 as a suitable growth strategy for Sevenoaks. Fundamentally, Option 1 does not meet the needs of the district, and when options are available to meet or even exceed the housing requirement in an area with low market and affordable housing delivery rates, these should be considered preferable in the first instance.
- 2.3.25 Options 2 and 3 both consider Pedham Place as a suitable and sustainable option for delivering a significant level of growth. Option 3 suggests a surplus of 1,163 dwellings which could provide a buffer, albeit a low one, for housing delivery. Options 2 and 3 also propose a range of small and medium sites that will serve to meet the immediate housing needs of the district, given the likely lead in times of a large scale development such as Pedham Place.
- 2.3.26 To evidence the inclusion of Pedham Place in this consultation, the Council have published an updated Green Belt Assessment that considers the Pedham Place parcel in isolation, rather than as a large swathe of land.
- 2.3.27 Gladman agree that assessing the role of Pedham Place within the Green Belt is best done as the parcel that is proposed to be released, but do not agree with the results within the report. Table 1 details what has been concluded by AECOM on behalf of the Council, and Gladman.

Table 1: Alternative Green Belt Assessment

Purpose	Criteria	AECOM	Gladman
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 sub-area is located at the edge of the large built up area of Swanley, with physical connections on part of its north and part of its west boundaries.	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 sub-area is connected to the large built-up area of Swanley. There are no outer boundary features within a reasonable distance of the sub-area which would regularise built form and prevent outward sprawl. The sub-area has predominantly recognisable and likely to be permanent inner boundary, which provides an additional barrier to sprawl.	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.	The sub-area forms a wider part of the gap between Swanley and Farningham and Swanley and Eynsford, contributing to the overall openness and scale of these gaps. It is judged that there might be some scope for development without significant physical or perceptual erosion of the gap between neighbouring built-up areas.	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.	Approximately 3% of the sub-area is covered by built form excluding hardstanding. The built form consists of a golf clubhouse and driving range to the north-east of the sub-area, and two light industrial buildings and two smaller buildings with associated access track and car parking in the centre of the sub-area. The remainder of the sub-area contains open fields and a golf course which contributes towards a more urban managed character, and areas of mature trees and hedgerow. The topography is undulating allowing for views onto wider countryside, especially towards the north-east, south and south-west. Overall, the sub-area has a largely rural character.	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 sub-area does not abut a historic town or provide views to a historic town and does not meet this purpose.	The parcel is not adjacent to or in the vicinity of an identified historic settlement core.
Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	Ensures that all other sources of land have been considered before Green Belt land.	This has not been considered in the 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. Through the two stage Regulation 18 consultation, the Council has demonstrated that the housing needs of Sevenoaks cannot be met through regeneration of derelict and urban land alone,

Policy ST2: Housing and Mixed Use Site Allocations

- 2.3.28 Gladman support the inclusion of Pedham Place as a mixed use allocation for 2500 homes, employment and associated infrastructure and look forward to working with the Council to bring this sustainable development forward.
- 2.3.29 The expected delivery rate is outlined in the table below and demonstrates the significant contribution Pedham Place can make to meeting Sevenoaks' housing need both within and beyond the plan period.

Table 2: Expected Delivery Rates

Description	Timescale
Local Plan adoption	Spring 2025
Pre-application consultation	Spring-Summer 2025
Outline planning application	Summer-Autumn 2025
Committee consideration	Summer-Autumn 2026
S.106 completion and issue of planning permission	Autumn-Winter 2026
Reserved matters submission (phase 1)	Spring 2027
Reserved matters approval (phase 1)	Winter 2027
Discharge of pre-commencement conditions	Summer-Autumn 2028
Commencement on site	Winter 2028
Infrastructure and highway works	Spring 2029
On site preliminaries	Autumn 2029
Residential development commences	Winter 2029
1 st house completion	Autumn 2030
1 st year completions	Autumn 2031 – 60 dpa
Completions year 2	Autumn 2032 – 120 dpa
Completions years 3	Autumn 2039 – 120 dpa
Completions year 4-14	Autumn 2044 – 200 dpa
Site completion	Spring 2045 – 200 dpa

- 2.3.30 It is recognised that development in this location will require 'Very Special Circumstances' or 'Exceptional Circumstances' to be demonstrated. The table below outlines housing delivery context that justify this development in the Green Belt and

the extensive benefits that will be delivered on and around Pedham Place against the key technical and sustainability criteria.

Table 3: Benefits and Exceptional Circumstances Summary

Key Issue	Benefits Delivered by Pedham Place
Housing 	Sevenoaks currently has a significant and pressing need for more market and affordable homes. Pedham Place proposes 2500 homes, of which 40% will be affordable, alongside employment and social infrastructure. The Council claimed a 3.9 year supply of housing in the most recent Five Year Housing Land Supply Statement dated April 2023¹. However, this was reduced to 2.8 years in September 2023 following a S78 appeal². This demonstrates the dire, and worsening level of housing delivery in the district. Sevenoaks is also the least affordable area in the region with the average home costing circa £575,000 whilst the average full time salary sits at circa £41,000. This results in an affordability ratio of 14.0- significantly above the affordable level of 4.0-5.0. The delivery of 1500 market and 1000 affordable homes against a significant and pressing need is a significant benefit of the scheme. The level of housing delivered at Pedham Place cannot be delivered elsewhere in the district and therefore significant weight should be attached to the 2500 homes delivered by Pedham Place. Pedham Place also proposes extra care apartments and a specialist village for older people, helping to meet the needs of an ageing population as well as young people and families. This will also serve the additional benefit of freeing up other family homes in the wider area.
Climate Change 	Pedham Place will be zero-carbon ready supporting national and local climate change objectives. Once the grid has been decarbonised, the homes will be heated without the use of fossil fuels, including sustainable electrified heat in place of gas boilers. The homes will be energy efficient ahead of the grid decarbonising by 2035, resulting in lower bills and additional comfort for residents. The scheme will incorporate renewable energy provision through connected Photovoltaic provision on roofs. Photovoltaics will be placed on new homes and linked to intelligent energy store that will allow demand response to make sure energy is used on-site, reduce bills for residents, and help support the grid. The scheme will address travel as part of its zero-carbon aspirations. This will include demand reduction through the mix of people on the site (not a dormitory suburb), local workspace and home working provision. It will also include public transport via the park and ride scheme, an accessibility hub with bike and car share services and provision for 100% electric car ownership.

¹ SDC Five Year Housing Land Supply April 2023-
https://www.sevenoaks.gov.uk/downloads/file/3893/five_year_housing_land_supply_statement_-_april_2023

² Appeal ref: APP/G2245/W/22/3313321/ APP/G2245/W/23/3322596

Transport and Highways 	The settlement has also been designed to be a walkable neighbourhood, where community facilities are within a 10 minute walking distance of the majority of homes within the scheme. The scheme includes a park-and-ride facility. This will serve people travelling by car to Swanley Station, taking them out of the M25 junction. They will support a much better bus service for the site than would otherwise be possible. The park-and-ride will be linked to a transport hub that will include bike hire/maintenance, e-scooter and e-bike hire station and a car share scheme. The existing public right of way will be retained with only a minor diversion to follow the masterplan streets. The scheme will also create a network of new pedestrian routes and dedicated cycle routes. The network of dedicated cycle routes is designed to provide safe, attractive, segregated routes that connect the key destinations across the scheme, including the primary schools and secondary school, the high street, the transport hub, employment area, the central park and surrounding parkland areas. Most significantly, the scheme presents the opportunity to provide net improvements to the existing highways network through the provision of new and improved public transport, contributions from the development to support the delivery of motorway junction upgrades, and improvements to the A20 access road. The scheme will also address a number of safety issues which have been noted in pass assessments and will overall, deliver substantive improvements to highways operations at this location.
Biodiversity 	While the site is currently green space the management of the golf course means that there is very little biodiversity. There is some tree cover and woodland around the edge of the site that will be retained but the rest is grass that is regularly cut with no ponds and little tree cover. The development will substantially enhance the level of biodiversity through the following means: Meadow Grassland: The scheme is on a plateau- the slopes of which will be planted as flower rich grassland. This is an ancient species rich landscape often associated with hill forts and so is very appropriate to the site. These areas will allow public access confined to footpaths. Species Rich Amenity Grassland: Elsewhere grassland will be designed for recreational use but will be planted and managed to maximise biodiversity. New Woodland: The scheme includes extensive areas of new woodland that will be planted with native species and will create rich new habitats as well as screening the edge of the development from long views. In addition to the woodland there will be extensive planting within the new build. Street trees will be planted on most streets and a series of interconnected greenways will include extensive tree planting and other opportunities for wildlife. The Greenways will provide the structure for a sustainable drainage system using swales, rain gardens, reed beds and wetlands to attenuate surface water run off while encouraging biodiversity. Biodiversity led design of the scheme will incorporate a range of habitat creating features such as bat and bird boxes, hedgehog highways, native planting, and ponds.

Communities and Infrastructure 	The masterplan has been designed to create a small traditional town, with all the infrastructure, services, and facilities you would expect to find in an established and thriving settlement. This includes a high street with at least 20 individual shop units with a shared surface for pedestrians and vehicles, a café, a hotel, a transport hub, tennis facilities, primary and secondary schools, healthcare facilities, a central park, restaurant, dispersed retail units amongst housing areas to meet micro-local need, employment space and park and ride facilities. This means that Pedham Place will deliver the local infrastructure and services to meet the needs of its residents, therefore placing no additional pressure on existing services. Rather, the development could serve to relieve some pressure through new and improved facilities and increased local choice-particularly with regard to transport, healthcare, and education. Pedham Place will be a healthy neighbourhood where people have access to formal and informal opportunities for recreation, walking, cycling and a place to connect with nature.
Education 	The proposed scheme will deliver 2x 2FE Primary Schools, a 5FE Secondary School (including Sixth Form) and a Special Educational Needs School. The schools will be sized as per the latest Kent 'Education Commissions Plan' (2019-2023). This provision equates to 840 Primary School student places and 1,170 Secondary School student places being created by development at Pedham Place. Against the need generated from solely Pedham Place, there is an over-provision in terms of education facilities. However, when you take in to account other committed developments it's correctly sized to meet both its own demands as well as educational demands in the local area. Pedham Place is a strategic solution to meet wider housing needs but also educational needs in the local area. Indeed, Kent County Council's representation to the previous emerging local plan confirmed that there was insufficient primary and secondary capacity in the local area and without the delivery of Pedham Place, demand from existing commitments would not be able to be accommodated locally as there is no scope to upgrade existing schools. The education provision that Pedham Place could deliver could benefit primary school provision in the Swanley & Hextable area and secondary school provision across North Sevenoaks.
Landscape/AONB 	The masterplan for Pedham Place has been developed with a detailed knowledge and understanding of the landscape within which this proposed urban extension lies. The proposals site is very visually contained due to its elevation and plateau type form, sitting above steep sided and wooded valleys, views up to the boundaries are heavily screened. Locations to the north, east and south east are well screened by a combination of rolling topography and dense woodland and offer limited opportunities to view the proposed developments.

	The landscape is well wooded over rolling hills and the possibility of views of the proposed development recede at 4-5km leading to negligible levels of change. The latest development and refinement of the masterplan and the adjustment of areas of commercial development within the plan have been tested through landscape sections to understand whether the level of visual impact has altered. The sections confirm the strong visual enclosure afforded to the site through retained woodland and vegetation and the ability of new planting to enhance this screening and enclosing effect.
Economy and Employment 	Pedham Place will deliver 15.36ha/49,000sqm of employment land, supporting a wealth of jobs both during construction phases and when occupied. A mixed used scheme of this size has the potential to generate significant funds for both the local and hyper-local economy. Based on Lichfield's Economic Toolkit calculations, and assuming a build period of between 10-15 years, the development could be expected to generate the following: • A total construction cost of £441,800,000 • 603 full time equivalent construction jobs, and a further 42 indirect full time equivalent jobs • Generate £42,635,000 direct gross value added per year, equating to a total Gross Value Added of £1,207,430,000 over the build period. New residents will also have notable expenditure impacts, with total first occupation expenditure totalling around £15,345,000 and a continued gross potential spending power of £90,818,000 per annum. This presents a great opportunity for increased local investment and support for local businesses in the district. The LPA fiscal impacts are also important, as the scheme could generate £4,915,000 in Council Tax per annum to support local services and facilities as well as around £21,060,000 from the New Homes Bonus payment scheme.

2.4 Housing Choice for All

Policy H1: Housing Mix

- 2.4.1 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.

- 2.4.2 Following consultation in summer 2022, Government advised that M4(2) standards would be set as the minimum standards for all new homes³. It was noted that further consultation would be undertaken prior to amending the corresponding Building Regulations and statutory guidance.
- 2.4.3 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.
- 2.4.4 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.
- 2.4.5 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 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.
- 2.4.6 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.
- 2.4.7 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.

³ <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>

- 2.4.8 With regard to Self-Commissioned Homes, Gladman recommend that the policy include a mechanism that allowed self-build plots on site to be developed as market housing if after 12 months of marketing, there has been no interest. This will ensure that the policy requirement remains flexible and maximises housing delivery.

Policy H2: Provision of Affordable Housing

- 2.4.9 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.
- 2.4.10 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, to deliver this.

2.5 Employment and Economy

Policy EMP1: Delivering Economic Success

- 2.5.1 Gladman consider that the 5.7ha identified in this policy is considerably lower than alternative forecasts would suggest. Gladman have commissioned Lichfield's to critique this position and this report is included at Appendix 2.
- 2.5.2 This critique looks to understand the demand forecasting scenarios modelled as part of the 2022 Study, the range of land requirements identified, and their validity. The Study identifies an overall need for 5.7 hectares ('ha') of employment need to 2040 factoring in the supply position. As part of the Study, only two forecasting approaches have been undertaken to estimate the Council's employment requirements, including:

- A labour demand scenario using Cambridge Econometrics ('CE') forecasts; and
- A past trends scenario driven by the annual rate of change in employment floorspace.

2.5.3 It is noted that the Study does not consider the implications of a labour supply scenario (i.e. one based on planned housing delivery, a recommended future needs scenario in line with the Housing and Economic Needs Assessment PPG (para 27).

2.5.4 Therefore, this critique reviews the two scenarios modelled as part of the Study, and considers the merits of including additional demand scenarios (i.e. based on the supply of labour) to provide a more rounded consideration of future needs in Sevenoaks District.

2.5.5 The table below summarises the findings of the alternative scenarios against the currently supply position, each resulting in significant under delivery.

Table 4: Demand and Supply balance, 2020-2040

	Scenario 1: Labour Demand (Experian)	Scenario 2: Labour Supply-Baseline (10,680 homes)	Scenario 2: Labour-Supply- Option 2 (11,000 homes)	Scenario 2: Labour-Supply- Option 3 (12,000 homes)
Total demand (ha)	27.1	33.0	33.9	37.1
Total supply (ha)	3.3			
Balance	-23.8	-29.7	-30.6	-33.8

2.5.6 Gladman support the allocation of Pedham Place as an area to deliver 15.36ha/49,000sqm of employment land but consider that the employment needs of the district are significantly higher than planned for at this stage. All the alternative demand scenarios presented in Table 4 demonstrate there is in fact a credibly higher needs requirement for employment land in Sevenoaks above the 5.7 ha identified in the Study over the same plan period. In fact, considering the same supply position from the Study, this shows a significant shortfall of between 23.8-33.8 ha of employment land.

Policy EMP2: Delivering New Employment Land

- 2.5.7 Gladman consider that the 5.7ha identified in this policy is considerably lower than alternative forecasts would suggest and recommend that additional employment land is allocated within this policy to ensure the economic aspirations of the Council can be realised.
- 2.5.8 Gladman support the allocation of Pedham Place as an area to deliver employment needs but the current proposal of 4.9ha is below what the site is proposing. Given that the employment needs of the district are significantly higher than planned for at this stage, Gladman recommend this allocation is increased to 15.36ha (49,000sqm) to reflect the site's potential.
- 2.5.9 All the alternative demand scenarios presented in Table 3 demonstrate there is in fact a credibly higher needs requirement for employment land in Sevenoaks above the 5.7 ha identified in the Study over the same plan period. In fact, considering the same supply position from the Study, this shows a significant shortfall of between 23.8-33.8 ha of employment land which Pedham Place can help deliver.

Workspace and Co-location of Uses

- 2.5.10 Gladman fully support the policy intention to co-locate residential and employment land uses where possible. Pedham Place presents the opportunity for this, and it can be demonstrated that this will be safe and secure for all occupiers, we well designed in terms of layout, orientation, access and servicing needs, high quality housing, not cause any unacceptable highways impacts and will not result in unacceptable amenity impacts.

Policy SWN1: Swanley Town Centre

- 2.5.11 Gladman support the policy intention to ensure that Swanley remains a sustainable a welcoming market town that draws in residents and visitors. Development at Pedham Place can support many of the policy aspirations through new local expenditure, a new local population to use the town centre and high-street, as well as new services and facilities to meet the needs of the new population and not cause undue pressure on the existing services in Swanley.

- 2.5.12 Appendix 3: Lichfields Settlement Study details the way in which development at Pedham Place will support and boost Swanley town centre and will help the policy intention become a reality.

2.6 Climate Change

Policy CC1: Mitigating and Adapting to the Impacts of Climate Change

- 2.6.1 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.
- 2.6.2 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?

- 2.6.3 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.

2.6.4 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.

2.6.5 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 support the Council's choice to consult on an updated Green Belt review and release considerations at this time.

Policy CC2: Low Carbon and Climate Resilient Development

2.6.6 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.

2.7 Design

Policy DE1: Design Review Panel

2.7.1 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.

2.7.2 Gladman recommend that the policy be worded to acknowledge that different levels of detail are required for different schemes. For example, the policy could have specific reference to Reserved Matters and Full applications to ensure that design

matters for the determination of Outline stage applications are appropriate and proportionate.

- 2.7.3 Gladman support the use of Design Review Panels for large scale outline schemes, such as Pedham Place where the design of a new settlement is of fundamental importance. As explored in the appended Vision Document 'A New Settlement Vision for Sevenoaks', considerable consideration has been given to the high quality design of the scheme. For outline applications, a stepped requirement may ensure that the level of design work required at the initial stages is commensurate with the scale of development.

Policy DE2: Ensuring Design Quality

- 2.7.4 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, and for large scale developments, such as Pedham Place.
- 2.7.5 As with Design Review Panels, Gladman consider that the policy may be most effective if it details the level of design work required at different stages and scales of development. This will ensure that design matters are considered suitably with Reserved Matters and Full applications and that design matters for Outline applications are relative to the size and scale of the scheme. As previously outlined, the scale of Pedham Place requires a considered and high level approach to the design of the new settlement to ensure that a new, desirable place is created where people want to live and work.

Policy DE3: Design Codes

- 2.7.6 Gladman broadly support the use of design codes, however the policy should be amended to detail what constitutes 'an appropriate scale' to ensure that development can be delivered without delay. For example, schemes such as Pedham Place can comfortably make use of design codes to ensure that the development is delivered

in a cohesive manner, with high quality design being prioritised across phases and neighbourhoods. However, for smaller schemes, design codes have the potential to become overly prescriptive and hinder otherwise sustainable development from being delivered.

2.8 Health and Wellbeing

Policy HW1: Health and Wellbeing

- 2.8.1 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 PPG 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.
- 2.8.2 Rather, Gladman recommend that HIA Screening Reports should be required on developments of 10 or more units to establish whether an adverse impact on health is likely to result from the development, in the first instance. Where an adverse impact is identified, then a full HIA should be produced to outline the harm and the mitigation strategy.
- 2.8.3 The policy requirements for HIAs should be based on a proportionate level of detail in relation to the type and scale of development proposed, particularly as large scale strategic developments can typically deliver many health and wellbeing benefits through extensive public open space, sports and leisure facilities, active travel strategies, and new community hubs to support new and existing residents. This approach will ensure that harm, mitigation, and benefits can all be suitably considered in the planning balance.

Policy AQ1: Air Quality

- 2.8.4 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.’ Policy AQ1 should reflect this and include flexibility to ensure that where a neutral or positive impact cannot be evidenced, the harm is considered in a planning balance exercise.

2.9 The Natural Environment

Policy NE1: Landscape and Areas of Outstanding Natural Beauty

- 2.9.1 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.
- 2.9.2 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. The proposals site is very visually contained due to its elevation and plateau type form, sitting above steep sided and wooded valleys where views up to the boundaries are heavily screened. Locations to the north, east and south east are well screened by a combination of rolling topography and dense woodland and offer limited opportunities to view the proposed developments with partial views possible of the south eastern section.
- 2.9.3 The proposed masterplan looks to replace the golf course links and infrastructure with a mixture of housing and commercial development combined with a suite of economic and social benefits including educational, health and leisure facilities. This is set within a landscape framework that looks to directly address the identified aims of enhancing the landscape character through a targeted approach of mitigation that will see the introduction of new woodland planting, new species rich grassland, new public rights of way and access over into the AONB, and new orchards and coppice woodland management.

- 2.9.4 The proposed development will deliver significant, positive biodiversity enhancement to the AONB and landscape character areas. Importantly these would not be carried out in isolation but will look to connect to existing areas of protected habitat within the surrounding landscape. New woodland cover will be created within the landscape framework of the masterplan providing opportunities for visual screening, woodland commerce, the creation of new woodland coppice and new orchard planting.
- 2.9.5 This is explored fully within Appendix 5: Kent Downs AONB Landscape and Visual Review.

Policy BW2: Biodiversity in New Development

- 2.9.6 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.
- 2.9.7 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.
- 2.9.8 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.

2.10 Infrastructure and Community

Policy SL1: Sport and Leisure Facilities

- 2.10.1 Gladman support the policy intention and note that many of the elements within the policy can and will be deliverable on Pedham Place. Gladman 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. These will be available for public use and will be complimented by sustainable travel links in and around the site.

2.11 Transport

Policy T1: Sustainable Movement Network

- 2.11.1 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.
- 2.11.2 The updated Transport, Highways and Accessibility Statement included at Appendix 1 demonstrates how Pedham Place can deliver the aspirations of this policy.

3 SITE SUBMISSION PROFILE

3.1 Pedham Place, Swanley

- 3.1.1 This section briefly outlines some the most significant elements of development at Pedham Place. It is intended to be read alongside the appendices of this submission and the accompanying New Settlement Vision Document submitted to the Council as part of this consultation.

Site Location and Suitability

- 3.1.2 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.
- 3.1.3 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. Development will include major employment development on suitable land closest to the motorway to meet current and future needs for jobs creation and prosperity,
- 3.1.4 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

- 3.1.5 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.
- 3.1.6 Approaches to delivering net zero homes may allow opportunities to support offsetting through developing relationships with existing decarbonisation projects in Sevenoaks.
- 3.1.7 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.
- 3.1.8 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.
- 3.1.9 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

- 3.1.10 The site is currently located within the Green Belt. 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 within this representation and within the accompanying New Settlement Vision Document.
- 3.1.11 The most recently published Green Belt review and boundary review (by Sevenoaks District Council) has been considered as part of the review. Although the proposal site (considered under parcel SA 142) was found to uphold some of the purposes of Green Belt the report acknowledges that the potential for the site to come forward as a major development and urban expansion site remained possible with other planning factors balancing the possible harm to the Green Belt.

- 3.1.12 With regards to harm to the wider Green Belt, the report acknowledges that the site has two boundaries which are strong and permanent features in the M20 and M25. Additionally, the southern boundary is marked by Crockenhill Lane and the western boundary by woodland. The proposal will seek to further strengthen these southern and eastern boundaries creating the potential for both woodland and grassland ecology areas of substantial scale that could in the future be designated as local wildlife sites.
- 3.1.13 The Green Belt would be altered through the proposals with the developed areas being out of Green Belt and new boundaries being established. The most recent masterplan proposals demonstrate how these boundaries can be made recognisable and permanent features through extensive planting and landscaping along the southern boundary to create a new, significant boundary to the Green Belt.

Area of Outstanding Natural Beauty

- 3.1.14 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.
- 3.1.15 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
- 3.1.16 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.

- 3.1.17 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.
- 3.1.18 The scheme will continue to uphold the common aims of the AONB through a careful balance of development alongside landscape and ecological enhancement underpinned by an informed and sensitive approach to design. The scheme also stresses the opportunity for landscape character conservation and enhancement, specifically seeking to remove or mitigate identified detractors such as the golf course and road network, in favour of strong boundaries and landscape-led development.
- 3.1.19 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 and habitat degradation.
- 3.1.20 The proposed development will deliver significant, positive biodiversity enhancement to the AONB and landscape character areas. Importantly these would not be carried out in isolation but will look to connect to existing areas of protected habitat within the surrounding landscape. New woodland cover will be created within the landscape framework of the masterplan providing opportunities for visual screening, woodland commerce, the creation of new woodland coppice and new orchard planting.

Visual Effects

- 3.1.21 The proposals site is very visually contained due to its elevation and plateau type form, sitting above steep sided and wooded valleys where views up to the boundaries are heavily screened. Locations to the north, east and south east are well screened by a combination of rolling topography and dense woodland and offer limited opportunities to view the proposed developments with partial views possible of the south eastern section. Full views of the southern boundary to the site are only available from a small number of receptors directly south of the site. To the west the

vegetation of the motorway network and urban and industrial settlement further restrict potential views.

- 3.1.22 The latest development and refinement of the masterplan and the adjustment of areas of commercial development within the plan have been tested through landscape sections to understand whether the level of visual impact has altered. The sections confirm the strong visual enclosure afforded to the site through retained woodland and vegetation and the ability of new planting to enhance this screening and enclosing effect.

Indicative Masterplan

- 3.1.23 An initial concept masterplan is included below at Figure 2, with a high resolution image included within 'Pedham Place: A New Settlement Vision for Sevenoaks' (appended).



Figure 2: Pedham Place Concept Masterplan

4 CONCLUSIONS

4.1 Summary

- 4.1.1 Gladman welcomes the opportunity to comment on the development options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 4.1.2 Gladman have provided comments on the development options that have been identified in the Council's consultation material and recommend that the additional information and matters raised are carefully explored during the process of undertaking the new Local Plan.
- 4.1.3 We hope you have found these representations informative and useful towards the preparation of Plan 2040: A New Local Plan for Sevenoaks, particularly regarding suitability of Pedham Place for mixed-use development.
- 4.1.4 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.

APPENDICES

Appendix 1: Updated Highways, Transport and Accessibility Statement

Appendix 2: Lichfields Economic Study Critique

Appendix 3: Lichfields Settlement Study

Appendix 4: Landscape and Visual Impact Appraisal: Pedham Place

Appendix 5: Kent Downs AONB Landscape and Visual Review

Appendix 6: Heritage Note: Land at Pedham Place

Appendix 7: Pedham Place: A New Settlement Vision for Sevenoaks

