

Sevenoaks Local Plan Regulation 18 Consultation – Questions and Answers

Eynsford Pop-up Session – Monday 17 November 2025

Development Strategy

Question	Answer
You said that Pedham Place was assessed to be the 'least impactful' of the locations that are both in the national landscape and green belt. On what basis was this assessment made?	Please see landscape and visual evidence base document - Link
Why has Pedham place been approved as hilltop development 3+ storey high / Why are SDC changing years of planning by building on hills top (Pedham place) when all villages are valley bottom (preserving the landscape as Kent villages)	Pedham Place is a potential site allocation in Option 2 of the Local Plan consultation. It has not yet been approved and is subject to this consultation. The site is both in the Green Belt and National Landscape (previously AONB). We have undertaken landscape and visual evidence which is available here: Link
There is no government requirements to build Rugby stadiums. Why are you proposing a 28,000-seat stadium for a defunct rugby club that last played in Coventry?	The site at Petham Court has been promoted to us by Wasps for potential stadium proposals. We are considering the proposals through this Reg.18 consultation and have highlighted potential issues in relation to access, traffic, public transport and landscape. There are potential benefits related to employment, skills, sports and recreation. These will be analysed, together with consultation responses, to determine whether the site will be included in the Reg.19 publication
Why is a site not consistent with NPPF criteria being mooted?	If this query is in relation to Pedham Place, which is both in the Green Belt and National Landscape (AONB), we have been very

	clear that this site is outside our development strategy, which seeks to avoid strategic scale growth in this designated landscape area. However, we want to test an option which meets full need (17,175) and option 2 meets this need. We have undertaken additional landscape evidence which considers that Pedham is the least impactful and most capable of mitigation option in the National Landscape.
What are the repercussions from the government if quotas are not met by 2042?	Our Leader wrote to central government to object to the new standardised method for calculating housing needs and the resultant 63% increase in the housing target for 63%, together with policy changes such as 'grey belt'. Although a response was received, the NPPF has been published and the upshot is that we need to plan to meet this full need (1,145 homes per year over the 15-year plan period, so 17,175 in total). The Leader is intending to write to Government again, following Ministerial changes, seeking a meeting to discuss the implications of National Planning Policy changes on our District. Whether government would intervene to produce plans on behalf of the local authorities remains to be seen, but central government does have these powers and has used them recently, for example to direct Stockport to publish a consultation draft plan before Christmas.
Pedham would creep on the historic setting of Eynsford which has been defined as a historic town – how can SDC justify this?	Pedham Place is a potential site allocation in Option 2 of the Local Plan consultation. It has not yet been approved and is subject to this consultation. The site is both in the Green Belt and National Landscape (previously AONB). We have undertaken landscape and visual evidence which is available here: Link

What is the full rationale to release national landscape at Pedham versus national landscape at Westerham where there is housing need?	Pedham Place is a potential site allocation in Option 2 of the Local Plan consultation. It has not yet been approved and is subject to this consultation. The site is both in the Green Belt and National Landscape (previously AONB). We have undertaken landscape and visual evidence which is available here: Link - this considers National Landscape sites in Westerham, Sevenoaks and West Kingsdown v Pedham Place
What are the exceptional circumstances to justify national landscape release?	In terms of the National Landscape status, Chapter 15 of the NPPF provides further information, which states that major development should be refused in these areas, other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Further evidence base work will take place between Reg. 18 and Reg. 19 to understand if these tests have been met. Plans are evidence-led, and this would need to be in place before examination.
How can SDC justify the release of a site for 2500 homes in the national landscape when the identified gap is only 854?	Pedham Place is a potential site allocation in Option 2 of the Local Plan consultation. It has not yet been approved and is subject to this consultation. The identified shortfall (from 17,175 housing need) in Option 1 is 854 units, but we are also meant to provide a one-year buffer (1,145 units), to allow for there to be flexibility if certain sites do not come forward as planned.) Therefore, the shortfall plus buffer from options 1 is 2k which is comparable with the potential scale of Pedham Place.
Due to physical barriers, Pedham cannot be seen as a sustainable urban extension to Swanley – cut off by infrastructure – so under what planning definition are SDC proposing this site?	Pedham is adjacent to the boundary of Swanley (the District's second town) but physically separated from the town by the motorway (J3 M25). It is considered of a scale to be a stand-alone settlement, with a mix of uses including employment and education, leisure and a local centre, in addition to housing.

New towns cannot be included in housing target figures for a local authority plan – must be in addition to – so why are SDC promoting Pedham?	Pedham Place does not fall within the Government's new towns programme.
Proposals for Pedham place do not follow the recently published guidance for new towns as identified by the new town taskforce, including 10000 homes. Pedham could not meet the 10 principles for a new town which have been established by the new towns taskforce.	
Has option 1 achieved 95% of the district's housing target, why are SDC proposing option 2, which will exceed by 10%	Pedham Place is a potential site allocation in Option 2 of the Local Plan consultation. It has not yet been approved and is subject to this consultation. If option 2 is progressed, this would leave a small buffer. We are meant to progress a plan with a one-year buffer (1,145 units), to allow for there to be flexibility if certain sites do not come forward as planned. Therefore, any potential 'surplus' is very modest and will likely be used up by any sites which are found to be unsuitable (for various reasons) between the Reg.18 and Reg.19 stages, if Option 2 is progressed. In terms of the National Landscape status, Chapter 15 of the NPPF provides further information, which states that major development should be refused in these areas, other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Further evidence base work will take place between Reg. 18 and Reg. 19 to understand if these tests have been met. Plans are evidence-led, and this would need to be in place before examination. We have undertaken landscape and visual evidence which considers that Pedham is the least impactful option and most
Can SDC provide evidence of 'exceptional circumstances' that would necessitate exceeding its housing target by 10% and releasing a huge and strategic site within the national landscape?	
If national landscape sites need to be considered (which we do not agree with) why haven't SDC prioritized sites where housing is needed?	
As Pedham is in National Landscape and exceptional circumstances must be proven, how does SDC justify public good outweighing loss?	
To the criteria for Pedham place to be in the national interest and does it meet it?	

How can SDC justify a huge release of a national landscape site in a strategic highpoint of the Kent Downs National Landscape?	capable of mitigation option in the National Landscape and is available here: Link
How can SDC justify exceptional circumstances to prove the need to release this strategic site when their gap is a modest 5%?	
Using National Landscape sites within the Local Plan proposals will significantly increase the risk that the Local Plan is considered unsound – Why are SDC considering such an approach to meet such a modest (5%) gap in housing sites?	
How can a site for 1500 homes on the highest point of the National Landscape be considered less intrusive than smaller sites adjacent to established communities?	
Why is the proposal for a 28,000-seat stadium included in all options?	The site at Petham Court has been promoted to us by Wasps for potential stadium proposals. We are considering the proposals through this Reg.18 consultation and have highlighted potential issues in relation to access, traffic public transport and landscape. There are potential benefits related to employment, skills, sports and recreation. These will be analysed, together with consultation responses, to determine whether the site will be included in the Reg.19 publication. As it was considered suitable through the SHELAA process, this is why it features in both options. There is a free text section in the development strategy section of the survey where you are able to select a

	specific option but note that you do or do not support specific site proposals.
Why are SDC proposing such a concentration of development focused on Junction 3 of M25, which has already identified as one of the 4 locations suffering from the greatest concentration of traffic congestion.	Pedham is adjacent to the boundary of Swanley, which is the District's second town (as assessed through the settlement hierarchy). It is acknowledged through the strategic transport modelling evidence base that J3 M25 suffers from capacity issues at present, which would be exacerbated by future growth. Therefore, any development proposals would need to include junction improvements in this location. A scheme has been proposed by the site promoters, which will be tested and refined through the district-wide transport modelling.
Why are you voluntarily putting forward Pedham place forward knowing it does not meet the selection criteria and will have a negative impact on the local community.	Pedham Place is situated in both in the Green Belt and National Landscape (AONB) and we have been very clear that this site is outside our development strategy, which seeks to avoid strategic scale growth in this designated landscape area. However, we want to test an option which meets full need (17,175) and option 2 meets this need. We have undertaken additional landscape evidence which considers that Pedham is the least impactful and most capable of mitigation option in the National Landscape. We have taken forward all the SHELAA suitable sites (in Option 1). Unsuitable site are also listed in the SHELAA appendices. In terms of other submitted sites, the landscape and visual evidence referenced above considers National Landscape sites in Westerham, Sevenoaks and West Kingsdown v Pedham Place.
Given so many sites, why is Pedham place the only option 2 there are many other sites not considered?	
Can SDC give further evidence of why Pedham Place is considered preferable to other National Landscape sites in higher order settlements such as Westerham where there is unmet	Westerham is ranked as a town in our settlement hierarchy, and has a town council, but based on its services and facilities, it is actually more on par with service settlements rather than the towns in the District. The settlement does not have a station, it

housing need. Basing their proposal on visual assessment only seems unfounded – and could unfold the Local Plan process- why are SDC taking this risk?	does not have a secondary school and it is completely within the National Landscape. A small number of units are proposed on urban and brownfield sites in and around Westerham. Therefore, and in line with our development strategy, strategic scale growth is not proposed in Westerham.
Why aren't sites adjacent to Westerham not prioritised? Westerham does not have its fair share of housing allocations for a primary town (0.5% compared to Sevenoaks (28%) Swanley (14%) and Edenbridge (16%))?	We undertook some further landscape and visual evidence base work to test the two National Landscape Options which were consulted on at the previous Regulation 18 consultation. This considers National Landscape sites in Westerham, Sevenoaks and West Kingdown v Pedham Place and finds that Pedham is the least impactful and most capable of mitigation option in the National Landscape. This is available on our evidence base page: https://www.sevenoaks.gov.uk/downloads/file/4165/sevenoaks_landscape_and_visual_evidence
Why are you not expanding West Kingsdown considering the number of fields that surround the area?	Sites are proposed in West Kingsdown (see P.51 of the Plan) which sets out that 371 units are proposed (primarily in the Green Belt, adjacent to the settlement). It is also related to what land is available (i.e. what land has been promoted to us through the call for sites)

Green Belt and grey belt

Question	Answer
In Arup's 2023 analysis, Pedham place was assessed as strongly performing against the relevant criteria and covered by the definition of grey belt. Their latest assessment scores it lower. What has changed?	Grey Belt was introduced in December 2024. The central government definition of grey belt is: Grey belt: land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. The green belt purposes relate to: (d and e are excluded from grey belt) a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; d) to preserve the setting and special character of historic towns; As this is a central government definition, within national policy, we are unable to modify this definition of grey belt. Pedham Place is now considered 'provisional grey belt' because it does not perform strongly against the above three purposes. The next stage of analysis is of footnote 7 constraints, which include the National Landscape (AONB), heritage assets, flood zones and irreplaceable habitats. Sites may be excluded from being grey belt in due course where the asset or designation provides a strong reason for restricting/refusing development. We have asked site promoters to provide further evidence of any impacts/mitigation on footnote 7 designations as part of their Reg.18 responses. We are also awaiting further evidence-based updates, for example in relation to the Stage 2 (site specific) SFRA (strategic flood risk
What is the process for defining the Pedham place site as 'grey belt'	
Is SDC supportive of the designation of Pedham place as 'grey belt'	
Am I right in saying agricultural land and AONB will not turn grey?	

	assessment), which will be undertaken in the spring, leading to the Reg.19 publication (next summer).
How will Sevenoaks ensure that we keep a strategic gap – no coalescing?	In terms of ensuring a gap between settlements and stopping settlements merging, government has been clear (through the new definition of grey belt), that they are primarily concerned with the merging of towns (and have literally spelt out that village are not considered towns). Swanley is a town and Eynsford is a service settlement and Farningham is a village in the settlement hierarchy. Swanley, albeit adjacent to Pedham Place, will always have a degree of physical separation from the site, due to the presence of the motorway junction. The development proposals (and development brief) for the site will be able to ensure that any future scheme is designed in such a way that it does not lead to the coalescence of settlements. The presence of conservation areas in these locations is also pertinent, to ensure that heritage assets are conserved and enhanced.
How do you keep the strategic gap between Eynsford and Farningham and Swanley in light of the Pedham Place proposed development.	

Housing

Question	Answer
How was the figure for additional travelers sites arrived at?	The Gypsy and Traveller Accommodation Assessment (GTAA) 2025 identifies that Sevenoaks District needs 192 new pitches by 2042. This is available to view and comment on as part of the Regulation 18 consultation. This is clearly a dramatic increase in Gypsy and Traveller need across the District and has been driven by a number of factors including an increase in the number of households on a single pitch, and an increase in the number of children who will require a pitch within the Plan period. So far, promoters of suitable sites have come forward with 23 proposed pitches and additional work will be undertaken ahead of Regulation 19 to identify pitches to meet the remaining 169 pitches need. It is expected and recommended through the GTAA 2025 that many of these pitches are able to be met on existing sites (i.e. temporary permissions to permanent or new pitches on existing sites). There will be further consultations when new site options are put forward, offering more chances for community input.
A traveller site was given planning permission in Hextable after the site had been developed retrospective permission. Why? This was around 3 years ago, how is SDC supporting all residents?	The planning decisions for applications on specific sites can be found on our planning portal and will set out the reasons for each decision. The National Planning Policy Framework (NPPF) requires that we plan for all residents and communities within the District, and the Gypsy and Traveller community have specific needs which should be considered through the Local Plan, taking account of the NPPF and Planning Policy for Traveller Sites (PPTS).

To what extent have you evaluated and modelled an increase in housing density as a means to increase the number of homes able to be realized under option 1?	Emerging Policy H7 - Housing Density and Intensification sets expected densities on sites within different locations. The number of units included in the Regulation 18 document are the numbers promoted by the landowners/developers. We will be undertaking further capacity testing on all sites ahead of Regulation 19 next Summer 2026 and it is expected the proposed capacities in this document will closely align with emerging Policy H7.
As SDC say in their local plan that the majority of future need is for 1- and 2-bedroom dwellings – why can't they increase densities in identified sites to meet the 5% gap without using national landscapes sites.	
If the housing need in the Farningham and Eynsford district has been measured in single figures. Is the proposed Pedham place development appropriate or proportionate.	The District Council has undertaken a 5-year rolling programme to prepare Parish Housing Needs Surveys for all parishes in the District. These studies look at need arisen from within the Parish specifically, but do not consider wider housing needs across the District or people moving into the District. The government's Standard Methodology for calculating housing need, as well as SDCs Targeted Review of Local Housing Needs (TRLHN) 2025 forms the District's evidence base on district-wide need.

The SDC housing need review of Oct 2025 indicates that some 7000 new dwellings are needed to meet the needs of an increasing population. Where are the other 20000 people per the balance of 10,000 dwellings coming from?	National planning policy requires us to plan for future growth to ensure that there are enough homes for local people in the District over the plan period up to 2042, including affordable housing and homes for older people. Since the previous consideration of these sites, a new National Planning Policy Framework (NPPF) 2024 has been published, alongside a new standard methodology for calculating housing needs. This has seen the introduction of grey belt and an increase of 63% in annual housing needs across the District. This equates to 17,175 new homes over the plan period.
What is the evidence for housing need to total 17000 houses by 2042	
63% extra – how does this compare nationally?	
Where are all the people coming from who will occupy these houses, baring in mind that all other Kent Districts are being asked to build similar increased housebuilding?	Emerging Policy H2, Provision of Affordable Housing, sets the housing requirement for different types of sites, depending on number of units, size and location (i.e. within urban areas, brownfield or green belt). This figure is based on evidence surrounding what developers can realistically deliver whilst still making sites viable. In line with national policy. Policy H2 also sets a number of additional requirements for affordable housing provision, with the aim that on site provision of affordable homes will be achieved wherever possible. We will be preparing a new Affordable Housing SPD ahead of the Regulation 19 publication in Summer 2026 and this will be available for public consultation.
Will the site within Eynsford include some affordable housing?	

Transport and Infrastructure

Question	Answer
You mentioned consultation re: transport impact or Wasps stadium on M25 – when will the results of that come out? Presume not by 11 Dec	As the Local Plan progresses, further transport modelling will be undertaken to better understand traffic flows, capacity issues, and the mitigation required to accommodate proposed growth across the district. This work is ongoing and will inform the Regulation 19 version of the plan, so it will be available when that consultation is published.
What about secondary schools – only 3 atm?	We have worked closely with all infrastructure providers that serve Sevenoaks District to understand what's needed to support the growth proposed in the emerging Local Plan. This has helped us identify infrastructure requirements and also any existing pinch-points and capacity constraints that need to be addressed. The emerging projects that have been identified are set out in the Infrastructure Delivery Plan Statement October 2025 and is available to view and comment on as part of the public consultation. It can be viewed online here: https://www.sevenoaks.gov.uk/info/20069128/emerging_local_plan/691/sevenoaks_district_local_plan_%E2%80%93_evidence_base_documents We engage with infrastructure providers, such as health and education authorities, who determine the most appropriate evidence to inform their response to the Infrastructure Delivery Plan (IDP). Their input identifies what improvements are required to accommodate planned growth.
What about structure to support sewage systems?	
Can this development take place without the creation of sewage treatment works?	
All very well you build Doctors/dentists etc. – but what about the water?	
Is sufficiency of medical care – both community and tertiary levels being considered – already overstretched?	
Educational provision – what evidence is being collected to explore facilities or preschool/primary and secondary levels.	

	We will continue to engage with infrastructure providers to develop the Infrastructure Delivery Plan further as the Local Plan progresses, with projects being refined and more detail added on phasing, costs and delivery mechanisms. This iterative approach ensures that infrastructure provision remains responsive, deliverable, and aligned with our strategic objectives.
If Pedham place goes ahead, will developers be legally obliged to build Doctors surgeries and schools and how will the council ensure doctors surgeries are staffed?	Where infrastructure is necessary to mitigate the impact of development, it will be secured through developer contributions via Section 106 agreements at planning application stage. This ties the developer into either providing the necessary infrastructure directly or making a financial contribution towards its delivery. The agreement will also specify the timing of provision based on the urgency of the project. Ensuring adequate staffing levels for new infrastructure lies outside the scope of land use planning. However, in the case of education and health provision for example, the Council works closely with Kent County Council Education and the NHS to ensure that the timely delivery of infrastructure is aligned with the recruitment of professionals required to operate it effectively. We recognise that attracting and retaining skilled staff can be challenging - particularly in light of affordability pressures within the Sevenoaks District. To help address this, the emerging Local Plan includes policies that support employment growth alongside the delivery of new homes, prioritising affordable homes for those with a local connection to the area, including key workers. This integrated approach aims to provide future residents with
What are the plans for improved/ increased train capacity for Swanley and Sevenoaks given increase in population?	
The commuter trains from Swanley are standing room only on T-W-Thu, how will the plan address this in addition to both Eynsford + Farningham road stations being too small for Pedham place dev?	
How will you support service infrastructure?	
Who pays for infrastructure?	
How are all these additional people supposed to access doctors, hospitals and schools or even get near Swanley interchange without major and public transport	

improvements, new hospitals and schools? Who is going to pay for this, and for the new doctors surgeries and hospital needed for an enlarged population?	greater choice in both housing and employment, helping to create the conditions necessary for sustainable service delivery. We have worked closely with infrastructure providers, including Network Rail and KCC Highways, to understand what's needed to support the growth proposed in the emerging Local Plan. This has helped us identify emerging infrastructure requirements and also any existing pinch points and capacity constraints that need to be addressed. The proposed growth set out in the Local Plan may have an impact on train capacities and frequency of services. Any improvements/changes suggested by Network Rail to accommodate additional passengers will be identified in the Infrastructure Delivery Plan. Where infrastructure is necessary to mitigate the impact of development, it will be secured through developer contributions via Section 106 agreements at planning application stage. This ties the developer into either providing the necessary infrastructure directly or making a financial contribution towards its delivery. The agreement will also specify the timing of provision based on the urgency of the project.
The London Road between Swanley interchange and Swanley Town centre is also one of the 4 identified locations in the district with the highest traffic congestion – considering this why are SDC concentrating so much of the development in the local plan in this location where are sustainable movement to Swanley station is unproven	The Council's development strategy is to meet development needs in sustainable locations focusing on higher-tier settlements. The Settlement Hierarchy (2025) identifies Swanley as one of the District's towns and so it is expected to accommodate future growth. In regard to sustainable movement in Swanley, proposed policy T2 - Sustainable Movement aims to facilitate

	sustainable movement across the District for our residents to help them make healthy journeys and not be reliant on private vehicles. A range of transport choices are needed to suit residents' needs and local circumstances. We will continue to work in partnership with infrastructure providers to ensure transport needs are met. A Local Walking and Cycling Infrastructure Plan (LCWIP) for Swanley has been completed. LCWIPs set out long-term proposals for walking, wheeling and cycling routes, forming a key part of the Government's strategy to increase trips made on foot or by cycle. The emerging Plan's proposed policies T1 – Sustainable Movement Network and T2 – Sustainable Movement require new development to take account of and support LCWIP routes where appropriate.
Traffic at Bat& Ball is chaotic at the movement – how will this be addressed within the new plans?	The Bat and Ball junction is proposed to be upgraded with a new roundabout as part of the wider redevelopment of the Sevenoaks Quarry site. The aim is to improve traffic flow and safety while supporting access to new homes and community facilities. The delivery of this improvement is secured through a legal agreement (Section 106) and coordinated with KCC as the highways authority. Further to this, we are working closely with KCC Highways to model and measure the expected impact that the growth proposed in the emerging Local Plan will have on the transport network across the District. A second stage Transport Assessment has been undertaken to determine the transport implications of the proposed site allocations, and this is available to view and comment on as part of the public consultation. As the Local Plan progresses, further
Where will the new sewage treatment be in Otford? Also, what measures will be in place to ensure Phosphates and nutrients will be removed, which are not currently required when discharging affluent, however in doing so will substantially pollute the river.	
Where will the new sewage treatment plant be located. Will it discharge treated water into the Darent? Will this water damage the ecology of this rare chalk stream?	

	transport modelling work will be undertaken to better understand the traffic flow, capacity issues and mitigation required to accommodate the proposed growth. All transport improvement projects identified will be set out in the Infrastructure Delivery Plan by Regulation 19. We are aware that Thames Water has recently consulted on its draft Drainage and Wastewater Management Plan. The Long Reach Catchment Plan proposes a new sewerage treatment works (STW) site in Sevenoaks District to help manage future pressures on the existing STW. This needs further investigation, and we will engage with Thames Water and KCC as the plans develop. Environmental considerations, including impacts on the River Darent and its chalk stream ecology, are assessed through the provider's regulatory processes and the Environment Agency's requirements. Measures to manage phosphates and nutrients are governed by national water quality standards and the provider's treatment technology, which must comply with these standards before any discharge is permitted.
Pedham cannot be made sustainable and instead will see out commuting dependent on the car – how does this reflect the SDC policies for sustainable development and transport?	We are working closely with KCC Highways to model and measure the expected impact that the growth proposed in the emerging Local Plan will have on the transport network across the District. A second stage Transport Assessment has been undertaken to determine the transport implications of the proposed site allocations, and this is available to view and comment on as part of the public consultation. As the Local Plan progresses, further transport modelling work will be undertaken to better understand the traffic flow, capacity issues and mitigation

	required to accommodate the proposed growth. All transport improvement projects identified will be set out in the Infrastructure Delivery Plan by Regulation 19. Sustainable development and transport are key considerations in the emerging Local Plan. The emerging Plan contains proposed policy T1 (Sustainable Movement Network) which focuses on delivering sustainable movement across the District through working in partnership with public transport providers. The policy also aims to reduce car dependency and encourage more sustainable travel through walking, wheeling and cycling. The transport aims for the District will be supported by the finalised Infrastructure Delivery Plan (IDP). The IDP is a live document and will continue to develop in conjunction with the emerging Local Plan, as sites are identified, and more site-specific information becomes available. The final version of the IDP will contain a schedule of infrastructure provision, with costs, delivery timescales, and organisations responsible for delivery.
Pedham Place has poor public transport links and no trains. How can this be sustainable?	The Council's development strategy is to meet development needs in sustainable locations focusing on higher-tier settlements. The Settlement Hierarchy (2025) identifies Swanley as one of the District's towns and so it is expected to accommodate future growth. In regard to sustainable movement in Swanley, proposed policy T2 - Sustainable Movement aims to facilitate sustainable movement across the District for our residents to help them make healthy journeys and not be reliant on

	private vehicles. A range of transport choices are needed to suit residents' needs and local circumstances. We will continue to work in partnership with infrastructure providers to ensure transport needs are met. A Local Walking and Cycling Infrastructure Plan (LCWIP) for Swanley has been completed. LCWIPs set out long-term proposals for walking, wheeling and cycling routes, forming a key part of the Government's strategy to increase trips made on foot or by cycle. The emerging Plan's proposed policies T1 – Sustainable Movement Network and T2 – Sustainable Movement require new development to take account of and support LCWIP routes where appropriate.
A housing development was completed in Dunton Green five years ago. A doctor's surgery was included as part of the plans, but no local surgery wanted to take it on therefore the proposed site was developed into further housing. How will this plan ensure that this doesn't happen again.	Where infrastructure is necessary to mitigate the impact of development, it will be secured through developer contributions via Section 106 agreements at planning application stage. This ties the developer into either providing the necessary infrastructure directly or making a financial contribution towards its delivery. The agreement will also specify the timing of provision based on the urgency of the project. In the case of Dunton Green, the legal agreement included an alternative clause allowing a financial contribution as an alternative to providing a doctors surgery. While we understand the lack of a surgery was disappointing, how that contribution is used, such as whether to deliver a new facility or invest in existing services, is determined by the relevant infrastructure provider, for example the NHS, based on their operational priorities. We work closely with

	these providers to identify needs and secure contributions through the planning process.
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Climate Change

Question	Answer
It is the windiest site in Kent. Built on a million tons of untested spoil from canary wharf	We are aware that Pedham Place lies atop potentially contaminated land and the site promotor will need to carry out studies to determine whether the site is safe for development or can be made safe.
Due to the increasing water demand what measures will be in place to ensure no additional extractions occur from the river Drenth? The river Drenth is a rare, already overly extracted river, and further extraction will substantially damage the ecology.	Water supply sits somewhat outside of the planning process in that suppliers have a legal obligation to connect to new development. It is a reactive process for the suppliers and they tend to plan for the infrastructure once they have certainty on what sites are coming forward. They are governed by their own regulations in terms of how they extract water and it is not within the Council's remit to assess the impacts of water extraction. Having said that, we of course do not want to see an increase in unsustainable extraction and that is why we are in touch with the suppliers now to give them as much foresight of future development as possible so that appropriate plans can be put in place. When it comes to how that water is used, we propose Policy W3, which amongst other things, proposes that new homes will have to meet the strictest building regulations on water consumption (this is currently optional).
Provision of water supply from existing resources is of great concern, without further damaging the flow in the river Darent. Will you provide an analysis of where this supply will affect the river.	
How does this plan contribute to reducing pollution and wasted energy? Will those affordable housing work in the district or commute elsewhere?	We accept that the scale of growth required in this Plan is going to result in additional impacts, including through the risk of pollution and wasted energy. The policies within the Climate Change chapter are aimed at minimising waste, carbon emissions and avoiding flood risk and pollution from new development so that their additional impact is as low

	as possible, and certainly lower than has been the case in the past. In terms of work, we have had an Economic Needs Study prepared. It forecasts job growth in the District over the next 15 years and recommends a target for how much land we need for jobs. The Plan has proposed enough land to meet this target, and we therefore consider that there will be job opportunities around the new developments that do go ahead.
How is pollution being considered and water run off, particularly for Pedham place?	It is a requirement of national policy that new development does not increase flood risk, including from surface water, both on the site and elsewhere. The site promoters will need to demonstrate that they can provide suitable and sustainable drainage solutions to ensure this is the case. Similarly, new development should not result in an increase in pollution to water sources. For pollution more generally, national policy requires this to be taken into account when considering the impacts of new development upon health, well-being and the natural environment.

Flooding

Question	Answer
The site near Otford is a flood plain and regularly floods – how can it be good for housing?	We are aware that approximately 1/4 of the site is within Flood Zones 2 and 3. We have set out that development of this site must avoid those areas, as required by national policy. It is also a requirement of national policy that development does not increase flood risk both on the site or elsewhere, and the site promotor will need to demonstrate that suitable drainage measures can be put in place to avoid this.

Health and Wellbeing

Question	Answer
Have the health implications of putting so much housing (Pedham place) next to one of the busiest motorways in Europe been considered?	Air quality, noise, and health are considerations taken into place in all planning applications and any sites would be expected to prove they can mitigate any potential air quality issues on site. Any development meeting the current criteria, of major developments over 1000sqm, are required to submit an air quality assessment as part of their application where they must show they will have neutral or positive impact on air quality. Emerging Policy AQ1 requires Air quality assessments for all major housing developments of 10 units or more and most development within 50 metres of a strategic Road Network or heavily trafficked route.
HW2 - How can air quality be improved if Pedham were to add a possible 3000 vehicles to an already congested area with previously reported poor air quality.	
HW1 - How can Pedham be within the 1.2km walking distance of anywhere other than major roads?	If Pedham Place were to move forward in the Local Plan process, it is considered capable of accommodating a standalone settlement and therefore we would expect the site to come forward with supporting services and infrastructure in order to provide a sustainable location, with key services and public transport options within walking distance.

Natural Environment

Question	Answer
Grey belt is defined by a range of Criteria relating to how well it 'prevents' urban sprawl etc. If a wild orchid patch was found on 'grey belt' land- would it still be developed and build on.	At this stage our site assessments take into account designated sites such as Sites of Special Scientific Interest. However, for those sites that are allocated they will still need to submit a planning application and as part of that, in many instances, they will need to submit an ecology survey and an impact assessment, as necessary. Legislation and policy, both national and local, will apply. It is noted that some plant species are protected through the Wildlife and Countryside Act 1981. National policy sets out the principles that should be applied in relation to both designated and non-designated habitats, and any planning application will be assessed in light of the submitted information, the advice from our ecological advisors at KCC and in light of the policy and legislation requirements.
What about the ecosystem?	The natural environment is considered at a high level at this stage. Statutory designations for habitats, as well as local designations (e.g. Local Wildlife Sites), are taken into account through the site assessment process. National and local planning policy will apply to sites, and we are using our development briefs to highlight considerations e.g. the inclusion of buffers in relation to ancient woodlands. For those sites that are allocated, and where applicable, they will still need to submit a planning application as part of that undertake and submit ecology surveys and impact assessments as necessary. In some instances, Environmental Impact Assessments may also be necessary, but this generally

	only applies to sites where they are likely to have a significant impact on the environment due to their scale and/or location.
How do they propose and minimize the negative impact of the development given that it is on high point – ridge fully visible from protected landscapes from a very long distance?	We commissioned work from Arup which looked at both the landscape and visual impact of the nine sites forming part of option 1 in the previous Regulation 18 consultation and the impacts of the potential standalone settlement at Pedham Place. This can be viewed and forms part of our evidence base which can be accessed on our website. This includes an assessment of the impact on the special features of the Kent Downs National Landscape but it also outlines potential mitigation measures. These include the careful positioning of development and substantive native woodland planting on the ridgeline to screen views which would reflect the characteristic ridgeline ancient woodlands found in the wider area. Should the site be allocated, the applicant will also be expected to undertake their own Landscape and Visual Impact Assessment and to set out how they would minimise the impact on the National Landscape and where possible, enhance it.
How do you propose ensuring the very special views from the AONB areas are preserved not just for now but for future generations.	
Have you considered the detrimental impact on the skyline/ dark skies of the massive development at Pedham?	
What are exceptional circumstances for NL release?	In terms of the National Landscape status, Chapter 15 of the NPPF provides further information, which states that major development should be refused in these areas, other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Further evidence base work will take place between Reg. 18 and Reg. 19 to understand

	if these tests have been met. Plans are evidence-led, and this would need to be in place before examination.
Why is SDC only considering visual impact?	We commissioned work from Arup which looked at both the landscape and visual impact of the nine sites forming part of option 1 in the previous Regulation 18 consultation and of the potential standalone settlement at Pedham Place. This can be found in our evidence base and can be commented on.

Employment and Economy

Question	Answer
How many people in the new housing will work in Sevenoaks District and how many will commute to London (a daily waste of energy)	It is well known that many residents commute out of the District for work. However, we have had an Economic Needs Study prepared which sets out the expected job growth within the District over the next 15 years and how much land this is likely required to support that growth. We are proposing enough land to meet this expected growth so that there remain opportunities for people to work in the District, as well as those that will continue to commute elsewhere.

Tourism

Question	Answer
New tourism sites don't appear to have been fully considered – for instance the district is becoming increasingly known for rewilding?	The Plan proposes Policies EMP4 and EMP4 in relation to guiding development in the rural areas and for tourism. If you feel that they are missing something, such as rewilding, please include this in your response and we will consider it.

Sport and Leisure

Question	Answer
What evidence supports the need for policy SL1? There are quite a few under utilised stadiums not far away?	The Local Plan is not just a housing plan. We have targets for employment land and gypsy and traveller accommodation too. We are also required to consider opportunities to grow the economy and facilitate access to sport and recreation facilities, amongst other things. The site was submitted to us for consideration, and we are therefore obliged to assess it, and if considered to meet our development strategy initially, it should be further tested through consultation. The intention of Criterion 1 of Policy SL1 was to acknowledge and support the high profile sporting facilities we already have in in the District (Brands Hatch, the London Golf Club and the permissioned Millwall training ground) and to have a mechanism to consider other proposals that may come forward. Developing the sports sector as a tool to drive promotion of the District is set out within the Council's adopted Economic Development Strategy 2022-2027 and has been an aim since before this proposal was submitted. The policy sets the criteria that would need to be met for such proposals to be looked on favourably. If you have comments on this policy, including how its worded, please include that in your representations for consideration. If the stadium proposal is not taken forwards, then it may be that the landowners/site promotor no longer seek to develop the land. It may also be that they
Why is a rugby stadium being considered? This is not part of the housing targets and would create a massive impact/ issue	
Why are we even considering a stadium when we have brands hatch. This is not a housing development need.	
The SL1 policy in the plan could open the door for more large-scale sporting development in the district – can the district really support this and is there really a need for this?	
As I understand it SL1 is only to apply to the potential stadium. Please can this be confirmed- if not such stadium/arena development would apply eventually.	

	propose a different use, which we would have to consider and assess in the same way as all other sites. As part of the next stage of the Plan process, we have to be able to evidence that the proposed site allocations are deliverable, and therefore the site should not make it into the final version of the Plan if it is evidenced to be undeliverable.
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Site Specific Queries

Question	Answer
Mentioned national landscape – what is their official response re: building Pedham place. If not asked, will you do so?? And its impact on national landscape	The National Landscape Association is the umbrella group for all the National Landscapes in the UK, supporting the National Landscape teams and providing a voice for its members. The Kent Downs National Landscape team has been consulted as part of this consultation and a response is expected. This response will be published alongside all other responses and will be available to view in due course. Responses to previous consultations are also available to view on our website. The National Landscape team's focus is on the National Landscape alone and therefore they will not be commenting in relation to the Green Belt. However, they have provided an advice note concerning the National Landscape in relation to footnote 7 of the National Planning Policy Framework, as this sets out that where the National Landscape would provide a strong reason for refusing or restricting development, then that land cannot constitute grey belt. This advice note is available to view as part of our evidence base on our website.
What was the view of the National Landscape Association of building in a National Landscape at Pedham Place?	
When Sevenoaks contacted the National landscape Association- what was their opinion on Sevenoaks' intention to support building on the green belt and national landscape at Pedham place?	
How likely would you say the development at Pedham Place is to go ahead?	
Emma mentioned a site off Eynsford high – where and what is being proposed for development there?	The site EYN1 at Land adjacent to Little Mote, High Street, Eynsford, is for five dwellings. Please see more details on page 497-502 in the 'SHELAA 2025 Appendix C - Suitable Sites' here https://www.sevenoaks.gov.uk/downloads/download/1090/strategic_housing_and_economic_land_availability_assessment_shelaa_2025

Part of the potential stadium site is 'not suitable for development'. What does that mean and what are the implications for the stadium?	Part of the potential stadium site falls within the 'National Landscape' which has additional protection in planning policy. This means we would expect there to be little/no development on this part of the site. The site promoter will need to submit further information to us showing exactly where on the site the stadium and associated uses would go. It is only then that we will be able to make a decision on whether it progresses through to the next stage of the Plan.
Pedham is situated between 4 roads. M25, A20, sparepenny lane, crockenhill lane. Will there be access to Pedham from these roads	Specific site access details are expected to be submitted by the site promoter as part of their Regulation 18 response. In addition, SDC will be preparing Development Briefs for each site that goes forward to Regulation 19, which will set out the preferred access option - in consultation with KCC Highways and informed by consultation responses.
How many times have the wasps gone into administration and how much did it cost local companies?	This is not something that we are to take account of as part of a site assessment. This is something that should be addressed by the site promoter.
Why is Broke Hill Golf Club (which was an active application) not included in the local plan?	Broke Hill Golf Course was assessed through the SHELAA process, but is considered 'Unsuitable' at this stage due to not being identified as grey belt land as part of the Green Belt Stage 2 assessment, which is available to view on our website. The site performs strongly against Purpose A - protecting the urban sprawl of the large built up area of Greater London. The full site assessment is available to view, and comment on, on our evidence base webpage
Why has the broke hill site been left out of the plan as a potential site? What is the difference between the Pedham place site? Broke hill h as better transport links?	

You mentioned mill field land between Eynsford and Farningham – this is owned by a charity trust -will this be compulsory purchased.	The Council is not intending to use CPO (Compulsory Purchase Order) powers to assemble land, as land is being promoted to us through the 'call for sites'. These land promoters/developers would also then progress a planning application on the sites in due course (i.e. the Council does not purchase or buy the land, it is the promoters/developers that bring these sites forward for development).
Are proposals for the WASPs stadium and Pedham place linked? Is one dependent on the other?	These are two separate sites which have been submitted to the Local Plan process by different site promoters. They have been assessed separately under different reference numbers and are not connected.
How are Pedham place and wasps stadium development connected? Does one require the other?	
Why are SDC proposing the former Oasis Academy site in Hextable for housing when they are proposing so much new housing in the area?	We have worked closely with all infrastructure providers that serve Sevenoaks District to understand what's needed to support the growth proposed in the emerging Local Plan. This has helped us identify infrastructure requirements and also any existing pinch-points and capacity constraints that need to be addressed. The emerging projects that have been identified are set out in the Infrastructure Delivery Plan Statement October 2025 and is available to view and comment on as part of the public consultation. We will continue to engage with infrastructure providers to develop the Infrastructure Delivery Plan further as the Local Plan progresses, with projects being refined and more detail added on phasing, costs and delivery mechanisms. This iterative approach ensures that infrastructure provision remains responsive, deliverable, and aligned with our strategic objectives. We work closely with Kent County Council, who are the statutory education provider for the

	District. They are best placed to assess future education needs and determine the most appropriate locations, delivery, and timing for provision.
What Is the identified local need for a 28,000 seat stadium?	The Local Plan is not just a housing plan. We have targets for employment land and gypsy and traveller accommodation too. We are also required to consider opportunities to grow the economy and facilitate access to sport and recreation facilities, amongst other things. The site was submitted to us for consideration and we are therefore obliged to assess it, and if considered to meet our development strategy initially, it should be further tested through consultation. The intention of Criterion 1 of Policy SL1 was to acknowledge and support the high profile sporting facilities we already have in in the District (Brands Hatch, the London Golf Club and the permissioned Millwall training ground) and to have a mechanism to consider other proposals that may come forward. Developing the sports sector as a tool to drive promotion of the District is set out within the Council's adopted Economic Development Strategy 2022-2027 and has been an aim since before this proposal was submitted. The policy sets the criteria that would need to be met for such proposals to be looked on favourably. If you have comments on this policy, including how its worded, please include that in your representations for consideration. If the stadium proposal is not taken forwards, then it may be that the land owners/site promotor no longer seek to develop the land. It may also be that they propose a
Why does SDC see a cluster of world class sporting facilities as a local priority when they have such a strategic challenge to provide housing in a district with 93% greenbelt and over 60% national landscape.	
Why are SDC promoting a cluster of world class sporting facilities along the A20 road where sustainable transport options are not achievable.	
The proposed uses associated with the stadium do not prioritize sustainable and permanent employment – where therefore are they being prioritized by SDC?	
It is very unlikely a stadium would ever be developed in the proposed area for many commercial reasons? What would then happen to the land?	

	different use, which we would have to consider and assess in the same way as all other sites. As part of the next stage of the Plan process, we have to be able to evidence that the proposed site allocations are deliverable, and therefore the site should not make it into the final version of the Plan if it is evidenced to be undeliverable.
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Site Selection Process

Question	Answer
Why are the disused greenhouses in the center of Eynsford not being considered as a possible site for development?	All sites which have been submitted and considered in the Local Plan process are available to view on our Interactive Map and through the SHELAA assessments. These are sites that have been submitted to us for consideration by landowners/site promoters and it may be that the land you refer to has not been submitted to SDC. If there are additional sites which you believe should be considered, please do identify these as part of your consultation response.
Can you explain how stage 1 assessment is calculated? Especially distances from Eynsford nor Farningham for 1500+	The SHELAA methodology, including a detailed explanation of the Stage 1 SHELAA assessment, and how this is linked to the emerging Development Strategy (Policy ST1) is available to view and comment on, on our evidence base webpage, as part of this Regulation 18 consultation. This includes a clear explanation of the tests for sites passing or falling out of the SHELAA process at Stage 1.
Was part of the stage 1 SHELAA site assessment framework assessment introduced to ensure Pedham Place could be included?	

Consultation

Question	Answer
Can you explain option 3 too – none of the above?	Option 3 in short means you do not support both Option 1/2 in its entirety and using the free text box below you are able to explain your reasoning for this.
Wasps stadium is unacceptable. Pedham place is unacceptable. So option 1 and 2 are unacceptable, which only leaves voting for 'none of the above' which suggests we are not interested – but we are.	There is a free text box below the question which allows residents to select if they support either Option 1/2 but with the caveat of specific sites like the above mentioned sites.
What does 'Testing' option 1 mean and what are sustainability criteria.	At this stage we are gathering information from the survey, in which we are also consulting with key stakeholders and statutory consultees, as such we are testing these options against the evidence we find. For the full sustainability criteria used in the Strategic Housing and Economic Land Availability Assessment that was used to find the suitable sites in this emerging Sevenoaks District Local Plan please see Appendix A on page 21 of 'SHELAA (2025) Methodology (includes Appendix A)': Link
Is it clear that people can choose option 1 with a caveat comment that you support without a specific site etc.	Yes, we have included a free text box below the choice which allows all respondents to explain and go into depth of their reasoning for choosing a specific option including any caveats etc.
Will option 'none of the above' be considered or ignored?	All representations to the consultation will be considered regardless of what option is chosen.
What is the impact of the 'Votes' e.g. option 1/option2/ none of the above?	The choices are recorded from all respondents and their associated comments/ reasoning for support or objection

	are considered through the consultation analysis which will take place after the closing of the Reg 18 Consultation. The results of this analysis will therefore inform the version of the Local Plan we take forward to Reg 19. Please note that planning consultations are not a vote, decisions arising from consultation responses are based on evidence in order to be justified and robust. One response citing planning reasons and evidence will hold more weight than 100 responses which do not cite planning reasons.
If we are generally supportive of Option 1 with the exclusion of Petham farm and the WASPS 28000 stadium proposal, how can we express this in our response without being seen to support the stadium?	Wasps is included in Option 1 and 2 as it is considered a suitable site in the SHELAA process. Respondents that support Option 1 or 2 but not specific sites can do so by explaining this caveat in the free text box below the question.
Please can you be clear that if you vote for option 1 or option 2 you are voting for the Wasps stadium?	
Option 1 could be supportable without the stadium; how can residents make this statement in their response without supporting the stadium proposals?	
If option 1 includes wasps stadium & option 2 includes Pedham place if neither is supported is the only way to register this to vote neither?	
It's unclear if the rugby stadium is part of options 1+2. Can we vote for option 1 and not for the Wasps stadium?	
What happens if option 3 'none of the above' becomes the most	Planning consultations are not a vote, decisions arising from consultation responses are based on evidence in order

agreed view. Where does this leave SDC to their residents? What steps can the government take?	to be justified and robust. One response citing planning reasons and evidence will hold more weight than 100 responses which do not cite planning reasons. If there were a reason why SDC are unable to meet housing demand due to sites becoming unsuitable as a result of emerging evidence, this would need to be evidenced in order to be defensible at examination. If this were unable to be defended, this would leave the District Council open to government intervention in the Local Plan and planning process, meaning that we would have less/no control over planning decisions at a local level.
Can we have operational definition of all the terms you use?	All definitions for the terms/ abbreviations can be found in the Glossary of the Local Plan document which can be downloaded to view online on our website or viewed in person at Town/ Parish Councils, Libraries, The SDC Offices etc.
How likely is option 2/3 to go ahead?	No Option is more likely to go ahead than another. At this stage we are consulting with the public on these options to gain valuable public information/ opinions which will inform the version of the Local Plan we take to the next stage Reg 19 next Summer, which at that point the public will have an additional chance to comment on that iteration of the Plan before it is taken to Submission/Examination.
How is it possible to propose a housing site without first planning an access road strategy before presenting for discussion?	Through this Regulation 18 consultation, as well as consulting with the public, we are also consulting with key stakeholders and statutory consultees, including infrastructure providers. We will also be expecting additional information to be submitted by site promoters. Alongside this, evidence base work is ongoing, for example
Why have traffic impact assessments not been completed in advance	

of regulation 18 consultation. Surely Proposing a concentration of development in these locations knowing that they suffer from traffic congestion already is irresponsible	with our Strategic Flood Risk Assessment (SFRA), transport modelling and liaising with infrastructure providers in relation to the Infrastructure Delivery Plan (IDP). We would expect information such as traffic impacts and site access to become clear between through the consultation responses and this will be fed into the Regulation 19 Publication next summer, when there will be a further opportunity for public comment.
What option is the stadium included under – option 1 or 2?	The Wasps Stadium proposal is included in both Option 1/2.

Local Government Reorganisation

Question	Answer
How would future Unitary Authorities (i.e. Kent) impact on decisions made now?	Government Reorganisation (LGR) is currently taking place in Kent and therefore there is a degree of uncertainty regarding future strategic plan-making across the subregion. However, it is important to progress this Local Plan in line with the agreed timetable, to ensure that local priorities are delivered, for residents, businesses and visitors, and as the organisation evolves into a unitary authority. LGR is likely to take several years, and it is important to have an up-to-date plan in place as soon as possible.
If Kent is moving to a unitary authority, wouldn't it be better to take a unitary view and therefore wait until it is formed.	

Other queries

Question	Answer
The documents detail an oil pipe on the west boundary, but it looks more central. How can that be built on?	We are aware of this Pipeline, and any future development of this site would need to respond to site constraints, such as this.
What are you doing to act on current issues such as antisocial behavior and planning problems before you put Pedham forward, which is likely to make things worse?	Antisocial behaviour is primarily addressed through community safety teams and the police rather than the planning system. However, through planning we can influence design features that help reduce opportunities for antisocial behaviour, such as good lighting, active frontages, and well-designed community spaces.
Have you tried refusing the target on the basis of the green belt/ AONB in the district and asked government to amend the target?	Our Leader wrote to central government to object to the new standardised method for calculating housing need and the resultant 63% increase in the housing target for 63%, together with policy changes such as 'grey belt'. Although a response was received, the NPPF has been published and the upshot is that we need to plan to meet this full need (1,145 homes per year over the 15-year plan period, so 17,175 in total). The Leader is intending to write to Government again, following Ministerial changes, seeking a meeting to discuss the implications of National Planning Policy changes on our District.
The pollution from m25 very often a stationary car park	No comment - please submit your response to the consultation
A20/M25 junction is gridlocked when brands hatch holds a major event with up to 14000 spectators. Allowing a rugby stadium (wasps) with 28000 spectators is only trebling the congestion.	

Farningham already has more than its fair share of gypsies/ travelers please- please recognize this and their impact on landscape/ shops/ traffic abuses.	No comment - please submit your response to the consultation
Thames water cannot provide water for developments like Perham place. Rainwater runoff from Pedham place would not reach the already stressed river Darent but would be piped away in drains/sewers. This never gets mentioned.	
Sevenoaks council appears to have taken a fairly extreme view of the concept of turning green belt to grey belt. The idea of a green belt was to ensure a belt of countryside and rural landscape out of London.	
If the Pedham place site is in the green AONB and you mention that there is no intention to develop the site, please take it out of the plan because it is causing significant worry and concern to locals – significant concern!!	
This sets a precedent of 'green belt' being designated as 'grey belt'	
Traffic assessments/impacts to follow – seems a little naïve or irresponsible for the strategic sites to be included before this work has been done.	